

Senedd Cymru
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Materion Gwledig
Craffu ar Fframwaith Datblygu Cenedlaethol
Cymru
CCERA(5) NDF(v2) 05
Ymateb gan Sefydliad Cynllunio Trefol Brenhinol
Cymru

Welsh Parliament
Climate Change, Environment and Rural Affairs
Committee
National Development Framework for Wales
CCERA(5) NDF(v2) 05
Evidence from Royal Town Planning Institute
Cymru



The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum, which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to respond to the above call for evidence from the Committee.

RTPI Cymru welcomes the progress made on the National Development Framework / Future Wales (NDF). In particular we recognise the impact COVID19 has had on Government resources and the bringing forward of projects and plans. We congratulate Welsh Government on progressing this important Plan that can help to shape the future of Wales in these difficult times.

As part of our [Plan the World We Need campaign](#), RTPI Cymru called for the NDF to come forward as a priority, to provide the framework to strategically guide development in Wales. We believe it will have an important role to play in identifying infrastructure projects and other development at a time where there is uncertainty around the future of planned projects, infrastructure finance and as the UK leaves the European Union.

It is important to recognise the spatial distinctiveness of places in developing policy. At the national level, it will be the NDF which can facilitate an integrated approach, linking decisions

on economic development with those on housing, climate change, energy generation, transport, and other infrastructure, providing a spatial framework for investment.

RTPI Cymru welcomes the working draft of the Plan and the progress that has been made. In particular, we welcome inclusion of a new paragraph (pg4) setting out the challenges of the climate emergency, the ecological emergency and the global health pandemic and the role of the NDF as a lever in delivering change in the face of these challenges.

We note the improved links with other investment areas, in particular we support the promotion of public transport and active travel within the Plan. It will be important for programmes of investment at the national level to fit within the spatial framework provided by the NDF and at the regional level to be aligned with Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

We also welcome the strengthening of links with other plans, creating a more joined-up policy framework in Wales, for example we support the efforts to link the Marine Plan and NDF – timescales for the production of the Marine Plan and NDF have overlapped, enabling the production of both plans to be joined up. We are pleased this joint working includes “identifying opportunities to share evidence and expertise” and that this will continue as both plans are implemented and reviewed. We recognise the difficulties in aligning plans and timescales, but where possible the opportunity to create these links will provide a stronger framework. We recognise this is the first version of the NDF and future versions will help the Plan mature and forge further links over time. The second revision for example will allow alignment with SDPs, which will develop over the next few years. We have seen this positive evolution take place in Scotland.

For the NDF to be successful, it is essential that its role in delivering Welsh Government objectives across all policies is understood and embraced. It is a powerful tool providing a comprehensive national spatial strategy which links investment decisions across Government, public authorities and private investment.

While there are many improvements, there are also areas that we believe could go further in the final Plan.

We recognise the challenge of achieving a sustainable pattern of development for the longer term, while taking into account climate change and other agendas that require us to look beyond the 20-year horizon and develop policies to achieve a longer-term objective for an uncertain future. We feel the NDF poses an opportunity to push boundaries in the longer term planning for Wales. For example, we were pleased to see this version of the Plan recognise flood risk and climate change resilience, and feel the plan could go further to address the issue of coastal adaptation in the future. While we acknowledge that this currently might be beyond the term of the Plan, the NDF could be starting to set the agenda.

The working document sets out 11 outcomes, but does not appear to follow these through the document. The outcomes do not appear to have directly linked actions or outcomes. It needs to be clear 'where we want to be in 20 years' in relation to the outcomes.

Long-term sustainability goals, including climate change must remain priorities and at the forefront of planning for the future in Wales. We urge Welsh Government to be bolder in its approach to integrating responses to climate change into its policy frameworks.

The links between the maps and the policies in some cases could be strengthened, for example:

- The map on pg 75 sets out “flood warning areas”, including for example large areas of Newport and Cardiff. Further explanation would help the interpretation of these areas to provide clarity and improve understanding.
- The diagram and proposals on pg 163 for South East Wales indicate the whole of the Vale of Glamorgan as a national growth area, despite being a major agricultural area and important open countryside close to Cardiff. Whilst we appreciate the nature of the diagram, they could be mis-interpreted given the development plan status of the NDF. In the absence of the detailed justification, the proposed area for development needs to be more narrowly defined in the text and diagram to protect the best farmland and to preserve areas of countryside.
- While we support the promotion of public transport links and active travel in the Plan, the continuing role of road transport, where there are no alternatives, should be recognised by the Plan. We note the map at pg 88 - the only North South link in the east is mainly in England. While that reflects the continuing reality of rail links the existence of North-South road links in Wales should also be recognised on the diagram. In relation to this we welcome the support for the “necessary investment in charging infrastructure” required to embrace the adoption of electric vehicles, as well as the link to “an increase in generation of renewable energy to support the increased demand for electricity”. The commitment to work with network operators and supporting innovation in hydrogen is also welcomed. (pg86)
- We appreciate the analysis set out in the regional maps, but we would suggest a separation / differentiation of baseline information (existing features) and proposed policy features.

In terms of the policies set out in the Plan, further explanation and clarification would be helpful in some areas, for example:

- Policy 25 (Regional Growth Areas) refers to “Brecon and the Border” but there is no explanation of what is considered to be “the Border”. (pg130)
- Further guidance on the relationship with the City Deal initiatives would be useful clarification. (see The Regions chapter)
- In relation to Policy 15 (National Forest) unfortunately there is insufficient detail to properly comment on this policy and it is unclear how the policy will work in practice (pg92), although we appreciate this is a new developing policy area.
- In relation to policies 17 and 18 (Renewable and Low Carbon Energy Development), the NDF should include a clear statement that it is the highest tier of development plan for Developments of National Significance proposals. We note that the supporting text to Policies 17 and 18 states “The Welsh Government will use regional energy planning to identify opportunities for all types of renewable projects”(pg99). Clarification of the relationship between the NDF and SDPs is needed, to avoid conflict and confusion in the decision making process.

- We note that Policy 19 (Strategic Policies for Regional Planning) (pg102) of the Plan sets out that SDPs should “provide a framework for minerals extraction, the circular economy, including waste treatment and disposal”. We would argue that longer term planning and guidance is required in relation to minerals and waste and should be more prominent in the NDF.

We note the addition of a number of maps in Chapter 2 which are set out to provide an overview of the current situation of various spatial indicators. They are useful as an overview but it would be useful if a link could be provided to a source for them to be viewed in more detail. The overview chapter is useful in highlighting the strengths and weaknesses which the NDF can address.

We note the proposals for the preparation of SDPs, required in all four regions of Wales. We are also aware of the current Welsh Government consultation on the draft regulations which will create four regional Corporate Joint Committees to exercise functions relating to strategic development planning, regional transport planning and economic well-being of their areas. Bringing forward SDPs at a regional level will enable us to address the more complex regional spatial issues that cross boundaries and may require different responses across Wales. While some SDPs might need to focus on housing, employment, and transport, others might require a focus on the natural environment etc.

Adequate resourcing of the planning function to support each level is vital. Resources for planning are important in achieving effective integration and ensuring alignment with spatial plans. This needs to include the emerging SDPs at the regional level, the well-established Local Development Plans (LDPs) within local authorities, and Place Plans for those communities which have them. Local planning authorities have lost significant capacity in recent years. A well resourced, plan-led, positive planning service can deliver corporate objectives, which, if properly encouraged and effectively organised can bring together objectives across services and help achieve local and national sustainable development and climate action goals. Corporate management teams provide leadership, vision and priority setting for areas, by shaping the strategic operational direction and investment decisions of local authorities. The implications of these corporate decisions on new investment, infrastructure, development activity, local services and policy delivery are significant, particularly at this time. The RTPi believes that making the role of the Chief Planning Officers a more prominent and strategic position within local authorities would positively influence outcomes and support good growth and a balanced recovery.

If you require further assistance, please contact RTPi Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk