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Lesley Griffiths AM
Cabinet Secretary for Energy, Planning and Rural Affairs
Welsh Government
Cardiff Bay
CF99 1NA

Email: correspondence.lesley.griffiths@gov.wales

Dear Cabinet Secretary

RE: INVITATIONS TO PREPARE A STRATEGIC DEVELOPMENT PLAN AND A JOINT LOCAL DEVELOPMENT PLAN (LDP) FOR ‘SOUTH EAST WALES - EAST’

I refer to your letters dated 13th December 2017 regarding your invitation to prepare a Strategic Development Plan (SDP) for the SE Wales region, and your invitation to produce a Joint Local Development Plan with Newport, Torfaen and Blaenau Gwent Councils.

I welcome and agree with your recognition that the planning system has a key role to play in delivering positive outcomes, prosperity for all, and making a real difference for people and places. A plan-led development system is an important tool in ensuring sustainable development but it also provides essential certainty to developers and investors, as well as to our communities. I fully recognise the benefits of a proper regional approach to cross-boundary issues and, as you will be aware, significant progress towards joint working has been made over the last three years culminating in the City Deal bid and creation of a Joint Cabinet.

I fully support the production of a Cardiff Capital Region SDP, as set out in the letter from the Leader of the Vale of Glamorgan, Councillor John Thomas and Councillors Andrew Morgan and David Poole, dated 6th February 2018, which states:

“there was consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of an SDP for the region. Whilst the decision to work towards an SDP is a matter for each of the 10 Councils, we are confident that this is a decision which can be taken quickly.”

County Councillor Peter Fox OBE, Leader/Arweinydd
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Within the next month, my Cabinet Member for Enterprise will be seeking a Council resolution to be part of the Cardiff Capital Region SDP. At the same time, we will be seeking a Council resolution to commence on a full revision of a Monmouthshire LDP, having completed a full review of our LDP, consulted on the draft Review Report, and carried out an options appraisal with regard to your letters.

The combined CCR Leaders' letter highlights the key concerns relating to preparing Joint LDPs on the large footprints you have proposed. These concerns include the delays in setting up and running the joint working arrangements as well as the distraction from delivering the SDP, which is the proper way of delivering strategic regional spatial planning. The delays and uncertainty surrounding Joint LDPs is evidenced by the Gwynedd and Ynys Môn Joint LDP, which took over 6 years to deliver and was very nearly not adopted by one Council, which would have left both Councils without a development plan.

The new provisions in the Planning (Wales) Act 2015 create an 'expiry date' for LDPs, beyond which they are no longer the development plan for the area. Consequently, the adopted Monmouthshire LDP legally "*ceases to be a local development plan*" on 31st December 2021. After this date, the Council will be at risk from development proposals without a statutory development plan framework to properly manage them, until such time as a replacement development plan is adopted. This calls into question our ability to ensure sustainable development and to secure S106 planning contributions towards essential infrastructure and affordable housing, without those policy hooks or supplementary planning guidance in place. Objections to this change during consultation on the Bill were not heeded, and as a result of this legislative provision you will understand why we cannot afford to risk the delays involved in establishing the governance, structure, team culture and accountability arrangements for a Joint LDP.

Given the agreement to proceed with an SDP, the proposed Joint LDPs provide an unnecessary sub-regional tier, achieving neither a proper City Region strategic approach nor a truly local plan that our communities value, engage with and take ownership of. Contrary to assertions made by your officers, there is a distinct lack of outcome-focussed evidence to support your proposed Joint LDP groupings. The rationale for the groupings appears to be entirely process-driven based on LDP expiry dates.

The proposed 'South East Wales – East' Joint LDP would result in a Plan covering some 400,000 people across an area exceeding 100,000 hectares. The proposed footprint comprises a very diverse area with vastly different demography, economies and physical characteristics ranging from Wales' youngest City, to historic market towns and significant rurality, to disadvantaged valleys communities. Population density¹ ranges from 7.85 people per square kilometre in Newport to 1.05 in Monmouthshire. The proportion of land area defined as 'built on' ranges from 25% in Newport to 3% in Monmouthshire². Blaenau Gwent has the highest proportion (23.4%) of LSOAs ranked in the lowest 10% in Wales while Monmouthshire has the lowest proportion (0%)³. The proposed grouping does not withstand evidence-based scrutiny.

¹ 2016 population data

² Corine Landcover Inventory

³ Welsh Index of Multiple Deprivation 2014

Monmouthshire has some very distinct challenges, including the fastest growing proportion of its population in the over 65 and over 85 age bands, with a declining younger population and a median age of 48 years. Directly linked with this challenge, Monmouthshire has the highest average house prices in Wales creating an affordability issue and a deficit of 20-40 year olds as well as increasing household sizes. If left unchecked this will result in imbalanced communities and socio-economic problems. While the overall principle of directing development to brownfield sites is accepted, we must take action to ensure the social and economic sustainability of our communities and the services they rely on. This directly relates to the Well-being agenda. A Monmouthshire LDP is the best mechanism for achieving this outcome in a timely manner.

It is fully acknowledged that the daily lives of our constituents are not prescribed by administrative boundaries, and that commuting patterns, retail expenditure, and some aspects of the housing market operate across our boundaries with our neighbours, both east and west. We further recognise that changes such as the Metro and Severn Bridge tolls will have implications for much of the Cardiff Capital Region, and that developments such as at Mamhilad in Torfaen and Glan Llyn in Newport have potential implications for parts of our County. Your officers recently highlighted best practice in the joint Supplementary Planning Guidance between Swansea and Neath Port Talbot Councils to shape the new University campus straddling their boundary, which illustrates how such matters can be successfully addressed without a Joint LDP.

Similarly, my officers agree that the first round of LDPs could have been delivered more quickly and would have benefitted from better cross-boundary working, although it is noted that the regulations and manual to guide this process were both delayed initially and then revised during the process, interrupting progress. Avoiding such delays and changes going forward would benefit us all considerably. There has been a significant maturing of the approach to collaborative working since that first round of LDPs.

The benefits of working much closer with our neighbouring Councils is accepted and meetings have already been held at officer level to identify areas where we can work jointly to better manage resources, ensure a consistent evidence base, remove duplication and waste, share data, and utilise common methodologies. As you may be aware, significant work is already progressing via the South East Wales Strategic Planning Group (SEWSPG) to agree common methodologies for use across the Cardiff Capital Region. To this end, and in addition to the current SEWSPG collaboration, we will be proposing closer liaison/collaboration with those authorities who wish to review their LDP at the current time, including a shared evidence base for key topics. However, each Council will need to ultimately maintain control over timing and governance to responsibly manage the risk of no plan coverage.

Notwithstanding the above, I would respectfully suggest to you that mandating joint working is not the way to secure success. Joint working will not be sustainable or effective unless all parties enter into the arrangement willingly.

I note the comments in your letter, but would reassure you that I am confident that my Council has the capacity, capability and resilience to deliver our LDP and I am committed to ensuring it is properly resourced.

County Councillor Peter Fox OBE, Leader/Arweinydd
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In conclusion, I share your goals of securing early progress on the SDP and ensuring full Plan coverage. However, having completed a full review of our LDP, consulted on the draft Review Report, and carried out an options appraisal with regard to the proposals set out in your letters, my position is that the best way forward is to proceed with the Cardiff Capital Region SDP and for Monmouthshire to commence on its own replacement LDP, working collaboratively with appropriate neighbouring Councils where possible, for example on a joint evidence base and common methodologies. My Cabinet Member for Enterprise will be seeking a Council resolution for the above on 19th March 2018.

I look forward to an early positive response on these matters to enable us to proceed in a timely manner.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Fox', written in a cursive style.

County Councillor Peter Fox OBE
Leader of the Council