

Submission of Evidence Form – National Development Framework

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Title of evidence

Principles for an Effective NDF

Summary of evidence

RTPI Cymru has developed an approach to the NDF which has been informed by our cross-sectoral Policy and Research Forum and discussions with RTPI members across Wales. Our evidence promotes a leadership role for the NDF, which has the ability to draw together potentially competing national land uses to provide an integrated approach to investment decisions with a national impact.

Summary of key issues/conclusions

To achieve such an important and beneficial role there are some key principles which need to underlie the preparation of the NDF.

- **Timescale for preparation and review** needs to be realistic but not over lengthy, and include time for engagement and consultation.
- **Adequate professional resources** must be allocated to enable the necessary level of data gathering, assessment, consultation and final presentation to meet the agreed timescales.
- **Clear lines of responsibility** at Departmental and Ministerial level should be detailed within the Welsh Government
- **Take a long term perspective.**
- **Establish a widespread level of support at the outset.**

In order to maximise the benefits, the NDF needs to:

- **Be evidence based and deliverable** - The NDF must show evidence of need for investment and evidence to justify the location

- **be spatially defined - by this we mean that it should make choices between places** - The NDF should only include policies and proposals which are spatial; other policies are more appropriately included in PPW.
- **provide integration across-different sectors and should spatially integrate all national policies.**

In particular, the NDF should spatially map out:

- **Transport investment and demand management corridors –**
- **Air Quality**
- **Energy infrastructure**
- **Cross-border linkages of policy and infrastructure** – the NDF should define those linkages across the border with England and the sea border with Northern Ireland and the Republic of Ireland.
- **a settlement hierarchy for Wales**, especially related to the best locations for future growth,
- **National Parks and AONBs**
- **Minerals**
- **Waste**

Why have you submitted this evidence?

RTPI Cymru believes the National Development Framework (NDF) should set the framework for decision-making on major spatial planning policy and infrastructure at the national level.

The content of the NDF needs to be strategic in nature, setting the context for taking difficult national decisions, at a much earlier stage than is currently the case.

It should inform long-term investment goals and identify the strategic development consequences of major infrastructure, and the infrastructure consequences of strategic development. Importantly the NDF should lead in integrating major investment decisions and support strategic and local development planning across Wales.

How should this evidence inform the development of the NDF?

The evidence from RTPI Cymru, supported by a further detailed briefing paper, provides a number of principles to guide the development of the NDF.

It also provides evidence of why a strategic approach to development is required in Wales and the need for collaboration across Government and stakeholders to achieve the Wales We Want.

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

The NDF offers the opportunity to identify environmental characteristics and broad strategies to balance protection, access, economic opportunities and living communities to meet the Well-being Goals. It should recognise that land and other resources are finite and subject to competing demands. The strategy the NDF sets out should help decision making on those competing demands.

Tackling national infrastructure challenges individually, or on a sector by sector basis, is a highly inefficient process. The NDF should include a coherent national infrastructure strategy whose policies and proposals inform and incorporate other national plans.

The NDF can provide the long term perspective to future-proofing society from the impacts of climate change, including extreme weather, water provision and energy supply, in hand with anticipated demographic change i.e. population growth, ageing populations and social cohesion.

Why is the evidence of national significance?

RTPI Cymru recognises the hierarchy of the development system introduced by the Planning (Wales) Act 2015 and has been careful to ensure that evidence relates to the national level, so ensuring the role for Strategic Development Plans (SDPs) and Local Development Plans (LDPs) are not undermined. It is essential that the hierarchy is respected.

However, we do acknowledge that where there is no SDP, the NDF may need to perform that role.

Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)

Yes, including our additional briefing paper providing more detail.

Principles for an Effective NDF

RTPI Cymru Briefing Paper in support of its response to the NDF

Key Principles

A National Development Framework for Wales could be a powerful tool to guide strategic land use development and the provision of infrastructure in an integrated, sustainable and economically viable manner. However to achieve such an important and beneficial role there are some key principles which need to underlie its preparation.

- **Timescale for preparation and review.** RTPI welcomes the timescale currently advertised for adoption of the NDF. It is important that the preparation is realistic but not over lengthy, including time for engagement and consultation. There must also be a clear commitment on timescale for review, which we note is currently set at five year reviews. This should prevent a drawn out process which could be interesting and iterative but would delay the benefits of the Framework.
- **Adequate professional resources** must be allocated to enable the necessary level of data gathering, assessment, consultation and final presentation to meet the agreed timescales.
- **Clear lines of responsibility** at Departmental and Ministerial level should be detailed within the Welsh Government. It is essential that the NDF has ownership and buy-in across Welsh Government. There may be some areas which do not consider themselves to be relevant to the NDF, such as education and health provision, but these can have significant spatial impacts in their operation.

A recent Welsh Government consultation on the Infrastructure Commission for Wales stated that the Commission's work will inform the NDF. RTPI Cymru welcomes the linkages between the Commission and the NDF. However, there are concerns on the timescale if the Commission is not yet operational. It should not hold up the progress of the NDF.

- **Long Term Perspective.** RTPI Cymru welcome the 20 year long term period in order to set clear long term strategies and targets. However it should also have longer-term aspirations in order to deal with future impacts, particularly arising from climate change. RTPI Cymru accepts that major changes in the context that the NDF will operate will occur, such as economic shocks, and this would affect timescales to achieve strategies and require adaptations but the underlying direction set by the Framework should be sufficiently strong and flexible to accept such changes. Information on how the NDF will be monitored on an ongoing process to inform the five year reviews, would be helpful; any process should enable public scrutiny.
- **Establishing a widespread level of support at the outset.** Given the purpose of the NDF, it is important that it is able to outlast more than one Welsh Government term, even if the political complexion changed. Such support needs to be drawn from politicians at National and local levels, as well as amongst partner organisations, including a role for RTPI Cymru. Means of obtaining such

broad support should include also involve active engagement in the preparation and review phases. It will be for the Welsh Government to determine how to secure political input but possibly a small multi Party committee of AMs might be convened with membership selected for an interest in this important matter. RTPI Cymru supports the current open engagement with a wide range of interests across Wales to enable the input of ideas, and opportunities for potentially divisive issues or major omissions to be picked up early in the preparation process, and suggestions to resolve them obtained.

Given the role of the National Assembly for Wales in agreeing the final NDF, we would expect a comprehensive briefing programme to be in place to provide all AMs involved with the knowledge to enable them to make an informed contribution.

RTPI Cymru believes the National Development Framework (NDF) should set the framework for decision-making on major spatial planning policy and infrastructure at the national level. The content of the NDF needs to be strategic in nature, setting the context for taking difficult national decisions, at a much earlier stage than is currently the case. It should inform long-term investment goals and identify the strategic development consequences of major infrastructure, and the infrastructure consequences of strategic development. Importantly the NDF should lead in integrating major investment decisions and support strategic and local development planning across Wales.

The NDF's preparation should take account of (but not repeat) existing national planning policies. That should not completely prevent it raising questions about that policy or its application. To avoid confusion any deviation from established planning policy should only be considered in exceptional circumstances, after careful consideration of the issues concerned, and detailed consultation.

There is a need for clarity of how the NDF will be reflected through SDPs and LDPs and guidance for these plans that may be emerging or under review during the transition period once the draft NDF has been published.

Future-proofing Society

The NDF can provide the long term perspective to future-proofing society from the impacts of climate change, including extreme weather, water provision and energy supply, in hand with anticipated demographic change i.e. population growth, ageing populations and social cohesion.

To effectively help 'future-proof' our societies for the twenty-first century will require much greater attention to how we organise and use land, how we transport ourselves, how we live and work in communities, how we generate and distribute energy, and how we use water – all in a coherent and coordinated way. The RTPI has published a report on the need to address these significant issues on a coordinated basis. The report can be viewed on the RTPI's website: <http://www.rtpi.org.uk/knowledge/research/planning-horizons/future-proofing-society/>

In order to maximise the benefits, the NDF needs to:

- **be evidence based and deliverable.**

The NDF must show evidence of need for investment and evidence to justify the location.

- **be spatially defined - by this we mean that it should make choices between places.**

The NDF should only include policies and proposals which are spatial i.e. they can be mapped; other policies are more appropriately included in PPW.

- **provide integration across-different sectors and should spatially integrate national policies.**

Tackling national infrastructure challenges individually, or on a sector by sector basis, is a highly inefficient process. The NDF should include a coherent national infrastructure strategy whose policies and proposals inform and incorporate other national plans. It should detail national constraints for development, including the identification of environmental characteristics.

A lack of joined up thinking about how infrastructure provision can tackle problems in other sectors means project costs and rationale often seem unpalatable when viewed in isolation, whilst in reality they may have the potential to deliver far-reaching and hugely valuable benefits. The Government needs to operate in a way that enables infrastructure, for example transport investment, to be integrated with wider policy priorities across different sectors. The NDF provides that vehicle.

The NDF offers the opportunity to identify environmental characteristics and broad strategies to balance protection, access, economic opportunities and living communities to meet the Well-being Goals. It should recognise that land and other resources are finite and subject to competing demands. The strategy the NDF sets out should help decision making on those competing demands.

Cardiff University, supported by RTPI Cymru, is currently developing a web-based, interactive data map tool for Wales to enable evidenced and better-coordinated policy that avoids geographic or spatial policy conflicts. The Map for Wales project offers the opportunity for policy makers and investors to explore how individual policy interventions interact with and impact development at both a local and national level. Such a tool would be invaluable in the development of the NDF.

Spatial Policies

In particular, the NDF should spatially map out:

- **Transport investment and demand management corridors** – it would not be appropriate to mark out specific new transport routes, unless these had already been through the appropriate decision process. The NDF should instead outline national transport corridors incorporating the National Transport Plan. These should include national rail and road routes and facilities for air and sea ports, as well as National walking and cycling routes and canals. The identification of key employment growth opportunities related to those corridors. Possibly incorporating a strategy that larger employment and other developments not only need but should directly enable transport improvements.
- **Air Quality** – by mapping air quality across Wales, will help guide major investment decisions. For example, where is investment needed to mitigate poor air quality, where should investment of certain types be avoided because of poor air quality?
- **Energy infrastructure** – the NDF should set out the preferred locations for energy generation infrastructure as defined as Developments of National Significance (DNS). The NDF should also include spatial strategies for energy transmission infrastructure. There should also be reference to those potential areas for schemes which fall outside of the Welsh Ministers' responsibility and are defined Nationally Strategic Infrastructure Projects (NSIPs).
- **Cross-border linkages of policy and infrastructure** – the NDF should define those linkages across the border with England and the sea border with Northern Ireland and the Republic of Ireland, through sea ports.
- **National Parks and AONBs** stating their national roles. Whilst these are not the areas of Wales that should be the focus of major development, they are important natural and cultural resources for Wales and should therefore be acknowledged in the NDF.
- **Minerals Resources** needed for safeguarding future resources and ensuring an appropriate sequencing / hierarchy of extraction operations to ensure minimal transport and ecology/landscape impacts.
- **Waste** strategy is another area that would benefit from a national spatial overview.

The strategic value of best quality farmland, for food production for economic and food security reasons, should be included. Also the NDF could consider a strategic commitment to allowing a level of new commercial forestry planting (avoiding the best farmland and most sensitive environmental sites) capable of supporting the important Welsh timber processing industry which is now threatened by declining supplies.

Settlement Hierarchy and Housing

To provide a national strategy for managed sustainable growth, the NDF offers the potential for identifying a settlement hierarchy for Wales, especially related to the best locations for future growth, and this would then set a context for SDPs and LDPs. All settlements should be well connected, whilst retaining their distinctiveness. However, RTPI Cymru accepts that connectivity may be in different forms in rural and urban areas.

The settlement hierarchy must be agreed through evidenced-based criteria and be flexible to allow for local circumstances, evidenced through the SDP or LDP process.

Any settlements identified as suitable for growth, should incorporate principles which support the well-being goals, for example effective rail linkages and public transport / active travel linkages, green space, social infrastructure e.g. schools, health centres, and be walkable neighbourhoods.

To reflect the need to address the issue of housing should only be considered on a broad scale leaving it up to SDPs and LDPs to consider the best way to allocate the provision, including brownfield, urban extension and new settlements, guided by planning policy. However, if SDPs are not forthcoming there needs to be a strategic steer for housing which links housing investment with growth and connectivity investment.

Welsh Language

RTPI Cymru welcomes that a Welsh Language Impact Assessment will be undertaken on the NDF. The Map for Wales tool kit may offer evidence to consider the potential impacts of national development on the Welsh language. The forthcoming revised TAN on Planning and the Welsh Language should also offer advice on DNS and the Welsh language.

RTPI Cymru

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

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