

# PONTYPOOL PARK ESTATE OFFICE

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WAG Planning: National Development Framework  
Cathays Park  
Cardiff CF10 3NQ

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### National Development Framework draft August 2019

Thank you for the opportunity to comment on this generally sensible document. It would be more sensible if it (and WAG generally) could separate political aspiration from planning reality. There clearly is both a political, and an aspirational, element to any planning process. But it is helpful to have the ambiguities and contradictions noted (the subjunctive is a useful tense much neglected by politicians), both to inspire credibility and avoid misunderstanding. For example:

The Welsh Language (your caps), however valuable, is not a planning matter; nor indeed, despite repeated references, does the draft NDF explain how it intends to “plan” for the language.

The Well-being Act is distracting legislation, and open to challenge. Its origins lie in a bizarre leaflet circulated by WAG among government offices: “Join the National Conversation. The Welsh Government is proposing a new law to ensure that the next generation inherits a country that is measurably better.” What kind of language is that? Aspiration is policy, not law.

The relation between WAG and the local authorities remains uncertain. At present, Wales has a plethora of highly-paid councillors and civil servants spending huge amounts of time effectively implementing a policy already determined by WAG. WAG has failed to merge authorities, and function-sharing is still *ad-hoc* and minimal. Will the evolving balance of responsibilities be determined by vanity and party politics, or by a rational assessment of efficient government?

Nation-building is, I appreciate, driven by party politics. But WAG’s obligation is to govern Wales, not to ensure the continuing power of a single party for another hundred years. How can WAG foster identity, pride, ambition, and self-sufficiency, without creating barriers to trade, exchange, education and investment? Or does WAG wish Wales to continue to hog the bottom of the league tables?

WAG’s Climate Change Emergency is a frivolous distraction. WAG has little control over climate change. There are many serious environmental challenges, and over some WAG may have some control: pollution, waste, use of resources etc. WAG should focus on what it can do. I see no mention of population growth and consumer demand; are these not also key concerns?

The Outcomes generally seem sensible. It is a relief that the embarrassing “poverty eradication” mantra has been dropped (if eradication is your core ambition, you will not want to achieve it, otherwise you will have nothing left to do). But please check for other misplaced prescriptive absolutes. Does “places which are decarbonised” mean no firewood, graphene nor plastics?

What is the purpose of the many photographs? They seem unrelated to the text, and do not obviously illustrate any point made. The shots are mostly hideous; is this how WAG sees us?

4 Strategic Choices. I agree the stress on urban areas: these are the major population concentrations and the engines for the economy. But there is more to an “urban area” than concrete: planning can determine whether the area works as a community or is just a group of buildings. Is the urban area a

magnet and a trigger? Does it stimulate, cross-fertilise, produce more than it consumes? Caerphilly Council absurdly claimed a “City of the Valleys” to justify its dismal planning policy of build anywhere anyhow. Other councils (including Cardiff) have ringed historic and successful urban centres with disconnected sprawl divorced from the community on which they feed. Torfaen Council has a LDP allegedly promoting its town centres, but in reality urging development of motorway-accessed out-of-town green fields. Is this double-speak, or lack of vision and imagination?

I agree also the points about inter-urban and regional connectivity. Urban centres only work if people can access a cluster from its periphery, and each cluster from another. People do not generally work and play their entire lives within the same community; they must be able to move. Investment in public transport and roads is essential but, as the M4 relief saga may have shown, and the Clydach Gorge spend certainly shows, big trophy single solutions may not by themselves solve any problem. Connections, bottlenecks, parking, flexible services, pricing, and access are all factors. I see no reference to the Heads of the Valleys nor the M50? Why is there no rail link from Ebbw Vale to Newport? Why is the new Llanfrechfa hospital only accessible by car? Why is the County Records Office in Ebbw Vale, when 1/3 of the county lives in Newport? If urban areas are to fulfil their function, they should generally host the central public services for their surrounding area.

5 Housing. Why kill the private rented sector by over-regulation? Those in most need of protection may be outside the regulations anyway. Why are so many new housing developments hideous?

8 Strategic Green Infrastructure. WAG makes a fuss about access to the countryside, obesity, and a right to everything. The mountains and commons of south Wales are immediately accessible, and the majority of people in Wales live within a few minutes of open landscape, but barely take advantage of it. WAG is responsible for the two key components for public enjoyment of the Valleys: crime and farming, and in both cases WAG seems challenged by its responsibility. There seems to be little policing of the commons, which are blighted by fly-tipping, fly-grazing and illegal vehicles; and the future of marginal Welsh farming seems uncertain for many reasons, including some beyond WAG’s control, but also others, notably confidence, for which WAG has a core role, and may be failing.

Please could WAG note that woodland must be managed. Green blobs may look good on a map, but it is their delivery of (multiple and often conflicting) benefits which is key: how will WAG ensure (its language) or try (my suggestion) to make this green infrastructure beneficial? Grey squirrel and deer, both the responsibility of WAG, are a major barrier to good woodland. Long-term management plans still do not exist, five years after the end of that over-prescriptive absurdity called Better Woods for Wales. This means that each woodland operation requires a separate licence, which may be worthwhile for a 3,000 acre block of sitka, but is nonsense for the complex small farm woods that WAG is supposedly encouraging. And if we are “decarbonised” and cannot sell firewood, forget it. What is the point creating a National Forest? WAG already owns huge areas of forestry, much in the Valleys where many people live, and does not seem to know what to do with it. The private sector is generally keen to invest and plant more, but WAG seems uncertain what it wants of forestry.

10 Renewable Energy. Yes agreed. But there is no point seeking to cover the Gwent Levels in plastic, concrete and glass, and claim this enhances the SSSI because it gets rid of cows. WAG is too often muddled, and gives mixed messages. So-called “green” energy may be less polluting than fossil-fuels, and less risky than nuclear; but it is still not free. There are always compromises and costs; it is misleading to claim otherwise. WAG seems easily seduced by trophy projects (Severn Barrage, the lagoons, let alone the so-called Circuit of Wales) which are obviously questionable.

15 District Heat Networks. Yes please: an obvious option to consider, for many years common on the Continent but still almost unknown here, and firmly within WAG’s responsibility.

16 Alignment of Regional Development Plans. Yes please; and local plans. It is absurd that twenty two unitary authorities, each with a plethora of highly-paid councillors and civil servants, should

compete with each other for the rate-paying panacea of “development”. The real competition is not between Cwmbran and Oakdale, but between Wales and China. How can WAG reduce the barriers to business, to make Wales an attractive place for investment and, of course, to live and work?

23 The Regions. Swansea and Llanelli are part of South Wales, not mid Wales. This is a planning document, and the demands of politics, equity etc are irrelevant. It obscures the real issues, which this process is presumably seeking to address, to pretend that Swansea and Montgomery are the same, or that Swansea and Newport are different. Please give and address the facts, not the political fiction.

27 Cardiff. The town centre seems vibrant, unlike Swansea and Newport, and well-managed (it is a pity Cardiff Bay is so hideous). But the urban sprawl outside Cardiff into the Vale and the lower Valleys is a mess. The thoughtful proposals of the Cardiff Civic Society and others, for a structured approach to the north west extension of Cardiff, may not be fully realised. There is a difference between building many houses at once, and the development of new, vibrant and sustainable communities. One can blame demand and developers, but responsibility also lies with the planners at national and local level. If the photographs in this document are anything to go by (not that there is any indication what they are supposed to illustrate), WAG seems happy to promote the hideous.

28 Newport. This is a sad case, for which the local Council and planners must take responsibility. The town centre hardly functions, despite the wealth of resources still intact. The town is the county capital, and should behave like it. But perhaps it is easier to blame WAG, Westminster etc?

30 Green Belts. Please articulate WAG’s understanding of the purpose of a green belt. Is it an immutable designation, or merely a temporary holding until some better use occurs? The proposal here is void for uncertainty: a green wedge from Chepstow to Cardiff, overlapping with National Growth Areas, is meaningless. There is a case for an immutable designation immediately around Cardiff, which is the only town in South Wales which does not have direct access to open country. In particular, the land between Newport and Cardiff, north of the M4, is an obvious location for a green belt, however termed, focussed around Ruperra Castle and its wider setting. This would provide a future for one of Wales’s foremost monuments (currently much in danger), and an unambiguous protection of a to-date largely untouched landscape, and an endorsement of the community groups active in the area. The mountain tops of the Valleys are another *de-facto* green belt, allowing many people access to open countryside within minutes of their home. But this resource is largely under-nurtured; and WAG’s right to everything, anti-poverty, obesity etc agenda will not redress this. WAG has the power to deal with fly-tipping, fly-grazing, off-roading and other environmental degradations. It also has the power to inspire the next generation of farmers to take over the challenge of upland management. WAG’s post-CAP proposals are slowly becoming promising, for which many thanks. But WAG has perhaps so-far failed on its many Pillar 2 schemes. The challenge is to devise long-term sustainable income support/substitution model in harmony with nature. To date, we have had a series of short-term, dis-jointed, capital projects, sometimes driven by WAG’s political imperative of the moment (clean water etc), and often subject to an unjustifiable *de facto* 50% levy by the local authority (as monopoly grant-applicant) for managing (sic) the project, to which of course WAG is party. The mountain tops are the green belt and lung of the Valleys; please could WAG nurture them.

32 Cardiff Airport is important. But it is not an “essential part of Wales’ (sic) strategic infrastructure” nor “an international gateway”. Bristol and Birmingham are; Cardiff never will be. WAG’s recent purchase and continuing subsidy suggest the nation-building vanity of a fledgling government which doubts its democratic mandate. Cardiff Airport should be private; government should govern.