Julie James AS/MS Y Gweinidog Tai a Llywodraeth Leol Minister for Housing and Local Government



Ein cyf/Our ref:

Russell George MS Chair of the Economy, Infrastructure and Skills Committee

21 September 2020

Dear Russell

Following extensive consultation on the draft National Development Framework (NDF) last year, I have, today, laid the revised draft NDF before the Senedd for a 60-day consideration period.

The NDF is accompanied by a consultation report setting out the issues raised during the consultation, a schedule of changes I intend to make following consideration of the consultation responses, and an updated integrated sustainability appraisal. They can be viewed here.

My response to the issues you raised after your initial consideration of the draft NDF is included in the consultation report, and is also appended to this letter. To support the scrutiny process I have today published two documents. The first sets out how I intend to monitor the NDF after its publication; and the second is a version of the schedules of changes document that has been laid in the format of the draft NDF document that was consulted upon last year. These documents are available to view

I will be tabling an amendable motion in government-time to provide an opportunity for the Senedd to express its views on (but not approve) the draft NDF. The debate will take place during the Senedd's 60-day consideration period so the Government can reflect on the issues raised together with any recommendations from Senedd Committees in a timely manner.

During last year's consultation on the draft NDF, Senedd members expressed to me the importance of everyone being able to understand what the NDF was and what it would mean for them. Some thought the name 'national development framework' did not set out what the NDF was or would do. I have reflected on this and asked Children in Wales to help develop a new title. They suggested the name 'Future Wales – The National Plan 2040'. On publication, the NDF will be known by this new name and referred to in short as Future Wales. You will see this new name appearing on some of the documents that will support the scrutiny process.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

I look forward to working with the Senedd on the completion of Future Wales, our first National Development Framework.

Yours sincerely,



Julie James AS/MS
Y Gweinidog Tai a Llywodraeth Leol
Minister for Housing and Local Government

Welsh Government response to Economy, Infrastructure and Skills Committee letter of 5 February 2020 regarding the draft National Development Framework.

Issue Raised Response

1. The framework seems to lack ambition. When drafting a key national planning document like this, there is an opportunity to set the agenda and make changes which will address big issues in society such as tackling climate change and economic and social inequality. The Committee felt that this opportunity has been missed somewhat.

We do not accept the Committee's assessment that the draft National Development Framework (NDF) lacks ambition. The NDF includes a vision and the policies to enable and deliver radical improvements to how places look and function across the country. The vision and policies reflect the wider strategic framework in which the NDF sits, which includes the Economic Action Plan, Low Carbon Wales and the Wales infrastructure Investment Plan.

The NDF is seeking to address significant and long term challenges, including the climate and environmental emergencies. It is explicitly seeking to enable a modal shift in travel methods and to reduce distances between people's homes, their jobs and the services they use. It is committed to placemaking – the method of planning that places value on having excellent access to services, community facilities and open spaces in communities. The net result would be a more decarbonised society that is less reliant on cars and healthier, more sociable communities with vibrant local services. In this regard, the NDF is perfectly aligned with the Welsh Government's commitment to revitalising town centres, to develop Metro transport systems and to enhance our natural resources.

A 'lack of ambition' is a term used in some consultation responses that want the NDF to allow widespread exploitation of greenfield land for the development of new poorly-located commuter towns and 'anywhere' estates. Focusing on opportunities to regenerate and renew town centres by promoting mixed developments and better sustainable transport infrastructure in existing towns and cities is ambitious because it is not the easiest option to take. It is the approach that is most likely to prioritise using brownfield land and the approach that is most likely to lead to more sustainable lifestyles.

As an estimate, new homes developed over the next twenty years will account for 8% of the housing stock. The NDF does not focus solely on planning for

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155	de Naiseu	this 8% of homes – it also provides a vision for how all places will be healthier and more vibrant in future. The NDF vision will influence other Welsh Government documents. The mechanisms for reviewing the NDF every 5 years (or sooner) will ensure it can influence and be responsive to the emergence of related strategies and plans, including: the Wales Infrastructure Investment Plan, the Wales Transport Strategy and recommendations of the National Infrastructure Commission for Wales. A vision for how the NDF will develop with each review is set out in a paper on the NDF Monitoring Framework. Financial Implication: None.
2.	The Committee is concerned that this lack of ambition means the NDF's will not create the correct space to foster growth in the economy. Professor Goodstadt stated "what's missing is some sense of the overall scale of the Welsh economy and what that should be" and referred to the document as only setting out a "trend-based view of life."	The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies and context necessary to achieve them. It is not the role of the NDF to set the Welsh Government's overarching economic policy as these can be found elsewhere in the Programme for Government and Economic Action Plan. The NDF provides the context for the planning ambitions set out in Welsh Government policies to be translated through Strategic and Local Development Plans which will put more detail on anticipated levels of sustainable economic growth, leading to greater fairness and equality between areas. Financial Implication: None.
3.	For example, the NDF does not mention the foundational economy despite this being a clear priority of the Welsh Government, indeed the UK2070 Commission has noted that Wales is leading the way this field. The foundational economy approach should be noted in, celebrated by and built on in the NDF.	The Welsh Government's approach to the foundational economy is currently being developed by the Minister for Economy, Transport and North Wales as one of the key features of the Economic Action Plan. It is difficult to frame national, strategic land use planning policies around this sector given its nature as something which is very locally based and driven by need within a tightly defined area.

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		Amendments to the NDF include reference to the importance of the foundational economy throughout Wales. The Welsh Government will also consider what other planning guidance could be issued to planning authorities and others to help develop this sector. Financial Implication: None.
4.	The lack of ambition in the document is also evident in that it does not set out specific pieces of key large transport infrastructure. For example, the Committee would have expected more details the planned Metros included in the NDF.	The NDF must be considered alongside other Welsh Government strategies and programmes. The Welsh Government will publish a new Wales Transport Strategy in 2020 which will set out the vision, priorities and desired outcomes for transport. The Strategy will be aligned with the NDF and support its spatial strategy which directs where new development and infrastructure investment will be focused. A new National Transport Delivery Plan will be produced to support the delivery of the Wales Transport Strategy and the NDF. The long term infrastructure needs of the country will also be identified by the National Infrastructure Commission for Wales (NICW). The NDF is a vehicle for setting direction and co-ordinating investment in infrastructure with a wider strategy for development, to ensure the benefits of infrastructure investment is maximised. The NDF will be published before NICW provides its recommendations. There will be stronger alignment and reciprocity between key documents as the full suite of relevant strategies and plans are put in place. Financial Implication: None
5.	The Committee was concerned about the sequencing of the national, strategic and local plans. Most Local Development Plans (LDPs) have been developed and clearly the work to develop the NDF is well underway. However very little work has been undertaken at the regional level on Strategic	The Welsh Government is committed to a three-tiered development planning system. The Planning (Wales) Act 2015 introduced the ability for local planning authorities to collaborate to produce SDPs. Although the relevant powers were commenced in 2015, proposals for SDPs have been slow to come forward. The Local Government and Elections (Wales) Bill will mandate preparation of SDPs, with governance provided by Corporate Joint Committees. The NDF further mandates the preparation of SDPs by providing a focus on regional

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Development Plans (SDPs). The Committee understands that we will be well into the 2020s before the first SDP is up and running. At this point we will be into the second, if not the third iteration of the NDF. Having some LDPs developed ahead of the NDF, and well ahead of the SDPs seems to present a risk of a disjointed approach to strategic planning. The timeframe before we see the three levels of plans working in order and harmony also is of concern. The Committee would like some reassurances around the speed of the SDPs and remaining LDPs coming forward and how the Government will ensure this lag between the three levels does not harm the NDF's ability to provide the correct spatial plan to address the key national priorities it sets out to do.

Response

planning, with Chapter 5 setting a framework for the preparation of SDPs (Policy 19). The NDF's regional policies will focus Welsh Government and key stakeholder action and investment in the four regions, identify key strategic spatial issues, and provide a framework for the co-ordination of national economic, housing, regeneration, environmental, flooding, energy, rural and transport policy delivery.

Recognising that SDPs are not yet in place, the NDF policies also set out key regional issues identified across the NDF process to provide a starting point for the preparation of SDPs and a regional context for the planning system in advance of the adoption of SDPs. As SDPs are required by law to be in conformity with the NDF, the regional content of the NDF provides a clear outline of the matters SDPs must address while enabling regionally-distinctive approaches to be developed

An important feature of the three-tiered development planning system will be the ability of higher tier plans to be influenced by the emergence and adoption of other development plans. It is anticipated that Strategic Development Plan evidence bases will form part of the evidence base for future NDFs. In time the NDF, SDPs and LDPs will inform and shape each other and this relationship will ensure a strong, effective planning system at all levels.

Financial Implication: None.

6. The Committee felt that the document was light on improving transport links between Welsh regions and cross-border with England. Both north-south and east-west connectivity could be greatly improved. This could be via direct links within an all-Wales integrated transport network, emphasising opportunities to develop public transport links and active travel. As well as helping people navigate easily around Wales this network

The NDF will be strengthened in response to consultation responses relating to transport issues. Chapter 4, which covers the national strategic matters, has been expanded with three additional policies on International, National and Regional Connectivity.

Proposed Policy 10 – International Connectivity

This policy sets out how the Welsh Government will support international connectivity at Cardiff Airport, Holyhead Port, the Haven Waterway and the Fishguard Port. This policy integrates what were three regional policies in the draft NDF.

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could also transport people into local hubs where they can travel onwards to England, Ireland and further afield.	Proposed Policy 11 – National Connectivity This policy sets out how the Welsh Government will support and invest in improving national connectivity. It identifies that our priorities are to encourage longer-distance trips to be made by public transport, whilst making longer journeys possible by electric vehicles, and also supports strengthening of the National Cycle Network. Proposed Policy 12 – Regional Connectivity This policy sets out how the Welsh Government will support and invest in improving regional connectivity. It sets out our priorities for both urban and rural areas. The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity. Financial Implication: None.
7. Although sea travel is not devolved, ports are. Whilst the Committee understands it's unlikely any new ports will be developed, infrastructure links to ports should feature in the document.	This policy position will be supported by the introduction of a new International Connectivity Policy in Chapter 4 of the NDF which identifies Holyhead Port, Haven Waterway and Fishguard Port as Strategic Gateways. Planning Policy Wales (PPW) sets out the national policy position regarding ports and acknowledges the important role they play in the economy and the sustainable movement of freight. PPW recognises that functional and attractive ports which meet current and future demand, make Wales an attractive location for businesses, visitors and freight transportation. As set out in PPW, the Welsh National Marine Plan (WNMP) provides a vision within which ports can plan their current and future operations, including options for expansion and diversification. Planning authorities must consider the land use implications of the WNMP when preparing their development plans.

Issue Raised	Response
	Financial Implication: None.
8. The Committee was not convinced by the argument for Wales to be split into three regions. Whilst it understands SDPs need not cover the whole of a region, it feels the Mid and South West Wales region would be better split with Mid Wales and South West Wales being regions to reflect their distinct characteristics.	It is agreed that the NDF would be enhanced by a four-region approach. The NDF will be presented on a four-region basis comprising North, Mid, South West and South East regions. Financial Implication: None.