

Julie James AM
Minister for Housing and Local Government

6 February 2020

Dear Julie,

As the National Development Framework (NDF) is a cross cutting document the Economy, Infrastructure and Skills Committee (EIS) held evidence sessions with stakeholders to examine the proposals relevant to the Committee's remit. The Committee is aware that the Climate Change, Environment and Rural Affairs Committee (CCERA) has undertaken a much deeper inquiry into the draft NDF and has published a report on the matter so I have copied this letter to its chair, Mike Hedges.

Following our sessions, the EIS Committee would like to raise the following points:

- 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.
- 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."



- 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 in this field. The foundational economy approach should be noted in, celebrated by and built on in the NDF.
- 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 of the planned Metros included in the NDF.
- 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 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.
- 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 could also transport people into local hubs where they can travel onwards to England, Ireland and further afield.

- 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.
- 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.

Although the Committees undertook work separately there are common areas where we share concerns. You will note the EIS concerns around inter-region and cross-border connection are shared in conclusions 1 and 6 of the CCERA report, similarly the Committee's concerns regarding the lack of mention of ports and the foundational economy are shared in conclusion 7 of the CCERA report.

I hope you find these comments useful when considering further development of the draft NDF and would welcome any feedback on the points we have raised.

Kind regards

A handwritten signature in black ink that reads "Russell George". The signature is written in a cursive style with a long horizontal flourish underneath.

Russell George

Chair, Economy, Infrastructure and Skills Committee