

# Consultation Response

## Draft National Development Framework Consultation

### Summary

The Home Builders Federation is supportive of a plan-led system and of this additional tier of planning control in principle but would raise several concerns regarding the Draft National Development Framework.

Fundamentally, the document fails to acknowledge the role of the private sector in delivering the housing the country needs to support growth, particularly in respect to the cross subsidy that delivers a significant level of affordable housing in Wales. Further, it does not support the growth aspirations of the City and Growth Deals in South and North of Wales. Our key concerns are as follows:

- The document lacks guidance on the role of private home builders in delivering the range of new homes Wales needs, both market and affordable. New housing is only referenced under the heading of 'Affordable housing', where it states: 'We are committed to ensuring that new housing meets the needs of all members of society' before then going on to emphasise 'those unable to afford to buy on the open market.'
- The document cites the recent Welsh Government housing need statistics but does not clarify that these are not housing supply targets. This important distinction was made by the Minister when the figures were released, and we would welcome confirmation and clarification in the NDF.
- The role of new market housing in supporting economic growth is not adequately acknowledged in the draft document. This economic growth could play an integral part in the drive to create new employment opportunities linked to City and Growth Deals. The demographic likely to be employed in the modern, high-tech industries that the Welsh Government aims to attract will require appropriate volumes and types of new market housing.
- There appears to be a lack of aspiration in the NDF in stating Welsh Government's obvious ambitions to enable growth. This is a missed opportunity, and an area where a pro-development commitment would be welcomed as a key factor in achieving these aspirations.
- The concentration of new development in existing urban areas, in particular, Newport, is not supported by a robust evidence base, nor do capacity assessments point to this as a suitable proposition. Newport is heavily constrained in several ways including flood risk and the capacity of nearby road infrastructure, including the M4.
- Whilst PPW10 supports the potential for the development of new settlements in Wales, the NDF contradicts these ambitions by suggesting 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.*'



- Many of the proposed policies require both the detail and the evidence base to be provided by the next tier of planning, which is the Strategic Development Plan (SDP). Currently no SDPs have formally commenced, although slow progress is being made in SE Wales who recently issued a draft timeline suggesting adoption in 2025. There is also currently no guarantee or requirement for SDPs to be commenced or adopted. This raises the question of what happens in the period between the NDF being adopted in 2020 and an SDP which at earliest would be adopted in 2025.
- The increase in use of public sector land for new housing development raises concerns regarding deliverability across Wales, particularly when considering the Housing Minister's recent letter to LPAs requiring them to bring forward schemes of a minimum 50% affordable housing on public sector land. Not only does public sector land often take a long time to come forward but also the high level of affordable housing raises questions over the viability of such sites.
- The concept of a green belt has been included without any evidence to support its need or location. The policy also states that it 'must be' provided rather than considered. Green belts also differ slightly to many planning policies in that they are permanently protecting an area for 50 years and are very infrequently reviewed. Green belts were established to limit urban growth, yet the two green belts identified in the NDF are both within the areas identified for growth.

The HBF believes that because of the lack of support for the private house building the plan does not provide any level of certainty for the private house building industry and is likely to result in a decline in the industry's future investment in Wales and a continued decrease in the number of both market and affordable new homes delivered.

## **Detailed Comments**

### **Chapter 2 - Challenges and Opportunities**

The HBF considers that the current housing crisis should be clearly identified as a challenge within the NDF. The document currently states:

*'Good quality affordable homes are the bedrock of communities and form the basis for individuals and families to flourish in all aspects of their lives. The NDF provides evidence of the need for housing across Wales at both a national and regional level. In particular, this evidence demonstrates the need for a focus on increasing the delivery of affordable homes. 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.'*

However, this concentrates on 'affordable homes', yet not all people looking for a home will either want or be able to live in a Council House or home offered by an RSL. Therefore, the documents should acknowledge the wider housing need across all tenures including market housing.

The document states that it evidences the need for housing across all tenures but then goes on to focus on only affordable housing. However, the quoted WG statistics show that the housing need requires 53% to be market housing. Accordingly, the HBF suggests that the document also needs to support this form of housing by providing a high-level policy to show how and where this significant element of the housing need is to be provided. On the basis that the delivery levels of homes in Wales has been falling for the



last three years and has not been near the level suggested by the latest WG statistics (8,300/yr) since 2007/8. It cannot just be left to the market to deliver these homes, particularly as we have to work within a plan led system. As the delivery of homes relies on a Plan Led system in Wales unless the NDF provides policy guidance for private house builders, it will make it far more difficult for them to make the longer term investment decisions needed to ensure that the supply of land is maintained at a level which will provide at least some chance of delivering the level of new housing needed in Wales, including an element of affordable.

Page 17 of the Draft NDF 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.'* Although the text above is clear, the NDF contains no policy support for this broader housing need. The HBF consider that such support should not be left for an SDP or LDP to deal with and should be included at the top of the Plan led hierarchy.

Further, there is no reference to the lack of land supply currently faced in Wales. Land is required for all forms of housing, be it affordable or private and without enough land the level of housing need will never be met. The shortage of a five year housing land supply across nearly all Local Authorities has been an ongoing issue for a number of years as shown in the WG Joint Housing Land Availability data: <https://gov.wales/sites/default/files/publications/2019-05/housing-land-availability-in-wales-2018.pdf>.

If the NDF does not support or provide the high-level guidance regarding where market housing should be provided, it is hard to understand how SDP's and or LDP's will be able to allocate enough land to ensure a five-year land supply is maintained. The HBF notes that the Welsh Government are currently consulting on the revocation of TAN1 so there may no longer be the requirement to show a five-year land supply. However, the consultation suggest that this will be replaced by an annual trajectory which will look at what should have been built compared to what has been built. This will increase the need to ensure enough of the right land is available for development to ensure delivery targets are met.

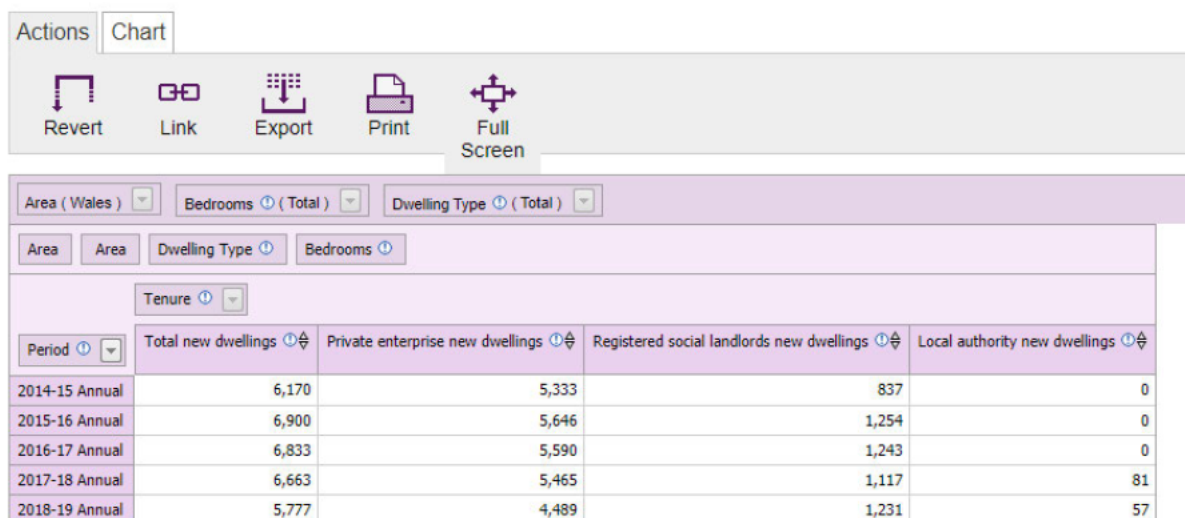
### **Comments on Market Housing**

The HBF raises several serious concerns about the proposed NDF in relation to how it deals with the need for housing.

There is no evidence to support the statement made by Julie James in her foreword *'Market led housing provision has failed to meet the needs of far too many people'* On the contrary; the private housing market has delivered most of the new housing seen in Wales as shown by the table below showing just the last five years. Indeed, last year, which saw one of the highest levels of homes delivered by RSL's and the highest level delivered by Councils, the private sector still completed 78% of all homes built in Wales.



## New dwellings completed by period and tenure



Importantly within the homes delivered, the private sector has delivered a significant amount of affordable homes, both for social rent and low-cost home ownership as seen in the table below: (WG statistics)

Year	Delivered through S106	Total no. delivered	% contribution
2017-18	773	2316	33
2016-17	932	2546	36
2015-16	705	2400	29
2014-15	796	2218	36

Accordingly, the HBF considers this statement is not acceptable and is not supported by WG own statistics, therefore it should either be removed or reworded.

At page 9 the document asks the following question '**How does the NDF fit with wider Welsh Government policy?**' The HBF requests that an additional section/wording is added referencing the Welsh Government **Prosperity for All: the national strategy**. This should be the starting point as it identifies the importance of housing in Wales. The relevant sections of the document include:

### Priority Areas

*In developing the strategy, we recognised five areas which emerged as having the greatest potential contribution to long-term prosperity and well-being.*

*Housing: the bedrock of living well is a good quality, affordable home which brings a wide range of benefits to health, learning and prosperity.*





## Housing

### Vision

*We want everyone to live in a home that meets their needs and supports a healthy, successful and prosperous life. Good quality homes are the bedrock of good communities and form the basis for individuals and families to flourish in all aspects of their lives.*

The HBF suggests that unless all housing tenures are clearly supported by the NDF the document will not be in compliance with or supportive of, the WG own key document **Prosperity for All: the national strategy**.

The Outcomes identified in Chapter 3 of the document at point no.2 states, 'access to homes' the HBF consider that in view of the comments above and the policies within the NDF that the Plan fails to deal fully with this outcome focusing solely on the provision of affordable housing.

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

The HBF questions why the document states the following:

*'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.'*

This appears to be in contradiction to the recently published PPW10 which states at para 3.49: 'Due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or the NDF. This is due to their significance and impacts extending beyond a single local authority.'

In view of the shortage of land for housing development being faced in Wales and the large number of constraints associated with development, particularly around some of the existing urban areas, such as flood plain, topography and green wedges, we suggest that removing the ability to consider new settlements for the next 20 years is short sighted and could further limit the delivery of new homes in Wales. It also removes the opportunity to plan for a truly sustainable place, designed around public transport options and incorporating Placemaking from the start, rather than trying to retrofit new development into and around existing urban areas.

## **Housing and the Economy**

The HBF questions the lack of an economic growth policy in the NDF. The planning system has a key role in supporting economic growth and, at this strategic level, sending out the right message to investors in Wales. Importantly, linked to this, is the relationship between jobs and new homes and the need to house the workforce. Currently estimates are based on past trends, so if the City Growth Deals and other WG initiatives are successful in attracting a range of new jobs then the future housing supply will need to exceed current estimates. Many of the new jobs created are likely to be well paid and the employees are unlikely to need affordable housing; a point which emphasises the importance of the plan needing to acknowledge and support the role of the private house builder in delivering the market homes Wales will need to service these new jobs. This point has been recognised by WG in the soon to be published Development Plan Manual 3 which states at para 5.49 – 5.50:



*'LPAs should not consider employment forecasts in isolation, but the relationship between economic and demographic/population projections. Demographic and population projections will be a key consideration in understanding the potential of a future population to accommodate economic growth options (and vice versa). What is the relationship between the number of jobs generated and the economically active element of the projected population? Will a population provide sufficient homes so as not to import labour and hence increase in-commuting? ....*

*5.50 The critical point is ensuring that both economic and housing growth are broadly aligned, accepting there is no direct mathematical relationship. Both forecasts and the scale of growth should be similar to support each other.'*

The NDF also fails to acknowledge the link between new housing and the wide range of economic benefits it creates in the local area, through the creation of jobs, money invested into local infrastructure, council tax and the wider spend by new residents.

### **Comments on Proposed Policies**

#### **Policy 1 - Sustainable Urban Growth**

Although the HBF has no objection in principle to this Policy, in view of other policies in the NDF this appears to be the only form of development which is being supported for the next 20 years in Wales. This is short sighted and will further limit the delivery of new homes in Wales. It also appears that no assessment has been carried out of the capacity to provide the level of development in the limited areas identified in the plan (centres of national and regional growth) along with the transport hubs.

Wales has not been delivering the number of homes it needs for several years and, although the latest WG statistics has reduced the need from the previous Holman estimates, we are still building around 2,000 homes a year fewer than the identified need. The last time the latest need estimates were met was 2007/8 so there is also a considerable backlog of unmet need. The HBF considers that this policy will only further limit the land available for development and puts at risk any chance there was of getting close to meeting the identified need for new homes across all tenures.

#### **Policy 3 - Public Investment, Public Buildings and Publicly Owned Land**

Publicly owned land has traditionally often come to the open market and been bought by private developers who then provide a percentage of affordable housing in line with the relevant current planning policies, subject to viability considerations. It has always been an option for the public sector landowner to require a higher level of affordable homes, however as this normally results in a reduced capital receipt so does not often happen. In terms of the NDF's aspiration, firstly we are concerned that the suggested use of such land for only affordable housing will result in less land being available to private house builders which, in turn, is likely to reduce the level of new homes delivered across Wales and the contribution such sites make to the provision of affordable housing. Secondly, we are also not convinced that such a policy, on its own, will change the mindset of the public sector landowners, who will still be looking to maximise the capital receipt from their land. If they are made to provide the higher affordable requirement then they may not bring the land forward, resulting in fewer new homes being delivered. Historically, even when Local Authorities have brought land to the market, it has often taken much longer than initially thought, due to the need to prepare design briefs and go through several internal processes.



Finally, the HBF questions whether any assessment has been made of the quantity of policy compliant public sector land which is available/suitable for the development of affordable housing?

### **Policy 5 - Delivering Affordable Homes**

Although the HBF has no objection in principle to this policy and are supportive of the wish to deliver more affordable homes, we strongly object to this being the only housing policy.

Accordingly, the HBF requests that an additional policy is included referring to the provision of all new homes not just affordable ones. Based on a range of high-level Welsh Government documents, including some already referenced in our representations, housing across all tenures is one of Welsh Governments priority areas. The provision of housing is often identified as a basic human right, and this applies across all tenures. The NDF, as currently written, provides no advice on how this need should be planned for other than in relation to affordable housing.

In terms of the need identified, the NDF clearly states the need for both affordable and market housing:

*'The central estimate suggests a need for an additional 114,000 homes across Wales up to 2038. During the initial five years (2018/19 to 2022/23) it is estimated that 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 HBF notes that when these housing need estimates were released in January 2019 the Minister, Julie James, made a statement which included several important points.

*'The new Estimates of Housing Need will inform plans and strategies at a national and regional level across many policy areas. They will be central to the formulation of future housing and planning policy across my portfolio and inform areas such as the National Development Framework (NDF), which is due to be published in 2020.'*

The HBF would argue that this has not actually happened as the NDF includes no policies which help guide the delivery of the 53% market housing identified.

*'It is important to acknowledge that, while these estimates form a basis of discussion for policy decisions and are an indication of the overall need and demand for additional housing units in Wales, they should not be used as a housing target and cannot forecast exactly what is going to happen in the future.'*

Alongside the new Housing Policy that we have requested be included in the NDF, the Plan should also make the same clear statement about the estimates not being used as a housing target, within the policy wording or supporting text. The NDF is the lead policy document which all other plans such as SDP's and LDP's are required to be in compliance with and so including this clarification will help to ensure all housing needs are adequately reflected in the emerging SDP and LDP's. This is a critical point since, as currently referenced the housing need figure could be misread as the housing target for Wales which would lead to significant under delivery.

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





The policy states: *'The Welsh Government requires Strategic Development Plans to come forward in each of the three regions to deliver the requirements of this policy.'*

The HBF questions how this will be achieved particularly as the supporting text goes on to say, *'The Welsh Government will work with local planning authorities to support the establishment of Strategic Development Plans.'* The NDF requires significant policy detail to be provided by SDP's, yet there appears to be no clarity on how and when SDP's will come forward and be adopted. This raises the concern of a 'policy vacuum' being created in which strategic issues are not dealt with due to the lack of detailed policy guidance within the NDF and no adopted SDP. With decisions continuing to have to be made at a local level as part of the ongoing review of LDP's. The HBF suggests that this undermines the move towards greater regional working and in part the reason for creating the additional SDP and NDF Plan layer. Again, this lack of policy guidance is likely to result in fewer homes being built than are needed.

### **Policy 28 - Newport**

The HBF consider that identifying Newport as a focus for regional growth has not been informed by an assessment of the constraints faced by Newport, these include existing highway infrastructure including the M4, flooding, and the proposed green belt. This lack of assessment puts at risk the delivery of the growth suggested by the NDF, including market and affordable homes. As discussed above leaving this to the SDP or LDP level of plan making is not acceptable and may not happen for several years.

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

Whilst the HBF does not object to this Policy in principle, we consider that the area should be identified on the Region Map. Greater clarity is required in explaining the physical extent of this area is and how it relates and links to Cardiff and Newport which are identified as the key drivers of the South East Growth Area.

### **Policy 30 - Green Belts in South/ North East Wales**

The HBF questions why the word 'required' is used and what evidence is there to support the areas identified. The allocation of Green Belts is different to other policies in that they are permanently protecting an area for 50 years and are very infrequently reviewed. Green belts were established to limit urban growth, yet the two green belts identified in the NDF are both within the areas identified for growth. Again, leaving it to the SDP to resolve the details of these green belts is not acceptable and provides uncertainty to both developers considering longer term development options and the Local Authorities who are trying to progress their LDP reviews.

PPW 10 states: *Managing Settlement Form - Green Belts and Green Wedges*

*3.60 Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. 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 HBF suggests that without this supporting evidence, the policy should only suggest that a Green Belt is 'considered' as such an approach would be more in line with the wording above.





### **Policy 31 – Growth in sustainable transit orientated settlements**

Whilst the HBF does not object to this Policy in principle, we question whether any assessment has been made of the areas around these transit nodes to understand the level of growth which can be accommodated? Most train/bus stations are located within existing urban areas, which is the reason they exist. There is often limited potential for new development close to them, which means that not only will land for housing be limited but it will also be competing with other uses such as office and retail who also want to develop in a sustainable location, close to transport links. In terms of growth around new stations which are part of Phase 2 Metro, HBF understands no funding is yet committed to these and that they are likely to take many years to come forward. This will lead to a considerable delay in delivering the housing needed to meet existing housing needs.

The HBF would argue that there is however potential for new transit hubs to be created along existing transit routes in areas currently undeveloped and provide sustainable new development designed to work around the transit hub, something which a revised or new policy could explain and support. This is another reason why the principle of new settlements should be supported by the NDF.

#### **Comments on Growth Areas**

##### **North Wales**

The area identified for growth is not only limited in size but is also limited to two local authorities Wrexham and Flintshire which is considered to be over restrictive and likely to add to the out commute from North Wales across the border. In addition, a green belt is also suggested / required, further limiting the area for growth. The Growth Deal in North Wales has only recently been signed and the HBF is not aware of any move towards an SDP which could take at least 5 years to be adopted, based on the proposed SE Wales timescales.

The HBF have already questioned the lack of evidence behind the proposed Green Belt Policy, but more specifically to North Wales we also question whether any work has been carried out to understand how a green belt might align with the plans of Cheshire West and Chester.

Policy 19 Green belts - the wording used is *'supports the role of Strategic Development Plans identifying and establishing green belts...'* however the supporting text states *'Strategic development plans must identify a green belt that includes the area to the north east of Wrexham'*

Neither Wrexham or Flintshire have an adopted LDP and are at a stage where they will not be able to find it difficult to take account of the NDF in terms of the work they have carried out regarding their extensive evidence base. It is difficult to understand how policy-based decisions will be made in these circumstances with potential policy conflict between recently adopted Local Plan and the NDF. The HBF would suggest that this situation could only be resolved through LDP plan review or an SDP both of which will take several years.

##### **Mid and South West Wales**



The Areas of growth are extremely limited restricted potential development opportunities which could support the economic ambitions for the areas.

The text does not support the diagram in terms of growth areas with Neath identified as a 'Centre of National Growth' on the plan but gets no mention in the wording of the Policy 23.

The supporting text to Policies 23/24 states '*The area can accommodate new growth in a planned and co-ordinated way*' what evidence do WG have to support this statement, has any development capacity work been carried out.

### **South East Wales**

Under the heading Focus for growth the phrase 'the valleys' is far too general. Looking at current LDP's most of the housing and employment sites which have not delivered over the last 10 years are situated in the valleys. This issue has been recognised by several recent WG studies including the Arcadis Report in 2017 and more recently by the WG Plan led manual. The HBF requests that the plan should be more specific about the areas within the valleys that are considered most appropriate for growth, based on a number of criteria including market demand, infrastructure and facilities and sustainability as well as considering available and planned public transport.

### **Comments on supporting documents**

#### **INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK Final Scoping Report APRIL 2018**

*Well-Being goals - A more equal Wales*

*Opportunities for the NDF to address*

*The NDF should support the provision for a range of housing and other types of accommodation that meet the needs of the population and promotes safe and sustainable communities. This could be through methods such as identifying strategic housing locations and/or developing national housing targets.*

#### **INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK Appraisal of Draft National Development Framework: ISA Report (incorporating Environmental Report) JUNE 2019**

*2.6.3 The support for significant economic growth and new housing that satisfies needs should help to reduce poverty and homelessness and better enable people of all backgrounds in many regions of Wales to pursue healthy and high-quality lifestyles.*

#### **NDF - Preferred Option Objectives (p.74)**

*5. Housing 5.1 To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth.*

The HBF refer to all three of these documents which clearly state the need and the importance of considering a range of housing types including market housing and the wider importance of housing in creating a more equal Wales. As stated in our comments above as the current plan only contains a policy relating to affordable housing the document is clearly not in line with the comments and opportunities identified in the documents referenced above.



### **Other Consultation Responses**

The HBF have also taken the opportunity to review some of the other consultation responses and the evidence provided to the ongoing National Assembly Wales Climate Committee. This includes responses from other professional bodies, academia and Local Authorities it is extremely interesting to see that there are many areas of concern where many sectors agree including:

- NDF should be more ambitious.
- Too much focus on setting the scene and outlining the expectations for Strategic Development Plans.
- Lack of urban capacity study to support push for urban growth.
- NDF should support potential for new settlements.
- Housing need figure needs to clearly be the starting point not a target.
- Constraints on development in Newport.
- Lack of evidence for green belt requirement.





## **Consultation Response Form**

Your name	<b>Mr Mark Harris</b>
Your address	<b>PO Box 201, Barry, CF63 9FA</b>
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<u>Organisation (if applicable)</u>	<b>Home Builders Federation</b>

## 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 checked="" 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 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 HBF considers that no.5 is over restrictive suggesting that work opportunities are limited to Town and cites.

## 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas. However, this is not the only option available with new settlements being another as identified in PPW10. There appears to be no evidence base to support the proposed strategy in particular with regard to the existing constraints on development faced by current urban areas and the capacity of these areas to deliver the level of new development needed in Wales. The HBF contend that this strategy will further reduce the availability of land for development in Wales, at a time when we need to be building more homes to meet the identified need.

Please see additional comments on separate submission.



### 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 checked="" 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?

The HBF believes that based on recent trends that the role of the private house building industry in delivering affordable homes should be recognised and supported. In 2017-2018 one third of the affordable homes built in Wales were delivered through S106 agreements as part of market housing schemes. Although the providers identified in the Policy do have a role to play in the longer term, they cannot replace the current level of supply provided by the private house builder, in the short to medium term. The Plan based on WG statistics show that there is a need to increase the level of supply to 3,900 homes a year whereas in recent years we have only seen on average 2,400 affordable homes.

Please see additional comments on separate submission.

### 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 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?

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## 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?

The HBF would however note that this is a reasonable new technology which is evolving very quickly so any policy needs to be flexible enough to allow for this.

## 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"/>

The HBF notes that the supporting text to Policy 8 suggests that the aims of the policy are best carried out at a regional and more local level which would suggest that this should be dealt with at SDP's or LDP's.



## 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 checked="" type="checkbox"/>
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?

The supporting text to policies 14/15 suggests that 'large scale, mixed use developments of 100 dwellings or more should consider the potential for a District Heat Network'. The HBF consider this threshold to be far too low and would ask what evidence is available to suggest it is possible at this scale. Based on other policies within the plan currently new development is being focused around and within existing urban areas, this will often result in the need to retrofit the proposed district heat network into already developed areas, this is likely to result in far less success in the delivery of this ambition.

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

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"/>

## 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 checked="" 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 additional comments on separate submission.



## **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.

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## **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?

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#### 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 see additional comments on separate submission.

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