

Report on the draft National Development Framework

December 2019



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Report on the draft National Development Framework

December 2019



About the Committee

The Committee was established on 28 June 2016. Its remit can be found at:
www.assembly.wales/SeneddCCERA

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1. Introduction

1. The Welsh Government published the draft National Development Framework (NDF) for consultation on 7 August 2019. The consultation closed on 15 November 2019. The Committee's inquiry is intended to inform the development of the final version of the NDF.

Background

2. The Welsh Government has described the purpose of the NDF as:

- setting out where nationally important growth and infrastructure is needed and how the planning system can deliver it;
- providing direction for Strategic Development Plans (SDPs) and Local Development Plans (LDPs);
- supporting determination of applications under the Developments of National Significance (DNS) regime;
- supporting national economic, transport, environmental, housing, energy and cultural strategies and ensuring they can be delivered through the planning system; and
- sitting alongside Planning Policy Wales (PPW), which sets out the Welsh Government's national planning policies and will continue to provide the context for land use planning.

3. The final version of the NDF is expected to be published in September 2020. Work to develop the NDF began in 2016 and the Welsh Government has published a timeline showing the various stages of development:

- Evidence gathering and engagement to develop the vision, objectives and options for the NDF (October 2016 – March 2018);
- Publishing and consulting on issues, options and the NDF preferred option, supported by environmental reports and assessments (April 2018 – July 2018);
- Considering responses to the preferred option consultation and preparing the draft NDF (July 2018 – August 2019);

- Consulting on the draft NDF, considering responses and preparing a consultation report (August 2019 – March 2020);
- Consideration of the draft NDF by the National Assembly for Wales for a statutory 60-day consultation period (April – June 2020); and
- Publishing the final NDF (September 2020).

Committee consideration of NDF preferred option

4. The Welsh Government consulted on its preferred option for the NDF between April and July 2018. Rather than consult on a draft version of the NDF, the Welsh Government consulted on a vision, objectives and preferred option to provide the basis for developing the draft NDF.

5. This Committee scrutinised the preferred option in June 2018. This included a public evidence session with planning experts and a stakeholder workshop. Following this work, the Committee wrote to the then Cabinet Secretary for Energy, Planning and Rural Affairs, Lesley Griffiths, in August 2018, seeking clarification on a range of issues.

Our approach

6. The Committee considered written submissions and heard oral evidence from stakeholders during meetings on 24 October, 6 November and 14 November.

External expert adviser

7. The Committee decided to appoint an external expert adviser, Dr Graeme Purves OBE¹, to support its scrutiny of the draft NDF.

8. The Committee is very grateful to Graeme Purves for his assistance, which has been invaluable in informing the Committee's deliberations and conclusions.

Senedd Research Academic Fellowship Scheme

9. Ludi Simpson, Professor of Population Studies, University of Manchester, was commissioned under the Fellowship Scheme to prepare a briefing for the

¹ Graeme Purves is a former Assistant Chief Planner with the Scottish Government. He led the teams which prepared Scotland's first and second National Planning Frameworks. He is a member of the UK2070 Commission which is currently undertaking an inquiry into spatial inequalities across the UK. He is also a Director of the Sir Patrick Geddes Memorial Trust and a member of the Scottish Advisory Committee of the Royal Society for the Protection of Birds.

Committee. The briefing, “Demographic projections and planning: a collaborative partnership”², reviewed the estimates of housing need for Wales and their use in the draft NDF. The Committee is grateful to Ludi Simpson for his assistance.

² <https://seneddresearch.blog/2019/11/22/new-publication-demographic-projections-and-planning-a-collaborative-partnership/>

2. Recommendation

10. The Committee undertook its work in parallel with the Welsh Government's consultation on the draft NDF. Given the time available, the report does not seek to cover every policy included in the draft NDF or reproduce in detail the oral and written evidence in support of each conclusion. Hyperlinks to transcripts of meetings, written evidence and briefing papers considered by the Committee are listed on the Committee's website³.

Recommendation 1. The Welsh Government should publish its response to this report alongside the next iteration of the NDF when it comes before the Assembly for scrutiny in 2020.

Its response should address each of the Committee's conclusions. Where a conclusion has suggested an amendment to the draft NDF, the Welsh Government should explain whether and how it has been incorporated or reflected in the final NDF.

Where the Welsh Government has determined that a conclusion should not be incorporated or reflected in the NDF, it should specify its reasons. Where the Welsh Government has determined that a conclusion would be more appropriately dealt with in another planning or policy document, it should refer to the specific document.

³ www.assembly.wales/en/bus-home/committees/Pages/Committee-Profile.aspx?cid=444.

3. Ambitions and outcomes

- 11.** The National Development Framework (NDF) will set out a 20-year land-use framework and be reviewed at least every five years. It will set out the Welsh Government's policies on development and land use in a spatial context.
- 12.** Unlike its predecessor, the Wales Spatial Plan, the NDF will have development plan status. This means that planning decisions will need to be made in accordance with it and all Strategic Development Plans⁴ (SDPs) and Local Development Plans (LDPs) must conform with it.
- 13.** Several contributors to the Committee's work expressed disappointment that the draft NDF was not sufficiently ambitious. Others raised concerns about an inconsistent approach throughout the NDF.
- 14.** The Committee notes the intention that the NDF and Planning Policy Wales should be seen as complementary documents, Nevertheless, stakeholders expressed concern that it was not always apparent why certain matters appeared in the NDF, particularly considering they lacked a spatial dimension. Planning Officers Society Wales expressed concern that the draft NDF provides "no policy framework for a number of land uses, including retailing, recreation and leisure, minerals, tourism, and general infrastructure". It acknowledged that national strategies for some of these issues were set out in other documents, but suggested that "the purpose of the NDF is to give a spatial context to issues of national importance". It cautioned that, without this spatial context, "these issues remain open to interpretation at lower levels and may not end up delivering national objectives".
- 15.** Royal Town Planning Institute Cymru (RTPI Cymru) believed that the draft NDF was inconsistent in its spatial approach, saying that "it is only spatial for some topics, such as growth areas, onshore wind and solar, district heat networks etc". However, it did not take a spatial approach for seemingly appropriate policies, such as Mobile Action Zones, biodiversity enhancement and the national forest. This was echoed by RSPB Cymru, which said that "the NDF approach to spatial strategy looks somewhat unbalanced".
- 16.** Witnesses expressed the view that the spatial aspects of challenges and opportunities would be brought out more clearly by mapping some of the available evidence. Several witnesses felt that much of the policy content of

⁴ are discussed further in Chapter 4.

Chapter 4 after the Spatial Strategy diagram on page 25 comprises statements of generally applicable policy principle which are not spatial in character.

17. Dr Neil Harris said that, although some stakeholders had commented on a perceived lack of detail in the draft NDF, it should focus on “key issues of national significance” and calls for more detail to be included should be resisted. However, he suggested that “there is also scope for reducing the content of the NDF where material is well-enough covered in Planning Policy Wales and little value is added through the text of the NDF”.

18. RSPB Cymru noted that the draft NDF should be read “in parallel” with Planning Policy Wales⁵ (PPW). However, “both contain ‘all Wales’ policies and there needs to be a clearer rationale across both for which policies should be in the NDF and which are only covered in PPW”. It said:

“In our view, there are significant gaps in the NDF including the absence of policies for nationally important landscape and biodiversity assets which are found in PPW but not in the NDF.”

Wider UK spatial and cross-border connections

19. Some witnesses felt that the draft NDF should provide more information on the wider context of spatial relationships and connections within the UK and with Ireland, and particularly on spatial issues on the border with England.

20. The draft NDF recognises the important social, economic and institutional links across the Wales-England border, and the importance of trade and ferry links with Ireland. RTPI Cymru referred to cross-border collaboration and said:

“We welcome that the NDF recognises that there are spatial issues in England that require a response and long term plan from 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.”

Outcomes

21. Contributors to the Committee’s work were supportive of the inclusion of outcomes in principle, but some expressed concern about the detail. Dr Neil

⁵ PPW sets out the Welsh Government’s national planning policies and provides the context for land use planning.

Harris believed the outcomes were “sometimes expressed very generally” and it would, consequently, be difficult to monitor progress towards achieving them.

22. Savills considered the outcomes to be “generally achievable if a little unambitious”. It explained that the outcomes illustrated “the NDF focus on Wales as a place to live for its current population with little or no reference to its context or external relationships and opportunities”.

23. Planning Officers Society Wales believed the outcomes were “mostly laudable” but questioned their deliverability, particularly as “they are in part contradictory”. It suggested that several outcomes sought to support growth, whereas others sought to protect and enhance natural resources and the environment. This tension could prove to be problematic:

“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.”

24. Savills expressed the view that the outcomes place insufficient emphasis on the economy and that a substantive economic purpose is required to provide an adequate framework for sustainable development.

25. RSPB Cymru referred to a “disconnect” in relation to climate change policies. As an example, it said:

“the climate change outcome refers to energy, transport, health and jobs but not to housing; while the outcome for homes and housing makes no reference to climate change and the types of buildings that we need to build – i.e. low or zero-carbon – to get to net-zero.”

Welsh language

26. The Planning Policy Manager, Ceredigion County Council expressed concern about the 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”.

Interaction with other policies

27. The NDF is cited by the Welsh Government’s economic action plan, Prosperity for All as a guiding strategic development plan for the next 20 years. The introduction to the draft NDF states that it has been informed by the Wales National Marine Plan, the Transport Strategy and the Low Carbon Wales Plan. It also states that the spatial strategy set out in the NDF will inform the Wales Infrastructure Investment Plan. There is no reference in the draft NDF to the “foundational economy” approach introduced by the Welsh Government.

28. Contributors emphasised the need to ensure that there are clear and understood links between the draft NDF and other relevant Welsh Government policies. The link with the Infrastructure Investment Plan was seen as being particularly crucial. RTPI Cymru said that:

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

29. The Planning Policy Manager, Ceredigion County Council told the Committee that “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”. This would also apply to “The Infrastructure Investment Plan and the emerging Infrastructure [consenting] Bill”.⁶

30. The National Park Authorities believed that the relationship of the outcomes in the draft NDF and PPW’s National Placemaking Outcomes was unclear. Like RTPI Cymru, it suggested that a grid or matrix was necessary to identify the relationships between the two sets of outcomes and other policies.

31. RTPI Cymru suggested that a “table setting out the links and relationships between the relevant plans, such as SDPs and LDPs, would provide clarity to all stakeholders and help engage those important sectors and stakeholders that sit outside of planning”.

Evidence base

32. Several contributors questioned the evidence base for policies in the draft NDF. Planning Officers Society Wales told the Committee that the development plan system in Wales “is predicated upon an evidence base that demonstrates the

⁶ Further information on the proposed new infrastructure consenting process:

<https://seneddresearch.blog/2018/06/07/a-new-infrastructure-consenting-process-for-wales/>

viability and deliverability of its proposals”. It cautioned that the lack of such a requirement for the NDF could be problematic:

“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.”

Monitoring framework

33. In his evidence, Dr Neil Harris pointed out that the Welsh Government has not indicated how the NDF will be monitored and that outcomes are expressed in such general terms that monitoring progress in relation to them might be difficult. This position was supported by Planning Officers Society Wales, who said that:

“The NDF should include a monitoring framework in the same way as LDPs to assess its effectiveness and delivery against its objectives.”

34. The Integrated Sustainability Appraisal (ISA) report for the draft NDF also proposes a draft framework to monitor the impact of the final NDF. The indicators to be monitored have yet to be confirmed and the framework will be published alongside the final ISA report.

Conclusions

Conclusion 1. The Welsh Government must use the NDF outcomes to articulate a bolder long-term vision. The national dimension of strategy needs to be more fully developed.

Conclusion 2. The NDF should use a set of clear principles of sustainable development, derived from the Well-being of Future Generations Act 2015, to underpin guidance on the identification of appropriate locations for growth and development.

Conclusion 3. There is scope for more exploration and better presentation of the implications of the identified challenges and opportunities for each area of Wales. For each area, the NDF should map demographic, economic, environmental and Welsh language dimensions

Conclusion 4. There needs to be a clearer rationale for the allocation of policies between the NDF and PPW. Non-spatial policy should be reserved for PPW.

Where a national policy is included in PPW and not the NDF, the NDF should signpost this.

Conclusion 5. The Welsh Government should publish a matrix or grid that clearly identifies and cross-references the relationship between the NDF and other policies.

Conclusion 6. The assessment of challenges and opportunities in the NDF should place Wales within its wider geopolitical context and address its external relationships. The Welsh Government should work with the UK Government to develop mechanisms to encourage cross-border collaboration on spatial planning matters of common interest.

Conclusion 7. We are disappointed that there is insufficient alignment and reciprocity between the NDF, the Transport Strategy, the Low Carbon Wales Plan, the Wales National Marine Plan and the Wales Infrastructure Investment Plan. This must be addressed. The Welsh Government must also explain how the NDF will support the foundational economy.

Conclusion 8. The Welsh Government should make a statement on how the policies in the NDF will contribute to its ambition for there to be 1 million Welsh speakers by 2050.

Conclusion 9. The Welsh Government should set out how the NDF is to be monitored.

4. Strategy

35. The Planning (Wales) Act 2015 (the Planning Act) introduced two new levels of development plan, which will sit above existing Local Development Plans (LDPs):

- a NDF covering the whole of Wales; and
- Strategic Development Plans (SDPs) covering distinct regions.

The three regions

36. The division of Wales into three regions caused considerable concern for many stakeholders. Savills said that there had been no explanation of the rationale for the approach and that the “definition of the regions is crude and does not necessarily reflect the geography, context, opportunity and challenges that need to be addressed within Wales to inform the Spatial Strategy”.

37. Dr Neil Harris noted that the regions were based on existing economic regions. He suggested that:

“This is unusual in a NDF in the context of the declaration of Climate Emergency, given that it appears to prioritise economic considerations over any other thematic area. There is administrative expediency in using economic regions in the NDF, yet the risk is that the regions do not make sense for the very wide range of issues that collectively come together for planning and development purposes.”

38. The Planning Policy Manager for Ceredigion County Council disagreed “fundamentally with NDF division of Wales into three regions, not four”. She said:

“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 from 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 the qualities of Mid Wales.”

Strategic Development Plans (SDPs)

39. SDPs are regional plans that will sit between the NDF and LDPs in certain parts of Wales and will deal with issues that are not of national significance but cut across more than one Local Planning Authority area. There is currently no statutory duty requiring SDPs to be produced.

40. There was a recognition that the NDF will rely heavily on SDPs to deliver its outcomes. Dr Neil Harris explained that the NDF “is particularly focused on setting the scene and outlining the expectations for Strategic Development Plans”. He said: “The NDF operates broadly within a subsidiarity principle, and so only deals with key planning and development issues of national importance”. However, Dr Neil Harris observed that:

“there is a stronger focus in the NDF on steering the three regions and their SDPs than there is on national-scale spatial planning and development issues. Work on SDPs is only just starting and is in the very early stages of scoping out how and when they will be prepared.”

41. The Committee was told that the first SDP, for south-east Wales, was in the very early stages of development and it was unlikely that it would be adopted before 2025. Stakeholders expressed uncertainty about how progress on delivering the NDF objectives can be made in the meantime. The Home Builders’ Federation cautioned that:

“Currently no SDPs have commenced in Wales following the Planning Wales Act in 2015 leaving an evidence void. There is also currently no guarantee or requirement for SDPs to be commenced or adopted. The most advanced SDP is the SE Wales proposal which recently issued a draft timeline suggesting adoption in 2025. This raises the question of what happens in the period between the NDF being adopted in 2020 and an SDP which at earliest would be 2025.”

42. Innogy Renewables UK said that more clarity was needed about how the NDF, SDPs and LDPs would work together, particularly concerning the planning decision-making process. It suggested that the NDF should “clarify that local planning authorities cannot adopt SDPs, LDPs and/or supplementary guidance that contradicts the NDF, for example through landscape capacity and sensitivity studies that typically constrain development”. Without this clear commitment, “there is a risk that the NDF could be diluted sequentially through the hierarchy of plans and restrict the deployment of large scale renewable energy projects”.

43. The National Park Authorities believed that Wales' National Park Authorities should "remain outwith Strategic Development Plans". However, this would mean that there would need to be an "emphasis on the NDF to set an appropriate framework for development within National Park Authorities".

44. The draft NDF refers to the importance of the relationship between SDPs, the Welsh Government's Regional Economic Development Plans and city region deals. However, the Committee notes that regional economic development plans are yet to be published.

Areas for growth

45. The strategy identifies three "National Growth Areas"⁷, where it is intended that most new large scale employment and housing growth will take place. Smaller "Regional Growth Areas" are also identified, as are intra-urban, regional and international connections. The Spatial Strategy sets out policies for issues of national importance including renewable energy, affordable housing, mobile communications, ecological networks and charging infrastructure for electric vehicles.

46. The strategy focuses change and growth on existing urban areas, particularly the cities and large towns. It appears to equate sustainability with compact, mixed-use urban patterns of development supported by Metro networks or other public transport infrastructure. Dr Neil Harris explained:

"The NDF essentially establishes a spatial framework for the concentration of growth in identified urban areas – cities and large towns – and sustainable growth to sustain settlements and meet local needs in other locations as a way of providing stability. Growth in rural areas and smaller settlements will be 'appropriate' or 'proportionate' to meet the needs of those living there. In summary, the strategy is one of urban-focused growth and stability elsewhere."

47. Planning Officers Society Wales said it was 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". It questioned whether the aspirations in the NDF could be delivered in practice, given the lack of vacant or available sites within existing urban settlements:

⁷ Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; and Wrexham and Deeside.

“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.”

48. Similar views were expressed by the Home Builders’ Federation, which said:

“The concentration of new development in existing urban areas and, in particular, Newport, is not supported by a robust evidence base, nor do capacity assessments point to this as a suitable proposition. Newport is heavily constrained because of flood risk and the capacity of nearby road infrastructure, including the M4.”

49. Savills said that there was very little explanation of the expected impact of focusing growth in such a limited number of areas and what this would mean in practice.

50. Similarly, the Planning Policy Manager from Ceredigion said the NDF did not consider the “likely consequences” on adjacent areas to the National Growth Areas. The focus on the three areas could “result in intensifying rather than ameliorating existing spatial inequalities, for example in terms of depopulation / increasingly skewed demographics, economic opportunities, health and educational opportunities”.

Rural Wales

51. For rural Wales, the emphasis in the draft NDF is on supporting communities, maintaining and improving access to services, and safeguarding land for food production. No attempt is made to identify an alternative model for sustainable development and decarbonisation applicable to rural areas.

52. The Planning Policy Manager from Ceredigion believed the NDF was at risk of missing an opportunity to “consider a positive future for rural Wales”. She explained:

“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”.

Public sector land

53. Policy 3 of the draft NDF states that public sector land holdings will support the delivery of sustainable places and that the Welsh Government will work to ensure that new development of a significant scale is located in town and city centres, which are accessible by walking, cycling and public transport.

54. The supporting text states that “Where publicly owned land could support sustainable places, positive consideration should be given to the future use of this land and whether it could, for example, support new mixed-use development, including affordable housing and new commercial activities or transport infrastructure”.

55. Several witnesses were concerned by the extent of the strategy’s reliance on public land. Some doubted that sufficient public land was available in the right places to deliver affordable housing on the scale envisaged. Planning Officers Society Wales said:

“It is considered that there is not a significant amount of Council owned land available in Wales for development, particularly in town centre locations.”

56. Planning Officers Society Wales also explained that the receipts from the disposal of local authority land were already being used “to deliver other strategic objectives such as the 21st Century schools programme”. It said:

“Welsh Government need to support Councils financially to deliver this agenda if land receipts are going to be reduced to support other policy initiatives.”

New settlements

57. The spatial strategy set out in the draft NDF appears to rule out the creation of new towns. Contributors to the Committee’s work pointed out that, in contrast, PPW provides for the development of new settlements where such development would offer significant environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements.

58. Planning Officers Society Wales questioned this apparent contradiction and said that:

“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.”

59. This was echoed by the House Builders’ Federation, which said:

“Whilst PPW10 supports the potential for the development of new settlements in Wales, the NDF contradicts these ambitions by suggesting that ‘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.’”

Universities

60. The draft NDF recognises that research and development are key drivers of competitiveness and opportunity and highlights the significant roles of the universities in each of the three regions. Savills believed the NDF should say more about higher education and research and development.

61. The recently-published second report of the UK2070 Commission, *Moving Up the Gears: Seven Priorities for Action*, points out that UK universities are “well placed geographically to support strategic renewal in the nations and regions, translating their advanced research power into development”.

Conclusions

Conclusion 10. The NDF should adopt the four region model recommended by Cardiff University.

Conclusion 11. The NDF should recognise the opportunities for people to live and work sustainably outside towns and cities.

Conclusion 12. The NDF should set out a positive strategy for economic and social renewal and development in rural Wales. This strategy should encourage appropriate economic growth, improved transport and ecological connectivity.

Conclusion 13. The Welsh Government should indicate how the strategy in the NDF is to be given effect before SDPs are adopted. Local Planning Authorities have demonstrated a limited appetite for SDPs. The Welsh Government should explain how the development of such plans can be incentivised.

Conclusion 14. The Welsh Government should indicate how it will ensure that national and regional strategic planning and city region deals are co-ordinated

and properly aligned. The Welsh Government should set out its understanding of when Regional Economic Development plans will be published.

Conclusion 15. The strategy set out in the NDF should have a clearer economic purpose.

Conclusion 16. The Welsh Government should provide evidence of the capacity for development in existing urban centres and the availability of publicly owned land for development on the scale and in the locations required to support the NDF strategy.

Conclusion 17. Policies concerning new settlements should be consistent between the NDF and PPW.

Conclusion 18. The NDF should make a clearer statement about the important role of universities in supporting strategic development and renewal at national and regional levels.

5. Decarbonisation and climate change

62. There was support across the board for the inclusion of an outcome relating to decarbonisation. Renewable UK Cymru referred to the NDF as a “generation-defining opportunity” to “put in place a new planning framework that can unlock Wales’ potential to meet the challenges of the declared climate emergency”.

63. However, several contributors commented that the draft NDF focuses heavily on decarbonisation but says little about other important challenges associated with climate change.

64. RTPI Cymru said that while it supported the outcomes concerning decarbonisation, it believed that 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”. RSPB Cymru drew attention to the fact that Outcome 11 on climate change encompasses energy, the economy, transport and health, but not housing.

65. Innogy Renewables UK supported the Welsh Government’s recognition “that renewable energy is a key part of the commitment to decarbonisation and tackling the causes of climate change”. It also welcomed the “inclusion of the Welsh Government’s renewable energy targets as a key driver of the NDF” but cautioned that these would need to be reconsidered in the light of the declaration of a Climate Emergency and the aspiration to be “net-zero” by 2050.

66. RSPB Cymru welcomed the emphasis on climate change and biodiversity decline. However, it believed there were “significant gaps” in how the policies could deliver the desired outcomes. As an example, it suggested the NDF should make it obligatory “that development contributes to nature recovery”. It added that “policies for nationally important sites and priority species are absent and must be included”.

67. Policy 7 states a commitment to supporting the increased use of ultra-low emission vehicles. Cynnal Cymru expressed the view that the rollout of electric vehicle (EV) charging infrastructure had been disappointingly slow.

68. Innogy Renewables UK cautioned that the, despite setting a strategic direction for EV charging infrastructure, the draft NDF does not “consider the new and/or upgraded grid infrastructure required to enable the roll-out of EVs”.

69. It suggested that Policy 7 or its supporting text “should be amended to be supportive in principle of the new and/or reinforced grid infrastructure required in parts of Wales to enable the effective roll-out of EV charging points”.

Conclusions

Conclusion 19. We believe the NDF is a key tool in addressing climate change. The NDF should look beyond decarbonisation and address other aspects of climate change such as flood risk, water management and the implications for coastal planning.

Conclusion 20. The climate change outcome should encompass housing and the outcome for homes and housing should address the types of homes Wales needs to build to address climate change.

Conclusion 21. The NDF should articulate the spatial dimension of its strategy for decarbonising transport and heating. It should set out more clearly how reduced reliance on private vehicles is to be achieved in both urban and rural areas.

Conclusion 22. The NDF should indicate how the delivery of vehicle charging infrastructure and heat networks is to be taken forward.

6. Housing

70. The draft NDF identifies a shortfall in the delivery of new homes and indicates that the provision of affordable homes should be a key focus for housing delivery.

71. Representatives of the housebuilding industry argued that the draft NDF focuses excessively on affordable housing and fails to acknowledge the important role of private housebuilders, including SME builders, in overall housing delivery.

72. The Home Builders' Federation said that the draft NDF should recognise the role of new housing in supporting economic growth, which could "play an integral part of the drive to create new employment opportunities linked to City and Growth Deals". It explained that:

"The demographic likely to be employed in the modern high-tech industries that the Welsh Government aims to attract will require appropriate volumes and types of new housing."

73. The draft NDF highlights the need to think about the types of homes and places Wales will need to meet the needs of an ageing society.

Estimate of housing need

74. The draft NDF uses the Welsh Government's Estimates of housing need in Wales by tenure (2018-based) publication which includes several different demographic scenarios. The draft NDF uses the central estimate, which suggests that:

- 114,000 additional homes are needed across Wales by 2038;
- during the first five years (2018/19 to 2022/23), an average of 8,300 new homes will be required annually, with 57% of them needed in South East Wales, 24% in Mid and South West Wales and 19% in North Wales; and
- affordability should be the key focus with 47% of new homes during 2018/19 to 2022/23 needing to be affordable housing (social housing or intermediate rent). This represents an average of 3,900 affordable homes and 4,400 market homes annually over the five years.

75. The estimates of housing need publication states that these figures should not be used as housing targets, rather they should “form a basis of discussion for policy decisions”.

76. Professor Ludi Simpson expressed the view that the figures quoted in the draft NDF probably underestimate housing need and emphasised they should not be regarded as targets.

77. The Planning Officers Society Wales suggested that 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”. The Home Builders’ Federation also expressed concern that the figures could be incorrectly interpreted as housing supply targets, saying:

“This important distinction was made by the Minister when the figures were released, and we would welcome confirmation and clarification in the NDF.”

78. The draft NDF states that the Welsh Government believes that a change in delivery model is required to deliver affordable homes at the scale and pace required and that the public sector must lead the way in shaping sustainable places. In his evidence, Professor Ludi Simpson stated that the commitment in Policy 5 that the Welsh Government will increase delivery of affordable homes has more the character of an aspiration than a plan and that the Welsh Government needs to set out the mechanisms which will be used to ensure that targets are met.

79. Savills expressed concern that specifying that 47% of new homes between 2018/19 and 2022/23 should be affordable could place heavy demands on the public sector and suppress delivery by the private sector. It explained:

“The draft NDF expects a much more significant number of affordable homes to come from the public sector almost immediately and there are clear practical difficulties in achieving this. This is accompanied by a lower contribution (than is currently being delivered) of other housing from the private sector. We doubt whether it is the intention of the NDF to suppress current performance but this is a realistic scenario based on proposed expectations.”

80. Planning Officers Society Wales said that the draft NDF “appears to be somewhat dismissive of the role the private sector, in particular, volume house-

builders, have in delivering Affordable Housing, which has been significant in the last 20 years”.

81. In its evidence, Federation of Master Builders Cymru stated that while the draft NDF referred to supporting smaller construction companies in rural areas, there were several practical impediments in terms of process and access to finance which made it difficult for them to develop on smaller sites.

Conclusions

Conclusion 23. The NDF should look at the housing sector as a whole and address the role of the private sector, including SME builders in housing delivery. This should include small sites not included in Local Development Plans.

Conclusion 24. The NDF needs to specify the mechanisms to be used to deliver new affordable housing on the scale envisaged by the strategy. The Welsh Government should explain how the “Independent review of affordable housing supply” it commissioned, and which reported in May 2019, will inform the NDF.

Conclusion 25. The NDF’s estimate of housing need should be updated based on the latest available evidence.

Conclusion 26. Any targets for affordable housing should be expressed as numbers, not percentages.

Conclusion 27. The housing needs of older people need to be given particular attention. National guidance on this should be provided by the NDF itself.

Conclusion 28. The NDF should recognise the importance of SME builders in providing housing in rural Wales and explore the potential for removing barriers to the construction of small housing developments of under 10 units.

Conclusion 29. The Committee is disappointed by the ongoing lack of progress in amending Part L (Conservation of fuel and power) of building regulations. The Welsh Government should set out its timetable for amending Part L.

7. Infrastructure and connectivity

82. Several contributors believed that the NDF needs to identify specific infrastructure projects to address the challenges and opportunities it outlines.

83. The introduction to the draft NDF indicates that it provides direction on “where we should be investing in infrastructure”. In its evidence, Innogy Renewables UK pointed out that the proposals for a new infrastructure planning regime in Wales state that decisions on nationally significant scale development “will be taken in accordance with the NDF”. However, large renewable energy developments are the only elements of infrastructure on which the draft document provides spatial guidance. Policies for the consenting of other large infrastructure projects, such as major transport, gas and waste infrastructure, which are also currently Developments of National Significance (DNS), are absent from the draft NDF.

84. In its evidence RSPB Cymru argued that the Welsh Government should give more consideration to the role of the NDF as a policy framework for making decisions on all DNS.

85. Innogy Renewables UK suggested that the Welsh Government should set out its “position on non-devolved projects”. It noted that the draft NDF only referred to nuclear policies.

86. In its second report, *Moving Up the Gears: Seven National Priorities for Action*, the UK2070 Commission calls for a “connectivity revolution”, to deliver improved connectivity between cities, sustainable multi-modal mobility within major urban areas, and connectivity beyond urban areas for marginalised communities in coastal and rural areas that have lost transport and local services. The proposals for Metros in North Wales, Swansea Bay and South Wales clearly accord with the second of these objectives. The *Beyond HS2* report identifies Cardiff as a city which would particularly benefit from a strategy of strengthening east-west rail corridors.

87. RTPI Cymru welcomed the attention given in the draft NDF to improving connectivity between south Wales/south-west England and north Wales/north-east England but expressed disappointment that the draft NDF omitted reference to north/south Wales connectivity. It said:

“The long-term plan should set a strong and clear vision for improving the notoriously poor links between north and south Wales.”

88. This was echoed by National Park Authorities, which noted that the draft NDF states that “Connections between North and South Wales are fragmented and it is not possible to travel by train without leaving the country”. It questioned the rationale for omitting from the NDF a policy or policies to address this problem.

89. In its evidence Planning Officers Society Wales drew attention to the role that freight policy might play in reducing climate change impacts and the need to clarify the role of Welsh ports.

90. RSPB Cymru pointed out that the Habitat Regulations Assessment had identified the need for further studies to be undertaken concerning Policy 20 for the Port of Holyhead.

91. Chapter 2 of the Draft NDF identifies the provision of access to a superfast fixed broadband speed as a current connectivity challenge. It points out that superfast broadband coverage in Wales remains below the UK average.

92. Chapter 4 states that the Welsh Government is committed to ensuring all parts of Wales are supported by the telecoms infrastructure they need and that it will identify Mobile Action Zones focused on areas of little or no coverage and where there is demand for new infrastructure. In its evidence, RTPI Cymru identified Mobile Action Areas as one of the policies which should be given spatial expression in the NDF.

Conclusions

Conclusion 30. The NDF should identify core infrastructure requirements and should provide a spatial framework to inform decision-making for all nationally significant infrastructure. The Welsh Government should set out its “in principle” position on non-devolved infrastructure projects and policies.

Conclusion 31. The NDF should include specific proposals to address connectivity issues within Wales in addition to those which cross the border with England. This should include improved connectivity between Welsh towns and cities, between urban and rural areas and also within rural areas. The NDF should also reflect the Welsh Government’s Active Travel priorities.

Conclusion 32. The Committee understands that there is greater demand for east-west transport connectivity in the major corridors in both north and south Wales, but the NDF should also address the poor connectivity between north and south Wales.

Conclusion 33. The Welsh Government’s commitments on digital infrastructure, including Mobile Action Zones, need to be given spatial expression in the NDF. Spatial policies for ports and freight transport require development.

8. Energy

93. As discussed earlier in this Report, contributors to the Committee’s work expressed the view that in the context of the decarbonisation agenda and climate emergency, the NDF needs to take a broader, more comprehensive view of opportunities and challenges in the energy sector.

94. Renewable UK Cymru believed the draft NDF “lacks a unifying strategic vision for Wales’ future energy system”. It said:

“A greater balance could have been achieved between proposing specific policy approaches for specific technologies and offering a more coherent view of how the energy system will need to accommodate decarbonising heat and transport.”

95. Savills believed that the lack of “reference to the grid issues is an omission to the document”. It argued that the relationship of energy generation and distribution via the National Grid in a UK context “must also be recognised and considered as part of the NDF”.

96. Several witnesses felt that the draft NDF focuses too narrowly on onshore wind and solar power developments, saying little about other renewable technologies or the onshore infrastructure requirements of offshore wind developments. Planning Officers Society Wales noted that:

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

97. In its evidence, Innogy Renewables UK pointed out that large renewable energy projects now devolved for determination in Wales had previously benefitted from unequivocal policy support in UK National Policy Statements. It expressed concern that this would no longer be the case. Innogy Renewables UK also argued that planning policy needed to address repowering and extending the life of renewable energy developments.

98. The draft NDF does not include reference to energy sources such as gas and oil. This appears to be a significant omission, given that Milford Haven is the biggest energy port in the UK.

Priority Areas for Wind and Solar Energy

99. The Welsh Government supports large scale onshore wind and solar energy development in the Priority Areas that it has identified. According to the draft NDF, there would be a presumption in favour of development for these schemes and an “associated acceptance of landscape change”.

100. The draft NDF states that guidance will be produced on the development of onshore wind and solar energy schemes in Priority Areas. No timeframe is provided for the development of this guidance. Implementation of developments within the Priority Areas will be monitored against the Welsh Government’s renewable energy targets.

101. Witnesses for the renewable energy industry made detailed criticisms of the methodology used to identify the Priority Areas. They argued that some of the least constrained areas have been excluded from the Priority Areas and that excessively onerous buffers have been drawn around environmental designations and that no separation distance from residential properties has been included. Representatives of the sector considered that the Preferred Area approach will unduly constrain opportunities to increase renewable energy generating capacity in Wales. Innogy Renewables UK explained that:

“less than 10% of the Priority Areas for ‘Solar and Wind Energy’ is suitable for onshore wind, and only 5% is ‘available’ once existing wind farms have been excluded. Furthermore, parts of the available areas are only likely to be suitable for <10MW projects that won’t fall under the DNS system and won’t be assessed against the NDF.”

102. Renewable UK Cymru said its analysis delivered similar assessments:

“the total area of developable (unconstrained) opportunity for the 11 priority areas which relate to onshore wind equates to approximately 5%. In these areas, it is likely that the vast majority of developable opportunities would relate to sites of less than 10MW capacity, and therefore not within the NDF’s remit.”

103. In its evidence, Innogy Renewables UK and Renewable UK stated that maintaining adequate separation between wind turbines and existing residential properties is an important consideration in safeguarding residential amenity and considered failure to take distance from residential properties into account to be a serious flaw in the methodology used to identify Preferred Areas.

104. Renewable UK Cymru and Innogy Renewables UK believed that the NDF should adopt a criteria-based policy framework for renewable energy developments.

105. RSPB Cymru said it wanted to “see more onshore wind and solar renewable energy as part of a range of measures to address the climate emergency. However, development needs to be strategically planned and located in places that are low risk to wildlife to avoid adding to biodiversity decline”. It explained that:

“The issues raised for biodiversity and ecosystem resilience are very different between solar and onshore wind technologies. The evidence used to derive Priority Areas seems to have been strongly informed by the landscape and visual impact of onshore wind.”

106. RSPB Cymru expressed concern that the wording of Policy 10 appears to weaken to protection of Sites of Special Scientific Interest (SSSIs) by requiring only that development minimises rather than avoids adverse impacts. It explained that “this also compounds a problem caused by the wording introduced in the published PPW (5.9.17) which potentially weaken SSSI protection”. It concluded that it had “been assured that this is not the intent of Welsh Government and urge that the wording of the NDF and PPW are revised”.

Conclusions

Conclusion 34. The NDF should set out a unifying strategic vision for the future of energy in Wales and be clear about the targets for electricity generation and decarbonisation to which the Welsh Government is working.

Conclusion 35. The NDF should provide a supportive framework for renewable technologies other than wind and solar, and address storage and the onshore infrastructure requirements of offshore wind farms.

Conclusion 36. The level of support for renewable energy developments provided by the NDF should not be weaker than that previously provided by UK National Policy Statements. Renewable energy policies should address repowering and extending the life of existing developments.

Conclusion 37. The NDF should set out the implications of decarbonising heat and transport for electricity demand and the transmission system.

Conclusion 38. The NDF should express a vision and strategy to support developments based on local energy distribution.

Conclusion 39. Policy 7 should be amended to address grid infrastructure requirements.

Conclusion 40. The NDF should adopt a criteria-based policy framework for renewable energy developments

Conclusion 41. Wind and solar developments are subject to very different constraints and have different potential impacts on wildlife, and should, therefore, be addressed by separate planning policies.

Conclusion 42. The NDF policy on wind and solar energy developments should accord the same level of protection to SSSIs as PPW.

Conclusion 43. The NDF should recognise the potential to secure environmental and recreational benefits in association with renewable energy developments.

9. Biodiversity, green infrastructure and the national forest

107. The draft NDF includes commitments to a strategic framework for biodiversity enhancement, support for strategic green infrastructure and the creation of a national forest. These policies were generally welcomed by witnesses, though some considered they could be more ambitious.

108. In reference to Policy 8 (Strategic framework for biodiversity enhancement and ecosystem resilience), RSPB Cymru emphasised that the NDF should include a “clear commitment to achieving net biodiversity benefit”. It expressed concern that “As written, the NDF policy is weaker than and inconsistent with Planning Policy Wales”. It suggested that:

“A cornerstone for nature’s recovery is safeguarding and achieving favourable condition of our most important wildlife sites. We want to see the inclusion of a protected sites policy covering Natura 2000 sites and SSSIs which is currently absent. As the top tier spatial plan, the NDF should include policies for spatially defined national designations.”

109. The statement supporting Policy 9 (National forest) indicates that the forest is likely to be dispersed across several locations, but no indication is given of where these might be. Dr Neil Harris commented that the proposal for a national forest “is nowhere identified within the strategy map”. He added that “stakeholders will be concerned that this is only ‘an idea’ at an early stage, and may be premature for inclusion in the NDF if nothing can be said spatially about its broad location”. Savills echoed these comments:

“No information is given even indicatively or on any spatial diagram or plan as to the location or extent of the Forest and caution must be given to the presence of existing resources and available sites in determining its extent and location(s).”

110. The Planning Officers Society Wales said the draft NDF does not explain how the Welsh Government will identify “delivery sites and mechanisms” to achieve the national forest. They believed this was particularly important, given the ambition “to increase woodland cover in Wales by 2000 hectares/annum from 2020 (i.e. next year)”.

111. In his evidence, Professor Dave Chadwick highlighted to role of trees in water and flood risk management and the important role of peatlands as carbon sinks.

Confor referred to the importance of riparian woodland in maintaining water quality. RSPB Cymru said:

“We support the inclusion in the NDF of policies for a National Forest and a Valleys Regional Park. We want to see these policies implemented in ways that also achieve the biodiversity and climate objectives of the plan. For example, the National Forest policy might be used to further the conservation of our globally significant ‘Celtic Rainforests’.”

112. Wildlife Trusts Wales highlighted the absence of any link between green infrastructure and the delivery of affordable homes.

Greenbelt

113. Several contributors referred to greenbelt policies in the draft NDF. Savills referred to the greenbelt in north-east Wales and cautioned that the policy needed further consideration. It suggested that the use of greenbelt “is increasingly considered to be a concept that imposes a restrictive approach to planning policy that has the potential to stagnate the housing market and too blunt and negative an instrument”. It suggested an alternative approach:

“Rather than a Greenbelt, it is proposed that areas of significant green infrastructure, potentially incorporating areas identified for the National Forest (Policy 9) is likely to be a much more useful and constructive approach to “conserving” countryside by placing it in a functional setting rather than a restrictive context.”

114. In any event, Savills noted that the strategic regional diagram that the National Growth Area overlaps the Greenbelt for the north-east Wales. It commented that “it is difficult to see how the two concepts can be merged”.

115. Planning Officers Society Wales described Policy 30 (Green belts in south east Wales) as “one of the most prescriptive policies in the Draft NDF”. It said there was an “absence of detailed evidence and analysis to support” the greenbelt requirement and added that:

“Designation of a greenbelt is a major long-term policy decision that should be based on robust evidence.”

116. The Home Builders Federation echoed this, saying:

“The concept of a green belt has been included without any evidence to support its need or location. The policy also states that it ‘must be’ provided rather than considered. Green belts also differ slightly to many planning policies in that they are permanently protecting an area for 50 years and are very infrequently reviewed. Green belts were established to limit urban growth, yet the two green belts identified in the NDF are both within the areas identified for growth.”

Conclusions

Conclusion 44. Biodiversity enhancement, ecosystem resilience, strategic green infrastructure and the national forest should be given spatial expression in the NDF. The NDF should set out how the commitments are to be delivered.

Conclusion 45. Policy 8 should be strengthened to state that biodiversity “must” rather than “should” be protected and should require that development contributes to nature recovery.

Conclusion 46. The NDF should identify national spatial priorities for biodiversity enhancement. There is a need to embed the requirement for the mitigation measures identified by the Habitats Regulations Assessment into the NDF. The national ecological network should address the needs of priority species.

Conclusion 47. The development of the national forest should take account of the potential role of tree planting in water and flood risk management as well as agri-food production. Planting to develop the national forest should avoid peatland.

Conclusion 48. The NDF should identify existing woodland assets. The national forest should further the conservation of globally significant Celtic rainforest.

Conclusion 49. The opportunity should be taken to make links between green infrastructure networks and the housing and urban renewal agendas. Links should also be made between green infrastructure networks, the national forest and the tourism and leisure agenda through initiatives such as the National Cycle Network.

Conclusion 50. There is a need for greater clarity on the role of green belts in national and regional strategy; the discretion accorded to SDPs in their definition; the relationship between and respective roles of green belt and green infrastructure; and the potential relationship of greenbelt with the national forest policy.

10. Assembly consideration of the NDF

117. The Planning (Wales) Act 2015 (the Act) requires the draft NDF to be considered by the Assembly before the final NDF is published. The Assembly will have 60 sitting days to consider it. We expect this statutory consultation period to begin in April 2020.

118. According to the Act, The Welsh Ministers must take account of any resolution or recommendations made by the Assembly, or any of its committees, in deciding whether or not the draft NDF should be amended.

119. The Welsh Ministers must publish a statement alongside the final NDF outlining how they have had regard to the Assembly's resolutions or recommendations.

Conclusion 51. The Business Committee, as the Assembly Committee with responsibility for considering Assembly procedures, should bring forward proposals to facilitate scrutiny of the final NDF in accordance with the Planning (Wales) Act 2015. It should do so in consultation with the Welsh Government, external stakeholders and Assembly Committees.