

**Draft National Development Framework Response from Victoria Robinson, Vice Chair – Planning Officers Society for Wales (POSW)**

**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>
			X			

- 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>
		X			

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

I think the outcomes are mostly laudable aims but question their deliverability, particularly when they are in part contradictory. For example Outcomes 2, 3, 5, 6, and 8 would support growth whilst Outcomes 9, 10 and 11 seek to protect and enhance natural resources and the environment. A conflicting set of objectives cannot deliver sustainable development.

As written the objectives seek economic development and increased affordable housing whilst reclaiming lost biodiversity and protecting greenfield land. The NDF is silent on how these conflicts are to be resolved. To ensure that the economic and social elements of sustainable development are delivered through land use planning, it is essential to balance all sustainability objectives.

The NDF needs to be realistic as well as ambitious if it is going to be a meaningful plan.

Outcome 5 – “A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth”. Not everyone in Wales can (or want to) live and work in towns and cities. We recognise that the NDF seeks to focus growth in sustainable places and concentrate development in towns and cities but this is not deliverable or desirable for the whole of Wales or for all the people of Wales, many of whom live and work sustainably outside towns

and cities. Such an outcome is therefore grossly over-simplistic and gives the impression it is only a plan for the urban parts of Wales.

## 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 checked="" type="checkbox"/>				
Rural areas (Policy 4)		<input checked="" 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 spatial strategy recognises a “National Growth Area” covering most of South East Wales, which I welcome given the growth agenda planned and committed to through the Cardiff Capital Region City Deal.

### **Growth in existing settlements:**

Policies 1, 2 and 3 seek to concentrate growth within towns and cities, highlighting that large-scale public service facilities (such as universities and colleges, hospitals and public sector organisation buildings) should be located in town and city centres (Policy 2 refers). The NDF needs to clarify the definition of ‘town and city centres’.

Whilst this is welcomed in principle, it is unclear whether the NDF has been informed by any urban capacity studies to determine whether there are suitable sites available for such facilities within town/city centres across Wales. Is the focus on existing town/city centres and urban areas

realistic and deliverable in the absence of urban capacity studies to support it? The number of vacant / available sites (particularly brownfield sites) within existing settlements is limited. Many of these sites have been developed in recent years for housing and they are a finite resource. An over-reliance on growth within existing settlements could stifle growth within the “National Growth Areas” and undermine the delivery of the NDF and its outcomes.

Furthermore, development of large-scale public service facilities within town and city centres should not be at the exclusion of other suitable sites. It would be more appropriate to direct large-scale public service facilities to locations that are easily accessible by a range of modes of sustainable transport and close to where users live or work, or where other complementary uses are nearby. Policy 2 as worded is currently too restrictive and would preclude very suitable sites not in town/city centres.

Furthermore, focussing development within existing urban settlements can result in town cramming and increased pressure and loss of open space, as well as significant further pressure on infrastructure like transport, schools, medical facilities etc. which is already a major concern for our communities.

The policy should acknowledge that development on the periphery of settlements can also deliver sustainable development, especially where there are current transport routes or the possibility of new routes being opened up. The acknowledgement that some development may need to take place on the edges of settlements and on greenfield land will ensure that the most sustainable options for accommodating growth can be pursued.

The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives and this is what the NDF should be stating rather than dictating where such developments should only be located.

**Potential for new sustainable settlements:**

The NDF Strategy appears to dismiss the potential for sustainable new settlements. However, it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development in settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development.

The commentary on new settlements is too prescriptive in the NDF where it states: *“Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources”* (page 22 refers). This would appear to rule out proposals for new settlements despite Planning Policy Wales (PPW) setting out the exceptional circumstances where they may be appropriate. In contrast the NDF should reflect the policy advice in PPW and recognise there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies. We feel the NDF has ignored the opportunity that new settlements could have in delivering sustainable places to meet the needs of our communities and future generations, particularly in South East Wales and we feel the NDF should make a positive statement about how such opportunities should be explored in the SDP and LDPs to follow.

**Publicly owned land:**

Policy 3 emphasises the importance of publicly owned land in delivering development including for mixed use and affordable housing. Whilst this is welcomed in principle, it is considered that there is not a significant amount of Council owned land available in Wales for development, particularly in town centre locations.

Many Local Authorities are already identifying available land to deliver Affordable Housing, schools, infrastructure improvements and other corporate projects. However, Local Authorities also use the receipts from land disposal to deliver other strategic objectives such as the 21<sup>st</sup> Century schools programme. Welsh Government need to support Council’s financially to deliver this agenda if land receipts are going to be reduced to support other policy initiatives.

**Supporting rural communities:**

Policy 4 supports ‘appropriate proportionate growth in rural towns and villages’ but recognises this is best planned at regional and local levels. This is welcomed and should be based on evidence prepared at LDP level.

**Comments on the Spatial Strategy Map:**

The following concerns about the spatial strategy map are raised:

- It is too cluttered and therefore difficult to read / understand.
- There are a number of regional growth areas identified, but these areas are not labelled and they are not identified on the later regional maps, unless they are the 'Centres for Regional Growth' in which case why are none of the South East Wales shown on the all Wales 'Spatial Strategy' map?
- It is unclear which places the intra-urban connectivity relate to and such connectivity is too simplistic – it ignores east-west connectivity in South East Wales, particularly the M4 corridor.
- The all Wales Spatial Strategy map on page 25 is not consistent with the regional maps at pages 50, 57 and 63, which is confusing and could lead to challenge when trying to demonstrate conformity in lower tier plans.
- Existing regional centres should be identified where they have an important functional role in providing a hub for employment and public services.
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### 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>
		X				

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

The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. The estimates of need "should not be used as housing targets" and therefore Policy 5 should be reworded to state that regional Estimates of Housing Need should form part of the evidence base for affordable housing targets, rather than basing SDP targets entirely upon these estimates. Unless this is clarified there is a concern that the target of 47% should be affordable might dictate that similar targets are included within the SDP/LDP. This may not be deliverable, desirable nor appropriate.

I support all initiatives aimed at increasing the supply of Affordable Housing and it is clear that more needs to be done to increase the supply of Affordable Housing. Local Authorities are responding to this challenge with ambitious programmes of Council house building. However, there are concerns that across Wales the identified need for affordable housing is not close to

being met.

Whilst Affordable Housing supply through public sector, RSL, Council housing and support for SME builders is a laudable ambition, the NDF appears to be somewhat dismissive of that the role the private sector, in particular volume house-builders, have in delivering Affordable Housing, which has been significant in the last 20 years. In the South East region the private sector has been responsible for delivering a significant number of affordable homes through section 106 agreements on market-led developments.

The role of the private sector in delivering Affordable Housing will be largely influenced by market forces such as development viability, land/build costs, developer risk and return on investment which varies across Wales. In this regard, it is still important to allocate land in locations where developers want to build and where development viability is strong enough to support a strong policy requirement for increased levels of Affordable Housing and other necessary infrastructure. In areas with weaker market viability, or significant development cost, public sector intervention will be needed to help deliver sites and Welsh Government need to provide the necessary funding to support this.

There is a danger that Welsh Government's policies on housing will push volume house-builders out of Wales, as their representatives have suggested in various forums, and this would undermine our ability to meet housing need across a range and mix of house types and at the scale necessary to meet the NDF outcomes.

The NDF must have the same rigorous approach to deliverability as that required of Local Planning Authorities when preparing their Strategic and Local Development Plans, which must be in conformity with the NDF. This is particularly important to ensure that the NDF provides an effective framework for delivering enough affordable housing to meet the high level of need identified.

Finally, it should be recognised through the NDF, PPW and in subsequent SDPs and LDPs that in order to make quality places with cohesive communities where people want to live, new housing developments need to deliver a mix of house type and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable housing is too large and fails to create a sustainable mixed community. Delivering the identified need of 47% affordable

housing on large scale sites is unlikely to be desirable as it could not be ‘pepper-potted’ appropriately or enable sustainable mixed communities to be created. Welsh Government and Local Authorities will need to work with housing providers to ensure this need can be met in a range of appropriate ways to deliver sustainable development.

#### 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	Don't know	No opinion
						<input checked="" 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?

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

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

#### 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?

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

Policy 9 sets out WG's commitment to developing a 'National Forest' but does not explain how Welsh Government will identify delivery sites and mechanisms to achieve this aim. We are

supportive of this initiative but would like more information from Welsh Government on how it will increase woodland cover in Wales by 2000 hectares/annum from 2020 (i.e. next year).

Such proposals should be planned for the long-term to protect our environmental assets now and for future generations in accordance with the WBFG Act. Further consideration should be given to the regulatory framework protecting trees as an environmental asset. They should be protected for their ecological value and not just amenity value.

### 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...

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

The NDF does not consider of tidal or off shore generation, both of which could make significant contributions in terms of energy generation, whilst having less landscape impact than large scale onshore developments.

### 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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input checked="" 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.

The Cardiff Capital Region (CCR) Cabinet has already signed up to the principle of an SDP for the Cardiff Capital Region on 10<sup>th</sup> June 2019 and a report is currently being considered by all 10 Councils in the region to seek formal approval to proceed. We hope to submit a proposal for an SDP in South East Wales to Welsh Government in due course.

It is clear that the NDF delegates a significant amount of decision making to the regional plan and this is welcomed in the most part, given that the SDP will have a more robust and detailed evidence base than is apparent with the NDF. However, concerns below regarding some of the more prescriptive policies in the NDF go too far given the lack of evidence to support them.

### 9. 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 checked="" type="checkbox"/>

### 10. 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>
						X

### 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>
			X			

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.

#### Issues with the NDF proposals for South East Wales:

Policy 27 on Cardiff is welcomed insofar as it recognises the Capital City's role as the primary national centre and its continued growth needs to be supported. However, the NDF only recognises the constraints around Cardiff in to the North and South. It does not address the pressures to the West in the Vale of Glamorgan and how these should be addressed.

The recognition of the strategic importance of Newport within the South East Wales region in Policy 28 is welcomed. However, it should be noted that significant parts of Newport remain in flood zones and there are serious transport constraints, namely the congested M4 and the Brynglas Tunnels that need to be addressed for the NDF Strategy to work.

Policy 29 supports regeneration and investment in the Heads of the Valleys area and this is welcomed. However, whilst the sentiment of the policy is generally agreed with there is a lack of

detail in the supporting text on how prosperity is to be increased and social equalities addressed.

The focus on Cardiff, Newport and the Heads of the Valleys has (whether intentionally or not) left important areas in the region outside the NDF's consideration. Some parts of the region have been ignored (i.e. the Vale of Glamorgan and Bridgend) or deliberately restricted (i.e. Monmouthshire) without robust evidence to support this approach and considerations of the implications for this. The NDF therefore fails to recognise the growth potential of these places and pre-determines stagnation versus growth. Decisions about the spatial strategy for the region should be taken at a regional and local level, as recognised at various points in the NDF.

There are opportunities for sustainable development throughout the region and not just in Cardiff, Newport and the Heads of the Valleys. To deliver the strategic policies 1 and 4 the NDF should recognise the whole of the South East Region as an area where sustainable growth is required and the strategy for delivery determined at a regional and local level through the SDP and LDPs.

It is unclear how emphasis on Newport and the Valleys and delivery on brownfield sites has been informed by urban capacity studies and development viability appraisals. I question how deliverable this strategy is, and whether local planning authorities will be able to prepare SDPs and LDPs that conform with the NDF whilst demonstrating deliverability through their independent Examination. It needs to be acknowledged that some form of controlled expansion into the countryside on greenfield land will need to occur in the region to meet growth potential, and consequently the NDF should have some reference and policy text on acceptable expansions into the countryside and potential for sustainable new settlements.

**Housing:**

The NDF states that "71,200 additional new homes are needed in the region until 2038". This figure is not particularly aspirational considering the current adopted LDPs in the region have a housing requirement in excess of 110,000. The required 48% of additional homes being affordable is very ambitious in this context and the reality is if we're going to provide enough affordable housing we need to build more housing overall.

**New Settlements:**

There should be a recognition of the potential for new settlements, to be considered in the SDP in

accordance with the policy advice in Planning Policy Wales. Delivering the necessary homes to meet need is going to require a range of approaches and the potential for a new settlement needs to be explored rather than dismissed as it appears to be at present.

**Green Belt Issues:**

One of the most prescriptive policies in the Draft NDF is Policy 30 (Green Belts in South East Wales). While the Policy itself requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, it refers particularly to Newport and the eastern region. The supporting text goes further to state: *“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”* (emphasis added) and the illustrative diagram on page 63 shows a clear indication of the location of that green belt. This is considered to be too prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement. If it were proposed as part of an SDP or LDP in this way it would not meet the tests of soundness without robust evidence to support it – it is not reasonable that the NDF has a lower bar for evidence required to support it when it is being so prescriptive.

The green belt policy would appear to be overly restrictive in the eastern part of the region (i.e. Monmouthshire) where sustainable growth should be welcomed to manage social issues such as population decline and to address inequalities in terms of access to affordable housing for younger people. Furthermore, this part of the region needs to respond to the effects of migration resulting from the impact of the removal of the Severn Bridge tolls particularly the economic opportunities associated with this – there is a significant opportunity for Monmouthshire to capitalise on economic links to the South West region and its strategic location between the Great Western Cities of Cardiff, Newport and Bristol, and to address the social sustainability of the County’s demography.

A greenbelt is a permanent protective designation that should look to protect an area from development for a period of at least 50 years. Designation of a greenbelt is a major long-term policy decision that should be based on robust evidence. Within a greenbelt, the only development permitted is essential accommodation for agricultural, forestry and rural enterprise workers, and essential outdoor recreation facilities. Ironically, the draft NDF text requires that the greenbelt should be considered in relation to the greenbelt around Bristol, where emerging development plans are seeking to de-designate parts of the greenbelt because it has overly

constrained growth.

Restricting growth in this part of the region in such a prescriptive way through the NDF undermines the Cardiff Capital Region City Deal which includes a growth strategy for the whole region and would act to hinder growth in an area of significant demand and potential. It also undermines the role of the SDP and pre-determines the growth strategy to follow which needs to be supported by robust evidence.

Furthermore, there may be other parts of the region where a green belt is justified. While the draft NDF does not outwardly dismiss the designation of a green belt elsewhere in the region, the exclusion of such a designation in the NDF when a green belt to the north of the M4 from the Severn Crossings to North Cardiff is explicitly required in the NDF, could predetermine any future consideration on this matter at a regional or local level.

## **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.

No comment.

## **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?

No comment.

## **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?

No comment.

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.

#### **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?

The evidence and assumptions that have informed the NDF are not clear. Therefore the focus on existing town/city centres and urban areas may not be realistic or deliverable in the absence of urban capacity studies to support it. An over-reliance on growth within existing settlements could stifle growth within the “National Growth Areas” and undermine the delivery of the NDF and its outcomes.

Furthermore, It is unrealistic to expect all new development to be on brownfield land. Where brownfield sites are suitable and viable they should be prioritised, but the NDF implies greenfield development should be severely restricted. This strategy is unlikely to deliver the sustainable development needed to meet the needs of the future generations of Wales.

The Development Plan system is predicated upon an evidence base that demonstrates the viability and deliverability of its proposals. There is no such evidence to support the NDF outcomes or to demonstrate they are deliverable. The NDF is setting outcomes that SDPs and LDPs will need to conform to and prove through examination that they are deliverable, based on robust evidence. This could lead to conflict in SDPs and LDPs that could seriously hamper development plan preparation and undermine the plan led system.

I remain to be convinced that the NDF Outcomes can be realistically achieved without additional resources being made available to deliver the individual priorities. Will Welsh Government be providing additional resources to Local Planning Authorities who are tasked with implementing the NDF through SDPs and LDPs?

### **Alternative Proposals**

The NDF should set out the framework of policy that the lower tiers of plans can build upon and provide increasing detail. The NDF needs to take a lead on significant issues, setting out the national approach to addressing the issues that have national significance. However, the NDF as drafted does not include a number of significant elements that require a national lead in order for lower tier plans to provide the detail as follows:

- **Congestion on the M4** and the costs to the Welsh economy. The recent decision by the Welsh Government to not progress the Second M4 means that the existing issues with the Brynglas Tunnels remain. The NDF makes no reference to addressing the M4 congestion and the consequential adverse impact on the economy of Wales. The NDF is proposing economic growth whilst remaining completely silent on the M4 which carries the majority of its freight and workforce. This is a significant omission for a spatial Development Plan for Wales for the next 20 years.
- **A465 Heads of the Valleys Road**. No reference is made to the contribution that this significant artery into Wales can have in delivering national and regional development. The Valleys Taskforce has set out aspiration and proposals for the Heads of the Valleys area and key to delivering these is maximising the benefits of the investment that has been made by Welsh Government on this national artery. It is surprising that the NDF does not include specific policies on maximising the benefits of the improvements within this area.
- **Freight** is a significant contributor to climate change and the impacts of heavy goods vehicles on the road structure requires significant funding to maintain the damage done by lorries. The electrification of the railways provides the opportunity to set out ambitious modal shift targets for freight from road to rail, particularly where the freight is going to the ports or elsewhere on the mainline rail network. Freight is also a major contributor to the problems at Brynglas Tunnels and delays to freight movements are one of the main costs to the Welsh economy and should be addressed in the NDF.
- **Offshore wind generation** or the potential for **Tidal Lagoons** to generate significant levels of renewable energy have not been recognised in the NDF. Both of these options have the potential to cause less damage in terms of landscape and ecological impact, whilst generating significant levels of renewable energy. The NDF purely concentrates on onshore wind and solar generation and district heating networks at the expense of a holistic policy approach to delivering

renewable energy.

- The NDF needs to clarify the **role of ports** in Wales. They are shown on the spatial strategy diagram and regional plans but there is no policy or explanation as to their current and future roles.
- Environmental issues like **air quality** and **flood risk** are given very little acknowledgement and consideration throughout the NDF.

In addition to the significant omissions outlined above, the NDF provides no policy framework for a number of land uses, including retailing, recreation and leisure, minerals, tourism, and general infrastructure. Whilst it is acknowledged that there are a number of documents that sets out national strategies for some of these issues, the purpose of the NDF is to give a spatial context to issues of national importance to provide the spatial framework for the policy framework at lower tiers. Without this spatial context these issues remain open to interpretation at lower levels and may not end up delivering national objectives.

The NDF should include a monitoring framework in the same way as LDPs to assess its effectiveness and delivery against its objectives. At this stage this would provide an opportunity to consider how realistic or achievable some of the NDF's policies and proposals are.

Overall the significant omissions from the NDF and the failure of the NDF to provide a spatial strategy for development in Wales undermines its credibility and raises significant concerns over whether the document is fit for its purpose. In summary, the NDF is a missed opportunity.

### Are you...?

Providing your own personal response	<input checked="" 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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