

National Development Framework Consultation Response Form



This response is from the **Morgan Academy** at Swansea University.

The Morgan Academy, named after the late Rhodri Morgan, former First Minister of Wales and Swansea University Chancellor, is a research-based think tank created to deal with the pressing “wicked issues” of public policy in Wales and the wider world. Based in Swansea University, the Morgan Academy works across subject disciplines, promoting critical thinking and working collaboratively to promote innovative evidence-based policy.

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To inform this response we received views from the following colleagues at Swansea University:

Name	Acronym used in this response	Area of Expertise	Special projects
Professor Don Webber	DW	Economics	
Dr Laurie Hughes	LH	Business	
Dr Alan Sandry	AS	Political Science	Economies of identity (a Morgan Academy project)
Dr Aled Eirug	AE	History; Media	City Region Deals (a Morgan Academy project with WISERD)
Dr Simon Brooks	SB	Humanities	The Future of Wales (a Morgan Academy project)
Professor Karen Morrow	KM	Environmental Law	
Dr Jenny Baker	JB	Engineering	SPECIFIC
Hywel Lloyd	HL	Energy, Planning	Active Building Centre
Dr Enrico Andreoli	EA	Engineering	Energy Safety Research Institute (ESRI)
Dr Charles Dunnill	CWD	Engineering	Hydrogen energy ESRI
Victoria Seller	VS	Business	Centre for Health Environment Management Research and Innovation (CHEMRI)
Professor Sir Mansel Aylward and Robert Royce	MA/RR	Health	Bevan Commission
Dr Gwenno Ffrancon	GFf	Welsh Language and Culture	Academi Hywel Teifi

In this response, direct quotes from the contributors listed above are attributed by acronym.

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Two main concerns have been raised about how realistic is the overall vision in the 11 Outcomes. They are:

1. Overall, the vision of planning remains tightly focused on economic and (to a lesser extent) social development. Greater emphasis on the latter compared to some earlier policy documents is welcome. BUT the evidence of damage to biodiversity in Wales and of continuing environmental degradation is submerged. Serious attention needs to be given to the limits of the environment's ability to resource and absorb the impacts of development. This should become more prominent in the NDF and the decision-making processes that it will inform. Otherwise, there is a risk that:

"the version of sustainability that is adopted here [will be] ecologically unrealistic and thus unfit to deliver what it promises". KM

2. While the draft NDF states that the 11 outcomes are 'inter-related and inter-dependent' there is a risk that action directed at one outcome could have a negative impact on achievement of another. To avoid this, decision-makers should acquire a habit of constant vigilance as to lateral and unintended consequences.

JB offers the following example. 'World-class' digital infrastructure (= faster, reliable data) (Outcome 8) could impede progress on Outcome 11 (decarbonisation) from a global perspective. In Wales, some 90% of internet traffic is for personal (not business) use.

"Over 2% of the world's emissions are attributed to data centres and whilst it is difficult to predict future growth rates (with predictions of between 8% to 50% of all energy use being for data centres by 2050), currently it is acknowledged that efficiency improvements are not keeping pace with increased usage enabled by ever faster downloading rates. To ensure that Wales is on-track to meet its 2050 climate change targets the role of data in energy consumption must be considered as part of this goal". JB.

Smart meters, grids and cities can support transitions to a more energy efficient future, but the growth in number of connected devices represents an increase in energy consumed. This conundrum, and how research can help resolve it, is considered in a recent article: Morley, J., Widdicks, K. and Hazas, M., 'Digitalisation, energy and data demand: The impact of Internet traffic on overall and peak electricity consumption' (2018) *Energy Research & Social Science* 38: 128 – 137.¹

¹ <https://www.sciencedirect.com/science/article/pii/S2214629618301051>

A possible solution to this 'Push me, pull you' effect of actions to meet the individual Outcomes is to identify an overarching criterion for all actions, thereby helping to avoid contradictory targets. In the comments after the next question, there is a suggestion that this overarching criterion should be decarbonisation. The effect would be to require consideration of the impact on emissions for all actions directed at achieving individual Outcomes. Decarbonisation would be, effectively, a 'primary consideration' in all actions within the NDF.

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

Most of our contributors gave a qualified welcome to the 11 Outcomes. However, there are concerns:

- Outcomes 3 and 5 refer to sustainable growth and there are several other references to sustainable growth in the draft NDF, without really explaining what it means and how it relates to 'inclusive growth' and 'sustainable development'.
- 'Sustainable growth doesn't necessarily drive socio-economic inequality, in fact the last 30 years has shown the opposite. The importance of being embedded within a supportive environment, broadly defined, is highly correlated with life satisfaction. In practice this means strengthening community cohesion.'* **DW**
- The draft NDF states that the Outcomes are 'inter-related and inter-dependent'. This is true and very important. But the way in which they link together is not sufficiently developed. This is risky because of the problem of contradictory targets emerging within the individual Outcomes, illustrated in the example given in the response to Question 1 above about the carbon footprint of faster data.

One way of avoiding this would be to make Outcome 11 (decarbonisation) the overarching theme. This includes but is not limited to access to clean and sustainable energy.

Such an approach could also help drive innovative solutions. The following example is offered by **JB**:

“If Wales can create innovative solutions to reducing data requirements whilst still providing the required service this is something that could be exported elsewhere – and could save money on infrastructure upgrades which are always leaving rural communities behind. Extracting heat from data centres to support district heating etc. could also reduce the impact. My point is data should not be considered in isolation to energy generation and use.” **JB**

There could be better linkages between the choices that need to be made for sustainable and non-polluting sources of energy and the achievement of the other Outcomes.

4. An additional point about decarbonisation is the impact on jobs and prosperity:

“... besides decarbonising the power sector we will need to decarbonise the industrial sector (processes that emit CO2 independently of the energy source used) and depending on the success of this latter activity jobs and prosperity will be strongly impacted.” **EA**

5. And another: there is throughout the document a dearth of recognition of the importance of the type of buildings we create – this will have an impact on many if not all the Objectives (e.g. 1,2,7,8 and 9), and certainly on decarbonisation (11).
6. Finally, there is an inexplicable under-emphasis on health. Outcome 1 is that people live and work in ‘connected, inclusive and **healthy places**’ and Outcome 3 is that people live in ‘regions that tackle health and socio-economic inequality through sustainable growth’. Taken together these seem an inadequate way of thinking about how planning can impact positively on long-term health. Further comments about this are made in the responses to Question 6 and Policy 16 (‘The Regions’)

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The division of Wales into regions, and the three regions identified, are problematic in some respects. This is explored further in the response to question 8 (The Regions) below. Some vital issues transcend not only internal boundaries but also national and international boundaries. One such is the monitoring and enforcement of regulation of air quality.

Clean Air

The draft NDF's reference to the importance of supporting good practices to minimise the creation of air quality problems that can arise through poorly thought-out planning decisions is welcome. This is an issue that requires whole-jurisdiction and inter-jurisdictional regulation and enforcement, and which is dependent for its success on cross-disciplinary and cross-sectoral collaboration.

The current planning system does not sufficiently focus on air quality. Even though the Planning Policy Wales refers to it, in practice, planning officers are not empowered through training and support from senior levels in their organisations to make informed decisions on air quality.

“Better monitoring and modelling can help planning decision-makers make better decisions, and both, especially monitoring, are tools that aren’t used widely enough at the moment.” VS

Welsh Government policy development towards a Clean Air Act for Wales is an opportunity to address these issues on an all-Wales basis, taking into account UK and international efforts. The Morgan Academy, in partnership with the Centre for Health Environment Research Management and Innovation, is coordinating a stakeholder group aimed at increasing engagement by researchers, NGOs and stakeholders in the legislative policy and enactment. We want to work closely with Welsh Government policy teams and interest groups within the National Assembly for Wales to strive for an optimal legislative framework for air quality monitoring, regulation, public information and public education.

Policies 1 and 3: Sustainable urban growth. This mentions ‘metro projects at different stages of progress’. There are two: North East Wales and South Wales, neither of which touches mid and West Wales, which are also under-served for public transport. Where the metros stop, new boundaries, borders, divides of different kinds may emerge. We need to join up thinking about – and planning for - rural and urban travel. Perhaps bus routes should also be at the heart of a metro policy.

Policy 3 contains a welcome move to requiring a different approach, based on the requirements of the Well-being of Future Generations (Wales) Act, to considering the sale, re-use and development of publicly owned land. Some examples are given as to what may need to be considered but this new approach implies a significantly different set of values, principles and rules, much of which has yet to emerge.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

Policies 4 and 5 rightly address the need to meet housing need based on the statistical evidence and projections as to need, including as to affordable housing. However, given the 'inter-related and inter-linked' nature of the Objectives, it is surprising that there is no mention of making these homes zero carbon in construction or performance. The proposal to 'shift the delivery model to building affordable homes at scale and pace' suggests that these homes could be built quickly but omits to mention the crucial question of quality. This misses the need to respond to other Objectives in the draft NDF, as well as an opportunity for Wales to become a beacon of good practice:

"Homes which do not have the build quality and do not meet the building regulations a few months after construction are a big problem to renters and home owners. Wales could lead the way in construction quality by ensuring that all new homes must pass an 'MOT' for houses 1 year after construction to prove that they are still meeting the standards to which they were supposed to be built. If they do not meet the standards then fines should be introduced to compensate the home-owner for the higher heating bills and reduced comfort of a sub-standard home." **JB**

"From an air quality perspective, new homes need to be carefully planned, using the tools and measures described in the earlier policies ... [Policy 5] could be more explicit on this point." **VS**

This section of the draft NDF should make the links with the Objectives as to clean energy, clean air as part of a healthy environment, energy saving and decarbonisation. It should be a requirement that all new homes are built with appropriate insulation, energy saving methods and no need to use fossil fuels. Otherwise, homeowners and landlords – or the public purse - will have to meet the

cost of expensive upgrades when they are inevitably required to de-carbonise to meet current climate change targets. Welsh Government will be aware of the active buildings development in Neath: <http://specific.eu.com/assets/animation/POBL-AHN/> . This kind of development will be crucial over the period of the 20-year strategy, and now is the perfect time for Welsh Government to make a bold, necessary statement of intention about integrating active building requirements into the regulation of new build homes in Wales.

Local Authority Homes for Rent

The emphasis on affordable housing is welcome, and it is assumed that implicit in this is commitment to more local authority-owned houses for rent.

Second homes

SB has carried out comparative research, to be published early in 2020, on policies regarding second homes. He comments that there is evidence supporting the surcharging of second homes through the tax system, and that a current loophole in the law which enables some second home owners to avoid council tax should be closed.

Issues generated by second home ownership may vary by area. This suggests that local housing market conditions should be taken into account: one size may not fit all. For example, **SB** points out that

“There are communities in Wales in which second home occupancy is now in the vicinity of 50% and this is unsustainable.” And suggests that

“[Welsh Government should evaluate with a view to rolling out] the ‘Local Housing Market’ conditions applied to development in certain coastal communities in Gwynedd and Anglesey in the current Gwynedd and Anglesey Development Plan.” **SB**

Whereas **DW** counsels caution about penalising second home ownership through taxation in the Swansea area:

“Taxing second homes will discourage home ownership, reduce the upward pressure on house prices within Swansea and increase the price disparities between homes in Swansea and further afield. This will reduce the ability of the Swansea population to purchase properties elsewhere and reduce their geographical mobility.” **DW**

Funding

HL comments that the NDF reflects levers available in existing law and policy – Local Development Plans and housing funding allocations – as such the NDF does little to secure affordable housing. However,

“... more broadly, the NDF takes an urban densification approach, which makes sense in terms of maximising the uses of collective infrastructures”. HL

Welsh Language

There is a connection to be made here with Outcome 4 (Welsh Language) and associated policies. Housing development can support language retention. SMEs carrying out such development in rural areas will tend to market and sell to local people. Welsh language can be protected by using Welsh names on locations and attractions and by retaining Welsh or at least bilingual place names for developments and streets.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

Policy 6 addresses an important and pressing need and is welcome, subject to the point made in the responses to questions 1 and 2 about the need to address the energy needs and thus carbon footprint of ever-bigger data centres. An additional challenge is that implementation of the policy will depend to a large extent on the goodwill of the mobile phone companies.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the rollout of charging infrastructure for ultra-low emission vehicles?

Policy 7 is broadly welcomed. It is especially welcome from an air quality perspective. However, the inter-connectedness of the Objectives should again be kept centrally in mind, and the need to join up knowledge that can help identify potential unintended consequences. The following points are offered:

Rural Areas

"Sustainable transport to be built into new developments is great. However, there must also be a remit to examine rural links; footpaths, cycle-paths and public transport. The [draft NDF] notes how most of new development will be in the city and therefore for rural areas not to be left behind there must be a framework for sustainable transport to be examined in rural towns and villages.

"Rural areas are already significantly left behind regarding electric charging infrastructure and there needs to be recognition that this not only disadvantages people who live there but the tourist industry. Whilst electric charging infrastructure may not be financially viable for businesses to support in rural areas there will be a need for government support to stop certain areas becoming 'electric vehicle no go areas' which could severely impact the tourist industry." JB

Public Transport

"... there is no mention of electrified public transport like buses and trains – either by electrified lines or by battery or H2 on board." JB

The Grid

“Structure and support to allow electric vehicles (and other demand-side response mechanisms) to support the electric grid - particularly in rural areas where the grid is weak - is essential. Whilst the grid is not devolved it interacts with many things that are devolved, and this resource should be harnessed.”

JB

Decarbonisation

“Driverless cars should be considered with respect to carbon emissions – there is a risk that they exponentially increase emissions – e.g. if they cause a switch from electric train to driverless car, and enable people to drive for leisure and commute further.” **JB**

Demographics

“[This policy] seems to ignore the potential effect of demographic change and its associations with driving licences. Fewer people in the late teens and twenties wish to drive and have licences. They will need an integrated transport system that is not reliant on their family members. According to the most recent literature, within conurbations, tram systems seem to be the way forward as they are less sensitive to congestion as other transport modes. Between conurbations, transport needs greater capacity and lower prices to stimulate low carbon behaviours.” **DW**

Integration in planning

“The Welsh Government supports the increasing use of ultra low emission vehicles. [Active Building Centre] will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.

“Again, the NDF does little to actually progress the policy in practice in the planning framework, others will do the work . . . when it could make some effort to assess minimum requirements, or reflect on what has to change, e.g. currently there are some 527 fuel stations spread across Wales, they provide x mile equivalent of fuel to the xxx,000 vehicles in Wales . . .” **HL**

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Welsh Government's commitment to continuing to work with Natural Resources Wales is welcome. The Environment Act provides a framework within which collaboration already takes place but links with local authorities could be better developed: they have scope to push green infrastructure requirements through the planning regime.

Air Quality

"From an air quality perspective, many nitrogen-sensitive habitats are in decline due to air pollution and any development allowed needs to be mindful of this to mitigate further adverse impact."

"Higher protection could be given to Wales' ancient woodland inventory (the Environment Act (potentially) provides for this) as it is not well-protected at present."

"With Brexit, there is an opportunity to revise / change the requirements of the Habitats Directive, which is (arguably) not fit for the specific habitats of the UK (and Wales)." **VS**

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Renewable energy sources and cleaner energy are vital components of reducing carbon emissions and of improving air quality. Prioritisation of these in the draft NDF is welcome. The beneficial total effect of wind energy, for example, on the economy and the environment has been shown in work by **DW** and others, and Wales is well-placed to develop a leading role internationally in the development and deployment of renewable energy.

Having said that, we offer the following comments:

1. The draft NDF declares the intention to 'work with relevant stakeholders to help unlock the renewable energy potential of [the Priority Areas] and the economic, social and environmental benefits they can bring to communities.' Public engagement at community level in these areas will be essential to ensure that such development does not produce unwanted consequences detrimental to achievement of all the Outcomes (see the comments above in the response to Question 1 on the NDF Outcomes).
2. The focus in this section of the draft NDF is on large-scale wind and solar development. These are important, but there are other or additional technologies that should be part of the planning for spatial development and which are currently absent from the text:
 - A. **Grid infrastructure** is essential to secure the benefits of wind and solar technologies: intermittency necessitates connections (smart grid) and the ability to cope with a variable power supply. The work of the Welsh research collaborative Flexis <http://www.flexis.wales/> is pertinent here (among other areas), building on world-class capability in Welsh universities. Additional clean sources of electricity can be developed to in-fill:

"The buffering or decoupling of energy supply and demand is especially critical in Wales where there is a huge resource for intermittent energy i.e. when the wind is blowing it is really blowing. The grid and the energy management systems soon will become saturated and the energy is then lost or wasted. Additional supplies of wind are therefore not effective beyond the demand capacity. Energy storage or the use of hydrogen in this case could decouple supply from demand leading to much better utilisation of the available renewable energy resource."

CWD

- B. Policy 7 envisages more and longer journeys by electric vehicles in Wales. Increased capacity to charge electric vehicles implies increased demand for electricity, while noting that Wales often generates more electricity than it uses. Major wind and solar developments may supply part of the increased demand, subject to the issue of intermittency. Other, more localised approaches are also important, for example the potential for active buildings (see: Active Building Centre <https://www.activebuildingcentre.com/>) which can be designed to generate, or capture and store electricity (and heat) and to provide space, for example in car parks out of office/school hours, for charging. Their ability to store energy will help reduce peak demand and could reduce the net increase in overall demand that might otherwise occur as mobility switches from fossil to renewable fuel. These things are equally a matter for the NDF as for local planning regimes: as the draft NDF states, the frameworks and strategies at different levels need to be interwoven and complementary in their operation.

And/or, different technological innovations to address carbon emissions from vehicles can be considered, that do not (or will not) necessarily require increased use of electric vehicles:

“An alternative approach to storing energy in batteries or hydrogen produced from water splitting, would be to use wind and solar energy to convert CO₂ to clean fuel (no N and S content as instead found in fossil fuels, thus no NO_x and SO_x emissions upon combustion, only CO₂). The greatest advantage of this fuel is that it can be used directly in the present infrastructure. The CO₂ emitted upon combustion of the CO₂-derived fuel is then extracted from the air via Direct Air Capture (DAC) to be then reused. DAC technologies are already being developed in view of the necessity to extract CO₂ from the air to avoid irreversible climate change. This approach eliminates the need for global scale deployment of electric vehicles (point 5 above), accordingly the massive exploitation of natural resources to make batteries would be avoided, and with it the drastic upscaling of the electricity grid to charge them. Hard to decarbonise transport (i.e. cannot be powered with batteries) such as aviation, heavy-duty vehicles, shipping would also be decarbonised. Heating would not need a hydrogen infrastructure since methane made from CO₂ could be used. These technologies are being developed but not available at commercial scale at the moment. Also, CO₂ conversion technologies are strategic to make chemicals that will not be available from fossil carbon sources in the future, so they will have to be developed anyway with or without a hydrogen grid or electrified transport.” EA

- C. Wave and tidal technologies should be priorities as well as wind and solar. Wales has a significant coast to area ratio and has a real opportunity to

develop and maintain globally important expertise in coastal energy technologies (for example, Marine Energy Wales.

<https://www.marineenergywales.co.uk/about/>).

Where development or experimental deployment of such technologies is dependent on decisions of the UK government, this should not exclude them from the NDF for Wales: it simply means that there may be additional or different pathways to the necessary political decisions, such as power purchase agreements by the Welsh Government and other bodies.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The draft NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales. Several contributors recognised the value of a regional approach to implementation. However, many questions and concerns were raised about whether the 3 proposed regions were the right ones, and also whether the same regions were right for work towards achievement of all the Objectives.

The main point we make is that this needs further thought.

There are particular issues about the 3-region division in relation to health. The following points are from contributors from the Bevan Commission.²

“The strategy is based on dividing Wales into 3 regions. Those regions do not match Regional Partnership Boards which are meant to be central to NHS and local government partnership working and planning (the Regions being larger). For example South East Wales incorporates Cardiff and the Vale, Aneurin Bevan, and Cym Taf Morgannwg Health Boards geographical coverage. If these Regions are going to be the basis of planning for the Assembly for many things, why not also make them the basis for health and social care planning?”

“It [is] not readily apparent from the [draft NDF] what practical actions Welsh Government are going to take to tackle inequalities between and within areas? This also has knock on implications for tackling health inequalities. Pro-actively tackling health inequalities is one of the prudent principles Welsh Government have previously signed up to. It is not clear whether the National Development Framework is going to make inequalities in Wales better or worse. For example, whilst the document makes clear that Cardiff ‘will retain and extend its role as the primary national centre for culture, sport, leisure media, the night time economy and finance’ it is much less clear what actions are to be taken in many other parts of Wales. Similarly, it says WG ‘supports co-ordinated regeneration and investment in the Heads of the Valleys area to increase prosperity and address social inequalities’ there are no specific actions to back this statement up.”

² <http://www.bevancommission.org/en/>

“Bevan Commissioner Sir Michael Marmot has previously set out six policy objectives for reducing health inequalities (see the 2008 World Health Organisation report ‘Closing the gap in a generation: Health equity through action on the social determinants of health’ and we would expect them the National Development Framework to reflect them. They are:

- (1) Give every child the best start in life;*
- (2) Enable all children, young people and adults to maximise their capabilities and have control over their lives;*
- (3) Create fair employment and good work for all;*
- (4) Ensure healthy standard of living for all;*
- (5) Create and develop healthy and sustainable places and communities;*
- (6) Strengthen the role and impact of ill-health prevention.*

The Bevan Commission has published a number of papers that explore how Wales can go about implementing such principles including the 2017/18 papers Exploiting the Welsh Health Legacy: A New Way of Thinking’ ‘Exploiting the Welsh Health Legacy: A New Way of Planning’ and ‘Exploiting the Welsh Health Legacy: A New Way of Doing’.³

“We would have expected to see set out an explicit ambition to develop a ‘whole system’ approach to promoting and maintaining health and wellness in Wales. As part of that, the interconnections with areas such as affordable housing, education and employment should be referenced. Likewise the importance of both the NHS and local government as anchoring institutions to local communities. Delivering on this vision arguably requires greater attention to be given to what planning and actions are taken at lower layer super output level, than what takes place at regional level.” MA

For different actions within the Objectives, different areas and different regional structures may be preferable to a division of the country into three for the purposes of implementation action towards all the Objectives. It will be important to identify target areas where performance in one or more respects is poor, to identify good practice and to transmit learning from to the poorer performing areas. One concern raised was that the division into regions risks widening disparities between the south east and the rest of Wales:

“An integrated boundary-blind approach that builds links and fosters cooperation could generate more beneficial effects for all in Wales” DW

DW continues with the following examples of the limitations of a static approach to regional implementation:

³ Available at: <http://www.bevancommission.org/en/publications>

“Geographical boundaries appear to be to be based on convenience rather than functional. The boundary between Bridgend and Port Talbot seems almost arbitrary. Instead, there should be a multi-layered, functionally agile process with an integration conversation that appreciates interlinkages and maximises spill-over benefits.

“Productivity variations seem to be driven more by demand than supply constraints (Webber, D. J. 2019 (forthcoming) ‘Understanding the current productivity puzzle using two-dimensions’, and hence rural productivity values will inherently be low and unlikely to be part of the process of ‘picking winners’. For example, high quality support for SMEs shouldn’t be regionally-focused if the benefits naturally permeate regional boundaries, and there should be recognition of and support for an entrepreneurial culture irrespective of location, especially when export potential is concerned.

“Skills are low on priority if the size of the economy is stimulated most by demand, and stimulating demand by marketing what we have here in terms of goods, experiences, life style and tourism opportunities. Why aren’t we seen as the alternative to the Lake District?” DW

Some questions arise here which resonate with debate about the implementation in the 4 areas designated for City Region Deals.⁴ These questions include the relationship between areas regarded as rural and urban, the position of mid-Wales (however defined), how to ensure public accountability and effective governance and how to ensure coordination between the regions.

For example:

“Rural areas in south and north Wales have more in common with mid Wales than their industrial/urban neighbours? We have four ‘partnership’ or ‘city region partnerships’ - it begs the question whether Swansea/southwest Wales is considered sufficiently and whether the mid Wales region might serve better as the rural heartland stretching from Carmarthenshire to Denbighshire and Anglesey?” AE

“The former Mid Wales Development Corporation formed a dynamic agency for development in the most rural area of Wales - Wales has 40% of its population in rural areas. Should the Mid Wales region be the driver for rural planning throughout Wales?” AE

“ - apart from the question of whether there should be 3 or 4, how does all this fit in with the City region partnerships if at all ? There is a nod to them, but its not clear how they would be coordinated? There is a reference to the Swansea Bay Metro (Policy 26) but little about them elsewhere.” AE

⁴ For example, at 2019 Morgan Academy symposia *How City Deals Could Make a Difference* and *Delivering City Deals in Wales* papers available at: <https://www.swansea.ac.uk/morganacademy/events/previous-events/>

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A specific point was made by one contributor about the development of Holyhead as a cruise port. This

"... could have a negative impact on air quality through increased vehicle movements to and from and from the ships themselves, which run on heavy fuel oil at sea and diesel in port, and whose engines are largely unabated." **VS**

More generally, it will be important to consider development in the north as elsewhere on the basis of accurate market information, avoiding the danger of paying 'lip service' to the north:

"Do we know why people venture to this area, what are the demand driven effects, where supply chains are weak and where policy can have a tangible effect ... ?"
DW

And to ensure culturally sensitive approaches:

"There is a need to plan for sensitive development in rural Wales, where communities suffer greatly from out-migration among young people, often as the result of a lack of suitable employment opportunities. I support Trawsfynydd, but of course it might not happen. The spatial representation of north Wales on the map with a metro and development confined to Flintshire, Wrexham and a narrow north coastal strip is unfortunate. I agree however that large-scale housing developments would be more suitable in these more urban areas, as rural Welsh-

speaking communities are very sensitive, linguistically, to developments of this type. However, employment opportunities should be more diffuse.” SB

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

In relation to this region, transport was the main focus of our contributors' responses. They recognised the need for alternatives to road access, better links of train to port, avoidance of over-reliance on the Metro and a strategic not merely pragmatic approach to road transport infrastructure.

Air travel

Policy 32 in the draft NDF is about Cardiff Airport and states that Welsh Government supports its expansion and wishes to ensure that future expansion and change are not constrained by development in the vicinity. There is obvious tension between the ambition to almost double passenger numbers and the climate change-driven imperative to reduce air travel overall. Public concern and media debate about this has increased since work began on the draft NDF. Welsh Government will need to justify airport expansion in this context, perhaps by showing how other less polluting forms of transport within Wales will reduce the need for flying, or by showing how expansion of Cardiff Airport passenger numbers would not affect overall passenger numbers within the UK and might even reduce the carbon footprint of travellers to Wales. Currently the draft NDF does not expressly acknowledge this as an issue nor indicate any thinking about the answers to these questions.

Circular Economy

Policy 33 makes a passing reference to promoting the circular economy. This should develop into a more significant aspect of the Framework. Circular economy principles could enhance development in Wales significantly. It should have more prominence across all regions. It will be critical to make our economy more sustainable and our goods more affordable.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

Clean Air

Air quality monitoring, regulation and enforcement is of pervasive importance as set out in the responses above to Question 2 (Spatial Strategy) and indicators about this should be included.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Contributors responding to these questions agreed that references to the Welsh language should be strengthened throughout the draft NDF. Both the Welsh Government's Welsh Language Strategy and the Well-being goals under the Well-being of Future Generations (Wales) Act acknowledge the importance of the social use of the Welsh language.

SB suggests an approach which requires acknowledgement of areas of Wales where Welsh is sensitive as a community language, 'Areas of linguistic sensitivity' would be comparable to areas of natural beauty and national parks, and would be:

"... areas of Wales where at least 50% of the population speak Welsh at a community level, following the 2011 census. There would be areas where development would occur, and might in fact be encouraged, but in a way which is sensitive to the maintenance of Welsh as a community language and for which particular public policy interventions might be required ..." **SB**

And suggests that the draft NDF should specifically acknowledge the Arfor scheme.⁵

In this paradigm, growth of the language in other areas of Wales would be primarily via the education system.

Gff, whilst agreeing with the need for acknowledgement of areas of linguistic sensitivity to development, favoured a graduated linguistic map of the whole of Wales rather than a focus on the Arfor areas alone.

"I ... would welcome a map which grades the demarcation by percentages according to the changes in language ability/use across Wales. I'm concerned that a focus on the Arfor areas will mean that the plight of traditionally strong Welsh-speaking areas that are by now struggling will be ignored. [For example] ... areas such as y Parsel Mawr in the Swansea Valley – the villages of the Mawr ward in Swansea, Garnswllt, Felindre, Craig Cefn Parc etc. Local Authority policies and national government decisions in recent years have had a very detrimental effect on the language in this area e.g. poor public transport links,

⁵ <https://dlit.co/arfor-innovation-fund/>

closing the local Welsh-medium school; granting planning for a wind farm on common land on Mynydd y Gwair and ignoring local residents' concerns about access to the land; granting planning for a new energy plant in Felindre which will be followed soon by Parkway station and no doubt a large residential housing development. Should that materialise, a new school will be required, but there's a strong risk it would be a English-medium school and thus changing what has been the language of education in this area for many decades. The Welsh language is at risk of disappearing as an everyday language in this traditional Welsh heartland within a decade, and it's not part of Arfor. Many other areas across Wales will fit this bill too." **Gff**⁶

Gff adds that a strategic approach is needed not only in the education sector but elsewhere including within health and care sectors, which are not mentioned within the draft NDF with regard to Welsh language needs:

"... this is a basic human right, to be able to communicate in your mother tongue when you're in a position of need or in a fragile state. There will be added stress involved for an individual having to resort to a second language when required to explain their concerns/symptoms/ailments, and this is especially problematic when dealing with children, those suffering with mental health or dementia and too many of our older Welsh-speaking generation are living in residential homes without care provided in Welsh or an opportunity for them to use the language on an everyday basis." **Gff**

Other contributors noted the need to target support at the areas most in need, that is, areas where Welsh language use is poor. Some wondered about the significance of 'one million': is it mainly a symbolic 'big round number'? It was suggested that the target could not be reached if efforts via levers of planning and development were focused mainly on areas where Welsh is (already) an everyday language of the community:

"I'm concerned that with this proposal areas that are making a valuable and brave contribution in resurrecting the presence and strength of the language will be ignored – places like Abergavenny, and other areas of Gwent where greater numbers of Welsh learners are recorded. There are risks also for areas such as the Swansea Valley, the Neath Valley where the language has lost ground as the language of everyday conversation in the last two decades. ... The language is on the lips of a great deal of residents in these valleys, but residents lack confidence to use it in a daily setting, claiming a lack of quality to their language ability and that their Welsh is 'kitchen Welsh' – this is most definitely not the case, and the misplaced lack of confidence seems to be very prevalent in the valleys of Swansea and NPT. In addition, local authority decision-making and policies are currently not required to fully consider impact on the language

⁶ The plight of areas such as this in the context of choices made within City Region Deals was noted in debates at the recent Morgan Academy symposia and further research is proposed, framed by the Well-being goals . Fn. above

before they are made. I'd like to see an NDF that takes these areas into consideration and that they are not sacrificed on the altar of the Welsh heartland utopia. Focussing on the heartlands won't bring about the target of a million speakers." **GFf**

Once more, the inter-connectedness of the Outcomes is apparent. Welsh language must be considered in the development of digital technology and green technology.

"Without consideration of the language in these developmental areas, we risk leaving the language as an exotic 'other', and a language that is not a living one which moves with the times. Welsh needs to be available on artificial intelligence platforms, for example, to ensure its longevity as a living language, used in everyday conversations in the workplace, in homes and in social spaces." **GFf**

And Welsh language promotion can be intertwined with and add value to development of tourism alongside indigenous social use. Lessons might be taken from elsewhere, for example:

"In the Gaeltacht Quarter in West Belfast, there is a development, currently under construction, where Irish speakers will be given preferential treatment for social housing. The site will also house accommodation units for tourists. Hence, people visiting Belfast will be able to stay in an area where they will hear Gaelic as the primary language. The architects envisage that this will raise the profile of Irish speakers, in Belfast and across Ulster. Furthermore, and importantly for them, they appreciate that tourists will spend more in their locale. There may be some potential to replicate this in certain areas of our nation..." **AS**

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

We are happy for this response to the consultation to be shared with the National Assembly for Wales and to be made public, on the internet or in a report.