



Ein cyf/Our ref:

Mike Hedges MS,
Chair of the Climate Change, Environment and Rural Affairs Committee

21 September 2020

Dear Mike

Following extensive consultation on the draft National Development Framework (NDF) last year, I have laid today the revised draft NDF before the Senedd for a 60-day consideration period.

The NDF is accompanied by a consultation report setting out the issues raised during the consultation, a schedule of changes I intend to make following consideration of the consultation responses, and an updated integrated sustainability appraisal. They can be viewed [here](#).

My response to the conclusions you made after your initial consideration of the draft NDF is included in the consultation report and is also appended to this letter. To support the scrutiny process I have today published two documents. The first sets out how I intend to monitor the NDF after its publication; and the second is a version of the schedules of changes document that has been laid in the format of the draft NDF document that was consulted upon last year. These documents are available to view [here](#).

I will be tabling an amendable motion in government-time to provide an opportunity for the Senedd to express its views on (but not approve) the draft NDF. The debate will take place during the Senedd's 60-day consideration period so the Government can reflect on the issues raised together with any recommendations from Senedd Committees in a timely manner.

During last year's consultation on the draft NDF, Senedd members expressed to me the importance of everyone being able to understand what the NDF was and what it would mean for them. Some thought the name 'national development framework' did not set out what the NDF was or would do. I have reflected on this and asked Children in Wales to help develop a new title. They suggested the name 'Future Wales – The National Plan 2040'. On publication, the NDF will be known by this new name and referred to in short as Future

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Wales. You will see this new name appearing on some of the documents that will support the scrutiny process.

I look forward to working with the Senedd on the completion of Future Wales, our first National Development Framework.

Yours sincerely,

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive style with a large initial 'J'.

Julie James AS/MS

Y Gweinidog Tai a Llywodraeth Leol
Minister for Housing and Local Government

Conclusion	Response
Conclusion 1. The Welsh Government must use the NDF outcomes to articulate a bolder long-term vision. The national dimension of strategy needs to be more fully developed.	Accept The Introductory chapters of the NDF, up to and including the NDF Outcomes, will be updated and will be clearer on the role of the NDF and how it can help deliver bold changes. The Outcomes will be strengthened and will be complemented by a monitoring framework. Chapter 4 which covers the national strategic matters will be expanded, with additional policies on rural issues, transport, digital communications and flood risk. The linkages between the national issues and regional issues will be more clearly signposted by using cross-referencing and consistent structures. Financial Implication: None.
Conclusion 2. The NDF should use a set of clear principles of sustainable development, derived from the Well-being of Future Generations Act 2015, to underpin guidance on the identification of appropriate locations for growth and development.	Accept in principle The draft NDF set out how the Well-being of Future Generations Act, and its definition of sustainable development, shaped and informed its preparation. Chapter 1 of the NDF will be revised to ensure the key messages are clearly communicated. The Integrated Sustainability Appraisal embeds the principle of sustainable development at all stages of development of the NDF and ensures the NDF is as sustainable as possible. Financial Implication: None.
Conclusion 3. There is scope for more exploration and better presentation of the implications of the identified challenges and opportunities for each area of Wales. For each area, the NDF should map demographic, economic, environmental and Welsh language dimensions	Accept It is agreed that spatial representation of key issues will strengthen the NDF and help better explain the challenges and opportunities the NDF is seeking to address. Chapter 2 and the regional sections will be amended to include more maps and graphic presentation of data. Financial Implication: None.
Conclusion 4. There needs to be a clearer rationale for the allocation of policies between the NDF and PPW. Non-spatial policy should be reserved for PPW. Where a national policy is included in PPW and not the NDF, the NDF should signpost this.	Accept It is agreed that the relationship between the two documents and, it follows, the allocation of policies, could be more clearly articulated. The policies contained in the draft NDF reflected Government priorities outlined in its key strategy documents, particularly where these have a spatial expression, whilst PPW covers all major issues of relevance to the planning system. Chapter 1 of the NDF now provides a clearer rationale for the allocation of policies and this is set within a revised explanation of the relationship between the documents. An illustrative diagram will be included which exemplifies the topic areas covered in both documents. Together

Conclusion	Response
	these changes seek to highlight where topics are covered by both documents and where they are not. To highlight links between NDF policies and PPW we will include a visual cross-reference alongside each policy, with all links compiled in an appendix to the NDF. Financial Implication: None.
Conclusion 5. The Welsh Government should publish a matrix or grid that clearly identifies and cross-references the relationship between the NDF and other policies.	Accept in Principle It is acknowledged that clarity and transparency surrounding the relationships between policy documents is important. The NDF is accompanied by an integrated sustainability assessment which outlines the scope of documents which have a relationship with the NDF. The changes made in response to conclusion 4 are applicable to this conclusion and will provide clarity on the relationships between the NDF and other policies. Further, written statements on how the NDF links to other strategies will be included. Financial Implication: None.
Conclusion 6. The assessment of challenges and opportunities in the NDF should place Wales within its wider geopolitical context and address its external relationships. The Welsh Government should work with the UK Government to develop mechanisms to encourage cross-border collaboration on spatial planning matters of common interest.	Accept It is agreed that Chapter 2 of the NDF would be strengthened by a wider UK and geopolitical context. The Welsh Government welcomes opportunities to engage with the UK Government on spatial planning matters, but recognises that England has a significantly different legislative context and approach to spatial planning. The Welsh Government has worked with and involved the offices of the Mayors of the Combined Authorities in South West England, the West Midlands and North West of England in the preparation of the draft NDF. Forums such as the 5 Administrations meetings of Chief Planning Officers and the British and Irish Council have been utilised to develop shared approaches where possible. Where there are mutually beneficial opportunities for cooperation on spatial planning matters, for example the current work by the UK Geospatial Commission to develop mapping capabilities, the Welsh Government is eager to be involved. Financial Implication: None.
Conclusion 7. We are disappointed that there is insufficient alignment and reciprocity between the NDF, the Transport Strategy, the Low Carbon Wales Plan, the Wales National Marine Plan and the Wales Infrastructure Investment Plan. This must be addressed. The Welsh Government must also	Accept We agree the NDF will be strengthened when it is complemented by other Welsh Government strategies and plans. To a degree, this should emerge organically as documents such as the Transport Strategy and the Wales Infrastructure Investment Plan are revised in the coming years. An explanatory paper explaining how the NDF will evolve as it is reviewed was published in January 2020.

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explain how the NDF will support the foundational economy.	The revised NDF will clarify the relationship and links between the NDF and existing documents, such as Low Carbon Wales and the Wales National Marine Plan. The revised NDF will contain more specific references to the foundational economy, as defined in Prosperity for All: the economic action plan. Where discreet elements of the foundational economy are highlighted in the NDF – for example tourism - we will highlight that this is part of the foundational economy. Financial Implication: None.
Conclusion 8. The Welsh Government should make a statement on how the policies in the NDF will contribute to its ambition for there to be 1 million Welsh speakers by 2050.	Accept NDF Outcome 4 will be developed, setting out how planning can contribute to the wider ambition. The ISA contains a specific objective on the Welsh language and contains statements explaining how NDF policies contribute to the Welsh Government's strategic ambitions for the Welsh language. Financial Implication: None.
Conclusion 9. The Welsh Government should set out how the NDF is to be monitored.	Accept It is agreed that the NDF would be strengthened by an explanation of how the NDF will be monitored and reviewed. Chapter 3 will be expanded to provide an overview of the intended approach and a supporting paper explaining in detail the monitoring and review process published. Financial Implication: None.
Conclusion 10. The NDF should adopt the four region model recommended by Cardiff University.	Accept Cardiff University's August 2017 Report 'Identification of Regional Areas for the National Development Framework' concludes that there should be 4 NDF regions, with Ceredigion being included in the South West region and Powys forming a Central East Wales region in its own right. The report recognises that a single authority region may give rise to issues and states: If however 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. It is agreed the NDF should adopt the 4 region model recommended by Cardiff University on the basis that a region should comprise of more than one authority. Financial Implication: None.

Conclusion	Response
Conclusion 11. The NDF should recognise the opportunities for people to live and work sustainably outside towns and cities.	Accept The Welsh Government agrees that rural areas must provide opportunities for people to live and work so that they remain sustainable, resilient and successful places, complementing not competing against large urban areas. The NDF supports sustainable growth in all parts of Wales. National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. Development and growth in towns and villages in rural areas should be proportionate and of appropriate scale, and support local aspirations and need. In order to address these issues the draft NDF policy 4 on rural communities will be split in to two policies, a revised Policy 4 Supporting Rural Communities and a proposed new Policy 5 Supporting the Rural Economy. The purpose of this is to provide clearer focus and greater detail on the issues relevant to each policy and which will together provide a more coherent strategy for rural areas. The revised NDF strongly supports communities in rural areas; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services. The revised NDF recognises the need for a broad economic base to provide employment opportunity, increased skill levels and wages, and identifies sectors which Planning Authorities should seek to encourage, including the foundational sector (especially tourism and food and drink), agricultural diversification and innovative and high technology enterprise. The revised NDF emphasises that settlements reflect good placemaking principles to create vibrant and active places where people can walk and cycle and are less reliant on cars, resulting in greater well-being and health benefits. Public transport initiatives are supported together with active travel and growth of electric charging networks. The NDF supports stronger strategic links across and between regions. The revised NDF states regions should work together to identify ways to develop stronger strategic transport links between rural areas and larger towns and cities for mutual economic benefit. Financial Implication: None
Conclusion 12. The NDF should set out a positive strategy for economic and social renewal and development in rural Wales.	Accept It is agreed the NDF should be revised to present a more positive message for rural areas. Proposed Policy 5 highlights the opportunities for growth and development

Conclusion	Response
This strategy should encourage appropriate economic growth, improved transport and ecological connectivity.	in rural areas and recognises the challenges that need to be addressed in order to establish economically and socially strong and sustainable places. Draft NDF policy 4 on rural communities will be split in to two policies. A revised Policy 4 Supporting Rural Communities and a new Policy 5 Supporting the Rural Economy. The purpose of this is to provide clearer focus and greater detail on the issues relevant to each policy and which will together provide a more coherent strategy for rural areas. The revised NDF will identify the sectors which are important to rural areas and which should be supported. The rural economy needs to establish a broad employment and skills base to build resilience and sustainability. It is essential that opportunities exist in rural areas to retain and attract people of working age, help tackle social issues and contribute to well-being. The revised NDF supports the foundational sector (emphasising the likes of tourism and food and drink), start-ups, micro business, agriculture and diversification. The revised NDF also recognises the importance of innovative and high technology business in rural areas to help rural areas unlock their full potential. Planning Authorities should encourage the growth of all these sectors, and supply and distribution networks, through policies in Strategic and Local Development Plans. The revised NDF emphasises that rural settlements reflect good placemaking principles to create vibrant active places where people can walk and cycle and are less reliant on cars, resulting in greater well-being and health benefits. Public transport initiatives are supported together with active travel and growth of charging networks. The revised NDF talks in detail about transport and connectivity generally across Wales and much of this also applies to rural areas. It has a proposed new Policy 11 National Connectivity and proposed new Policy 12 Regional Connectivity. Ecological connectivity is covered in detail in draft Policy 8 Strategic Framework for Biodiversity Enhancement and Ecosystem Resilience; this has been slightly revised and has been renumbered as proposed Policy 9 Resilient Ecological Networks and Green Infrastructure. The essential nature of digital communications in rural areas is highlighted to support social and economic interaction, access to services and to help tackle isolation and exclusion and improve well-being. The revised NDF supports the need for modern fast digital infrastructure in rural areas. Local Planning Authorities should work with mobile phone and broadband operators to ensure the needs of rural areas are assessed and planned for through the Strategic and Local Development Plan

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	process. Mobile Action Zones will contribute to this objective and a new Digital Communications policy has also been introduced to the NDF. Financial Implication: None
Conclusion 13. The Welsh Government should indicate how the strategy in the NDF is to be given effect before SDPs are adopted. Local Planning Authorities have demonstrated a limited appetite for SDPs. The Welsh Government should explain how the development of such plans can be incentivised.	Accept The NDF will have effect as a development plan from the day it is published and will be used in decision-making. When the NDF is published there may be need to review lower tier plans to ensure they are in general conformity with the NDF. Recognising that Strategic Development Plans (SDPs) are not yet in place, the NDF has a strong focus on regional planning. NDF regional policies set out the key regional issues identified through the plan preparation process to provide a starting point for the preparation of SDPs. This provides a context for regional planning in advance of the adoption of SDPs. As SDPs are required by law to be in conformity with the NDF, the regional content of the NDF provides a clear outline of the matters SDPs must address while enabling regionally-distinctive approaches to be developed. Proposed Policy 19 in Chapter 5 of the NDF sets out the framework for the preparation of SDPs. The NDF's regional policies will focus Welsh Government and key stakeholder action and investment in the four regions, identifying key strategic spatial issues and providing a framework for the co-ordination of national economic, housing, regeneration, environmental, flooding, energy, rural and transport policy delivery. SDPs, when prepared, will develop and add detail to the regional policies of the NDF. An important feature of the three-tiered development planning system is the ability of higher tier plans to be influenced by the emergence and adoption of other development plans. In time it is anticipated the NDF, SDPs and LDPs will inform and shape each other and this relationship will ensure a strong, effective planning system at all levels. The NDF has been prepared to directly support the delivery of SDPs. The Local Government and Elections (Wales) Bill 2019 has specifically considered regional planning and places a duty on Local Authorities to work together to prepare SDPs. This will ensure greater certainty on the delivery of SDPs. The Welsh Government will consider using its intervention powers, if required, to commence and drive the preparation of Strategic Development Plans. Financial Implication: None
Conclusion 14. The Welsh Government should indicate	Accept

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how it will ensure that national and regional strategic planning and city region deals are co-ordinated and properly aligned. The Welsh Government should set out its understanding of when Regional Economic Development plans will be published.	The NDF is highlighted in Prosperity for All as holding an important role in driving sustainable growth and combating climate change by guiding strategic development over the next 20 years. The NDF supports the delivery of the Economic Action Plan (EAP) and will help plan and consent the modern connected infrastructure the EAP seeks to deliver; ensure jobs are closer to homes; and develop a stronger approach to regional planning and delivery. City deals and the provision of infrastructure to stimulate growth across wider regional areas, will rely on the planning system to help co-ordinate infrastructure delivery, land-uses and maximise the benefits of investment across regions. The Welsh Government's Chief Regional Officers are preparing Regional Economic Frameworks to drive the Welsh Government's regionally focussed approach to economic development. The NDF, with its strong regional focus and direction for Strategic Development Plans, will directly support this approach. Prosperity for All: the Economic Action Plan set a commitment to a more regionally focussed approach to economic development and sets out the intention to develop regional economic plans in each of the regions of Wales. Having engaged with stakeholders the consensus feedback has been the need not for a plan, but rather for Regional Economic Frameworks which set out a shared set of economic priorities across the public, private and third sectors and a shared framework for their delivery within each of the regions. Regional Economic Frameworks (REFs) are important vehicles for facilitating collaborative delivery and it is intended that the REFs will in practice be a high level and long-term economic development strategy for each region, led by Welsh Government, co-designed and co-delivered with the regional partners. The REFs will identify and develop the distinctive strengths of each of the Welsh regions, supporting inclusive and sustainable economic growth, and will maximise opportunities to address regional and local inequalities, helping the Welsh Government and participating partners to contribute to the Well-being Goals for Wales. This is consistent and complementary to the aims of the emerging national (all-Wales) Regional Investment Framework and work is being taken forward in tandem, working closely with colleagues in WEFO. The regional teams, led by the Chief Regional Officers, have been working with key stakeholders and partners over the past months to gather evidence to help inform development of the REF and will be embarking on a

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	series of broader engagement events over the coming months, with a view to publishing later in the year. The ongoing work to align with and inform the City and Growth Deals, OECD project on regional governance and investment, WEFO's thinking on Regional Investment Funds, draft National Development Framework, the Local Government position on CJsCs and a range of other economic development-related work across Welsh Government, will influence the content and potentially the timings of the REFs. Furthermore, the REFs are underpinned by the principle of co-design and co-development, and consequently will reflect the pace at which partners in each region are content to proceed, rather than timescales imposed by Welsh Government. Financial Implication: None
Conclusion 15. The strategy set out in the NDF should have a clearer economic purpose.	Accept in principle We agree the NDF would be strengthened by the inclusion of clearer statements on economic ambitions. Links between the NDF and the Economic Action Plan will be clarified, including acknowledging the role of the foundational economy (see also conclusion 7). Financial Implication: None
Conclusion 16. The Welsh Government should provide evidence of the capacity for development in existing urban centres and the availability of publicly owned land for development on the scale and in the locations required to support the NDF strategy.	Accept in principle The NDF does not set targets for levels of growth, therefore specific capacity studies are not considered appropriate or necessary. The Welsh Government will make available mapping that shows the extent of land-use change in urban locations, including those places named in the draft NDF strategy, over the past twenty years. Land in public ownership includes the holdings of the Welsh Government, UK Government, local authorities, NHS, Ministry of Defence and Natural Resources Wales. A Public Land Unit has recently been established within Welsh Government to focus on delivering development through land in public ownership. The Welsh Government recognises the benefit of developing a single register and map of publicly-owned land but this does not yet exist. Financial Implication: None
Conclusion 17. Policies concerning new settlements should be consistent between the NDF and PPW.	Accept in principle PPW sets the overall context for new settlements and the process for a development plan to allocate one. PPW enables new settlements to be identified under certain circumstances, but does not require development plans to identify them. We do not agree with the inference that PPW and the NDF are not consistent with each other. This NDF states that new settlements are not necessary at this time and

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	that our focus should be on radical improvements to existing cities and towns to address deprivation, inequality and to improve the range and quality of services they offer. This position does not prejudice future iterations of the NDF from identifying a need for new settlements if the evidence suggests that they are required. Financial Implication: None
Conclusion 18. The NDF should make a clearer statement about the important role of universities in supporting strategic development and renewal at national and regional levels.	Accept It is agreed that Chapter 2 of the NDF should identify the opportunity universities provide to support strategic development. Each regional section will also be amended to identify the importance of universities within each region. Financial Implication: None.
Conclusion 19. We believe the NDF is a key tool in addressing climate change. The NDF should look beyond decarbonisation and address other aspects of climate change such as flood risk, water management and the implications for coastal planning.	Accept A new policy on flood risk management is proposed (policy 8), recognising the severity of flood risk in some parts of the National and Regional Growth Areas and the need for sustainable management of flood risk. The NDF Outcomes have been amended to strengthen and develop references to climate change, based on the feedback received through the consultation. The revisions to Chapter 2 will include providing more context on climate change and associated issues, including flood risk, water management and coastal planning. The NDF also contains policies on the role played by nature-based solutions, including the safeguarding of ecosystem services and the provision of green infrastructure, and makes a connection between these and wider land management issues, all of which are vital as part of responding to the climate emergency. Financial Implication: None
Conclusion 20. The climate change outcome should encompass housing and the outcome for homes and housing should address the types of homes Wales needs to build to address climate change.	Accept The NDF Outcomes have been amended to strengthen and develop references to climate change, based on the feedback received through the consultation and the conclusion of the Committee. Outcome 11 has been amended to specifically state new homes will need to be energy efficient and help communities adapt to the changing climate. Financial Implication: None
Conclusion 21. The NDF should articulate the spatial	Accept in principle

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dimension of its strategy for decarbonising transport and heating. It should set out more clearly how reduced reliance on private vehicles is to be achieved in both urban and rural areas.	Planning Policy Wales (PPW) articulates the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. It acknowledges that delivering this modal shift will make an important contribution to decarbonisation and improving air quality. PPW sets out policy requiring the use of a sustainable transport hierarchy in relation to new development which prioritises walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services. To support the policy position in PPW, Chapter 4 of the NDF will be expanded with additional policies on National and Regional Connectivity. The new policies and supporting text set out how the Welsh Government aims to improve connectivity within and between urban and rural areas by reducing the need to travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport. The policies also support the implementation of the Active Travel Act and the revitalisation of the National Cycle Network. In relation to the decarbonising of heat, proposed Policy 16 sets out that our spatial priority is for the suitability and viability of District Heat Networks to be investigated in the towns and cities identified in the NDF as Priority Areas for District Heat Networks. Although heat networks are supported in principle wherever they are viable, these are the areas in Wales considered to have the greatest potential for heat networks. Financial Implication: None
Conclusion 22. The NDF should indicate how the delivery of vehicle charging infrastructure and heat networks is to be taken forward.	Accept It is agreed the NDF should provide further clarity on how the planning system can assist in the delivery of electric vehicle charging infrastructure across Wales. Chapter 4, which covers the national strategic matters, will be expanded with additional policies on transport. The new National and Regional Connectivity policies (proposed policies 11 and 12) will set out how the Welsh Government will support the delivery of electric vehicle charging infrastructure in both rural and urban areas. The Welsh Government will also be publishing an Electric Vehicle Charging Strategy. Permitted development rights were introduced in 2019 for the installation, alteration and replacement of electrical outlets and upstands for recharging electric vehicles, subject to conditions, to expedite the creation of a Wales-wide network of electric vehicle charging infrastructure - at homes, workplaces and key destinations, such as supermarkets, retail and commercial centres and leisure facilities.

Conclusion	Response
	In relation to heat networks, the NDF states that planning authorities should explore and identify opportunities for District Heat Networks, particularly in the Priority Areas, and, where possible, seek to develop city or town-wide District Heat Networks in as many locations as possible. It states that, as a minimum, proposals for large-scale, mixed-use developments of 100 dwellings or 10,000sq m of commercial floorspace or more should consider the potential for a heat network Support for heat network planning is already available from the UK Government. Part of the Welsh Government's Renewable Energy Toolkit for planners also contains information on how local planning authorities can begin to map the potential in their areas. The Welsh Government will also be considering what further assistance and guidance it can give in the future. Financial Implication: The Welsh Government is investing £2m in the short-term to facilitate a network of rapid electric vehicle chargers. However, we expect business and industry to drive much of the roll-out of charging infrastructure.
Conclusion 23. The NDF should look at the housing sector as a whole and address the role of the private sector, including SME builders in housing delivery. This should include small sites not included in Local Development Plans.	Accept in principle The Welsh Government recognises that private sector house-builders play an important role in addressing housing needs, including contributing to the delivery of affordable housing. The Welsh Government will continue to work with house-builders on the delivery of private sector housing. However, in order to address the significant need for affordable homes identified in the Welsh Government's 'Estimates of housing need', the focus of the NDF is on the role of local authorities and registered social landlords in increasing the number of affordable homes provided in Wales. Proposed amendments to the text supporting the policy on 'Delivering Affordable Homes' will recognise the contribution of new market homes in addressing housing need more broadly. Planning Policy Wales already requires planning authorities to set a target for the delivery of homes on small sites and to maintain a register of small sites which fall below the threshold for allocation in their development plans. In addition, the Welsh Government's £40m Stalled Sites Fund is assisting in creating and promoting development opportunities for SME construction companies. Also, since 2013 the Welsh Government has been supporting SME builders with access to affordable development financing through the Wales Property Development Fund. (See Conclusion 4) Financial Implication: None

Conclusion	Response
Conclusion 24. The NDF needs to specify the mechanisms to be used to deliver new affordable housing on the scale envisaged by the strategy. The Welsh Government should explain how the “Independent review of affordable housing supply” it commissioned, and which reported in May 2019, will inform the NDF.	Reject The NDF is clear that there will need to an increased focus on the role of local authorities, registered social landlords and SME builders in order to deliver the increase in affordable homes indicated. The conclusions of the ‘Independent Review of Affordable Housing’ support this position and were taken into account in the preparation of the draft NDF. Financial Implication: This could require a change to Welsh Government funding for affordable housing.
Conclusion 25. The NDF’s estimate of housing need should be updated based on the latest available evidence.	Accept Updated estimates of housing need will be included in the final version of the NDF. Financial Implication: None
Conclusion 26. Any targets for affordable housing should be expressed as numbers, not percentages.	Reject The NDF does not include targets for affordable housing. The percentages of affordable housing included in the NDF are taken from the Welsh Government’s ‘Estimates of housing need by tenure’ and are indicative and trend based only, forming part of the context to inform planning authorities when determining their housing requirements through their Strategic or Local Development Plans. Financial Implication: N/A
Conclusion 27. The housing needs of older people need to be given particular attention. National guidance on this should be provided by the NDF itself.	Accept in principle The changing population of Wales, including the trend towards there being a higher number of older people, is recognised as being part of the context for the NDF, as set out in Chapter 2. The housing needs of older people vary across Wales and this is therefore more appropriately addressed by each local authority, based on the specific needs they have identified for their area. Financial Implication: None
Conclusion 28. The NDF should recognise the importance of SME builders in providing housing in rural Wales and explore the potential for removing barriers to the construction of small housing developments of under 10 units.	Accept in principle The NDF recognises that SME builders have an important role in increasing the provision of new homes across Wales. As part of facilitating this Planning Policy Wales already requires planning authorities to set a target for the delivery of homes on small sites and to maintain a register of small sites which fall below the threshold for allocation in their development plans. In terms of removing barriers, the Welsh Government’s £40m Stalled Sites Fund is assisting in creating and promoting development opportunities for SME construction companies. Also, since 2013 the Welsh Government has been supporting SME builders with access to affordable development financing through the Wales Property Development Fund. (See Conclusion 4)

Conclusion	Response
	Financial Implication: None
Conclusion 29. The Committee is disappointed by the ongoing lack of progress in amending Part L (Conservation of fuel and power) of building regulations. The Welsh Government should set out its timetable for amending Part L	Accept Part L (and F) consultation proposals for new housing were published on 19 December 2019 and ended on 12 March 2020. The proposals include a significant and necessary step-change in energy and carbon performance in new housing. The consultation also provided details of possible 2025 standards. Later this year we will also be consulting on proposals to prevent overheating in new dwellings, Part L standards for non-domestic buildings and where building work is carried out to existing dwellings. The consultation also indicated that the preferred timeline for the Part L regulations to come into force is in 2020. Financial Implication: None
Conclusion 30. The NDF should identify core infrastructure requirements and should provide a spatial framework to inform decision-making for all nationally significant infrastructure. The Welsh Government should set out its “in principle” position on non-devolved infrastructure projects and policies.	Accept in principle The long term infrastructure needs of the country will be assessed by the National Infrastructure Commission for Wales (NICW). The NDF is a vehicle for coordinating investment in infrastructure with a wider strategy for development, to ensure the benefits of infrastructure investment are maximised. The NDF will be published before NICW provides its recommendations, therefore the strong support for Metro systems, enhanced active travel and green infrastructure, and flood risk management infrastructure in the NDF should be acknowledged by NICW. As outlined in response to Conclusion 7, there will be much stronger alignment and reciprocity between key documents as the full suite of relevant strategies and plans are put in place. The Welsh Government regularly makes the case for investment by the UK Government and utility providers in non-devolved infrastructure that will benefit the well-being of people in Wales, and it will continue to do so. Where non-devolved infrastructure projects are proposed by other parties, the Welsh Government gives clear statements of its views and ensures it is actively involved in discussions and plans. Financial Implication: none
Conclusion 31. The NDF should include specific proposals to address connectivity issues within Wales in addition to those which cross the border with England. This should include improved connectivity between Welsh towns and cities, between urban and rural areas and also within rural areas. The	Accept It is agreed the NDF should be more explicit and address the issue of connectivity within Wales in addition to those which cross the border with England. Chapter 4, which covers the national strategic matters, will be expanded with additional policies on National and Regional Connectivity (proposed policies 11 and 12). The new policies and supporting text set out how the Welsh Government aims to improve connectivity within and between urban and rural areas by reducing the need to

Conclusion	Response
NDF should also reflect the Welsh Government's Active Travel priorities.	travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport. The policies also support the implementation of the Active Travel Act and the revitalisation of the National Cycle Network. The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity. Financial Implication: None
Conclusion 32. The Committee understands that there is greater demand for east-west transport connectivity in the major corridors in both north and south Wales, but the NDF should also address the poor connectivity between north and south Wales	Accept It is agreed that the NDF should also address the issue of connectivity across Wales and between the Regions. Chapter 4, which covers the national strategic matters, will be expanded with additional policies on National and Regional Connectivity. The new policies and supporting text set out how the Welsh Government aims to improve connectivity across Wales and between the Regions by reducing the need to travel, particularly by private vehicles, and supporting a modal shift to walking, cycling and public transport. The National and Regional Connectivity policies are supported by specific transport policies in the regional sections of the NDF which provide the regional context and specific proposals for improving connectivity. Financial Implication:None
Conclusion 33. The Welsh Government's commitments on digital infrastructure, including Mobile Action Zones, need to be given spatial expression in the NDF. Spatial policies for ports and freight transport require development.	Reject - Mobile Action Zones Accept - Ports and freight transport Whilst it had been the Welsh Government's early intention to include maps in the NDF showing Mobile Action Zones, this has not been achievable in the Plan's current time-frame. The Digital Infrastructure Department continue to work on identifying the specific locations of each Zone. Once approved by the Welsh Government, the Zones will be subject to normal consultation procedures. NDF policy clearly establishes the principle of Mobile Action Zones and how the Welsh Government will work with Local Planning Authorities and mobile operators to create the right environment to bring forward improved coverage within these areas (when identified). The development plan status of the NDF affords greater weight to the policy's intentions, despite there being no direct spatial reference to Zones. The UK Government has been working with mobile operators on an initiative to establish a Shared Rural Network across the UK, including Wales. This would allow mobile operators to share infrastructure to provide

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	4G services, enabling most rural areas to get the fast and reliable mobile coverage they need. The initiative is subject to agreement and would take place over a five-year period up to 2025. Planning Policy Wales sets out the national policy position regarding ports and acknowledges the important role they play in the economy and the sustainable movement of freight. PPW recognises that functional and attractive ports which meet current and future demand, make Wales an attractive location for businesses, visitors and freight transportation. This policy position will be supported by the introduction of a new International Connectivity Policy in Chapter 4 of the NDF which identifies Cardiff Airport, Haven Waterway, Fishguard Port and Holyhead Port as Strategic Gateways (proposed policy 10). The Strategic Gateways are critical to the effective movement of people and cargo as part of networks or supply chains within their respective regions, Wales and the UK. Financial Implications: There are no financial implications to the Mobile Action Zone policy in the NDF. The establishment of the mobile infrastructure within Zones may require Welsh Government financial support. There are no financial implications regarding spatial policies for ports and freight transport.
Conclusion 34. The NDF should set out a unifying strategic vision for the future of energy in Wales and be clear about the targets for electricity generation and decarbonisation to which the Welsh Government is working.	Accept in principle The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies necessary to achieve them. It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy. The NDF is clear that its renewable energy policies are seeking to help achieve the Welsh Government's existing renewable energy and decarbonisation targets which have been set by the Minister for Energy, Environment and Rural Affairs. It is accepted though that the above position should be more clearly set out in the NDF and changes to the supporting text of the renewable energy policies will be made. Financial Implication: None
Conclusion 35. The NDF should provide a supportive framework for renewable technologies other than wind and solar, and address storage and the onshore	Accept The draft NDF contained a policy which was supportive of other renewable energy technologies and which sought to consider the same issues as those for wind

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infrastructure requirements of offshore wind farms.	and solar. However it is accepted that this situation was unclear. The revised renewable energy policies of the NDF now clearly apply to all renewable and low carbon technologies and reference to associated infrastructure requirements are now included. Financial Implication: None
Conclusion 36. The level of support for renewable energy developments provided by the NDF should not be weaker than that previously provided by UK National Policy Statements. Renewable energy policies should address repowering and extending the life of existing developments.	Accept in principle We do not consider that the draft NDF provided any less of a supportive environment for renewable energy development than was previously the case. This, coupled with the very positive policy statements in PPW, should give renewable energy developers the planning support they need to proceed with schemes. In Wales there is a significantly more supportive regime for large-scale onshore wind development than the UK Government currently provides for developments in England. However, we accept that the policies could be clearer in this respect. The revised policies therefore are more explicit in both expressing the Welsh Government's support for renewable energy generally and that schemes will be permitted provided the criteria contained within the policies are met. Financial Implication: None
Conclusion 37. The NDF should set out the implications of decarbonising heat and transport for electricity demand and the transmission system.	Accept in principle It is difficult for the NDF to set out the implications of decarbonising heat and transport at this stage as the routes to decarbonisation are not fixed and there are many variables. It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy, which can be found elsewhere. However, during the lifetime of the NDF, the energy system will likely move to a "multi-vector system" approach, which will require flexibility to fully exploit the inter-relationships and synergies between the power, heat and transport sectors. Future reviews of the NDF will need to respond to this when the picture becomes clearer. Text to this affect has been added to the revised NDF. Financial Implication: None
Conclusion 38. The NDF should express a vision and strategy to support developments based on local energy distribution	Accept in principle The Welsh Government supports the move towards local energy distribution as a way of minimising the need for new, large-scale grid infrastructure. Revisions to the supporting text of the NDF will be made to refer to this 'multi-vector' approach. The NDF takes into account wider Welsh Government policies and strategies and provides the planning policies

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	necessary to achieve them. It is not the role of the NDF to set the Welsh Government's overarching energy strategy and policy, which can be found elsewhere. The Minister for Energy, Environment and Rural Affairs is currently preparing a policy statement on local energy and its implications for distribution. Financial Implication: None
Conclusion 39. Policy 7 should be amended to address grid infrastructure requirements.	Accept in principle Draft Policy 7: Ultra Low Emission Vehicles, will be incorporated into the new National and Regional Connectivity policies (proposed policies 11 and 12) in Chapter 4 of the NDF. The Welsh Government is working with energy network operators in Wales to develop the electricity grid infrastructure to support increased use of electric cars, which is reflected in the supporting text. Financial Implication: We expect business and industry to drive much of the roll-out of charging infrastructure, including grid capacity and infrastructure.
Conclusion 40. The NDF should adopt a criteria-based policy framework for renewable energy developments.	Accept Whilst the draft NDF renewable energy policies listed the issues which needed to be considered, it is recognised that they did not provide the level of certainty to stakeholders and decision-makers on the criteria that should be followed. The revised NDF contains a positively framed detailed criteria-based policy for the determination of all renewable and low carbon energy developments over 10MW. Financial Implication: None
Conclusion 41. Wind and solar developments are subject to very different constraints and have different potential impacts on wildlife, and should, therefore, be addressed by separate planning policies.	Accept in principle Whilst it is accepted that wind and solar developments have different impacts on wildlife, the Welsh Government considers that, at a strategic level, NDF policies can be framed that can deal with these issues collectively. It is preferable (like many other planning policy documents) for single policies to cover all technologies available and for the decision-maker to consider the issues in detail. The Welsh Government has produced practice guidance on this which will be useful in this regard: https://gov.wales/planning-implications-renewable-and-low-carbon-energy-development-practice-guidance The revised NDF policies and supporting text give clearer statements on the protection of protected sites and wildlife species.

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	Financial Implication: None
Conclusion 42. The NDF policy on wind and solar energy developments should accord the same level of protection to SSSIs as PPW.	Accept It is important that the NDF and PPW are consistent in demonstrating the same level of protection to Sites of Special Scientific Interest (SSSIs). Changes have been made to the criteria-based policy and supporting text to ensure this level of consistency between the two documents. Financial Implication: None
Conclusion 43. The NDF should recognise the potential to secure environmental and recreational benefits in association with renewable energy developments	Accept in principle The draft NDF recognised the potential to secure benefits associated with renewable energy schemes and stated that planning applications must demonstrate how local social, economic and environmental benefits have been maximised as part of development proposal. However, it is recognised that these statements could be stronger, particularly around environmental benefits. The revised renewable energy policies therefore state that proposals should describe the net economic benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. The criteria-based policy also requires that proposals includes biodiversity enhancement measures to provide a net benefit for the environment. Financial Implication: None
Conclusion 44. Biodiversity enhancement, ecosystem resilience, strategic green infrastructure and the national forest should be given spatial expression in the NDF. The NDF should set out how the commitments are to be delivered.	Accept in principle We agree that the NDF could be strengthened to spatially represent the strategic environmental policies. An illustrative map (not presented on an ordnance survey base) will be included in the NDF to indicate broad locational information for themes such as biodiversity hotspots, biodiversity networks and ecosystem services. The supporting text will be expanded to include more directional narrative on policy implementation. Financial Implication: None
Conclusion 45. Policy 8 should be strengthened to state that biodiversity “must” rather than “should” be protected and should require that development contributes to nature recovery.	Accept We agree that the policy wording should be changed to a ‘must’; Section 6 of the Environment (Wales) Act 2016 directs public authorities to maintain and enhance biodiversity in the exercise of their functions. The policy will be amended to reflect the legislation. Financial Implication: None
Conclusion 46. The NDF should identify national spatial priorities for biodiversity enhancement. There is a need to embed	Accept in principle We agree that the NDF can be strengthened to include a tighter policy focus to securing biodiversity enhancement. The NDF’s strategic focus can be utilised to deliver a net

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the requirement for the mitigation measures identified by the Habitats Regulations Assessment into the NDF. The national ecological network should address the needs of priority species.	benefit for biodiversity in order to realise sustainable growth. The Habitats Regulations Assessment (HRA) of the NDF is an iterative assessment process; work is being undertaken to develop a mitigation table that clearly articulates the mitigation measures that will be needed to deliver the NDF policies. References within the NDF to the HRA will be enhanced and this will clearly signpost the mitigation measures. The policy and supporting narrative have been strengthened to accommodate the needs of species within resilient ecological networks. The needs of all species will be referenced in order to reflect the complexity of natural systems. Financial Implication: None
Conclusion 47. The development of the national forest should take account of the potential role of tree planting in water and flood risk management as well as agri-food production. Planting to develop the national forest should avoid peatland.	Accept in principle The National Forest policy in the NDF is an enabling policy. One of the strategic aims is to develop a national forest resource that delivers connected ecosystems, improved biodiversity and habitats. The specific needs of planting regimes will be identified elsewhere, however the NDF will guide the sustainability of such locations through the policy on resilient ecological networks. Financial Implication: None
Conclusion 48. The NDF should identify existing woodland assets. The national forest should further the conservation of globally significant Celtic rainforest.	Accept in principle We agree that the spatial representation of existing broad habitat types should be strengthened in the NDF. An illustrative map, identifying key existing forestry assets will be included. The Celtic Rainforest is supported by Welsh Government and implementation of the National Forest Policy will align with and further support the conservation of this unique and hugely significant habitat. Financial Implication: None
Conclusion 49. The opportunity should be taken to make links between green infrastructure networks and the housing and urban renewal agendas. Links should also be made between green infrastructure networks, the national forest and the tourism and leisure agenda through initiatives such as the National Cycle Network.	Accept in principle The Welsh Government agrees that the role of green infrastructure in creating sustainable urban communities should be more clearly recognised in the NDF. The proposed policy on shaping urban growth will reference the functional role of green infrastructure as a key principle of placemaking. PPW 10 expresses wider connections between policy areas such as green infrastructure networks, tourism and active travel routes. The placemaking narrative positively articulates such connections. Financial Implication: None

Conclusion	Response
Conclusion 50. There is a need for greater clarity on the role of green belts in national and regional strategy; the discretion accorded to SDPs in their definition; the relationship between and respective roles of green belt and green infrastructure; and the potential relationship of greenbelt with the national forest policy	Accept It is accepted that the NDF policies (and their supporting text) on green belts in North and South East Wales would benefit from greater clarity on their establishment through the SDP process and how planning proposals should be determined in these areas in advance of the adoption of SDPs. Changes will be made to the NDF to this effect. Whilst green belt and green infrastructure may geographically cover the same areas and be mutually reinforcing in terms of affording protection to land from development, the purposes of identifying green infrastructure and green belt differ. The same rationale will be true of land identified as having potential for woodland planting as part of the National Forest. In addition, the question of how to address any other type of development in a green belt, including those which may be associated with a national forest proposal, is already covered by policy in PPW. Financial Implication: None
Conclusion 51. The Business Committee, as the Assembly Committee with responsibility for considering Assembly procedures, should bring forward proposals to facilitate scrutiny of the final NDF in accordance with the Planning (Wales) Act 2015. It should do so in consultation with the Welsh Government, external stakeholders and Assembly Committees.	Not for the Welsh Government to accept or reject The Welsh Government continues to work with the Business Committee to ensure Committee scrutiny of the draft NDF is facilitated, in accordance with the Planning (Wales) Act 2015. Financial Implication: None