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**MEMBER BRIEFING NOTE: NATIONAL DEVELOPMENT FRAMEWORK  
CONSULTATION**

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**Reason for the Report**

1. To provide Members with an opportunity to note the content of the Cabinet response to the Welsh Government's National Development Framework 2020-2040.

**Background Information**

2. The National Development Framework (NDF) is a new development plan which will set the direction for development in Wales from 2020 to 2040. It is being prepared by the Welsh Government and will represent the highest tier of statutory development plans in Wales.
3. It will provide a framework which will be built upon by Strategic Development Plans (SDPs) at a regional level and Local Development Plans (LDPs) at a local authority level. SDPs and LDPs will be required to be in conformity with the NDF.
4. The NDF is a spatial plan which means that it sets a direction for the future provision of infrastructure and development. It does not allocate exact locations for development but, in the case of SDPs, sets out the policies and key issues the Welsh Government requires the regions to take forward.
5. The Well-being of Future Generations (Wales) Act 2015 influences the content of the Plan which seeks to maximise contributions to the wellbeing goals and well-being objectives. The NDF also gives a spatial expression to Welsh Government policies of national importance and is intended to be read alongside 'Planning Policy Wales' (PPW), which provides planning policy on an all-Wales basis.

## Issues

6. A copy of the Consultation Draft NDF is included in Appendix 1 of this report. The front portion of the document outlines the scope of the NDF and sets out 11 overarching ambitions based on national planning principles and sustainable placemaking outcomes as outlined in PPW.
7. This is followed by the NDF Spatial Strategy which sets out a guiding framework for where large scale change and nationally important developments will be focused over the next 20 years. It contains a Spatial Strategy Key Diagram along with 15 policies based on three components:
  - Where in Wales growth should be focused;
  - How growth should be planned and managed;
  - How we should power and heat places using renewable energy.
8. Particular attention is drawn to the final section of the document which sets out policies for the three regions in Wales including six policies relating to South East Wales. Relevant extracts from policies and their supporting justification set out below:
  - **Policy 27 – Cardiff** - *Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports regional development which addresses the opportunities and challenges arising from Cardiff's geographic location and its functions as a Capital City. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the United Kingdom stage.*
  - **Policy 28 – Newport** - *The Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the city. Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. Development in the wider region should be carefully managed to*

*support Newport's growth and to provide a focus for regional planning. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.*

- ***Policy 28 supporting text:*** *Cardiff is currently experiencing a period of growth in population and employment, but the city cannot continue to expand indefinitely without major consequences for the environment. It is a compact city nearing its physical limits, which include Caerphilly and Garth mountains to the north and the Bristol Channel to the south. Cardiff must generate and support regional growth throughout the south east while enhancing its status as a vibrant capital city of Wales.*
- *The Strategic Development Plan will need to consider the interdependence between Cardiff and the wider region. Regional transport infrastructure reflects the significance of Cardiff and has consolidated its role as the main focal point of the region. The potential to reach central Cardiff quickly and conveniently using the Metro generates opportunities for development in settlements outside the city. The cultural and economic strength of Cardiff must generate region-wide prosperity and well-being.*
- *The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. It has significant brownfield development opportunities to provide new housing and employment areas. There are emerging highly skilled employment opportunities in the transport and digital communications sectors which should be catalysts for further economic investments. The Metro will improve the city's public transport system, especially within the city and to surrounding towns. It benefits from established road and rail links with Cardiff, Bristol and London.*
- *Growth at Newport will help manage the development pressures in Cardiff and provide a strategic focus for the eastern part of the region. Strategic growth should be focussed in and immediately adjoining Newport itself, to support brownfield regeneration.*

- **Policy 30 – Green Belts in South East Wales - The Welsh Government** requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region. Regional plans should consider the relationship of any new green belts with the green belt around Bristol.
  - **Policy 30 supporting text:** Strategic decisions on the location of development, key services and infrastructure should support the region's cities and Valleys communities and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations within the context of the whole region. The Welsh Government supports the use of green belts in the South East region in managing and planning urban growth. Planning Policy Wales sets out the policy context for them. The Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff.

### **Cabinet Response**

9. In response to the details set out in the National Development Framework 2020 – 2040: Consultation Draft (attached to this report as **Appendix 1**) the Cabinet report made the following comments:
  - *The Cabinet welcomes a strategic approach to development in Wales and recognises the opportunities for using the planning system to address national and regional priorities. Clearly, a strategic approach can play an important role in informing the infrastructure investment and developments needed to deliver in areas relating to economic growth, decarbonisation, resilient ecosystems, health and community well-being. As a major urban area, Cardiff particularly welcomes Policy 1, which explicitly supports sustainable urban growth given it is uniquely positioned to deliver on this.*
  - Of particular relevance to Cardiff are statements which recognise and support the key role played by cities and large towns by:
    - Encouraging sustainable and efficient patterns of development;

- Co-locating homes with jobs and vital services and the efficient use of resources;
  - Focussing on cities and large towns as the main development areas;
  - Creating concentrations of jobs, services and amenities;
  - Creating a critical mass to support and sustain good public transport services and encourage active travel.
- *For this approach to function effectively however, the National Development Framework must be informed by, and respond to, the major demographic, economic, housing and transport trends across Wales. This is particularly relevant for Cardiff, given that its size and scale is of regional and national significance.*
  - *For example, Cardiff is projected to be the fastest growing UK Core City and over the next 20 years is projected to grow by more than every other Welsh Local Authority combined. Cardiff is also the economic powerhouse of Wales with 82% of net new jobs created in Wales over the last 5 years created in the capital city. The regional significance of the capital city is further underlined by the fact that over 100,000 commuters travel into Cardiff from outside the local authority boundary every day. Cardiff's population and economic growth therefore represents a major opportunity for Wales that the National Development Framework, as currently drafted, significantly underplays, placing a disproportionate emphasis on the challenges associated with growth.*
  - *For example, Policy 28 recognises the capital city's growth but states that "the city cannot continue to expand indefinitely without major consequences for the environment." The Council's LDP which is underpinned by a robust detailed evidence base demonstrates clearly that significant capacity exists for Cardiff to grow sustainably and in accordance with place-making principles for the duration of the plan period. Furthermore, significant brownfield contributions over recent decades have played a key role in delivering sustainable growth in Cardiff and there is no new evidence within the NDF to suggest that further contributions may not be achieved beyond the current plan period. Policy 28 therefore fails to recognise the sustainable city paradigm where critical mass and agglomeration effects can have major advantages for both the economy and the environment.*

- *The National Development Framework identifies “Newport as the focus for regional growth and investment.” Cardiff Council fully supports the growth of Newport- as well as any other major conurbation area within the region in line with the principles expressed in Policy 1 of the Framework. However, the Council is very concerned that rather than promoting and supporting economic and population growth in Cardiff and Newport the Framework is instead proposing a dispersal of growth from Cardiff to Newport.*
- *Cardiff Council would argue that such a policy of dispersal could undermine Cardiff’s role as the economic driver of the Welsh economy, and run counter to delivering sustainable long-term economic growth in Wales. A policy of dispersal runs the real risk that the jobs and investment currently attracted into Wales by the capital city will not be deflected to Newport but instead would be directed to Bristol and other core cities, and thus not come to Wales at all. The Council would instead argue that the Framework should respond to the national trends outlines in paragraph 12 through seeking to support the Cardiff’s population and economic growth, and the unique role the city economy plays in the national economy, whilst ensure that the benefits of this growth are felt across the wider Capital Region.*
- *In supporting the proposal that ‘the cultural and economic strength of Cardiff must generate region-wide prosperity and well-being,’ the Council would also urge the Welsh Government to ensure that national policy recognises the significant inequalities that exist within Cardiff. For example, if the ‘Southern Arc’ of Cardiff, Ely in the West to Trowbridge in the East, and area with a greater population than Newport, was a single local authority it would be by far the most deprived in Wales. The economic growth in the city centre must lead to improved outcomes for deprived and disconnected communities within the city and the wider city region.*
- *The Council is very concerned that the statements above (para 8) appear in the Framework devoid of reference to any evidence base. It is in the Council’s view considered inappropriate for the National Development Framework to include unqualified statements, for example relating to Cardiff’s growth potential, in the absence of robust evidence in the form of urban capacity studies and other*

*relevant data that would be expected in the development of LDPs and in any future SDP. Given the role that the National Framework will play in informing both the Strategic Development Plan and Local Development Plans it is imperative that it is underpinned by the same rigorous and detailed evidence base expected at local and regional levels. The Council is concerned that this is not currently the case.*

- *This report in the main limits our comments to those parts of the NDF dealing directly with Cardiff. Nevertheless, we have significant concerns about other aspects as well. These derive broadly from the incompatibility of having an evidence-weak NDF which would in turn form the basis of SDPs and LDPs which must be evidence-led. We reserve the right to make further comments as appropriate on aspects beyond Cardiff.*
- *The Council would also argue strongly that the proposals such as those in Policy 28 do not belong in a National Development Framework, but is instead a decision for Strategic and Local Development Plans.*
- *In summary, while Cardiff Council welcomes a great deal in the National Development Framework for the reasons outlined above the Council cannot support the NDF as currently drafted.*
- Cardiff Council would therefore welcome further dialogue with Welsh Government to more fully demonstrate how the city is uniquely positioned to deliver on the 11 outcomes of the National Development Framework, and how this role can be more clearly expressed in the final version of the document. This dialogue could also explore how robust local evidence can help inform the development of the National Framework to ensure that any national plan benefits from the same rigorous assessment as local plans.

### **Report Recommendations**

10. In response to the report, the Cabinet was *'recommended to approve the proposed response to the NDF Consultation Draft as set out in paragraphs 9-20 of the Cabinet report and seek further dialogue with Welsh Government to address the issues raised'*.

## **Way Forward**

11. Members are to note the contents of the Member Briefing Note.

## **Legal Implications**

12. The Scrutiny Committee is empowered to enquire, consider, review and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters there are no direct legal implications. However, legal implications may arise if and when the matters under review are implemented with or without any modifications. Any report with recommendations for decision that goes to Cabinet/Council will set out any legal implications arising from those recommendations. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. Scrutiny Procedure Rules; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

## **Financial Implications**

13. The Scrutiny Committee is empowered to enquire, consider, review and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters there are no direct financial implications at this stage in relation to any of the work programme. However, financial implications may arise if and when the matters under review are implemented with or without any modifications. Any report with recommendations for decision that goes to Cabinet/Council will set out any financial implications arising from those recommendations.



## **RECOMMENDATION**

The Committee is recommended to:

- i. Note the content of this Member briefing note.

**DAVINA FIORE**

**Director of Governance & Legal Services**

**25 September 2019**