

# Draft National Development Framework

## 1. NDF Outcomes (chapter 3)

Q1. 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?

Disagree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them

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

Q3. 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)			X				
Rural areas (Policy 4)							

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Plans for developing urban areas is over-reliant on the assumption that there is enough viable public sector land available. What is the evidence that this is the case?

There is a lack of recognition that brownfield sites typically cost more to develop.

Newport has issues with flooding and capacity of road infrastructure (M4).

The NDF needs to allow more flexibility re the green belts surrounding the urban areas. If economic and transport policies in less affluent areas fail (such as the valleys), market house builders are unlikely to develop there due to viability issues. If that is the case, there needs to be mechanism to consider extending the green belts around the urban areas. Current green belt policies are too stringent and don't allow for changes in circumstances.

## 3. Affordable Housing (policy 5)

Q5. 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?

Disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

We are disappointed that the draft NDF does not recognise the role of the public sector in the failure to supply housing need. It is stated that the delivery gap '...has widened since greater reliance has been placed on the private sector to meet this basic human need.' It is fair to state that the current market delivery model has, and is, failing to deliver, but this model has evolved largely due to public sector policy and its implementation. The market housing delivery model is today over-reliant on a very small number of PLC house builders. Due to the increasingly complex and expensive planning process, SMEs have all but disappeared from the market with a mere circa 10% of new homes delivered by SMEs today. SMEs have not had the opportunity to deliver affordable homes because there are too many barriers in their way. If these barriers were removed / much more support for SMEs to overcome the barriers, more market homes would be delivered and by default, affordable homes.

A bulk of the draft NDF sets the scene for a three-tiered planning hierarchy - NDF, SDPs, LDPs. Without SDPs (Only the South East Wales one is off the ground, and even then is unlikely to "go live" before 2025), the NDF risks becoming an impotent tool. It is therefore vital that Welsh Government mandate the establishment of SDPs. The planning machine requires all three cogs for it to work.

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

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Neither agree nor disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

*No Response*

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

Q9. 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?

Neither agree nor disagree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

*No Response*

#### 6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Neither agree nor disagree

## 7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. 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	Don't know	No opinion
Large scale wind and solar developments							X
District heat networks							X
							X

Q13. 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?

*No Response*

## 8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?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.

Strongly agree

## 9. North Wales (policies 17-22)

Q15. 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?

Agree

## 10. Mid and South West Wales (policies 23-26)

Q16. 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?

Agree

## 11. South East Wales (policies 27-33)

Q17. 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?

Agree

Q18. 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.

The overarching principles are fine, but there is a serious lack of ambition. From a housing viewpoint, the NDF focusses on consolidating what is a mediocre status quo rather than present an ambitious vision for the future (one we desperately need).

## 12. Integrated Sustainability Appraisal

Q19. 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.

*No Response*

## 13. Habitats Regulations Assessment

Q20. 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?

*No Response*

## 14. Welsh Language

Q21. 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?

*No Response*

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

*No Response*

## 15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

*No Response*

## 16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

## Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

<b>Name</b>	Ifan Glyn
<b>Organisation (if applicable)</b>	Federation of Master Builders Cymru
<b>Preferred contact details (email/phone/post)</b>	-

Q26. If you want to receive a receipt of your response, please provide an email address.  
Email address

*No Response*

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*