2020 Draft National Development Framework Research Briefing

October 2020





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Introduction

The Welsh Government has laid the **draft of its first National Development Framework (NDF) for Wales** before the Senedd.

The NDF is to be known as 'Future Wales – The National Plan 2040'.

Production of the NDF is a statutory requirement. It will set out the Welsh Government's strategy for addressing its national priorities through the planning system. The final NDF is due to be published in February 2021.

The process for developing the NDF began in 2016 and consists of a number of key stages. This briefing summarises:

- the 2020 draft NDF, and associated documents, laid before the Senedd in September 2020;
- how these proposals differ from those contained in the previous version of the draft NDF, which was consulted upon in 2019; and
- Senedd committee scrutiny of the 2019 draft NDF.

Senedd Research published a **separate research briefing** in 2019 to support scrutiny of the 2019 draft NDF. That briefing provides further historical background on the development of the NDF, including a summary of the 2019 draft and its precursor, the 2018 'NDF preferred option'.

1. Background

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 NDF will set out the Welsh Government's policies on development and land use in a spatial context. It will set out a 20 year land use framework and be reviewed at least every five years.

Unlike its predecessor, the **Wales Spatial Plan**, the NDF will have development plan status. This means that planning decisions must be made in accordance with it and all SDPs and LDPs must be in conformity with it.

SDPs are regional plans that will sit between the NDF and LDPs, and will deal with issues that cut across a number of local planning authority (LPA) areas (but are not of national significance). At the time of writing this briefing there is no statutory duty to produce SDPs, however the Welsh Government has said that the **Local Government and Elections (Wales) Bill** will mandate the preparation of SDPs.

The 2020 draft NDF document, discussed later in this briefing, includes a policy that 'requires SDPs to come forward'.

1.1. Purpose of the NDF

At the beginning of the process, the Welsh Government set out 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 SDPs and 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.

The latest version of PPW (Edition 10) was published in December 2018, having been revised to take account of the *Well-being of Future Generations (Wales) Act 2015.*

1.2. Developing the NDF

Work to develop the NDF began in 2016. The Welsh Government has **published a timeline** showing the stages involved in its development. This includes:

- developing a <u>Statement of Public Participation</u> (January September 2016);
- gathering evidence and undertaking 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 2019 draft NDF, considering responses and preparing the consultation report (August 2019 – June 2020);
- the Senedd considering the draft NDF and proposed changes (September November 2020); and
- publishing the final NDF (February 2021).

The Welsh Government had previously intended to lay the draft NDF before the Senedd in April 2020 and publish the final version in September, however this timeframe was changed as a result of the Coronavirus pandemic.

1.3. Senedd consideration period

The Planning Act requires the Welsh Ministers to lay the draft NDF before the Senedd for a 60 day 'consideration period'. The draft NDF must be accompanied by a report summarising the issues raised during the consultation process and how the Welsh Ministers have taken them into account.

The Minister for Housing and Local Government, Julie James, (the Minister) laid the **draft NDF** and the **consultation report** before the Senedd on 21 September 2020, and in doing so started the 60 day consideration period.

The Senedd can't 'approve' the NDF. Rather, the Welsh Ministers must take account of any resolution or recommendations made by the Senedd, or any of its committees, in deciding whether or not the draft NDF should be amended. The Welsh Ministers must publish a statement alongside the final NDF outlining how they have had regard to the Senedd's resolutions or recommendations.

2. Scrutiny of the 2019 draft NDF

The Senedd's Climate Change, Environment and Rural Affairs (CCERA) Committee and Economy, Infrastructure and Skills (EIS) Committee scrutinised the 2019 draft NDF in late 2019.

In addition to publishing the **2019 draft NDF research briefing**, Senedd Research commissioned Ludi Simpson, Professor of Population Studies at the University of Manchester, to **review the housing estimates in the 2019 draft NDF**. His paper was produced under the **Senedd Research Fellowship Scheme**.

2.1. Climate Change Environment and Rural Affairs Committee

The CCERA Committee held public evidence sessions on **24 October, 6 November** and **14 November**. The **Committee's report** (PDF, 1MB), published in December, drew 50 conclusions for the Welsh Government. The Welsh Government's substantive response to the Committee's conclusions is included in the **consultation report** laid by the Minister on 21 September 2020.

The Welsh Government accepted 47 of the Committee's 50 conclusions, albeit 22 of them in principle only. It accepted one conclusion in part and rejected the other two.

Significant changes made to the 2020 draft NDF that are consistent with the Committee's conclusions include:

- clearer links to other Welsh Government documents, such as Low Carbon Wales, the Wales National Marine Plan, the revised transport strategy currently being developed and the Wales Infrastructure Investment Plan;
- adding significantly more images including national and regional maps and diagrams to illustrate key issues and polices;
- providing more detail about how the NDF will be monitored and reviewed, including publishing a NDF monitoring framework;
- strengthening the NDF in terms of responding to climate change, for example by including a new policy on flood risk management;
- greater emphasis on rural communities; there are now separate policies on supporting rural communities and supporting the rural economy;
- switching to four regions ('North', 'Mid Wales', 'South West' and 'South East') rather than the three regions originally proposed ('north', 'mid and south west',

and 'south east' Wales); and

 greater emphasis on a criteria-based policy to renewable energy developments, alongside a spatial-based policy.

2.2. Economy, Infrastructure and Skills Committee

The EIS Committee **scrutinised the 2019 draft NDF** in November 2019, and **wrote to the Minister**. Again, the Welsh Government's response is included in the **consultation report** laid by the Minister on 21 September 2020.

The Committee was concerned by what it called the 2019 draft NDF's "lack of ambition". The Welsh Government strongly rejected this assessment saying that the 2019 draft NDF includes policies to deliver "radical improvements to how places look and function".

The Welsh Government did accept the Committee's concerns around the lack of progress at the regional level saying that the **Local Government and Elections (Wales) Bill** will mandate preparation of SDPs. The Welsh Government also agreed with the Committee's comments on strengthening transport connections within Wales and between Wales and elsewhere. The 2020 draft NDF includes new policies on international, national and regional connectivity.

The EIS Committee agreed with the CCERA Committee that four regions would be better than three. As indicated above, the Welsh Government also agreed with this.

3. 2020 draft NDF: 'Future Wales'

The Minister laid the **draft NDF**, the **consultation report** and associated other documents before the Senedd on 21 September 2020.

This includes a **schedule of changes** setting out how the draft NDF has changed as a result of the 2019 consultation and Committee scrutiny. This document is laid out in three columns, showing:

- the updated (2020) version of the draft NDF;
- the previous (2019) version of the draft NDF; and
- a combined version with tracked changes.

In her **statement** the Minister said the NDF will "help deliver decarbonisation, ecosystem resilience and inclusive, fair economic growth" and is to be known as 'Future Wales – The National Plan 2040'.

The full suite of documents laid before is Senedd is as follows:

- Draft NDF;
- Consultation Report: Summary (PDF, 786KB);
- Consultation Report (PDF, 3MB);
- Schedule of Changes;
- Habitats Regulations Assessment;
- Integrated Sustainability Appraisal: Non-Technical Summary; and
- Integrated Sustainability Appraisal.

In addition to the documents laid before the Senedd, the Welsh Government has published further documents on its website:

- 'Working draft' of the NDF this is the updated (2020) version of the draft NDF, including maps and images, set out as it might look as the final version. The Welsh Government states that it has been prepared to assist the Senedd's scrutiny.
- Monitoring framework setting out how the Welsh Government will monitor and review the NDF. A proposed monitoring framework was not published alongside the 2019 draft NDF.

The Welsh Government has also previously published an **explanatory paper on the future progression of the NDF** setting out the key factors which will inform the review of the NDF, including how it will be influenced by the Welsh Government's latest strategies and priorities.

This is accompanied on the Welsh Government website by a number of other **explanatory and background papers**.

3.1. 2020 draft NDF structure

The 2020 draft NDF retains the same overall structure as the 2019 draft. It has five chapters:

- **Chapter 1 is the introduction**. It sets out the purpose of the NDF and describes how it fits within wider Welsh Government policy.
- Chapter 2, 'Wales: an overview', outlines key challenges and opportunities over the next 20 years, supported by a series of contextual maps and other visuals. It discusses the issues of climate change, Covid-19 recovery, low carbon economy, renewable energy, natural resources, water and coasts, a changing society, housing, prosperity, travel and the four regions. The contextual maps and visuals are new to the 2020 version.
- Chapter 3, 'setting and achieving our ambitions' lists the 'Future Wales Outcomes', which are the Welsh Government's overarching ambitions for what it wants Wales to be like in 20 years' time, and sets out how the NDF will be reviewed. The information on how the NDF will be reviewed is new to the 2020 version.
- Chapter 4, 'strategic and spatial choices: Future Wales' spatial strategy', sets out a spatial strategy which includes a policy framework for all Wales issues of national importance and a 'strategic diagram' (i.e. a high level map).
- Chapter 5, 'the regions', sets strategy for nationally important issues in the four regions – North, Mid Wales, South West and South East. The 2019 version contained three regions: North Wales, Mid and South West Wales and South East Wales.

The 2020 draft NDF contains 36 policies (three more than the 2019 version), which it sets out in Chapters 4 and 5. A grid at the end of Chapter 5 shows the relationship between the policies and the outcomes they seek to achieve.

The outcomes and policies are described in more detail below.

3.2. Chapter 3 – Setting and achieving our ambitions

Chapter 3 sets out the 11 Future Wales Outcomes. While the supporting text has been amended, the outcomes remain the same as those in the 2019 version, with one exception: climate resilience has been added to the final outcome.

The Future Wales Outcomes are a "Wales where people live:

- 1. and work in connected, inclusive and healthy places;
- 2. in vibrant rural places with access to homes, jobs and services;
- **3.** in distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- 4. in places with a thriving Welsh language;
- 5. and work in towns and cities which are a focus and springboard for sustainable growth;
- 6. in places where prosperity, innovation and culture are promoted;
- 7. in places where travel is sustainable;
- 8. in places with world-class digital infrastructure;
- 9. in places that sustainably manage their natural resources and reduce pollution;
- 10. in places with biodiverse, resilient and connected ecosystems; and
- 11. in places which are decarbonised and climate-resistant".

Chapter 3 also describes how the Welsh Government intends to prepare and publish a review of the NDF every five years. The review will outline progress in delivering the Future Wales Outcomes, based on four key sources:

- National indicators the Welsh Government's 46 national wellbeing indicators aim to measure progress against the well-being goals established by the Well-being of Future Generations (Wales) Act 2015.
- Specific indicators linked to the NDF policies (see below).
- Integrated Sustainability Appraisal for the NDF (see below).
- "Contextual evidence and influencing factors" this includes the latest data, statistics and research, and Welsh Government policies and publications. The Welsh Government states that it will also invite people to submit evidence for consideration.

Further information on how the NDF will be monitored and reviewed can be found in the **monitoring framework document**.

3.3. Chapter 4 - Spatial Strategy (Policies 1 - 18)

The spatial strategy is described as a guiding framework for where large scale change and nationally important developments will be focused over the next 20 years. Policies within this chapter of the 2020 draft NDF identify key national and regional centres providing:

... a basis for long term infrastructure investment, [and identifying] priorities for the planning system and a framework for the management of natural resources.

The Spatial Strategy also sets out policies for issues of national importance including renewable energy, affordable housing, mobile communications, flooding and national and international connectivity. The policies and if/how they have changed from the 2019 draft NDF are summarised below.





Source: Working draft of the NDF (page 6)

Policy 1 – Where Wales will grow

This policy has been added to the 2020 draft NDF and expands on the introduction to Chapter 4 included in the 2019 draft NDF. The Welsh Government describes it as driving the delivery of the NDF Outcomes. The remainder of Chapter 4 (policies 2 - 18) sets out national policies that are "critical to the successful delivery of the spatial strategy".

It identifies three National Growth Areas – Cardiff, Newport and the Valleys, Swansea Bay and Llanelli, and Wrexham and Deeside – where there will be growth in employment and housing opportunities and investment in infrastructure.

The 2020 draft NDF also identifies a number of Regional Growth Areas which, through specific policies in SDPs and LDPs:

... should retain and enhance the commercial and public service base that make them focal points in their areas.

The Regional Growth Areas are:

South West

- Carmarthen; and
- The Pembrokeshire Haven Towns, including:
 - Haverfordwest;
 - Milford Haven;
 - Pembroke;
 - Pembroke Dock.

Mid Wales

- The Teifi Valley, including:
 - Cardigan;
 - Newcastle Emlyn;
 - Llandysul; and
 - Lampeter;
- Brecon and the Border;
- The Heart of Wales, including:
 - Llandrindod Wells; and

- Builth Wells;
- Bro Hafren, including:
 - Welshpool; and
 - Newtown;
- Aberystwyth.

North

- Holyhead;
- Caernarfon and Bangor;
- Llandudno and Colwyn Bay; and
- Rhyl and Prestatyn.

Policy 2 - Shaping urban growth and regeneration – strategic placemaking

This policy replaces policy 1 in the 2019 draft NDF.

The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixeduse centres and public transport, and integrated with green infrastructure.

The policy identifies a number of strategic placemaking principles and states that planning authorities should use development plans to establish a vision for each town and city, supported by a spatial framework.

Policy 3 - Supporting urban growth and regeneration - Public sector leadership

This policy has been amended from the previous version of policy 3 contained in the 2019 draft NDF.

The Welsh Government will assemble land, invest in infrastructure and prepare sites for development. It will work with partners to unlock the potential of their land and support them to take an increased development role.

Policy 4 - Supporting rural communities

This policy has been amended from the previous version of policy 4 contained in the 2019 draft NDF.

The Welsh Government supports sustainable and vibrant rural communities.

While the 2019 draft NDF stated that SDPs and LDPs **should** plan positively to meet the needs of rural communities, the 2020 draft NDF states that these plans **must** identify their rural communities, assess their needs and set out policies that support them.

Policy 5 – Supporting the rural economy

This is a new policy.

The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns.

It also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas, creating higher paid jobs.

Policy 6 – Town centre first

This policy is an updated version of policy 2 in the 2019 draft NDF.

Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport.

The Welsh Government can intervene in the planning application process where a town centre first approach is not being followed.

Policy 7 – Delivering affordable homes

While the wording of this policy is the same as policy 5 in the 2019 draft NDF, with the exception of minor changes, the evidence base used to estimate housing need has been updated. It also includes estimates of housing need for the four regions (as opposed to the three regions used in the 2019 draft NDF).

The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through SDPs and LDPs planning authorities should:

... develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.

The 2020 draft NDF uses the Welsh Government's **Estimates of housing need** (2019-based) publication which includes a number of different demographic scenarios. The 2020 draft NDF uses the central estimate which suggests that:

- 110,000 additional homes are needed across Wales by 2039;
- during the first five years (2019/20 to 2023/24), an average of 7,400 new homes will be required annually, with close to two thirds of them needed in the South East region, just over a fifth in the South West and the remaining additional homes needed largely in the North, with only a relatively small number needed in Mid Wales; and
- the provision of affordable homes should become a key focus for housing delivery. Under the central estimate, over the next five years (2019/20 – 2023/24), the annual additional homes needed are split almost equally between affordable housing (social housing or intermediate rent) and market housing.

It is important to note that the estimates of housing need publication states that these figures **should not be used as housing targets**, rather they "will be used to inform housing policy development".

The housing figures are broken down by the four regions later in the 2020 draft NDF, and are summarised in table 1. The 2020 draft NDF states that these estimates:

... should inform the housing requirements set out in SDPs and LDPs... it is expected the housing requirements will differ from the estimates of housing need.

2020 Draft NDF region	Additional homes need- ed by 2039	Percentage of addition- al homes in the first five years (2019-20 to 2023-24) that should be affordable homes
North	16,200	53%
Mid Wales	1,800	61%
South West	25,600	44%
South East	66,400	48%

Table 1: 2020 draft NDF regional housing figures

Source: **2020 working draft NDF** (pages 110, 134, 146 and 167), based on the Welsh Government's central **Estimates of housing need in Wales by tenure (2019-based)**

Policy 8 – Flooding

This is a new policy.

Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority.

Policy 9 - Resilient ecological networks and green infrastructure

This policy is an updated version of policy 8 in the 2019 draft NDF.

The Welsh Government will work with key partners to identify areas which should be safeguarded and created as ecological networks, and identify opportunities where existing and potential green infrastructure could be maximised.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies.

The 2020 draft NDF also states that any priority areas for action identified **in Area Statements** (prepared by Natural Resources Wales) are a material planning consideration and development plans should set out appropriate policies to safeguard and connect these areas.

SDPs and LDPs must be informed by Green Infrastructure Assessments.

Policy 10 – International connectivity

This policy combines policies 20, 25 and 32 in the 2019 draft NDF into one new policy.

It identifies the following Strategic Gateways to facilitate international connectivity:

- Cardiff Airport;
- Holyhead Port;
- Haven Waterway, including the Ports of Milford Haven and Pembroke Dock; and
- Fishguard Port.

SDPs and LDPs should support these Strategic Gateways by maximising the benefits they provide to their respective regions and Wales. New development

around these areas should be carefully managed to ensure their operation is not compromised.

Cardiff Airport has published **Cardiff Airport 2040 Masterplan** setting out 'ambitious plans for growth over the next 20 years to become a key gateway to the UK'.

Policy 11 – National Connectivity

This policy replaces and incorporates policy 7 on ultra-low emission vehicles in the 2019 draft NDF.

The new version of this policy incorporates the principle of making longer journeys possible by electric vehicle, it also includes wider priorities to support and invest in improving national connectivity.

The Welsh Government will work with **Transport for Wales** and other partners to:

- transform the rail network;
- invest in the development of the national bus network, increasing modal share of bus travel;
- invest in improvements to the strategic road network, including the creation of a network of rapid charging points for electric vehicles; and
- revitalise the National Cycle Network to create a network of traffic-free paths connecting cities, towns and countryside.

Planning authorities must ensure that, where appropriate, new development contributes towards the improvement and development of the National Cycle Network.

Policy 12 – Regional connectivity

This is a new policy.

The 2020 draft NDF outlines measures to improve regional connectivity such as prioritising active travel, improving how bus services are planned, and developing Metros.

Planning authorities must maximise opportunities arising from investment in public transport, including car-free development around metro stations.

Active travel must be an essential and part of all new developments and planning

authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points in new non-residential developments.

Policy 13 – Supporting digital communications

This is a new policy.

The Welsh Government supports the provision of digital communications infrastructure and services across Wales.

New developments should include the provision of Gigabit capable broadband infrastructure from the outset.

Policy 14 – Planning in mobile action zones

This policy has been amended from policy 6 in the 2019 draft NDF.

The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage.

The Welsh Government published its **Mobile Action Plan** in October 2017. The plan sets out how the Welsh Government will use the devolved levers at its disposal – such as planning and business rates – as well as working with the mobile phone industry and Ofcom (the communications regulator) to improve mobile coverage.

Policy 6 of the 2019 draft NDF stated "there is a presumption in favour for new mobile telecommunications infrastructure, provided that there are no significant adverse landscape impacts". This has been removed from the 2020 draft NDF.

Policy 15 – National forest

This is the same as policy 9 in the 2019 draft NDF.

The Welsh Government will identify sites and mechanisms to develop a national forest and will support action to safeguard proposed locations.

The Welsh Government's **Woodlands for Wales strategy** sets a target to increase woodland cover by at least 2,000 hectares per annum from 2020.

Policy 16 – Heat networks

This policy combines policies 14 and 15 in the 2019 draft NDF.

District Heat Networks are a method of delivering heating and hot water to

multiple buildings from a central heat source. The draft NDF states that they can be the most effective way of providing low carbon heat, particularly in urban areas.

Within Priority Areas for District Heat Networks planning authorities should identify opportunities and plan positively for their implementation.

The 2020 draft NDF states that proposals for large-scale, mixed-use developments of 100 or more dwellings or 10,000sq m or more of commercial floorspace should consider the potential for a heat network though there is potential for them below this threshold.

3.3.a Renewable energy policies (policies 17 and 18)

In **A low carbon Wales,** the Welsh Government sets out a range of policies and proposals relating to renewable energy, these include targets for the generation of renewable energy as follows:

- for 70% of electricity consumption to be generated from renewable energy by 2030;
- for one gigawatt of renewable energy capacity to be locally owned by 2030; and
- for new renewable energy projects to have at least an element of local ownership from 2020.

The 2020 draft NDF sets out two policies in relation to renewable and low carbon energy. Policies 17 and 18 contain strategic spatial and criteria-based policies that should be considered together in the determination of applications.

Proposals should ensure there is no significant unacceptable detrimental impact on the surrounding natural environment and local communities.

An assessment of on-shore wind and solar energy potential in Wales

prepared on behalf of the Welsh Government identified the Priority Areas (shown in figure 2) as the most appropriate locations to accommodate landscape change.

Policy 17 – Renewable and low carbon energy and associated infrastructure

This policy incorporates policy 13 in the 2019 draft NDF.

The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet future energy needs.

In Pre-Assessed Areas for Wind Energy the Welsh Government has already

modelled the likely impact on the landscape and has "found them to be capable of accommodating development in an acceptable way". There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18.

However applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment.

Policy 18 - Renewable and low carbon energy - Developments of National Significance

This policy combines policies 10, 11 and 12 in the 2019 draft NDF.

Proposals for renewable and low carbon energy projects (including repowering) qualifying as **Developments of National Significance** will be permitted, subject to policy 17 and the criteria set out under policy 18 in the 2020 draft NDF.

Developments of National Significance, including large-scale energy developments are determined by the Welsh Ministers. Examples include:

- all on-shore wind generation of 10 or more megawatts; and
- other energy generation sites with generating power between 10 and 350 megawatts.





Source: Working draft of the NDF (page 94)

3.4. Chapter 5 – The Regions (Policies 19 - 36)

The 2020 draft NDF states:

Regional planning will play an increasingly important role in the future and is central to our vision for a three tiered planning system.

The regional policies in the 2020 draft NDF focus on four areas – North, Mid Wales, South West and South East. This approach has been revised from the 2019 draft NDF, which used a three region model instead (North Wales, Mid and South West Wales, and South East Wales).

Policy 19 – Strategic policies for regional planning

This is an updated version of policy 16 in the 2019 draft NDF.

SDPs must be adopted for each region and should establish:

- a spatial strategy;
- a settlement hierarchy;
- the housing provision and requirement;
- the gypsy and traveller need;
- the employment provision;
- the spatial areas for strategic housing, employment growth and renewable energy;
- the identification of green belts, green corridors and nationally important landscapes;
- the location of key services, transport and connectivity infrastructure;
- a framework for the sustainable management of natural resources and cultural assets;
- ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and
- a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal.

3.4.a North (Policies 20 – 24)

The North region is comprised of seven planning authorities - Conwy, Denbighshire, Flintshire, Gwynedd, the Isle of Anglesey, Snowdonia National Park and Wrexham.



Figure 3 - Regional strategic diagram for the North

Source: Working draft of the NDF (page 109)

Policy 20 – National Growth Area – Wrexham and Deeside

This is the same as policy 17 in 2019 draft NDF.

Wrexham and Deeside are the main focus for growth and investment in the North region.

The SDP and LDPs across the region must recognise the area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

Policy 21 – Regional Growth Area – North Wales coastal settlements

This policy is an updated version of policy 18 in the 2019 draft NDF, although the 2020 draft goes further in identifying specific towns.

Sustainable growth and regeneration will be supported in regionally important towns along the northern Coast. Holyhead, Caernarfon, Bangor, Llandudno, Colwyn Bay, Rhyl and Prestatyn will be a focus for "managed growth".

The SDP and LDPs should recognise the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas.

Policy 22 – Managing growth – Green belts in the North

This is an updated version of policy 19 in the 2019 draft NDF.

The Welsh Government requires the region's SDP to identify a green belt around Wrexham and Deeside to manage urban form and growth. It must also consider the relationship with the green belt in Cheshire West and Chester.

Policy 23 – Supporting growth – North Wales Metro

This is an updated version of policy 21 in the 2019 draft NDF.

The Welsh Government supports the development of the **North Wales Metro** and will work with Transport for Wales, local authorities and other partners to enable its delivery. It will also work with authorities in north Wales and the north west of England to ensure the Metro and wider transport investments strengthen cross-border transport connections with improved transport links between the North, Chester, Liverpool and Manchester.

The SDP and LDPs must support the North Wales Metro.

Policy 24 – North West Wales and Energy

This is an updated version of policy 22 in the 2019 draft NDF.

The Welsh Government supports north west Wales as a location for new energy development and investment. Such development should support local and regional communities; provide jobs and investment in training and skills; and work with universities and businesses across the region and the north west of England to co-ordinate and maximise new investment. In determining applications for nuclear energy generating stations, consideration should be given to the need for further low carbon energy generation, their contribution towards the UK's energy mix and security, the economic benefits they would bring and their impacts on the natural and historic environment.

The 2020 draft NDF also states that developments associated with the **Isle of Anglesey Energy Island Programme**, Wylfa Newydd and Trawsfynydd will be supported in principle as a means to create significant economic benefits for the area as well as generating renewable or low carbon energy.

On-shore developments associated with offshore renewable energy projects will also be supported in principle.

3.4.b Mid Wales (Policies 25 - 27)

The Mid Wales region is comprised of Ceredigion, Powys and the majority of the Brecon Beacons National Park planning authorities.



Figure 4- Regional strategic diagram for Mid Wales

Source: Working draft of the NDF (page 129)

Policy 25 – Regional Growth Areas – Mid Wales

This is a new policy, due to the change to the four region model (as opposed to the three region model used in the 2019 draft NDF).

The Welsh Government supports sustainable growth and development in a series of inter-connected towns across the region. Development in these areas should meet the regional housing, employment and social needs of Mid Wales. The Regional Growth Areas for the region are listed under policy 1.

Policy 26 – Managing growth – Growing the Mid Wales economy

This is a new policy, due to the change to the four region model (as opposed to the three region model used in the 2019 draft NDF).

The Welsh Government supports the growth and development of existing and new economic opportunities across Mid Wales.

The SDP and LDPs must develop policies that support agricultural and land based traditional rural enterprises; and provide a flexible framework to support the development of new, innovative and emerging technologies and sectors.

Policy 27 – Supporting growth – Movement in Mid Wales

This is a new policy, due to the change to the four region model (as opposed to the three region model used in the 2019 draft NDF).

The Welsh Government will work with local and regional authorities to ensure transport investments improve accessibility across Mid Wales and strengthen cross-border transport links.

The SDP and LDPs should support improved transport links within the region and with other regions and England.

3.4.c South West (Policies 28 – 32)

The South West region is comprised of five planning authorities - Carmarthenshire, Neath Port Talbot, Pembrokeshire, Pembrokeshire Coast National Park and Swansea.





Source: Working draft of the NDF (page 145)

Policy 28 – National Growth Area – Swansea Bay and Llanelli

This is an updated version of policy 23 in the 2019 draft NDF.

Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. The SDP and LDPs should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

Policy 29 – Regional Growth Areas – Carmarthen and the haven towns

This is an updated version of policy 24 in the 2019 draft NDF.

Carmarthen and the four 'haven towns' (Milford Haven, Haverfordwest, Pembroke and Pembroke Dock) will be the focus for managed growth. The SDP and LDPs should recognise the roles of these towns as being a focus for housing, employment, tourism, public transport and key services.

Policy 30 – Managing Growth – Green belts in the South West

This is a new policy, due to the change to the four region model (as opposed to the three region model used in the 2019 draft NDF).

The Welsh Government supports the use of the SDP to identify and establish green belts to manage urban form and growth, particularly around Swansea Bay and Llanelli.

Policy 31 – Supporting growth – South West Metro

This is an updated version of policy 26 in the 2019 draft NDF.

The Welsh Government supports the development of the **South West Metro** and will work with Transport for Wales, local authorities and other partners to enable its delivery.

The SDP and LDPs should support the South West Metro.

Planning authorities should plan growth and regeneration to maximise the potential opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations

Policy 32 – Haven waterway and energy

This is an updated version of policy 25 in the 2019 draft NDF

The Welsh Government supports operations at Haven Waterway, the updated policy also recognises its location for potential new renewable and low carbon energy-related development.

When determining any applications for energy proposals, planning authorities should consider the contribution they will make to decarbonising energy supplies, the impacts on the landscape, seascapes, natural and historic environment and the economic benefits.

On-shore developments associated with off-shore renewable energy projects will be supported in principle.

3.4.d South East (Policies 33 – 36)

The South East region is comprised of ten planning authorities - Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taf, Torfaen and the Vale of Glamorgan.





Source: Working draft of the NDF (page 163)

Policy 33 – National Growth Area – Cardiff, Newport and the Valleys

This policy combines policies 27, 28 and 29 in the 2019 draft NDF.

Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. The SDP and LDPs should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government supports Cardiff's status as an internationally competitive city and a UK **core city**. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.

The Welsh Government also supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment, and co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities.

Policy 34 – Managing growth – Green belts in the South East

This is an updated version of policy 30 in the 2019 draft NDF.

The SDP must identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth, and must consider the relationship with the green belt in the West of England.

Policy 35 – Supporting growth – Valleys Regional Park

This is the same as policy 33 in the 2019 draft NDF.

The SDP and LDPs should embed the principles of a new **Valleys Regional Park** into their planning frameworks. The Welsh Government will work with others to support the regional park and maximise opportunities for new development.

Policy 36 – South East Metro

This is an updated version of policy 31 in the 2019 draft NDF.

The Welsh Government supports the development of the **South East Wales Metro** and will work with Transport for Wales, local authorities and other partners to enable its delivery.

Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.

3.5. Integrated Sustainability Appraisal

The 2020 draft NDF has been subject to an Integrated Sustainability Appraisal (ISA), the report for which has been **published in full** and as a **nontechnical summary**. The ISA aims to satisfy the requirements of **EU Strategic Environmental Assessment (SEA) Directive** and includes a number of other statutory and non-statutory assessments.

It is an iterative process that assesses the draft NDF against a framework of 17 social, economic, cultural and environmental objectives. The ISA report on the 2020 draft NDF draws the following conclusions:

- The Spatial Strategy would be expected to result in predominantly positive sustainability impacts, however there is a risk that the level of development proposed in the four regions will lead to an increase in flood risk, although this could be mitigated;
- The policies would be expected to have neutral or positive effects on the social and economic ISA objectives, which are related to improving education, health, economy, employment, connectivity, social cohesion and housing;
- More mixed impacts were identified for the objectives relating to protecting the natural environment, including energy and greenhouse emissions, air quality, flood risk, water, landscapes and townscapes, cultural heritage, biodiversity and geodiversity as well as natural resources, For most of these, it is unclear whether the positive or negative effects would outweigh the other; and
- Significant negative effects in the long-term were identified for policy 10 as it would encourage and support the maintenance of Cardiff Airport and other strategic gateways, which would be expected to continue to be major sources of greenhouse gas emissions as a result of air and shipping movements.

The ISA report makes the following recommendations to enhance the sustainability performance of the NDF:

- The NDF should maximise opportunities to strengthen links and connectivity between rural areas and more isolated communities with essential services, amenities and goods;
- There should be increased provision of green infrastructure to enhance the natural environment, including to facilitate the free movement of wildlife, as well as attractive and safe walking and cycling routes for people;
- The NDF could more closely consider the potential impact of dense development in urban locations on air quality and the extent to which this can be managed through the design and layout of development;
- Development in town and city centres could be required to enhance existing townscape character, through high-quality design measures; and
- The NDF could consider placing greater emphasis on, and providing more encouragement and support for, carbon neutral development.

3.6. Habitats Regulations Assessment

The 2020 draft NDF has also been subject to a **Habitats Regulations Assessment (HRA)**. The purpose of an HRA is to avoid a plan or project having a significant effect on European designated sites, either alone or in combination with other plans or projects.

The **Conservation of Habitats and Species Regulations 2017** implement the EU Habitats Directive and the EU Birds Directive. The Regulations apply the HRA process to Natura 2000 sites, which are designated under the two Directives, and also to **Ramsar sites**.

The HRA report for the 2020 draft NDF 'screened in' 24 of the 36 policies for more detailed assessment (called 'appropriate assessment'). This is compared to the HRA report for the 2019 draft screening in 20 of 33 policies. The conclusions are set out in Table 7 of the **HRA report**. In summary the report concludes:

- It is difficult at this "strategic stage of the development planning process" to be clear how strategic policy decisions may affect European designated sites, but early avoidance of issues has been a key element throughout the process for developing the NDF; and
- None of the policies in the draft NDF actively direct development in a way that the impacts could not be avoided or mitigated at the lower-tier (SDP/LDP) or project level.