

BRIDGEND COUNTY BOROUGH COUNCIL

REPORT TO DEVELOPMENT CONTROL COMMITTEE

5 DECEMBER 2019

National Development Framework Consultation Response

1. Purpose of report

- 1.1 To report Bridgend County Borough Council's response to the publication of the draft National Development Framework (NDF) by the Welsh Government (attached as Appendix 1). The NDF consultation on the draft closed on 1 November 2019 and can be accessed at: <https://gov.wales/draft-national-development-framework>

2. Connection to Corporate Improvement Objectives/other Corporate priorities

- 2.1 This Report assists in the achievement of the following Corporate priority:
- Supporting a successful economy – taking steps to make the County a good place to do business, for people to live, work, study and visit and to ensure that our schools are focused on raising the skills, qualifications and ambitions of all people in the County.

3. Background

- 3.1 The National Development Framework (NDF) is a spatial plan for addressing key national priorities in Wales through the Planning system from 2020 to 2040. It covers the big issues important to Wales' success, including housing, energy, economy, transport and the environment. It identifies where nationally significant developments should take place, where key growth areas are, what infrastructure and services are needed and how Wales can contribute to the fight against climate change.
- 3.2 The draft NDF sets out development policies for Wales as a whole and for three national growth areas: Wrexham and Deeside (North Wales), Swansea Bay & Llanelli (Mid & South West Wales) and Cardiff, Newport and the Valleys (South East Wales). This regional approach aligns with other Welsh Government strategies and allows a consistent approach to policy implementation across Wales, including the delivery of Strategic Delivery Plans (SDPs) for each of the regions identified. The draft NDF identifies 11 outcomes which are a vision for change over the next 20 years and form the basis for its policies and proposals.

4. Current situation/proposal

- 4.1 The outcomes, policies and proposals contained within the NDF aim to deliver the following:
- growth, including new housing and economic development, to be focused on towns and cities with good public transport and active travel networks;
 - urban centres and public transport hubs as focal points for higher density development;

- large public services facilities in town and city centres accessible by walking, cycling and public transport;
- sustainable rural communities and the appropriate growth of rural towns and villages;
- the delivery of more affordable homes;
- the introduction of Mobile Action Zones to help increase mobile coverage in areas of poor or no signal;
- ultra-low emission vehicles and the roll out of electric vehicle charging infrastructure across Wales ;
- the establishment of a national forest;
- large scale (10 mega watts and over) on-shore wind and solar energy development and identified Priority Areas for this;
- Priority Areas for District Heat Networks and identified towns across Wales where such schemes should be suitable;
- safeguarding of important ecological networks and the need to maintain and enhance green infrastructure as part of new development proposals.

As part of the South East Wales region, Bridgend is specifically identified in the NDF as a centre of regional growth. This is based on its strategically important location as part of the South Wales Metro system and the opportunity that this provides to improve rail, bus, cycling and walking infrastructure across the region to provide a focus for investment, regeneration and associated development. The NDF recognises the potential for regeneration and sustainable inclusive economic growth to help deliver the ambitions of the Our Valleys, Our Future project.

The NDF also identifies Bridgend as a Priority Area for District Heating Networks, with an expectation on Planning authorities to identify opportunities for integrating into new and existing development. The NDF proposes a policy for mixed use development proposals of 100 or more dwellings to prepare an Energy Masterplan to establish how such a network can be incorporated and if feasible, implemented.

Bridgend County Borough Council's response to the draft NDF consultation is attached as Appendix 1.

5. Effect upon policy framework and procedure rules

- 5.1 It is anticipated that the NDF will be published by Welsh Ministers in Autumn 2020. When it is, it will represent the top tier of the Development Plan hierarchy in Wales with the Strategic Development Plan (SDP) at regional level and the Local Development Plan (LDP) at local Authority level operating below it.
- 5.2 The LDP will need to be in general conformity with the NDF however, there are no identified impacts on the ongoing review of the LDP. The Council has published its draft Preferred Strategy in accordance with the emerging policies of the NDF. At its core, the Preferred Strategy promotes growth to be focused on existing settlements in accordance with a settlement hierarchy which highlights the importance of public transport connectivity. Policies within the LDP will emphasise the need for the provision of Active Travel infrastructure to be incorporated into development proposals. The Preferred Strategy also emphasises the opportunities presented by the projects and activities identified in the Bridgend Smart Energy Plan to promote

decarbonisation. Specifically, the LDP will incorporate policies to ensure proposed developments demonstrate how the proposal will facilitate a connection to a District Heating Network or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach.

6. Equality Impact Assessment

6.1 There are no direct implications associated with this report.

7. Well-being of Future Generations (Wales) Act 2015 implications

7.1 The NDF will be prepared in accordance with the 7 Wellbeing goals and the 5 ways of working as identified in the Act.

8. Financial implications

8.1 There is no cost implication for the Authority relating to the preparation of the NDF as it is a Welsh Government function. The cost of the ongoing LDP Review will be met from the Development Planning budget and carried out by Development Planning staff with expert advice and evidence procured from consultants and through collaboration with neighbouring Authorities as required.

9. Recommendation

9.1 That Development Control Committee notes the contents of Bridgend County Borough Council's response to the publication of the draft National Development Framework consultation (attached as Appendix 1).

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5 December 2019

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Appendix 1

Organisation	Bridgend County Borough Council
Your address	Civic Offices, Angel Street, Bridgend CF31 4WB
Preferred contact details (email/phone/post)	ldp@bridgend.gov.uk

Consultation Response Form

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	<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"/>

- 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	<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"/>

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

We are broadly supportive of the 11 Outcomes, although we would welcome increased evidence based policy commentary on how the conflicting objectives are to be delivered. For example, as written, the objectives seek economic growth and increased affordable housing provision whilst reclaiming lost biodiversity and protecting greenfield land. The NDF is silent on how these conflicts are to be resolved. There are also gaps in evidential analysis and information, the type of analysis that is required when producing other plans such as Local Development Plans.

Whilst the protection of the environment is an accepted principle of sustainable development, the NDF renders greenfield development difficult to plan for, which can be necessary to meet housing and economic development aspirations where a lack of developable and deliverable brownfield land remains. In order to ensure that the economic and social elements of sustainable development are delivered through land use planning, it is essential to balance all sustainability objectives. More explicit reference to this balanced approach would be welcomed in the NDF.

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 checked="" type="checkbox"/>	<input 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 spatial strategy recognises a “National Growth Area” covering most of South East Wales, which is supported given the growth agenda planned and committed to through the Cardiff Capital Region.

Growth in existing settlements:

Policies 1, 2 and 3 seek to concentrate growth within towns and cities, highlighting that large-scale public service facilities (such as universities and colleges, hospitals and public sector organisation buildings) should be located in town and city centres (Policy 2 refers). This is welcomed and it is recognised that development should primarily be focused towards existing settlements, especially where they benefit from good transport networks that support sustainable travel however, it is unclear whether the NDF has been informed by any urban capacity studies to determine whether there are sufficient, suitable sites available within town/city centres across Wales. Many of these sites have been developed for housing in recent years and the number of vacant/available sites (particularly brownfield sites) within existing settlements in the region is now limited. An over-reliance on growth within existing settlements could stifle growth within the “National Growth Areas” and undermine the delivery of the NDF and its outcomes.

The Policy should therefore also acknowledge that development on the periphery of settlements can also deliver sustainable development, especially where there are current transport routes or the possibility of new routes being opened up. A stronger acknowledgement that some development may need to take place on the edges of

settlements and on greenfield land will ensure that the most sustainable options for accommodating growth can be pursued.

The Planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives. More overt references to this end would be welcomed.

Publicly owned land:

Policy 3 emphasises the importance of publicly owned land in delivering development including for mixed use and affordable housing. Whilst this is welcomed in principle, it is considered that there is not a significant amount of existing Council owned land available in the South East region for development, particularly in town centre locations.

Supporting rural communities:

Policy 4 supports ‘appropriate proportionate growth in rural towns and villages’ but recognises this is best planned at regional and local levels. This is welcomed and should be based on evidence prepared at LDP level.

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	<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 disagree, in what other ways can the NDF approach the delivery of affordable housing?

We are broadly supportive of all initiatives aimed at increasing the supply of affordable housing across Wales however, there are some areas of uncertainty that require clarification within Policy 5.

The housing need evidence underpinning Policy 5 is fundamentally informed by the 2014 based household projections and alternative demographic scenarios haven't been considered. It is questionable as to whether this will impact upon the approach for SDPs and LDPs in terms of setting a housing requirement as use of principal projections at the local level may not be deemed robust by a multitude of stakeholders. Additional clarity on the status of the national and regional housing need estimate identified would also be welcomed. As the evidence base states, the estimates of need

'should not be used as housing targets' and therefore Policy 5 should be reworded to state that the national and regional estimates of housing need should form part of the evidence base to set affordable housing targets at smaller spatial scales. Unless this is clarified, there is a concern that the 47% affordable housing estimate could dictate inclusion of similar targets within SDPs and LDPs. This may not be deliverable (based on smaller scale viability estimates), desirable (in terms of planning for sustainable communities) or appropriate (based on more detailed assessments of housing need at lower geographies). Crucially, the national need identified also fails to factor in supply and is therefore a gross level of need as opposed to a net level of need. This can be misleading, especially if interpreted as a housing target without sufficient explanation of its basis and limitations.

The 'affordable housing' element identified in the NDF is also not TAN 2 compliant and only considers rented forms of affordable housing. This is because the national assessment has opted not to consider key measures of affordability such as house price to income ratios and first time buyer mortgageability. The need for other intermediate products such as low cost home ownership, homebuy and shared ownership has therefore not been considered. There is a risk that the NDF could be perceived as inconsistent with TAN 2 due to this mismatch between evidence and national policy definitions. The supporting text to Policy 5 states "we recognise that the affordability of housing is not uniform across Wales and different responses will be needed in different parts of Wales to meet the needs of local communities". This is very much welcomed although as the national supporting evidence only considers social rent and intermediate rent to be affordable housing, it is unclear whether Policy 5 of the NDF intends to redefine affordable housing and in turn, whether this would also trigger a revision of TAN 2. It is also unclear whether other TAN 2 compliant intermediate products (that may be identified as being in need locally) will be considered contributory to the delivery of Policy 5.

The NDF should also more overtly recognise the role that the private sector has in delivering affordable housing. This is largely influenced by market forces such as development viability, land/build costs, developer risk and return on investment which varies across Wales. In this regard, it is still important to allocate land in locations where developers have appetite to build and where development viability is strong enough to support a policy requirement for increased levels of affordable housing and other necessary infrastructure. In areas with weaker market viability or significant development cost, public sector intervention is often needed to help deliver sites and this should be clearly recognised in the NDF.

Finally, it should be noted that in order to develop quality places with cohesive communities where people want to live, new housing developments need to deliver a sustainable mix of house types and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable housing is too large and fails to create a sustainable mixed community. Delivering the identified need of 47% affordable housing on large scale sites is unlikely to be desirable as it would render it difficult to deliver appropriate clusters of affordable housing or enable sustainable mixed communities to be created.

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?

The identification of mobile action zones is welcomed and will assist in the development and enhancement of telecommunications infrastructure across Wales.

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	<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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The NDF's attempt to encourage the roll-out of charging infrastructure for ultra-low emission vehicles is welcomed, particularly to support rural areas where sustainable transport infrastructure is not always readily available however, there is need to plan for development of the local electricity grid which is not currently capable of meeting the needs of a dramatic and rapid increase in electric vehicles and charging points. The charging infrastructure and wider changes need to be underpinned by an energy plan for the region which should inform Policy 7. In addition, this needs to be supported by improvements to complementary sustainable transport infrastructure across Wales to tackle other transport issues such as congestion.

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	<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"/>

Policy 9 sets out Welsh Government's commitment to developing a 'National Forest' but does not explain how Welsh Government will identify delivery sites and mechanisms to achieve this aim. We are supportive of this initiative but would like more information from Welsh Government on how it will increase woodland cover in Wales by 2000 hectares per annum from 2020 (i.e. next year).

Such proposals should be planned for the long-term to protect our environmental assets now and for future generations in accordance with the WBFG Act. Further consideration should be given to the regulatory framework protecting trees as an environmental asset. They should be protected for their ecological value and not just amenity value.

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	<i>Don't know</i>	<i>No opinion</i>
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"/>

- 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?

The NDF identifies Bridgend as a Priority Area for District Heating Networks with an expectation on Planning Authorities to identify opportunities for integration into new and existing developments. The NDF proposes that, as a minimum, mixed use development proposals of 100 or more dwellings should consider the potential for a District Heat Network.

This is very much welcomed and is in conformity with our local evidence base. Bridgend piloted a whole system approach to local area energy planning as part of 'The Smart Systems and Heat Programme'. Many possible future local energy scenarios were assessed to identify areas within Bridgend more likely to be suitable for development of district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. District heating emerged as the most dominant heat type selected for the more densely populated areas of Bridgend. Building upon this evidence base, our Deposit Plan will include a detailed development management policy that seeks to ensure the use of low/zero carbon heating technologies for new development. Specifically, this policy will aim to facilitate proposals for District Heating Networks or Ground/Air Source Heat Pumps (informed by the SMP and Renewable Energy Assessment) within the County Borough, providing a highly sustainable means of heating developments. This policy will help ensure that development is designed in such a way so as to not prejudice the future development of a potentially County wide District Heating Network and enable development to connect to it at a later date once it becomes operational. Future allocations defined in the Deposit Plan are likely to be significant energy consuming developments and will be required to explore the potential of district heating or the use of ground or air source heat pumps. Therefore this policy will ensure that development proposals will need to be accompanied by an 'Energy Assessment' which investigates the potential to incorporate on-site zero and low carbon equipment and establish connections to existing sources of renewable energy. Opportunities for linking with district heating networks and where appropriate, sharing renewable energy with the wider public should also be explored.

Put succinctly therefore, these policies are welcomed and align with our local evidence base and emerging policies within the Bridgend Replacement LDP.

7. 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	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The 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.

It is clear that the NDF delegates a significant amount of decision making to regional plans and this is broadly supported given that SDPs will have a more robust and detailed evidence base than is apparent with the NDF.

The Cardiff Capital Region (CCR) Cabinet already signed up to the principle of an SDP for the Cardiff Capital Region on 10 June 2019 and a report is currently being considered by all 10 Councils in the region to seek formal approval to proceed.

In terms of the boundary for the SDP, the CCR Cabinet consider the most appropriate boundary is the 10 Local Planning Authority areas in the South East Wales region thus excluding the areas of the Brecon Beacons National Park (BBNP) Authority area. The NDF states that LPAs should determine the geographical footprints of the SDP however, the map of the South East region includes the BBNP areas and this could cause some confusion. The NDF should therefore be explicit under Policy 16 that the SDP need not include the whole region.

Bridgend County Borough is in a unique position as the gateway to both the Swansea Bay Region and the Cardiff Capital Region. The interdependencies and relationships between the Swansea Bay Region and the Cardiff Capital Region is of particular importance to Bridgend and indeed, the success of the NDF more broadly. Chapter 5 and Policy 16 clearly reference the distinctive opportunities and challenges that each region has, emphasising that many policy areas are best considered at the regional scale however, stronger emphasis on the importance of collaborative inter-regional planning, particularly within Authorities bordering wider regions, would be welcomed.

Policy 16 Strategic Policies for Regional Planning also refers to 'gypsy and traveller need'. It needs to be clear that the SDP will be looking specifically at transit sites and that permanent sites will be identified in LDPs and based on evidence of local need.

8. 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	<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 checked="" type="checkbox"/>

9. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF clearly references the importance of co-ordinating housing, economic growth and connectivity infrastructure across the whole region although crucial interdependencies between the Swansea Bay Region and the Cardiff Capital Region should also be highlighted. This is fundamental to collaborative, inter-regional strategic planning to deliver the objectives of the NDF, recognising Bridgend County Borough's pivotal position in this respect.

Policy 26 stresses that the SDP should seek to improve connectivity across the region through long term proposals such as the Swansea Metro scheme. There should also be strong emphasis on developing links between the Swansea Metro and the South Wales Metro to enhance inter and intra-regional connectivity, maximising opportunities to improve accessibility across these regions. Strategic transportation links at bordering areas such as Bridgend can provide a basis for better integrating land-use and transport planning.

10. 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.

Spatial Strategy

We support the identification of Bridgend as a Centre of Regional Growth. This is justified by the strategically important location as part of the South Wales Metro system and the opportunity that this provides to improve rail, bus, cycling and walking infrastructure across the region to provide a focus for investment, regeneration and associated development. The NDF also recognises the potential for regeneration and sustainable inclusive economic growth to help deliver the ambitions of the Our Valleys, Our Future project, which is welcomed however, more broadly speaking, it is unclear why certain specific Centres have been identified as Centres for Regional Growth and not others or what their role is in the region. In contrast, in the Mid and West Wales region, Policy 24 recognises the role of the Regional Centres identified there as the focus for managed growth. The NDF should take a consistent approach to this type of settlement across Wales. Decisions about the spatial strategy for the region should be taken at a regional and local level, as recognised at various points in the NDF.

In particular we have some concerns regarding Newport being identified as a major focus of growth in terms of the wider implications this will have on the rest of the region. This is especially given the fact that a significant proportion of Newport is located within a Zone 3 Flood Zone as detailed within the consultation draft of TAN 15. There are also serious transport constraints namely the congested M4 and the Brynglas Tunnels that need to be addressed for the NDF Strategy to be successful.

In order to deliver the Strategic Policies 1 and 4, it may be more appropriate for the NDF to recognise the whole of the South East Region as an area where sustainable growth is required with the strategy for delivery being determined at a regional and local level through the SDP and LDPs respectively.

Housing

The estimates of additional homes have been derived from the Estimates of Housing Need in Wales by Tenure (2018-based). The statistical release for the Estimates of Housing Need provides caveats that they are estimates based on a given set of assumptions, aimed at forming a basis for policy decisions. It is clear that the figures in the statistical release “should not be used as housing targets” yet there is a real danger that the inclusion of a single figure in the NDF without a full explanation of what this figure is will result in the figure being treated as a target.

There is some recognition that these estimates provide part of the evidence base and context on which the SDP should be based but this should go further to state explicitly that this figure is not a housing target but is informed by household projections that are based on past trends.

Strategic Transportation

In terms of the illustrative map at page 63, the symbolic ‘M’ for South Wales Metro could be improved by showing more detail on the map. This is particularly important when the text refers to the major strategic opportunity the Metro provides to improve infrastructure across the region and provide a focus for investment, regeneration and associated development. There is a fundamental need for the Swansea Bay Metro to be closely planned and linked with the South Wales Metro (via Bridgend) to successfully deliver the intended outcomes of the NDF.

Whilst there is a heavy emphasis on Transit Orientated Development in the SE Wales region, this should not, in principle, preclude sites in areas not well served by Metro provided there is opportunity to improve or add new public transport infrastructure. There should be added emphasis on this point. Intra-urban connectivity should also be shown as moving between east and west in the South East Wales region and not just from the Valleys heading southwards. The importance of developing transport links to and from the region including the other regions and England should also be stressed. It is noted that there is a different policy approach to links to the English regions between North Wales and South East Wales i.e. in North Wales the wider cross-border links to Cheshire/Liverpool City Region are recognised and encouraged (Policy 17). There is no similar reference in Policy 28. The NDF should recognise and support the important cross-border links in South East Wales in the same way as North Wales.

11. 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.

No comment

12. 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?

No comment.

13. 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?

No comment

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.

No comment

14. 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?

Bridgend County Borough Council has published its draft Preferred Strategy in accordance with the emerging policies of the NDF. At its core, the Preferred Strategy promotes growth within or on the edge of existing settlements in accordance with a settlement hierarchy which highlights the importance of public transport connectivity. Policies within the LDP will emphasise the need for the provision of Active Travel infrastructure to be incorporated into development proposals. The Preferred Strategy

also emphasises the opportunities presented by the projects and activities identified in the Bridgend Smart Energy Plan to promote decarbonisation and connections to a District Heating Network. These principles strongly accord with the draft NDF.

It is noted however, that the NDF provides no policy framework for a number of land uses including retail, recreation and leisure, minerals, tourism and general infrastructure. Whilst it is acknowledged that there are a number of documents that set out national strategies for some of these issues, the NDF should provide a more holistic spatial context to address such issues of national importance and provide the spatial framework for the policy framework at lower tiers.

The NDF would also benefit from more explicit signposting to evidence that supports the Policies and intended outcomes it contains, whilst demonstrating that they are deliverable. The NDF is setting outcomes that SDPs and LDPs will need to conform to and prove through examination that they are deliverable, based on robust evidence.

15. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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