

Consultation Response Form

Your name	Joe Ayoubkhani
Your address	Greyfriars House Greyfriars Road Cardiff CF10 3AL
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<u>Barton Willmore on behalf of Barratt & David</u> <u>Wilson Homes South Wales</u>

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

The Outcomes within the Draft NDF are overly general. The outcomes which are sought are reliant on complex multiple influences, many of which fall outside the remit of land use planning. Past experience has shown that achieving such outcomes is rarely solely a result of development plan policies.

Given the Draft NDF has development plan status (and sets the framework for SDPs and LDPs, which will need to conform with the NDF but will also be subject to tests of soundness and examination in public), we would seriously question whether the outcomes set by the Draft NDF are based upon a proportionate and sound evidence base and whether they are deliverable – this is a recurring concern which will be referred to in response to later questions. For example, Outcome 10 states that 'biodiversity has declined in recent decades [and] we will reverse these losses'. Whilst such an aspiration is to be applauded, we would question its deliverability and how this would be achieved and delivered in practice when preparing SDPs, LDPs and in the determination of planning applications.

Given the general, and sometimes competing, nature of the outcomes, and the lack of robust evidence from which they are founded, it will be impossible for lower tier plans to demonstrate general conformity with them – the result of which would be lengthy debate (at much time and expense) through SDP and LDP preparation.

Should the proposed outcomes still be sought, we consider that they would be better phrased as 'objectives' against which the NDF seeks to contribute towards. At the very least, it should be noted that the outcomes are dependent on a number of other factors outside the control of the NDF and very much driven by existing habits of society.

In any case, there is a need for the Draft NDF's outcomes to better balance environmental with social and economic considerations. For example, there is no reference to the need to provide quality housing for all within the proposed outcomes – despite this being identified as one of the five priority areas for cross-government working which have the greatest potential contribution to long-term prosperity and well-being within the Welsh Government's Prosperity for All and Economic Action Plan. In this regard, the Delivery of housing through the planning system, Consultation Document states:

"The planning system, through the Local Development Plan (LDP) process, must provide the land needed to allow for the building the new homes which local authorities have identified as being required".

The NDF therefore needs to provide the framework to enabling new homes to be built, whether open market or affordable homes.

The Vision previously expressed in an earlier consultation on the NDF included that:

"By 2040, we will help meet the wellbeing goals for current and future generations by ensuring Wales is a nation of:

*active and social places, where spatial choices have **supported the delivery of housing to meet society's needs**, in connected, accessible communities" (emphasis added)*

This Vision aligned with Planning Policy Wales (PPW) Edition 10, which at Paragraph 4.4.2 states:

"The planning system must provide for an adequate and continuous supply of land, available and suitable for development to meet society's current and future needs."

In respect of housing, the wider context and starting point from which the NDF will be implemented, is one of crisis. Ministerial Statements over the past five years have confirmed the role and importance of the planning system in meeting the evidenced acute shortage of homes. A selection of relevant extracts is provided below:

"Building more homes will not only meet growing housing need, but also generate growth and jobs, provide work to help people out of poverty and ameliorate the effects of the bedroom tax. The private and public sectors must be enabled and supported to play a full role in building more homes."¹ (emphasis added)

"We need to build more homes and the Government is committed to delivering an extra 20,000 affordable homes during this Assembly term, but we must also tackle the pressure on our current social housing stock."² (emphasis added)

"The delivery of housing remains one of the highest priorities of this Government...To be clear, each Local Planning Authority must provide a genuinely available supply of land for housing...This is a core principle of the planning system

¹ Stimulating Home Building in Wales - Carl Sargeant, Minister for Housing and Regeneration (17th July 2013)

² Oral Statement Concerning the Welsh Governments Legislative Programme for 2016/17 by the First Minister (June 2016)

established by PPW since 2002...We have an ambitious target of delivering 20,000 affordable homes over this term of Government”.³ (emphasis added)

If the Welsh Government is to address the current housing crisis in Wales, meet its commitment on housing delivery and support the aspirations of the growth deals within the regions (such as the Cardiff Capital Region and Swansea Bay City Deals), it is essential that the NDF includes an outcome with a focus on providing a range and choice of quality housing (both open market and affordable). In the context only a handful of LPAs being able to meet the Welsh Government’s minimum 5-year housing land supply requirement, it is essential that the NDF places emphasis on housing land supply and delivery via a range and choice of sites of varying scales. Despite the recent record of there being a significant shortage of readily deliverable, developable and available housing sites in Wales on which to develop, there is no mention within the NDF or its evidence base to housing land supply. We would seriously question how grounded the NDF can be in the absence of considering existing circumstances which are material to the achievement of the outcomes proposed.

³ Cabinet Secretary for Environment and Rural Affairs Letter to Heads of Planning (February 2017)

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	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

Firstly, on Page 22, it is stated that:

"Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources".

Given that the NDF is not based on a proportionate evidence base and is not supported by any urban capacity study to evidence the deliverability of focussing growth towards urban areas, it is considered that the statement is fundamentally flawed and as such should be removed from the NDF.

The Spatial Strategy does not include Monmouthshire as part of a National Growth Area, and whilst the map depicting the strategy is illustrative it appears that the majority / if not all of the Vale of Glamorgan lies outside of the Growth Area. The Vale of Glamorgan Council's draft response to the consultation picks up on this inconsistency:

"We would note there is an inconsistency with the way the "National Growth Area" is illustrated on the all-Wales spatial strategy plan (pg 25) compared to the area depicted on

the South East Wales regional plan (pg 63). The former suggests the growth area covers most of the Vale of Glamorgan as far as the Glamorgan Heritage Coast, which is what we would expect and endorse. Whereas, the latter regional plan suggests only half of the Vale of Glamorgan (roughly north of A48 strategic highway) is within the National Growth Area, which excludes Cardiff Airport and the St. Athan and Cardiff Airport Enterprise Zone. Whilst we note these are only illustrative / indicative plans, it is confusing and could lead to misinterpretation as the latter is clearly inaccurate and the plan on pg 63 should be amended to reflect the one on pg 25."

Further clarity should be provided on the geographical extent of the growth areas. In any case, there is a lack of evidence or rationale to justify why some areas are included within the Growth Area, whereas other areas are excluded despite them having a track record of delivering a greater proportion of homes (market and affordable). There has moreover been no testing of the economic and/or employment impacts of the spatial strategy or any testing of alternative options which would foster greater economic growth. This has implications on the ability to meet the requirements of SEA which the NDF is subjected to.

Notwithstanding the above, Monmouthshire Council and the Vale of Glamorgan both form part of the Cardiff Capital Region which sets an ambitious growth agenda across the region.

Despite being located outside the National Growth Area, Monmouthshire County Council's Economies of the Future Analysis states that *"As the City Deal is enacted, it is an appropriate time for Monmouthshire to consider the City Deal's opportunities for the County and how it can be leveraged to address the structural issues that are holding back Monmouthshire's economy"*. The Report concludes that 'radical policies that enable higher economic growth and increase productivity' are required in order to redress the socio-economic issues that Monmouthshire faces and to harness the opportunity presented by the Cardiff Capital Region City Deal.

The unambitious and overly restrictive nature of the NDF (restricting growth to certain areas) represents a missed opportunity for positive growth that can contribute to the achievement of sustainable development and the Well-being of Future Generations (Wales) Act 2015. Whilst the NDF is not subject to 'tests of soundness' in the same manner that SDPs and LDPs are, should the NDF be examined in such a way, we consider that it would be found unsound as its vision and strategy are not positive and sufficiently aspirational.

We comment on the lack of aspirational growth within the NDF later in these representations in response to Policy 5.

Urban areas (Policies 1, 2 & 3)

Policy 1 – Sustainable Urban Growth

Policy 1 seeks to direct new growth towards urban areas. Whilst this is welcomed in principle and has been a longstanding feature of planning policy for a number of years, the policy lacks any balance and does not recognise that release of land outside of settlements (supported by appropriate infrastructure which can benefit existing places) is sometimes inevitable and can result in sustainable development rather than the sprawling development as stated within the NDF.

The NDF is not based on a proportionate evidence base and is not supported by any urban capacity study to evidence the deliverability of focussing growth towards urban areas or transport nodes.

Currently, national policy allows consideration of suitable and sustainable greenfield sites within or on the edge of settlements, alongside new settlements in the open countryside in exceptional circumstances (PPW Edition 10 Para 3.40 refers). This recognises that there is a need to provide a range and choice of sites to ensure that there is a deliverable supply of housing to satisfy each Council's housing requirement. By way of example, Cardiff's 2010 Local Development Plan (LDP) was initially withdrawn as a result of concerns raised by the Inspector due to its overreliance on brownfield land – which is a finite resource in terms of availability. Accordingly, the (now adopted) LDP provided a more evenly balanced mix of brownfield and greenfield release.

The table below outlines the split of previously developed and greenfield allocated sites within adopted LDPs in South East Wales:

Local Planning Authority	Greenfield (no. of homes)	Brownfield (no. of homes)	Greenfield (%)	Brownfield (%)
Blaenau Gwent	126	1,768	6.65%	93.35%
Bridgend	3,093	4,766	39.36%	60.64%
Caerphilly	1,450	5,223	21.73%	78.27%
Cardiff	13,837	685	95.28%	4.72%
Merthyr Tydfil	955	3,009	24.09%	75.91%
Monmouthshire	1,846	600	75.47%	24.53%
Newport	2,022	10,433	16.23%	83.77%
RCT	3,069	1,456	67.82%	32.18%
Torfaen	1,713	3,253	34.49%	65.51%
Vale of Glamorgan	5,732	2,793	67.24%	32.76%
Total	33,843	33,986	49.89%	50.11%

There is currently a relatively even balance of greenfield and brownfield sites within adopted LDPs in the region – at around 50% greenfield, 50% brownfield. Despite this balance of allocated sites, only two Local Planning Authorities are able to demonstrate a five year supply and there exists a significant shortfall of housing across South East Wales with issues of deliverability impacting upon supply, as set out in the table below summarising 2019 JHLAS results:

Local Planning Authority	Housing Land Supply (Years)	Housing Shortfall (no. of homes)
Blaenau Gwent	1.48	2,052
Bridgend	2.9	1,797
Caerphilly	2.0	3,309
Cardiff	2.9	4,938
Merthyr Tydfil	1.1	1,872
Monmouthshire	4.0	725
Newport	5.2	-142
RCT	1.3	7481

Torfaen	3.4	922
Vale of Glamorgan	5.0	-1

Local Planning Authority	Average Housing Land Supply (Years)	Total Housing Shortfall (no. of homes)
All SE Wales Authorities	3.38	22,953

The above table identifies that the SE Wales Authorities have a housing land supply of 3.38 years across the region (against a requirement of 5 years) and a short-term shortfall of 22,953 homes.

The NDF proposes a greater focus on brownfield development than that already allocated without being based on any evidence to confirm that this approach/strategy is deliverable. PPW recognises (at Para 3.51) that not all previously developed land is suitable for development. Indeed, evidence from the South East Wales' authorities latest (2019) JHLAS indicates that, despite allocations within LDPs being evenly split in terms of greenfield to brownfield ratio, the vast majority of sites where development is not deliverable (and defined as being within Category 4 in the JHLAS) are previously developed (rather than being greenfield).

Local Planning Authority	TAN 1 Cat 4 Greenfield (no. of homes)	TAN 1 Cat 4 Brownfield (no. of homes)	TAN 1 Cat 4 Greenfield (%)	TAN 1 Cat 4 Brownfield (%)
Blaenau Gwent	0	0	0.00%	0.00%
Bridgend	252	1,703	12.891%	87.11%
Caerphilly	80	695	10.32%	89.68%
Cardiff	0	0	00.00%	0.00%
Merthyr Tydfil	559	1,337	29.48%	70.52%
Monmouthshire	230	125	64.79%	35.21%
Newport	1,028	3,226	24.17%	75.83%
RCT	2,416	3,045	44.24%	55.76%
Torfaen	561	1,183	32.17%	67.83%
Vale of Glamorgan	350	140	71.43%	28.57%
Total	5,476	11,454	32.34%	67.66%

The above table illustrates the issues associated with focussing on brownfield land, particularly given the greater emphasis on deliverability and front-loading of viability recently introduced as part of changes to national planning policy. Given the inherent costs associated with the development of previously developed land, an overreliance on it as a result of the NDF would also have a negative impact on the ability to deliver affordable housing without significant interventions (discussed later in these representations).

Brownfield completions over the last year equate to 2,399 homes. Forecasting this rate of delivery over the 20 year period would equate to 47,980 homes, which represents only to 58% of the overall need for South Wales. The strategy based on brownfield alone would therefore fall significantly short of minimum housing need in South East Wales, which represents the 'starting point' when considering the overall housing requirement in any case.

Accordingly, if the NDF's bias towards urban regeneration (and lack of any greenfield balance) were to be scrutinised against the 'tests of soundness' it would not meet the following tests & questions (as set out in the LDP Manual):

Test 2: Is the plan appropriate?

- *Is it supported by robust, proportionate and credible evidence?*
- *Is it logical, reasonable and balanced?*

Test 3: Will the plan deliver

Will it be effective?

- *Can it be implemented?*
- *Will development be viable?*
- *Can the sites allocated be delivered?*
- *Is the plan sufficiently flexible? Are there appropriate contingency provisions?*

Given that SDPs and LDPs which will need to conform with the NDF will be the subject of the above tests of soundness, the NDF as drafted will seriously undermine the ability to prepare a sound development plan at the lower tiers. This will have a consequential effect on confidence in the plan-led system and the delivery of much-needed homes.

The commentary on new settlements is too prescriptive in the NDF where it states: *"Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources"* (page 22 refers). This seems to run counter to PPW which outlined that there are exceptional circumstances where they may be appropriate. The text within the NDF is not evidence-based and should reflect the policy in PPW recognising there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. The Cardiff Capital Region Strategic Business Plan (February 2018), which has been prepared and endorsed by the ten local authorities within the region, provides support for new settlements in the region identifying that:

"In some parts of the region there is potential to explore the development of new settlements (settlements of the future) which would combine housing, employment, education and leisure elements in a planned, sustainable development of significant scale"(emphasis added)

Additionally, several local authorities previously identified support for the opportunity of new settlements through the NDF Call for Evidence and Projects consultation, as follows:

- Vale of Glamorgan Council: *"At this juncture, alternative solutions to meeting housing needs will need to be considered and in this regard, opportunities for new settlements may be appropriate in Wales";*
- Caerphilly County Borough Council: *"As part of the consideration of the settlement hierarchy and developing a national strategy for economic growth, the NDF should consider the issue of whether one or more New Settlements/Towns provide the appropriate opportunity to assist in delivering the NDF goals. New Settlements/Towns are highly contentious, but have not been identified in the development arena for nearly 70 years and, whilst highly controversial, the NDF should not pass on the opportunity to seriously consider this issue."*

As set out in PPW, new settlements could be given detailed consideration as part of SDP preparation, and it is not appropriate for the NDF to stymie such opportunities – not least given the support by a number of local authorities and at the regional-level. Surely given the current housing crisis in Wales we should allow SDPs/LDPs the full range of policy options to identify the most suitable strategy to meet their housing (and other) needs.

Policy 3 – Public Investment, Public Buildings and Publicly Owned Land

This policy should be removed because landownership is not a land use planning matter and any public sector land brought forward for development should be subject to the same rigour as private sector land in order to comply with the Draft Development Plan Manual (June 2019). The amplification text to Policy 3 states:

"Where publicly owned land could support sustainable places, positive consideration should be given to the future use of this land and whether it could, for example, support new mixed use development, including affordable housing and new commercial activities or transport infrastructure."

Given that no reference is made to landowners outside of the public sector, the inference is that there is a preference for the development of public land over private. Land ownership is not a material planning consideration and it is wholly inappropriate for a development plan to distinguish between landowners. Whilst, in-principle, there is support for public land to be brought forward for development, it should be the subject of the same rigour and scrutiny that other land (which may be more sustainable). This is particularly the case given that there are a number of allocations within existing LDPs which are within public ownership which have failed to come forward for delivery.

Where public land has come forward for development, there has often been a lengthy period of promotion with substantial public sector intervention via land assembly and funding. By way of example, the Welsh Development Agency (WDA) owned the large majority of the Former Arjo Wiggins Paper Mill Site (referred to as 'The Mill'). The planning application was initially submitted for this site in November 2004. Despite this being approximately 15 years ago, Cardiff Council's Draft 2019 JHLAS records that the site has only delivered 266 of its 800 home capacity. Similarly, the former Pirelli Cables Factory Site (now referred to as 'Loftus Garden Village' was initially the subject of a planning application by the WDA in September 2003 and its 250-homes were only completed in the past year. Whilst there is a role for the development of public land, an overreliance on the public sector to deliver homes at the pace and scale needed is likely to worsen issues of housing shortage.

Rural Areas (Policy 4)

The provision of job opportunities and enabling community services to be sustainable will require demographically mixed and resilient communities. Housing and affordable housing retains the working age population to help support employment. An appropriate level of housing should therefore be supported in rural areas.

In respect of rural areas, Draft NDF Outcome 2 states:

"In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification."

As set out earlier in these representations, the Outcomes do not make any reference to housing and the same criticism applies to Policy 4. The policy should therefore make reference to rural communities having appropriate access to a range and choice of housing.

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

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

Within the Overview and Challenges section of the draft NDF it states:

"The Welsh Government is targeting its housing and planning interventions towards achieving this aim within the broader context of increasing supply and responding to different needs."

Despite referring to 'increasing supply and responding to different needs', the draft NDF only provides support towards the delivery of affordable homes, which by their nature can only respond to one element of housing need. No support is provided for the delivery of open market housing despite the private sector playing a key role in the delivery of affordable housing in Wales. The Draft NDF is dismissive of private-led delivery of affordable housing stating:

"To address both the 'delivery gap' and housing need in Wales, a shift in the delivery model is required by building affordable homes at scale and pace. The gap has widened since greater reliance has been placed on the private sector to meet this basic human need."

Despite dismissing the private sector, the draft NDF does not identify an alternative model of delivery, nor is any evidence provided to demonstrate that a 'shift in the delivery model'

would be effective, especially given that people in Britain aspire to own their own homes and the land use planning system can do little to change this.

Barratt & David Wilson Homes consider that the 'delivery gap' (of both open market and affordable housing) is as a result of deficiencies in site selection within the majority of existing LDPs. An overreliance on brownfield industrial legacy sites and aspirational sites in off-market areas have resulted in housing shortages being experienced. Notwithstanding this, there exist numerous examples where private-led delivery has resulted in significant affordable housing provision being achieved. By way of example:

Vale of Glamorgan Policy MG2 of the adopted LDP:

20. Land to the north and west of Darren Close, Cowbridge – 40% affordable housing

28. Land at and adjoin St Cyres School, Murch Road – 35% affordable housing

25. Land adjoining St Josephs School, Sully Road – 35% affordable housing

Cardiff Adopted LDP

H1.8 Electrocoin Automatics Ltd, Caerphilly Road – 100% affordable housing

Strategic Site C – Goitre Fach – 30% affordable housing

Monmouthshire Adopted LDP

SAH4 Wonastow Road, Monmouth – 35% affordable housing

The Draft NDF states that the need identified for Wales up to 2038 based on the central estimate is 114,000 homes with it being estimated that during the initial five years (2018/19 to 2022/23) *"on average 8,300 additional homes will be required annually...It is estimated under the central estimate that on average 47% of additional homes should be affordable housing (social housing or intermediate rent) throughout 2018/19 to 2022/23, with the remaining 53% being market housing."*

The estimates of housing need assume two key elements: newly arising need is calculated from the 2014 based variant household projections; and existing Unmet need – is said to equate to the sum of both those in homeless accommodation as at latest estimates, and the number of households that were overcrowded and concealed as at the 2011 Census.

Each of the underlying variant population projections (underpinning the newly arising need calculation) assume a decline in the working age population (16-64) of Wales of between -2% and -7%, and little growth (in some cases decline) in the child age population. By way of comparison, the same projection series for England projects growth of 6.5% in the population 16-64.

Use of trend-based household projections in areas of low growth, leads to a perpetual state of decline in the projections over time – demonstrated by the significant ageing of the population (as above). Moreover, calculations of existing unmet need are just that – they fail to take account of ongoing levels of unmet need (homelessness and concealed households) that has occurred since 2011, and which are built into the future household projections.

By way of comparison, the level of housing need (without any adjustment for economic & infrastructure aspirations) set by the Draft NDF for the whole of Wales, is less than that of Gloucestershire County Council's administrative area and the West of England Joint Spatial

Plan area.

Area	20-year Housing Need
All Wales (Draft NDF)	114,000
Gloucestershire County (JCS & Local Plans)	115,200*
West of England (Joint Spatial Plan)	116,500*

* based on standard method for assessing local housing need

Whilst we appreciate that the level of need in neighbouring areas in England is identified using a different methodology, the housing need proposed in the Draft NDF would likely result in the rate of housebuilding in South East Wales continuing to fall behind the other areas of the Great Western Powerhouse.

The statistical release of the Estimates of Housing Need confirms that they “should not be used as housing targets”. The NDF needs to make this statement as well. However, it is not appropriate to use the central estimates - if housing need were to be set at these levels, it is likely to lead to further decline of the working age population and issues of affordability and need. It should moreover be made clear that it is not the role of the draft NDF to set a housing requirement with PPW 10 seeking to link homes and jobs stating that: *“Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area”* when setting housing requirements (PPW Edition 10 Para 4.2.7 refers). This is particularly the case given the lack of aspirational growth within the NDF to support & facilitate the economic and infrastructure objectives of the City Deals within Wales which are described as a ‘once in a generation’ opportunity. The NDF should therefore help to facilitate these initiatives rather than limit their potential.

The Swansea Bay City Deal comprises a £1.3 billion investment which seeks to create 10,000 jobs, whilst the Cardiff Capital Region City Deal is a £1.28 billion programme, which aims to create 25,000 new jobs, leverage £4bn private sector investment and achieve a five per cent uplift in the region’s GVA⁴. The City Deal has several wide-ranging benefits, as outlined within the Growth & Competitiveness Commission: Report and Recommendations⁵. In respect of the delivery of housing, the Report states:

- ***“Housing is critical to the functionality of city-region systems and the operation of labour markets in particular” (emphasis added);*** and
- ***“The evidence suggests that the planning process is currently viewed as **overbearing and disincentivising to housebuilders**. This results in a fragmented approach to housebuilding, with smaller scale developments being the norm and scale developments seen as difficult to deliver. This in turn is **limiting the flow of investment funding into housebuilding in Wales**, an approach that has proven successful in other UK city-regions.” (emphasis added).***

⁴ CCR City Deal Strategic Business Plan Wider Investment Fund, February 2018

⁵ The Cardiff Capital Region City Deal: Growth & Competitiveness Commission: Report and Recommendations, January 2017

The Cardiff Capital Region Strategic Business Plan⁶, which has been prepared and endorsed by the ten local authorities within the region, identifies that:

"The housing shortfall of the region, linked to the future economic aspirations of the Regional Cabinet, is being fully explored and detailed as an expression of 'need'... [the Regional Cabinet will] promote access to a range of housing, including affordable... Having a range of housing choice can stimulate latent housing markets, with long term benefits to communities."

The implication is that housing numbers should be increased where this will enable the resident labour force supply to match projected job growth. Moreover, Technical Advice Note 23: Economic Development (2014) states that "economic land uses also include construction, including housebuilding" and that "recognising the whole-economy contribution to economic growth is therefore important".

It is accordingly considered that the NDF should properly align housing and economic aspirations to ensure that the benefits of City Deal investment are properly harnessed and that housing need is met.

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

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

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?

⁶ CCR City Deal Strategic Business Plan Wider Investment Fund, February 2018

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 checked="" 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?

Whilst Barratt David Wilson Homes are supportive in principle of the technology, any strategy for rolling out provision must investigate and confirm whether the supporting infrastructure required to deliver the roll out is economical. It should also be recognised that the price of electric vehicles is a major barrier to increased take up and land use planning cannot influence the cost of such vehicles.

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

Whilst the need to protect and enhance biodiversity is supported in principle, it must be recognised that the habits of existing society and the way people live their lives has the greatest impact on the environment and its resilience. This fact needs to be appreciated and considered when developing such frameworks.

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

developments							
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

Policy 15 requires that: *"As a minimum, proposals for large scale, mixed use developments of 100 dwellings or more should consider the potential for a District Heat network".* In practice, a District Heat Network (DHN) is unlikely to be considered feasible in the majority of proposals, especially for only 100 units. The process of dismissing the feasibility of such schemes would place an undue burden on applicants. In any case, as set out in the Vale of Glamorgan Council's response to the Draft NDF – *"a significant hurdle to financial viability in delivering DHN schemes for domestic use is consumer uptake. Energy Services Providers are likely to have a minimum dwelling uptake to be able to consider taking on a DHN scheme, which in some cases will require as many as 500 dwellings to consider a CHP scheme economically viable".*

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

9. 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?

[illegible]

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

11. 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	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
----------------	-------	-------------------	----------	-------------------	-------------------	-------------------

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

Policy 28 – Newport

The Draft NDF identifies *"Newport as the focus for regional growth and investment."* However, there is no robust evidence in the form of an urban capacity study to demonstrate that Newport is capable of accommodating any growth beyond that of its own needs. As previously set out, given the role of the NDF in informing the SDP and LDP, it is, as set out in Cardiff Council's response to this consultation *"imperative that it is underpinned by the same rigorous and detailed evidence base expected at local and regional levels"*.

In focusing growth on Newport, the NDF makes no reference to the congestion issues that exist along the M4 at Newport and how it proposes this issue should be addressed in any SDP for the region.

Policy 29 – The Heads of the Valleys

Given that the NDF is not supported by any evidence, the implications of focusing the SDP on the Heads of the Valleys area cannot be understood and may not meet the tests of soundness that the SDP need to meet particularly in relation to Test of Soundness 3: Will the plan deliver

- *Will it be effective?*
- *Can it be implemented?*
- *Will development be viable?*
- *Can the sites allocated be delivered?*
- *Is the plan sufficiently flexible? Are there appropriate contingency provisions?*

It is a well-known fact that the viability of development within the Valleys is questionable which is demonstrated by the lack of activity and number of stalled sites. Stifling development in other parts of South East Wales will not make development in the Valleys viable but instead will harm the sustainable development of Wales.

Policy 30 – Green Belts in South East Wales

The Draft NDF is prescriptive in stating that it "requires" the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales with the amplification text going on to state that *"The Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff"* (emphasis added). No sound evidence is provided to justify the imposition of a Green Belt, nor the prescriptive supporting text which identifies its proposed location.

Paragraph 3.60 of PPW identifies where a green belt may be justified stating:

"Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process."

No evidence is provided by Welsh Government in terms of the 'demonstrable need' for the Green Belt. Having reviewed applications, which have been submitted in the proposed Green Belt area over the past five years, it is evident that no applications have been submitted in Cardiff or Newport whilst one application has been submitted and refused in Caerphilly and three applications have been submitted in Monmouthshire where one was refused, another approved and a third is under consideration.

It is clear that there is inadequate evidence of demonstrable development pressure on the basis that only four major applications have been made in the last five years in what is a substantial area covering a large portion of the region.. In any case, of the applications that have been received and determined some two thirds have been refused (partly on the basis that they lie outside of settlement boundary). This is despite there being an evidenced shortage of housing in both cases. Accordingly, standard development management policy mechanisms, such as settlement boundaries, are sufficiently robust to protect the urban form.

The requirement for a Green Belt in the eastern part of the region (predominantly Monmouthshire) would unduly restrict the potential for sustainable growth in this part of Wales to help redress the socio-economic issues that Monmouthshire faces. Moreover, this part of the region needs to respond to the effects of the removal of the Severn Bridge tolls. Monmouthshire's latest LHMA (July 2018) states the following in respect of potential impacts of in-migration on unaffordability:

"Bristol property prices have risen by 37%, which means that favourable prices in southeast Wales are proving attractive to house buyers. Information from an estate agent in Chepstow shows that 80% of people buying homes in Monmouthshire are coming from the Bristol area. With the electrification of the South Wales mainline, the planned South Wales metro, the proposed M4 relief road around Newport and the abolition of the Severn crossing tolls we can expect to see continued pressure on house prices in Monmouthshire."

Alongside issues of affordability, the unintended consequences of the Green Belt designation would be that Monmouthshire (and Wales) misses out on the economic opportunities associated with the removal of the tolls and the opportunity to capitalise on economic links between the Great Western Cities of Cardiff, Newport and Bristol. As set out earlier in these representations, no testing of alternative scenarios (such as there being no green belt designation) has been undertaken with regard to economic / employment implications. This has a bearing as to whether the Draft NDF meets the SEA Requirements that it is subject to.

Notwithstanding the above, there is a clear inconsistency in the policy approach to Green

Belts between South East Wales (where a green belt is 'required') and North Wales (where a green belt is 'supported' by Welsh Government'). No justification is provided for the different approach. Given that there is inadequate evidence for the Green Belt in South East Wales, it is suggested that the potential for a Green Belt be explored through the SDP and should not therefore be prescribed in the NDF.

PPW states at Paragraph 3.66 that:

"The boundaries of Green Belts should be altered only in exceptional circumstances and with regard to their intended long-term permanence."

Given that the SDP plan period is proposed to be 25 years commencing in 2025, and in light of the permanence of the Green Belt, it would likely be required to be in place until 2075 as a minimum (equivalent to two SDP plan periods). The permanence of the Green Belt requires that its designation is based on robust and sound evidence (which is currently lacking). Should its designation be required, it will be key that its location has regard to longer term need for development land (as set out in Para 3.68 of PPW). Given that the overall housing requirement for the NDF period is yet to have been identified, and given that there has been no consideration of urban capacity testing within settlements, it would be wholly inappropriate to require a Green Belt through the SDP.

Policy 31 – Growth in sustainable transit orientated settlements

Whilst there is in-principle support for development and growth focussed around existing and committed railway and Metro stations, constraints associated with developing such land need to be considered. Technical Advice Note (TAN) 15: Development and Flood Risk (2004) states at Paragraph 2.2:

"Historically, the topography of Wales has generally resulted in transport infrastructure and development being concentrated on valley floors, lowland areas and in the coastal fringes."

In physical terms, much of the land surrounding stations is therefore constrained by topography and/or flood risk. Every station in South East Wales includes some flood risk area within a 10-minute walking distance of it. Additionally, there are issues of multiple land ownerships which would limit the ability for significant development to come forward in such areas. Accordingly, the potential for transit-oriented development should not be overstated – not least given the uncertainty of phasing / delivery of later phases of Metro infrastructure.

12. 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.

As set out earlier in these representations, no testing of alternative scenarios (such as there being no green belt designation) has been undertaken with regard to economic / employment implications. This has a bearing as to whether the Draft NDF meets the SEA Requirements that it is subject to.

13. 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?

N/A

14. 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?

N/A

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.

N/A

15. 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?

We welcome the Welsh Government's introduction of an NDF to provide a co-ordinated approach to plan making and infrastructure delivery. However, the policies presented in the draft would serve to worsen the delivery of much-needed housing, stifle the ability to harness the opportunities presented by the various City and Growth Deals and have serious negative implications for plan-making⁷. Whilst on Page 10 it is stated that:

"The NDF will complement the Wales Infrastructure Investment Plan and Regional Economic Development Plans by enabling development that maximises the impacts of our investment."

The NDF, as written, actually seeks to constrain growth in Wales and will in actual fact stifle sustainable development in Wales. Whilst the Welsh Government's aspiration to regenerate the Valley's is commendable, stifling development in viable areas of Wales will result in development not happening rather than development being displaced to the Valleys.

Whilst we are fully supportive of the preparation of an NDF, it is fundamentally flawed in that it is overly prescriptive without being based on a sufficient evidence base. It moreover lacks balance, would unduly constrain the ability of subsequent SDPs and LDPs to deliver the aspirations of the economic ambitions of the growth deals. The result of which is that housing delivery would continue to falter and the shortage of genuinely available deliverable sites would significantly worsen impacting upon meeting Wales' housing needs (both market and affordable).

The NDF does not provide a clear framework and presents a significant risk to achieving the Government's national strategy set out in Prosperity for All. No sound evidence is provided to justify the imposition of a Green Belt, nor the prescriptive supporting text which identifies its proposed location. Moreover, the Draft NDF does not identify a clear purpose/reasoning for requiring a new Green Belt 'in principle', and so this would present significant challenge for lower tier plans to determine any boundary.

⁷ As set out in the Delivery of housing through the planning system consultation document (Welsh Government, October 2019), *"The planning system, through the Local Development Plan (LDP) process, must provide the land needed to allow for building the new homes which local planning authorities have identified as being required."*

The NDF should make clear that any preference for brownfield/regeneration is exactly that (in line with the search sequence outlined within Paragraph 3.39 of PPW) and that a range and choice of sites (including greenfield development) is required as part of the overall housing mix.

We recognise that some considerable time has passed since the NDF's preparation process started, the deadline for getting the NDF in place is approaching and there is a political imperative to get the NDF in place. It seems to us in these circumstances that there is a strategic decision to be made in respect of the NDF – either:

1. The NDF removes all prescriptive policy requirements, only includes broad and indicative elements for consideration through subsequent plan-making and is explicit that nothing which is stated within the NDF or its evidence base (or lack thereof) should pre-determine the outcome of SDPs and LDPs. In which case, there would be less of a requirement to scrutinise that detail. The NDF would need to avoid any perception that it is pre-judging the content of SDPs and LDPs in those circumstances and that it will be for the lower tier plans to consider many potential options. If as we understand, the Welsh Government do not intend to have the NDF independently examined and fully scrutinised against the tests of soundness at this stage, they and the NDF will need to make it clear that it illustrates only one option that will be considered when preparing lower tier plans; or

2. The NDF continues to include prescriptive policy requirements (albeit with greater balance and not unduly restricting otherwise sustainable development) – although this could only be progressed should there be a complete and proportionate evidence base which is robustly scrutinised through proper independent examination having regard to tests of soundness.

16. 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"/>
--	--------------------------

