



## **National Development Framework 2020-2040**

### **Representations on Consultation Draft**

**November 2019**

#### Introduction

Edenstone Group is a medium sized, privately owned housebuilder and land promoter based in Wales. Edenstone has grown extensively over recent years with plans for further growth by investing in development opportunities in South Wales. A key part of the business is working in partnerships with Registered Social Landlords (RSLs) to deliver affordable led development sites. The ethos behind the Edenstone Group is creating sustainable communities, providing quality new homes where people want to live.

It is important to be clear that Edenstone Group is very supportive of the additional tier of planning guidance that the NDF offers and role that this document will play in promoting a plan-led system in Wales which is, we believe, the best way to achieve sustainable development. The aspirations of the document are admirable and we wish to be part of the delivery of these objectives where possible. To ensure that this is achievable we set down our comments on the draft document below which we feel will assist in its implementation on the ground and ensure that the aspirations of a plan led system are met.

#### Chapter 2 – Wales: An Overview – Challenges and Opportunities

Edenstone Group delivers good quality affordable housing across South Wales and we support the notion that these homes are essential for balanced communities and that their delivery needs to be increased across the Country. However, it is considered that in targeting the housing and planning interventions to achieve this aim the Welsh Government should note and place some emphasis on the value that open market housing in conjunction with those providing it, play in delivering affordable housing and creating and maintaining the balanced neighbourhoods that the Government is seeking.

Furthermore, Edenstone considers that the Welsh Government should be more prescriptive to Local Planning Authorities preparing LDPs in respect of Exception Sites. PPW10 does not clearly set out a requirement for local authorities to make allowance for affordable exception sites in their LDPs it merely refers to areas 'where such policies are appropriate'. This is interpreted by at a local level and not applied in every authority in a similar way even where an affordable housing need is evident. We feel that all LPAs should have an exceptions policy which permits affordable housing in the right locations. This could be introduced via the NDF.

Furthermore, Edenstone appreciates the document's emphasis on creating a sense of place and communities not just new housing and infrastructure and the Edenstone Group is committed to delivering this on all its sites.



#### Chapter 4 – Strategic and Spatial Choices: the NDF Spatial Strategy

The co-location of homes, jobs and services is seen as essential to create the communities of the future and the focus in the NDF is largely around the cities and large towns in South East Wales as main development areas which clearly offer the most attraction and are often the most sustainable. These representations will deal with this in more detail in a later section but in setting out a spatial strategy such as this it should be noted that a number of the cities and large towns which might offer these opportunities in the future are being constrained by the “required” Green Belt as set out in Policy 30.

Reference is also made to the areas people have historically been drawn to from an economic perspective and the urban areas that have been created as a result, we feel that perhaps there should be some emphasis on those urban areas and large towns which benefit from good sustainable connections to England, in particular Monmouth and Chepstow.

Edenstone supports the requirement for development in those towns and villages in rural areas and would welcome a firmer policy stance on encouraging limited development (balanced with need) in these areas. Encouraging development in order to support services and perhaps introduce enhanced or new services in these areas would also be welcomed.

The document states that it *‘empowers local policy and decision makers to develop the national priorities through Strategic and Local Development Plans and identify areas and issues of significance in their particular areas’* However, there is concern that the prescriptive nature of, for example Policy 30 (which sets out the requirement for a Green Belt in South East Wales and its albeit broad identification on a plan) does not necessarily give the Local Planning Authorities the freedom they require to prepare their own plans which will be based on extensive evidence. Essentially, before they even commence gathering an evidence base to support their SDPs and LDPs they are being constrained and / or directed in an unsubstantiated manner.

#### Proposed Policies

##### **Policy 3 – Public Investment, Public Building and Publicly Owned Land**

Edenstone understands the rationale for this policy and is supportive of the concept but it is felt that this proposal should be considered carefully in respect of being able to deliver financially viable sites that will deliver the housing required. Historically such sites have been marketed to demonstrate best value and affordable housing quantum applied reflecting local planning policy, therefore the capital receipt for public sector landowners was attractive. It may be that in certain parts of the country a 100% affordable site may not provide the landowner with a satisfactory receipt and delivery may be delayed or may not happen at all. Perhaps an element of open market housing on these sites will assist, particularly in those areas where Acceptable Cost Guideline values are in the lower bands.



#### **Policy 4 – Supporting Rural Communities**

Edenstone welcomes the support offered by Policy 4 in respect of the rural communities in the Country and would wish to see local authorities allocating more appropriately sized sites across the more rural parts of Wales in order to assist in the support and provision of additional services in these areas where necessary.

#### **Policy 5 – Delivering Affordable Homes**

Edenstone is wholly supportive of increasing affordable housing delivery across Wales and is seeking out opportunities to offer partnerships with RSLs in a number of different authorities. It is considered though that the reference to affordable housing should also acknowledge the role shared ownership housing as this is also considered a necessary tenure to achieve the balanced communities the Welsh Government is seeking.

The NDF sets out a requirement for 114,000 new homes across Wales up to 2038 and that during the first 5-year period c. 8,300 additional homes are required annually which manifests to a requirement for c.3,900 affordable dwellings. It is considered that this is a very aspirational target given the overall growth level over the plan period and perhaps some thought should be given to proposing a more aspirational higher growth option to allow for 10,000 -12,000 new homes per annum which will be more likely to deliver the quantum of affordable housing required and thus targets will more likely be met.

We would also reiterate the involvement of the private sector housebuilding companies in assisting in this delivery and meeting the needs of the country.

#### **Policy 16 – Strategic Policies for Regional Planning**

Again, Edenstone is supportive of the benefits that Strategic level Development Plans (SDPs) will offer the planning process and furthermore of the matters that SDPs should deal with (such as spatial areas for strategic housing and employment growth, renewable energy and the identification of green belts) however, there is some concern that there is some discord between this Policy and the prescriptive nature of Policies 27-30, the development of which is not a result of the consideration of an extensive evidence base that SDPs and LDPs should be. For example, the identification of a broad location for the Green Belt in South East Wales which it is not believed is supported by any background evidence and / or research clearly pre-determines to a large extent the location of development across a significant part of South East Wales. When considered in the context of a locally obtained evidence base, this may not be the most suitable location or size a Green Belt of indeed it may be considered that other policy mechanisms can be utilised and the requirement for a green belt may not be necessary at all. Again, this is considered further in the comments relating to Policy 30. There is clear reference to the benefits of regional planning and this supported but it appears that the NDF is not really allowing this to take place in its correct form.

Furthermore, we are concerned about the transition period between the proposed adoption of the NDF in 2020 and the anticipated first SDP adoption in c.2025. As developers and promoters, we need to have a clear understand of where is and is not appropriate to invest our time and money and the lack of any formal guidance for a period of at least 5 years is concerning.



### **Policy 28 – Newport**

In respect of the focus that the NDF places on Newport, it is felt that perhaps some more consideration of constraints is required before a commitment is made. Newport is constrained by flooding, the highway infrastructure, the amount of Brownfield Land and the proposed green belt which prevents any development to the north of the city. By focussing growth on Newport without the assessment and evidence to back this up puts the delivery of the growth required at risk. Surrounding settlements all within easy reach of Newport and those also benefitting from the removal of the Severn Bridge Tolls should also be explored and supported to take further development.

Redevelopment of brownfield land (or previously developed land) is clearly of benefit and is key theme at a national level, however, such sites offer a number of constraints which may either make them technically undeliverable or financially unviable, therefore other opportunities to deliver sustainable housing developments should be considered – a review of allocated employment land could be a possibility as well as identifying sustainable green field sites in the right locations.

### **Policy 29 – Heads of the Valleys**

It is noted that this policy does not make any reference to Abergavenny even though this is one of the key settlements in this location.

In the policy text the NDF makes reference to the requirement for 48% of additional homes required to be affordable. As stated above this is admirable and could be achievable if total growth levels are increased and also if ACG banding is reviewed in some areas to allow the viable delivery of more affordable housing.

### **Policy 30 – Green Belts in South East Wales**

Edenstone is concerned that there is not sufficient evidence to support the 'requirement' or indeed even the identification of a green belt at this stage. PPW10 clearly states that:

*'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.'*

There is no clear evidence base supplied with the NDF and neither will the document be examined by an Independent Inspector to consider its 'soundness' therefore, to predetermine both the requirement and location (albeit indicative) is not in the spirit of developing planning policy and is at risk of restricting growth particularly in the eastern parts of Wales which could, and indeed, should be benefitting from the removal of the Severn Bridge Tolls.

In conclusion then, Edenstone is supportive of the plan-led system which is advocated by the NDF and the outcomes and aspirations of the document are welcomed on the whole, particularly in respect of the delivery of quality communities around Wales. It is considered though, that the document in parts is too prescriptive and perhaps goes beyond what a national level planning policy document should do. Those Plans that are prepared at a Strategic and Local Level and which are based on large amounts of evidence and are assessed independently are in fact the correct mechanisms via which to shape direction of development. Edenstone would welcome the



opportunity to discuss this further with the Welsh Government and work together in the NDFs delivery.

## **Consultation Response Form**

Your name	Katie Peters
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<u>Organisation (if applicable)</u>	Edenstone Group

## 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 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 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:

Please see attached representations

## 2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Please see attached representations



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

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

Please see attached representations

### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

N/A

### 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

N/A
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## 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?

[illegible]

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

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

N/A

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



## 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	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 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.

Please see attached representations

## **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.

## **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?

## 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?

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.

## 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?

*Please find attached detailed representations which provide comments on all relevant policies.*

**16. Are you...?**

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

<b>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</b>	<b>X</b>
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