



Written submission by Neil Harris in advance of evidence session on the National Development Framework for the Climate Change, Environment and Rural Affairs Committee

Thank you for the opportunity to present evidence to the Committee. This is a short written submission summarising my views on the consultation version of the Welsh Government's National Development Framework (NDF).

I very much welcome the introduction of the NDF. It will be **an important replacement for the Wales Spatial Plan** and will provide a valuable means of articulating some of the key spatial challenges facing Wales. The Wales Spatial Plan was an interesting and innovative document and it was disappointing to see the significant loss of political support and momentum following the second version of the Wales Spatial Plan. The NDF is a different document – in terms of status and a closer focus on land use and development – yet it fulfils some similar functions.

The Welsh Government is **commended for producing the NDF in multiple formats** for different audiences, including the easy read version and the young people's version.

It is clear that **the NDF is performing several different roles**. These include identifying some of the spatial patterns and trends affecting Wales in the next two decades, and translating into the planning system some of the wider policies of the Welsh Government. The consultation version of the NDF certainly tries to address some of the criticisms made of the Wales Spatial Plan by setting out clearer policies on development, and providing a clearer steer for other scales of the development plan framework. **The NDF is particularly focused on setting the scene and outlining the expectations for Strategic Development Plans**. The NDF operates broadly within a subsidiarity principle, and so only deals with key planning and development issues of national importance.

The **relationship of the NDF to Planning Policy Wales** is critical. Chapter 2 addresses 'challenges and opportunities', yet there is very little spatial exploration or representation of these challenges and opportunities as they affect different parts of Wales. This chapter therefore largely echoes text either found within or better placed in Planning Policy Wales. I had **anticipated more mapping of how these challenges and opportunities affected different parts of Wales** – e.g. where is population changing significantly, which places are most impacted on by an ageing society, where are natural landscapes under pressure, which are the ecosystems that we depend on, where are inequalities between places most acute, etc? I had **expected this section and part of the NDF to add far more value and spatial understanding** to planning and development issues across Wales. This is key to adding value that goes beyond the themes and issues already addressed in Planning Policy Wales.

The NDF states in chapter 3 a series of 'outcomes'. It is **positive that the NDF is focused on the outcomes it will help deliver**. This again will help it to address some of the criticism made of the

predecessor Wales Spatial Plan. These outcomes are nevertheless sometimes expressed very generally, and it will be **difficult to always monitor progress towards these outcomes**.

Chapter 4 of the NDF sets out strategic and spatial choices. 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**.

The NDF includes a spatial strategy map. This very generally identifies ‘international connections’, but does not provide any sense of where these places connect to. Similarly, there is very general indication of cross-border linkages with adjacent areas of England, yet without any sense of what these are or how they are important. The **strategy map feels very ‘static’ and a representation of existing features**, rather than a forward-facing strategy for the next 20 years.

Various stakeholders have called for ‘more detail’ to be provided in the NDF. There are good reasons for **keeping the NDF concise and focused on key issues of national significance**. There is a case for resisting calls for much more detail in the NDF. 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. There are nevertheless good reasons for calling for **more specificity on key issues**. For example, the reference to towns and cities ‘with good public transport links’ as a focus for growth could be refined to establish what this means, perhaps some criteria established, and indeed these settlements could then be identified. Similarly, where in Wales has there already been significant public sector investment, and where is this planned in future? There is a commitment to explore public sector land holdings, yet a well-developed NDF would at least be able to map such landholdings across Wales to support a spatial strategy. The NDF refers to strategic green infrastructure, but does not map this, despite referring to maps produced by Natural Resources Wales. These are all **missed opportunities for the NDF to be more specific and to be more spatial**. A similar theme is the reference to ecological networks that ‘will be identified’. These are critical areas for a NDF to explore and represent and should feature within the NDF itself. The same is true for a proposal for a National Forest, which is nowhere identified within the strategy map. 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.

The NDF provides more detail for large-scale wind and solar renewable energy developments than for any other thematic area or sector. This leads to a sense of **uneven consideration of different topics** within the NDF.

Chapter 5 addresses the regions of Wales. Some 25% or so of the NDF is dedicated to steering the preparation of Strategic Development Plans for three identified regions. This appears to me to be one of the more important functions of the NDF as presented. I would argue 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. The NDF is nevertheless very much dependent on SDPs for effect and implementation.

The region of Mid and South West Wales is extensive and does not properly reflect some of the functionality of regions for planning and development purposes in Wales. This is due to the selection of existing economic regions on which to base a National Development Framework. 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.**

There is some inconsistency in how some policies for the regions of the NDF are expressed. For example, there is a policy stating Welsh Government support for ‘identifying and establishing’ Green Belts in north Wales. This seems to steer work on SDPs and leaves open the exploration of whether to establish a Green Belt. The explanatory text supporting the policy then appears to go further and state that ‘SDPs must identify a Green Belt’. **This working relationship between the NDF and SDPs needs some further exploration.** Does the NDF propose a Green Belt and the SDP then only needs to define its boundaries? Or will the body responsible for the SDP be able to explore whether a Green Belt is an appropriate policy tool for inclusion in the SDP?

The NDF is a statutory development plan. I would have expected a plan of this kind to **include or set out some form of monitoring framework** as part of the framework itself. This appears to be absent from the consultation version of the NDF.

In summary, I welcome the publication of the draft of the NDF and the opportunity to comment on it, and my view is that the consultation version of the NDF needs in the process of revision:

- To provide a clearer spatial portrait of how the challenges and opportunities identified in chapter 2 play out across Wales as a whole, including the inequalities that exist between the different parts of Wales. This would involve selected mapping of existing and future patterns and trends.
- To be more specific about the outcomes to be achieved by the NDF, so that these are specific and measurable.
- To include a more refined spatial strategy map.
- To include more specific material to support some of its proposals, including strategic identification of opportunities for a national forest, identification of strategic public land holdings etc.
- To clarify the relationship between certain policies in the NDF – especially those on Green belts – and the work to be carried out in preparing SDPs.
- To include a section on the monitoring framework to be used for evaluating the NDF.

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