Why have we published these explanatory papers?
During the consultation on the Draft National Development Framework (NDF) some stakeholders suggested further details should be made available setting out how the NDF has been prepared. To assist stakeholders we have produced a collection of explanatory papers to set out the evidence that supports the draft NDF. These papers include:

- The Spatial Strategy
- The Assessments of the NDF
- Future progression of the NDF
- The Regions
- Rural Areas
- Housing need
- Welsh National Marine Plan and Ports
- Evidence compendium

What is this document?
The Regions
This explanatory paper has been prepared to assist readers of the draft NDF in understand the reasoning behind the regional footprint within the Draft NDF. Highlighting the key evidence that has informed the regional footprint.
Summary
1. The regional footprint set in the NDF comprises three regions: North Wales; Mid and South West Wales; South East Wales. These regions reflect the regional approach set out by the Welsh Government in *Prosperity for All: Economic Action Plan*. This paper outlines the main alternative footprints considered and sets out the reasons behind selecting the three-region footprint.

2. The draft NDF identifies three regions within Wales and sets a series of policies and a broad spatial strategy for development, specific to each region. The footprint of the three regions is set out on page 44 of the draft NDF and is shown:
The case for identifying regions in the NDF

3. The NDF has identified regions because there is a legislative basis for regional planning, established in the Planning (Wales) Act 2015 [http://www.legislation.gov.uk/anaw/2015/4/part/3/crossheading стратегический планирование enacted], which made provisions for strategic development plans covering more than one local authority area. By setting a regional footprint and proposing broad spatial strategies and policies for each region the NDF has sought to provide leadership and impetus for progress on establishing a regional tier of planning.

4. From an early stage in the preparation of the NDF it was recognised that proposing a regional footprint could prove contentious. The range of existing regional arrangements across public service delivery in Wales each offered established footprints which could be taken forward through the NDF. These included:

- Wales Spatial Plan areas
- Health Board areas
- Fire Service or Police Force areas
- City Deal and Growth Deal areas
- Travel to Work or Housing market areas
- ‘Traditional’ Strategic Planning areas (i.e. SEWSPG, SWWSPG, NWSPG).

Wales Spatial Plan

5. The Wales Spatial Plan – predecessor document to the NDF – included a strong emphasis on sub-national areas and identified 6 regions with ‘fuzzy boundaries’. Its regional footprint is shown to the right:

6. The approach in the Wales Spatial Plan initially led to a measure of regional working, though not to any formal strategic planning within the regions. Energy invested into the regions concept waned quickly and the ‘fuzzy boundaries’ approach was criticised for being ambiguous.

Cardiff University study – Identification of Regional Areas for the National Development Framework – August 2017

7. In 2016, the Welsh Government commissioned Cardiff University’s School of Geography and Planning [https://gov.wales/sites/default/files/publications/2019-08/identification-of-regional-areas-for-the-national-development-framework-final-report.pdf] to undertake an assessment of different potential regional models to be incorporated in the NDF. The study included a survey of stakeholders as part of the gathering of evidence and the development of different options for a regional footprint. On the Wales Spatial Plan’s regional approach, the study stated:
6.2.1 In summary, participants state that the Wales Spatial Plan areas provide a basis for exploring regions in the National Development Framework, yet there are important factors that require the definition of regions to be revisited to account for changes in patterns of activity and the policy landscape.

8. The study approached the task of recommending a regional footprint by using the seven well-being goals of the Well-being of Future Generations (Wales) Act 2015 to assess ‘the intensity of interaction between different areas’. It resulted in a series of regional footprints, ranging from two regions to nine regions. The full range of options is contained within the study report.

Figure 4: A Wales of Vibrant Culture and Thriving Welsh Language / 2 Regions

Figure 15: A Resilient Wales / 9 Regions
9. The study aggregated the various options derived from each of the well-being goals resulting in the two following footprints.

Figure 16: All Well-being Themes (Weighted) / 4 Regions

Figure 17: All Well-being Themes (Weighted) / 7 Regions
10. The study argued that the two options above had an inherent problem of splitting a local authority area (Conwy) across two regions. To reach final recommendations, therefore, further considerations were added:

9.2. In determining the final proposed boundaries additional factors were considered, particularly existing infrastructure networks (roads, rail, airports), commuting flow patterns, existing institutional structures (such as City Deals), and the statutory nature of the NDF which may require that regional boundaries align to existing Unitary Authority boundaries as well as the need to ensure balance between different sub regions in the composition of regional areas.

Figure 20: Proposed Regions / 4 Regions

Figure 23: Proposed Alternative Regions / 4 Regions
11. Figure 20, above left, represents the study’s recommended approach to a regional footprint in the NDF.

9.5 The four proposed regions were selected based on balancing the sub regional variation with wider regional patterns, equity considerations, and institutional factors. In contrast to the existing Swansea Bay City Region and the proposed Joint Governance Committee Areas, Ceredigion has been identified as being associated with South West Wales. In most sets of regionalization analysis the linkage between Ceredigion, Carmarthenshire, and Pembrokeshire is quite consistent as are the general patterns of commuting flows (Figures 21 and 22). Powys therefore stands as a single region in this proposal.

12. The alternative approach, shown above right in figure 23, shows Powys and Ceredigion forming a Mid Wales region. The justification given for this alternative was:

9.6 If there is a determination within Welsh Government that no single authority should constitute a region, it is suggested that consideration could also be given to a region composed of Ceredigion and Powys, given the existence of some northern linkages that exist between the two Unitary Authorities and some of the regionalization analysis.

Prosperity for All: the national strategy
13. The Welsh Government published its national strategy in September 2017. It provided a strong framework for enhanced regional working, to address regional inequalities, develop regional growth areas and introduce a new regionally-focused model of economic development. The document did not identify geographical regions other than to highlight the emerging Metro proposals in South Wales and North Wales.

Prosperity for All: economic action plan
14. The national strategy was followed by an Economic Action Plan in December 2017. It developed the theme of regional working and provided a geographical definition for regions in Wales, comprising three regions. This footprint is the footprint used in the draft NDF. The plan explained:

We will align our economic regions to those used for other footprints including Regional Skills Partnerships and those being used for local government collaboration.

15. The Economic Action Plan led the establishment of Chief Regional Officers to lead each region and be the voice of the regions within the Government. These Officers have established working relationships with local authorities and businesses in their regions and have been tasked with preparing Regional Economic Frameworks for their regions.

National Assembly scrutiny: the Climate Change, Environment and Rural Affairs Committee
16. The above named Committee conducted initial enquiries into the NDF in summer 2018, during the consultation on the NDF Preferred Option. The topic of regions and potential geographic footprints was discussed in evidence gathering sessions with the NDF team and with expert witnesses and stakeholders.

17. The Committee chair wrote to the Welsh Minister responsible for the NDF in August 2018, following the sessions and stakeholder workshops it held. The letter stated:

The Committee understands that the three regions in the NDF preferred option are aligned to those in ‘Prosperity for all: economic action plan’, however, our stakeholders recommended dividing the Mid and South West Wales region to create a total of four regions.
18. The Minister in a response to the Committee confirmed that:

   Future iterations of the NDF will be free to revisit the approach to regions.

The National Development Framework

19. The draft NDF adopted the Economic Action Plan’s 3-region model to ensure alignment with the broader emphasis within the Welsh Government towards regional working. The concerns regarding the regional footprint and in particular the composition of the Mid and South West Wales region, as highlighted by the Climate Change, Environment and Rural Affairs Committee were recognised from the outset.

20. The draft NDF sought to address these concerns by providing clear flexibility towards regional working within this region. Two paragraphs from page 56 of the draft NDF are shown below, with added emphasis to highlight the inherent flexibility offered in respect of distinguishing between Mid Wales and South West Wales:

   The size and diversity of this region, which includes Wales’ second city, two national parks and some of the most rural areas of the UK, means that the region does not have the degree of interconnectedness of other regions. From a high level national perspective, there are two broad spatial sub-regions – the built up areas around Swansea, Neath Port Talbot, southern Carmarthenshire and the Haven towns, and the dispersed settlements in a wider rural hinterland across north Pembrokeshire, Ceredigion, Powys and northern Carmarthenshire.

   There will be common strategic issues for the region and issues which are specific to sub-regions. It will be for local planning authorities to determine how regional planning should be undertaken across the region. It may be that a combination of a Strategic Development Plan and one or more Joint Local Development Plans are required. The Welsh Government will support approaches that define and focus on sub-regions, rather than a single full region, where it is demonstrated this is appropriate.

21. This level of flexibility and discretion for local planning authorities to set parameters for regional planning was not replicated in the sections on North Wales and South East Wales, respectively. This was a judgement based on the broad acceptance of the validity and appropriateness of these defined regions for strategic planning.

22. The consultation on the draft NDF asks a series of questions on the regional content of the NDF, including question 11:

   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.

23. Responses to the consultation will be assessed and consideration will be given to whether it would be appropriate to change the regional footprints and the policies between the close of the consultation and submission of the draft NDF to the National Assembly in spring 2020.