

7th March 2017

Dear Sir/Madam,

National Development Framework for Wales – Call for Evidence and Projects

The Cardiff Capital Region Programme Board, whose membership includes strategic directors from all 10 south east Wales authorities, and the South East Wales Strategic Planning Group (SEWSPG) wish to submit the attached evidence as an officer response to Welsh Government for consideration as part of the National Development Framework for Wales ‘call for evidence’.

The response outlines what the Cardiff Capital Region Programme Board and SEWSPG believe should be addressed in the NDF. We would welcome the opportunity to continue discussion with Welsh Government regarding issues and proposals for inclusion in the NDF and refer you to section 3 of our submission.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully,

Sheila Davies, Programme Director – Cardiff Capital Region City Deal.

1. National Development Framework for Wales – Introduction

- 1.1 The NDF will need to address issues of national strategic importance in order to provide the national framework for land use in Wales. This response considers what areas and issues should be considered in the NDF. In considering which issues should be addressed, the overall aim of delivering economic growth whilst positively contributing to environmental improvement is a key consideration. The considerations below address principle issues and are not meant to be exhaustive.

2. National Strategic Issues

Digital Connectivity/Telecommunications/Superfast Broadband

- 2.1 Access to high speed digital communications is vital to continued economic prosperity and growth. The NDF should seek to establish a framework for the delivery of the national network throughout Wales that will provide all businesses with appropriate digital access.

National and International Travel

- 2.2 Whilst being a relatively small country, there are acknowledged deficiencies in the current transport network in linking north and south Wales. The NDF should address the issues that constrain north-south movement to increase internal connectivity.
- 2.3 Connectivity between Wales and surrounding countries (England, Ireland, remainder of Europe etc.) also need to be considered through the NDF. Issues such as the Severn Bridge Tolls, ferry services operating to Ireland and Cardiff Airport providing flights to and throughout the UK, Europe and further afield all need to be integrated to increase accessibility into and out of Wales. In particular, there is an urgent need to improve the transport links (both public and private) to Cardiff Airport from all parts of Wales.
- 2.4 The NDF will also need to consider transport infrastructure improvements related to growth areas required to deliver the social and economic goals of the Welsh Government. Areas of growth will place further significant pressure on existing infrastructure and the NDF is best placed to address the scale and nature of improvements required to serve these areas. Such an approach should reference the role of cities in job creation, but also the need for people to access those opportunities. Improving transport links between centres of employment and centres of population will not only support more people into employment it also has the potential to improve productivity through business to business agglomeration effects.
- 2.5 General transport improvements are matters best addressed through local and regional interventions, rather than through a national strategy, however, there are likely to be a number of strategic transport issues that may include a national element which will need to be taken into consideration.

Active Travel

- 2.6 Provision for pedestrians and cyclists is generally a local or regional infrastructure issue. However, 1200 miles of the National Cycle Network (NCN) has already been delivered in Wales and further growth of the network is planned. Major additions to the NCN should be considered through the NDF, particularly where linkages between the NCN and identified growth areas would be beneficial.

Freight

- 2.7 The movement of freight within Wales and importing and exporting goods from further afield is a significant cost to the economy of Wales. The NDF should address the issue of Freight nationally, setting a framework for improvements and setting targets for modal split for transporting goods. It is important that the NDF recognises the role of current freight infrastructure in Wales when addressing this matter.
- 2.8 A key area to focus on is the network of ports that serve Wales. South and West Wales have numerous ports (Newport, Cardiff, Barry, Port Talbot, Swansea, Pembroke and Milford Haven) which contribute significantly to the economic prosperity of Wales by serving the major industrial areas in South Wales and beyond. Milford Haven is a particular issue, being a significant deep water port capable of accommodating the largest of oil tankers and heavy cargo haulers. Its location at the western edge of Wales raises issues in respect of accessibility that should be considered through the NDF. The potential expansion of Newport Port is addressed in more detail in Section 3.

Economic Growth

- 2.9 A key aim for Welsh Government is continued economic growth and increasing prosperity throughout Wales. To achieve this, the NDF will need to consider the level of economic growth that should be sought and identify what provision for growth needs to be made to achieve it. The NDF should consider identifying areas of growth (not only for employment but also housing and ancillary facilities) on a national scale, ensuring that economic growth integrates with other key issues to form a comprehensive framework for realising economic goals. Some examples of major growth areas will be included within the developing work referred to in Section 3 of this report.
- 2.10 The NDF should consider the employment market and identify growth sectors that will require new development to enable their growth. The spatial distribution of this provision is a key issue, and the opportunities for expanding on existing specialist areas should be considered. This requires recognition of the role of the Capital City in both creating jobs in predominantly knowledge based service industries, as well as delivering positive agglomeration benefits, whilst also recognising the role of other areas across the city-region in providing a range and choice of land. It is important that the NDF works with the market to support the most efficient use and allocation of land and resources.
- 2.11 Service sector employment is a key sector of employment that is not based on employment sites. Retailing and tourism are two areas that provide significant levels of employment throughout Wales and the NDF should not neglect addressing these sectors in considering the national framework for economic growth.
- 2.12 Other economic growth issues that the NDF should consider include:
- *Nationally significant Employment Sites* :- strategic scale employment sites that provide an employment gravity that will attract inward investment and provide significant knock-on effects
 - *Enterprise Zones and Simplified Planning Zones* :- Derestricted planning areas where planning intervention is restricted providing the opportunity for fast and effective employment development.
 - *Innovation Districts*:- Areas of concentrated specialised employment sectors that would benefit from being located with similar industries

- *National Anchor Company Network*: - A national strategy identifying and promoting key employers to locate at strategic points throughout Wales to act as catalysts for future growth and development.
- *National Network of business and conference centres*:- To support an improving and increasing economic base

Settlements

- 2.13 A key consideration for the NDF should be a settlement hierarchy, based upon their respective functions and their proposed functions over the plan period. The NDF should also consider whether continuing with the identified hierarchy is the appropriate course of action to deliver continued economic growth, whilst positively contributing to environmental improvement.
- 2.14 As part of the consideration of the settlement hierarchy and developing a national strategy for economic growth, the NDF should consider the issue of whether one or more New Settlements/Towns provide the appropriate opportunity to assist in delivering the NDF goals. New Settlements/Towns are highly contentious, but have not been identified in the development arena for nearly 70 years and, whilst highly controversial, the NDF should not pass on the opportunity to seriously consider this issue. The rewording of paragraph 9.2.7 in Planning Policy Wales, which is discouraging of new settlements on greenfield sites in Wales, should also be considered.
- 2.15 Population and household growth are key matters in the consideration of land use strategy at all levels. The NDF should give a lead on addressing the issue of population and household requirements (including affordable housing need) through its respective period. In conjunction with stakeholders, consideration should be given to identifying the level of population and numbers of dwellings required through its period taking into account evidence relating to need. It might be appropriate for this to go hand in hand with a corresponding adjustment in the 5 year land supply requirement of TAN1 and how this is calculated and reported.
- 2.16 The Growth and Competitiveness Commission advocates that the Cardiff Capital Region “should keep pace with average population growth in the UK core cities.” Setting the strategic level of population and households will facilitate apportionment across the local areas throughout Wales although this is not without complications. Some of Wales will be covered by City Regions, where a Strategic Development Plan can draw down and ascribe requirements to local authority or growth areas. However, a significant part of Wales does not comprise part of any City Region and, as such, have no strategic level planning tool to apportion growth across local areas. The NDF will need to consider an appropriate way to address this issue.
- 2.17 The NDF should take into account evidenced needs and consider identifying a network of integrated growth areas to accommodate significant levels of housing and employment growth, setting their respective scale and location through the national strategy.
- 2.18 The NDF should also consider identifying distinctive destinations and culture capitals at locations where enhancement of concentrated tourist facilities can realise significant benefits. Such facilities can be based on any customer generating activity, including the natural environment (coast and countryside), culture and heritage, action/adventure centres and events and festivals locations. This would fit into the settlement hierarchy based on the role and function of the respective places.

- 2.19 Currently provision for Gypsies and Travellers is addressed on a local area basis through LDPs. There are two types of provision for Gypsy and Travellers, namely permanent and transit provision. A criticism of this system is that transit provision is most appropriately considered at a higher than local authority level, to reflect the travel patterns that generate the need for transit places. The NDF could provide an overview of the transit patterns and establish a national strategy for the delivery of transit provision across Wales.

Social Infrastructure

- 2.20 The majority of social infrastructure is provided through services outside the remit of general planning and development, e.g. through social services or the health service. Accepting growth and identifying a strategic network of areas of growth will increase pressure on social infrastructure which should be taken into account in establishing the strategy. The NDF should consider the provision of social infrastructure from national perspective, including the following areas:

- Hospitals and specialist treatment centres
- 21st century schools
- 21st century prisons
- Higher education including universities
- Social support structures

Climate Change

- 2.21 This is a generic term used to cover issues relating to human impact upon the planet and the causes and impacts of global warming. Key issues under this umbrella include energy (use and generation), flooding and emissions.
- 2.22 Energy generation, particularly renewable energy generation, is a key issue for the NDF to address in setting the national framework. The NDF should identify the following:
- Strategic Areas of Search for Wind Generation
 - Key locations for conventional energy generation
 - Strategic locations for energy from waste generation
 - National Strategy for hydroelectric generation, including river turbines
 - Key locations for tidal power generation
 - Key locations for PV generation
- 2.23 The NDF should also set the development framework and national position in respect of fracking, possibly identifying strategically important locations, and the land use strategy issues relating to the move to a low carbon economy.
- 2.24 Coal remains a viable fuel for conventional energy generation and the NDF should set out the national requirement and identify broad areas where new extraction may be required or are suitable. Coal Legacy Regeneration sites should also be considered in the NDF and further detail is evidenced in Section 3.

- 2.25 The Gas and Electricity networks are related issues to the generation of power and a global position in respect of power generation and delivery should be considered as part of the NDF.
- 2.26 Emissions are a result of human activities, principally arising through transport, energy generation and industry. Reducing emissions will be inextricably linked to the source of the emission and the NDF position in respect of it. As such the NDF should consider the emissions impacts of the strategy in respect of these issues.
- 2.27 Notwithstanding weather pattern changes, the principal issue arising from climate change will be increased risks from flooding, both fluvial and coastal. The NDF should address the issue of national coastal and fluvial flood defences and identify any significant areas required for flood alleviation purposes.

Environment

- 2.28 Wales' environment is one of its most important assets, from built industrial landscapes to protected coastlines. Appropriate stewardship of these assets would contribute towards economic growth and prosperity, as well as realising positive benefits environmentally. The NDF has an important role in establishing a national strategy and framework to facilitate good stewardship.
- 2.29 Wales has a wealth of heritage, including World Heritage sites, Historic Parks and Gardens, Historic Landscapes and many local heritage assets including Listed Buildings and Scheduled Ancient Monuments. The NDF should seek to establish a national framework for these assets, linking them to opportunities for economic growth.
- 2.30 A key issue that the NDF should address is whether strategic Green Belts are required in Wales. Green Belts are permanently protected areas where the open nature of the land is protected in perpetuity. As a result, Green Belts represent significant and permanent barriers to development. The NDF will need to balance the need for growth with the need to protect / constrain urban areas and Green Belts are one of a many ways of dealing with these issues.
- 2.31 Wales has a wide range of natural environments that contribute towards its unique identity. Areas of ecological or geological importance are protected by a hierarchy of protection designations, ranging from European designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, through national designations, including Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) and Marine Conservation Zones (MCZs), to local ones such as Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINC). Whilst the European and National designations are outside the remit of the NDF in terms of designation and the local designations are too localised, the NDF should consider linkages between and within designations through a national strategy for green and blue infrastructure. This would identify important areas where existing green (land) and blue (water) spaces should be protected and/or enhance to support the vibrancy of the designations.
- 2.32 Water management and flooding are key issues for Wales moving into the future, with changing weather patterns meaning there will be less water in rivers in the summer months and more water in the winter months than is currently experienced. This will raise significant issues in respect of the river environment in years to come. The NDF should consider these effects and establish framework that will enable the issues to be tackled and positive wider benefits to be realised for the environment.

- 2.33 In addition to the changing levels of water in the rivers, climate change will also increase the incidence and severity of flooding in Wales, both coastally and fluvially. Flooding issues are raised and considered in the Climate Change section above.
- 2.34 Welsh landscapes benefit from a range of protection measures from statutory designations, such as Areas of Outstanding Natural Beauty (AONBs) and National Parks to non-statutory local designation set out in LDPs, such as Special Landscape Areas (SLAs). However these landscapes also contribute significantly to the economy of Wales through tourism and sterilising such areas would be counter-productive. The NDF should consider setting a framework for enhancing tourist opportunities in these areas whilst maintaining the quality of the landscapes.
- 2.35 The NDF could also consider establishing a framework and strategy for other, less direct, issues such as dark skies and tranquil places.

Regional and Local Strategic Issues

- 2.36 Whilst the NDF should appropriately address national issues and strategy, there will be some regional and sub-regional matters that the NDF should appropriately consider and set the framework for their delivery.
- 2.37 City Regions have recently gained momentum, especially with the City Deal agreement for the Cardiff Capital Region. It is important that the overall aims and objectives of the City Regions accord and integrate with the NDF and that the NDF has taken account of the implications that may arise from the City Regions proposals, providing the framework for addressing key issues. The key City Region issues that the NDF will need to reflect are the need to address the housing needs of the area, together with the economic growth and transport aspirations, which form the main building blocks for successful delivery of transformational change and growth of the capital city and wider region.
- 2.38 The City Regions only cover part of Wales and consideration should be given to whether the NDF will adopt a strategic role in these areas, setting regional requirements and targets to be disseminated at the local level. Doing this raises the potential for the NDF to be treated differently in some parts of Wales as opposed to others. However, not establishing a regional level framework in areas without the City Region element could result in a strategic vacuum in some areas.
- 2.39 Local issues will tend to be of a smaller scale and have much less impact than those issues requiring national attention. As a result it would be inappropriate for the NDF to address such issues. However, cumulative impacts of some local issues could be of such significance that they warrant regional and national consideration. For example:
- Air Quality:- the issue of deteriorating air quality, which is primarily a result of increased emissions. Economic growth will undoubtedly lead to an increase in the need to travel (more people means more journeys and more demand for travel) and transport emissions is one of the key factors in air quality. Increasing the need to travel has the potential to increase emissions further and, given that co-location of destinations (shops, employment, leisure, recreation etc.) is a sustainable goal, the potential to increase concentrations of different uses at specific locations, could increase the number of areas at risk of air quality failure.

- Redevelopment of Industrial Legacy Sites: - the redevelopment of industrial legacy sites and / or the redevelopment of surplus employment land would result in significant areas of land being brought back into beneficial use across the whole of Wales. However, the strategy for the re-use of such sites should have regard to their location, and those sites that are close to public transport nodes should be afforded a higher priority than those that are not.

3. **Submission of Projects – NDF**

- 3.1 The Cardiff Capital Region Cabinet has been formally established comprising the Leaders of the 'Constituent Authorities' of:
- Blaenau Gwent County Borough Council
 - Bridgend County Borough Council;
 - Caerphilly County Borough Council;
 - The City of Cardiff Council;
 - Merthyr Tydfil County Borough Council;
 - Monmouthshire County Borough Council;
 - Newport City Borough Council;
 - Rhondda Cynon Taff County Borough Council;
 - Torfaen County Borough Council; and,
 - Vale of Glamorgan County Borough Council.
- 3.2 The role of the Regional Cabinet is to ensure a strategic regional approach to economic development, regeneration, planning, transport, housing and innovation and digital, as well as having responsibility for the £1.2 billion Cardiff Capital Region City Deal.
- 3.3 To assist the Regional Cabinet in their task they are currently developing an integrated regional economic strategy which, in part, will focus on increased investment on strategic infrastructure. The schemes and projects detailed in this strategy, developed in partnership with the business community, will be of regional significance. As the Cardiff Capital Region is the largest of the economic sub-regions in Wales, home to nearly 50% of the population of Wales and accounts for approximately 50% of the total economic output of the Welsh economy, 49% of total employment and has over 38,000 active businesses, it maybe that some of these projects will also be considered as nationally significant.
- 3.4 The Regional Cabinet have indicated that they are keen to actively engage with Welsh Government in the development of the NDF in respect of strategic issues and projects to ensure that it reflects, supports and complements the work being under within the Cardiff Capital Region.