

## **Consultation Response Form**

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| Your name                                       | <b>Michael Rees</b>                              |
| Your address                                    | <b>22 Cathedral Road, Cardiff</b>                |
| Preferred contact details<br>(email/phone/post) | <b>michaelrees@lrmp planning.com</b>             |
| <u>Organisation (if applicable)</u>             | <b>LRM Planning on behalf of Llanarth Estate</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:

We are supportive of the principle of the outcomes, they are precisely the goals that the planning system should be seeking to achieve in Wales. We certainly welcome the overall ambitious growth aspirations for Wales in delivering homes and jobs. In this regard, it is encouraging that the role of the planning process in Wales can play in stimulating growth and well being is recognised.

However, we are concerned that this overarching aspiration does not translate into detailed elements of the document which seek to restrict and limit the opportunity for homes and jobs. Indeed, in order to achieve the outcomes, there will need to be a **positive step change** in the planning system in Wales that must be clear within the detailed elements of the NDF and then trickle down and actively seek to encourage growth, investment and well being. The outcomes cannot be achieved if SDP's and LDP's take a restrictive and negative approach to meeting needs through future development and continue to rely upon the same sites and strategies that have not delivered through LDP's, nor should the NDF restrict development (through new settlements and green belts) absent an understanding of the detailed issues at the local level.

The problems associated with existing allocations has explicitly manifested itself in the lowest sustained period of housing completions in Wales (during the period since 1974 for which figures are provided) despite the need for both private and affordable housing being greater than ever. We believe that the NDF presents an opportunity for addressing these problems and seeking to meet identified needs and deliver the associated socio-economic and environmental benefits.

Outcome 1 sets out the requirement to provide “**high quality homes meeting the needs of society**”. We welcome the recognition and importance of this requirement, the implications of not meeting housing needs are profound and far reaching into everyday life and well being in Wales. It is acknowledged that the level of 8000 completions has not been achieved since 2008. This is not due to capacity as that level had been achieved in 31 of the previous 34 years (i.e 1974 to 2008). It is plainly and unquestionably the case that the shortage is due to lack of deliverable supply.

It is important to understand the implications of the failures to meet needs and why outcome 1 is so important. Indeed, failure to meet housing needs will not only mean that outcome 1 cannot be achieved, but it will also mean that outcomes 2, 3, 5, 6, 7, 8 and 11 will be difficult to achieve – as such a holistic approach to jobs, homes and well being is needed.

We note that not meeting housing needs results in a wide range of societal impacts that are already being experienced in Wales:

- Worsening affordability – in Wales, house prices have increased from £128k in August 2012 to £168k in August 2018 yet average salaries have only experienced a slight increase from £23k to £26k over the same period. There is an overall lag behind the rest of the UK where average salaries were £26k in 2012 and rose to £29k in 2018;
- Even worse affordability in rural areas - the differential is worsened in rural areas, for instance in Monmouthshire average house prices were £195k in 2012 but have increased due to lack of supply to £275k in August 2018. Average salaries have only increased from £22.7k per annum in 2012 to £27.9k in 2018 and have not kept pace with the house price increase;
- Increased private sector rental prices (source: Rent Officers Wales) from an average of c£480 per month to c£549. The difference is again magnified in rural areas, in Monmouthshire rents have increased on average from £554 per month to £650;
- Lack of economic growth and investment: According to the EU, “*Wales has only 3.4% of the UK's total GDP (Eurostat, 2018)*” and as such “*it also underperforms economically*”. The EU indicates that “*This discrepancy is largely due to a low employment rate and low average wages. These in turn are a result of a prevalence of individuals with low or no qualifications, the absence of a major conurbation (by European standards) and a relatively high proportion of people of retirement age*”.
- In 2016, EU figures indicate that workplace Gross Value Added (GVA) for Wales was £59.6b (€66.5b) which equates to just 72.7% of the average for the total of all UK regions. It is also worth noting that for context, the figure stated for Wales is the lowest level of GVA per head (£19,140) in the UK;
- Out-commuting and reliance upon existing highways networks: where jobs provision and housing does not match, it is inevitable that there will be an

increase in out commuting, for Wales as a whole there is a daily net out commute of 47,700 people (an increase of 14,700 since 2001). This is a significant number of jobs and cannot be considered sustainable. With the tolls on the Severn crossings ceasing we expect the situation to worsen as people commute from Wales where house prices are lower to employment in adjacent conurbations e.g. Bristol and Gloucester. We are strongly of the view that planning interventions should seek to align jobs with housing and facilities;

- Without locally available jobs eg in the service and support sectors the ageing population in rural areas will become more isolated and at risk with a corresponding increase in the cost of social care;
- There has been a sea change in modes of employment and many employees work from home, from hubs and workstations via internet connections and are no longer dependent on fixed office space. The ability to work from alternative locations (going into the office for meetings) depends upon the availability of that space and fast connection rates which, once available, provides flexibility in terms of location and the opportunity for dispersal of population to support outlying communities; and
- It is noted that employment levels in Wales have improved, however, this in large due to the increase in the retirement age of Women to 65+ years.

If such basic issues are not addressed and needs are not met then the Outcomes (or the duties conferred on Public Bodies by the Well Being Act) cannot be achieved. As such we believe that the NDF should set a strong national growth policy as is suggested by the Outcomes with a positive approach to meeting needs that flows down to lower level plans.

Notwithstanding the above, we note that Outcome 5 should refer to rural areas as well and we comment on the importance of rural sustainability as well as of towns and cities which we consider later. In addition, we consider in more detail our response to housing policy later.

## 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 checked="" 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 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:

We have a number of concerns that we set out below:

**Chapter 2.** We note that in chapter 2, reference is made to increasing the delivery of “affordable homes”. Whilst we support increasing the provision of affordable homes (as a specific tenure) we are of the view that it should be clear that this doesn’t refer to a type of tenure rather it should refer to the overall delivery of homes. Indeed, given supply inelasticity it is inevitable that failure to meet needs and increase supply will only increase prices and adversely impact upon affordability. An opportunity exists to deliver modular homes for first time buyers that can become lifetime homes provided flexibility to grow as need arises is built in to the model.

We are further concerned that the overarching challenges with respect to housing are underplayed, little is said in the challenges section about the implications of prolonged under delivery of houses. Similarly the scale of the task of improving economic performance relative to other regions of the UK is unrecognised when Wales has some of the poorest communities in the EU. This requires a holistic approach to planning and development.

**Chapter 4:** We do not believe that realistic, credible and sustainable policy

interventions / approaches should be ruled out within a high level document such as the NDF. Rather local authorities should be able to call on all types of policy intervention (regeneration sites, urban extensions and new settlements) in order to address the key challenges that they face. It is inappropriate in terms of good planning and sustainability to rule out new towns or settlements absent an understanding of the local issues that are relevant to local areas. Indeed, it is only when detailed analysis and technical research is undertaken into local issues, challenges and potential solutions that such an option should be ruled in or out.

Indeed, we are strongly of the view that new towns / villages / settlements can play a leading role in the step change required, as has been the case historically. In this regard, as recently submitted proposals have demonstrated, new settlement proposals can be world leading examples of low waste and zero carbon communities, setting the standard for other developments to follow – and may be the most appropriate means of addressing the key challenges faced by an Authority (for instance where growth is constrained for various reasons, where infrastructure cannot sustain incremental growth, where there are no brownfield opportunities, where there is an ageing population, lack of support for businesses, out commuting for residents but workers having to commute in, lack of affordability for younger families and indigenous workforce).

Notwithstanding this, alongside innovative approaches to meeting the challenges faced we support commensurate growth of existing settlements albeit it is noted that small scale incremental growth will not necessarily lead to a sustainable approach to development and may also impact adversely on existing infrastructure. Rather this can only accurately be assessed at the local level, through LDP's.

Indeed, many existing towns and villages across Wales are struggling in terms of outdated infrastructure, facilities and lack of employment opportunities and would benefit from significant investment or from growth being targeted in complementary new and sustainable communities. As such larger scale growth options including new towns /villages and green field extensions can not only help to provide a step change in delivery as required by the outcomes but also provide a long term sustainable option including in support of the surrounding community.

We set out below our response to policies 1 to 4, although note that there is considerable overlap between each.

### **Policy 1: Sustainable Urban Growth**

We support the sustainable growth of existing settlements across Wales. Importantly, however, our support relates to all settlements not just those considered to be in urban areas. We note here (and consider further under policy 4) that over 1.2m people live in “rural areas” in Wales, 59 % of the landmass is used for agricultural purposes and green areas account for 95.8% of the total land area of Wales. As such, there is a very real need to ensure that growth also addresses the challenges faced in rural areas.

It is clear from the outcomes required at the national level however, that a step change is required in delivery:

- in achieving more compact and higher density places, it is inevitable that new releases of land for development will be required. Small scale incremental developments are unlikely to provide adequate mitigation to existing infrastructure pressures and so larger scale land releases sited strategically will usually be the most appropriate way of securing investment in facilities and improving sustainable patterns of development;
- not all existing settlements are sustainable locations themselves, this could be due to lack of jobs, services and facilities. Planning for growth comprehensively (to include all potential options including lateral expansion) provides an opportunity to address these issues, improve the sustainability and viability of many communities that have experienced a rise in house prices, lack of affordability, loss of a major employer, ageing population / loss of younger families etc.;
- we note that many authorities in Wales have had difficulty in attracting investment and job growth (as demonstrated by the low GVA figures compared to the rest of the UK), we believe that the NDF rightly provides a hierarchy for supplemental plans to encourage and stimulate growth rather than limit and constrain it. Indeed, the starting point for LDP Reviews ought to be how they can **positively address the supply and delivery problems**; and
- the growth aspirations of the NDF are only an opportunity to shape and grow cities if achievable and viable sites are allocated.

## **Policy 2: Supporting Urban Centres**

Given the comments set out under Policy 1, we are of the view that consideration needs to be given to provision of services in rural areas as well as urban. Indeed, it is often rural areas that are worst affected by lack of accessibility as well as housing to meet needs which results in unaffordability for the rural workforce, ageing populations and unviable settlements.

It is clearly the case that greenfield development and new settlements can be more sustainable than brownfield (i.e proximity to facilities, addressing infrastructure constraints, promoting zero carbon communities, attracting jobs and workers in new and innovative working environments including diversification and tourism etc....) as such there should not be an automatic presumption against provision of facilities and development outside of urban areas. Rather that rural areas will also require service provision and jobs.

## **Policy 3 Public Owned land**

In future consideration of publicly owned land, there are a number of key matters within LDP's that should be made clear within the policy:

- whether they are deliverable and available. Many of the sites that have failed

to be developed are publicly owned (reasons for not being brought forward are set out in the WG Viability Report in 2017);

- whether it is in a sustainable location. It does not follow that because a site is owned by the public sector it is suitable for development, or sustainable; and
- rural towns and villages will also require public services and this should be made clear.

#### **Policy 4 Supporting rural communities**

Rural areas across Wales are facing significant changes and challenges, ranging from tendency towards an ageing population, loss of younger population, lack of affordability, out committing, loss of facilities and services and will face the impacts of Brexit on farming subsidies. It is clear that they must not be overlooked for growth in favour of larger towns and cities. Indeed, constraining development will only reinforce these trends and result in further increases in house prices, further out commuting, lack of investment etc.

As such, it is fundamentally important that local policy is robust to ensure the long term viability of rural areas. With regards to the rural economy – some 59% of the country is utilised as agricultural land, given the length of the plan to 2040 it is imperative that it deals with the long term impacts of external policy changes such as Brexit.

Importantly rural workers need to be catered for, currently rural areas tend to not meet needs for younger workers, families etc which means that rural workers often have to commute in from towns and cities.



### 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?

There can be no doubting the scale of the housing shortfall in Wales as a result of continued under delivery nor the implications of this.

In January 2019, the publication "*Estimates of Housing Need in Wales at a national and regional level (2018 based)*" set out estimates of additional housing need over twenty years at a national level as well as for the three economic regions (North Wales, Mid and South West Wales, South East Wales).

These estimates cover a twenty year period (2018/19 to 2037/38). It is estimated that on average, between 6,700 and 9,700 additional housing units will be required annually during the first 5 years, with a central estimate of 8,300 per annum. These figures include an annual average of 1,100 additional housing units to clear those in existing unmet need. We would question how robust this is as a figure given that it is broadly the same as required from existing LDP's to the late 2020's in South East Wales (which is around 100,000). As such, the level identified to 2038 seems a major under estimation. Indeed, the NDF should set an aspirational level of growth not one that is based on the lowest sustained period of home building in recent history (resulting in a low trend).

Notwithstanding this, we are deeply concerned at the approach taken towards the provision of housing in general. Housing delivery has been consistently less than required and has been significantly below 8000 per annum for the past 10 years. Accordingly, it requires a step change to meet requirements and the NDF must clearly set the overarching policy requirement for this within Wales.

We note that in the year 2018/19 there were just 5,777 recorded completions compared to the identified requirement of 8,300. This means that the annual requirement for the period **2019 to 2023 has already increased to 8,930**. Given that there have been no changes in circumstances / no new allocations / permissions and no practical means of addressing the shortfall quickly, it is inevitable that this

requirement will increase further. This underlines the importance of a robust means of assessing land availability.

We also note that the requirement figure should extend to 2040 which is the timeframe of the plan rather than 2038.

In order to achieve the levels of growth required across all types of housing, local authorities will need to stimulate and encourage growth in order to ensure flexibility and aid delivery. This will require a robust plan led approach, however, we are concerned that the current development plan framework has not enabled providers to meet housing needs (and current proposals to remove TAN 1 and the need for a 5 year requirement of deliverable land will not assist this as it will remove the safety net which ensures delivery continues).

More scrutiny of delivery of sites is required through LDP Examinations if delivery is to be improved. It is noted that many sites that have not delivered were subject to objections regarding the contribution that they would make through LDP representations which have ultimately proved correct.

In order to increase the amount of affordable housing provided we would suggest the following:

- significant public sector grant is made available;
- increase the proportion of private housing to subsidise a greater amount of affordable;
- encouraging far greater freedom for housing associations to cover wider areas and grow their private sales arms.
- Increase the flexibility of provision to encourage self-build including investment in smaller modular homes, futureproofed to allow expansion when funds and needs dictate, allowing first time buyers more choice in terms of tenure and flexibility to create lifetime homes

As such in order to address the delivery constraints, it is clear that LDP's and SDP's will need to carry on the robust growth orientated approach of the NDF.

Importantly, we believe that if LDPs were to seek targets of 47% affordable housing provision on housing sites then new sites would be unlikely to come forward as the increased burden on developers would make schemes unviable. Such levels may be achievable in the South East of England but in our experience would not be viable in Wales where topography, infrastructure provision, ground conditions and site assembly costs account for a higher proportion of development cost. Rather, a smaller proportion of a larger number of developable sites is required.

#### **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 checked="" 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?

We support initiatives improve to mobile coverage particularly in rural areas to allow for increased home working and farm diversification. As such we believe that far greater evidence is required in order to identify those areas that would benefit from such investment. This will enable a more focussed policy rather than a broad statement.

## 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?

We are strongly of the view that new largescale proposals present an opportunity to provide a step change in the way that development is progressed and such initiatives should be fully integrated into all largescale proposals.

The reduction in harmful gases as a benefit of low emission vehicles will be an important factor in overcrowded areas and major cities but less relevant in sparsely populated areas where residents face other challenges.

Working patterns are changing and the future workforce is less dependent on the car as a primary mode of transportation as fixed work places are no longer the norm, other modes of transport are becoming more prevalent and employers are seeking flexibility and lifestyle choices to attract key workers. Car clubs and alternative means of transport are becoming more popular as people choose healthier options with less dependence on individual cars particularly in sustainable settlements.

We note that absent private sector investment, the Government will be required to fund the installation of public charging points in rural areas to ensure people can recharge conveniently in areas that may otherwise become isolated.

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

## 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?

We are supportive of the aspiration for 70% of electricity consumption to be generated from renewable energy by 2030. However, we are strongly of the view that much greater support and policy weight should be given to development proposals that actively encourage new and innovative ways of development. Indeed, these can be world class leading exemplars for Wales and the Welsh Government.

Opportunities exist to explore ways that farm waste can be re-used to generate energy through existing farm practices. Such schemes will be essential to aide the sustainability of rural areas. Zero carbon / low waste schemes, as integral components of new development proposals, can provide an opportunity for a step change in the way that development requirements are met that would also be best practice on a global stage. Indeed, such schemes could not only secure a new way of providing homes, jobs and facilities but will also address many of the challenges faced in local areas (including aged infrastructure, lack of facilities, affordability, out commuting, ageing population).

Such a proposal could include:

- Site and building layouts and orientations can be designed to ensure they maximise passive measures for heating and cooling. This includes orientating road layouts to maximise southerly aspects for buildings; locating buffer landscaping to protect developments from prevailing SW and cool winter NE winds; limit overshadowing and maximise the potential for solar gain.



- All new buildings should have high performance building fabric. As a minimum this should include a high level of insulation and buildings constructed to ensure they are airtight and thermal bridging is minimised.
- Energy centres and district heat networks which can service large scale sites and existing communities.
- The opportunity for development needs to be fuelled by a renewable or low carbon source such as Biomass or Biogas CHP.

We are strongly of the view that development schemes that promote such innovative proposals should be welcomed and actively encouraged. They should be viewed as a step change in the way that needs are met.

The problem with major renewable schemes is that suitable locations do not always correspond with densely populated areas and other forms of energy provision and green infrastructure will be more suitable to serve local needs.

## 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"/> |

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?

[illegible]

## 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.

It is unobjectionable that the South East region is the focus for growth in Wales and that Cardiff is the primary settlement indeed, the region must capitalise on its assets. However, we have a number of concerns which we set below.

**Growth** – we are concerned that the aspirations set out in outcomes for growth of homes and jobs is not transcribed into area specific policies. Indeed, a step change is required, but there is no spatial strategy to achieve this rather a reliance upon finding sites within existing settlements. This will not achieve the positive approach to provision of jobs and homes required, rather innovative and sustainable positive planning interventions are required to meet needs and address the social and economic problems of Wales.

**Newport** – we support the focus on Newport provided by policy 28. However there has been no urban capacity study of brownfield sites that confirm whether brownfield sites exist to form the core of supply until 2040 and it is inevitable that greenfield extensions will be required in order to meet needs (particularly given flooding constraints to the south of the City). As we have stated before, this is a matter for consideration at the local level based on evidence and need. Indeed, it should be recognised that these can be sustainable alternatives to brownfield sites and these may prove the most beneficial for a range of planning reasons. Ultimately, it is noted that there is a finite supply of brownfield sites within Newport and this should not continue unabated if it is as a result of employment sites changing to more valuable land uses. Safeguarding employment land (in particular for industry depending on access to transportation) needs to be given higher status if jobs are to be secured to support the level of growth required to increase prosperity.



Any greenbelt at the north of Newport should not be at the cost of the provision of sustainable jobs and homes which will ultimately undermine the aims of Newport being a focus for regional growth, indeed, there are existing settlements to the north of the M4 at Newport that will and in some instances, already are benefitting from improved transport links as a result of the S Wales Metro which can support growth in this region. Ability to deliver should not be underestimated and not meeting local needs will have adverse impacts upon these communities (such as inflated house prices, commuting and lack of mixed populations).

**Centres of regional growth** – it is unclear how the “centres of regional growth” have been established or evidenced. For instance Pontypridd and Merthyr are chosen yet are both virtually entirely constrained by topography and there is no evidence of urban capacity (so there be actually be only very limited opportunity for jobs and homes at these locations), many other important settlements are not even mentioned including those that serve significant rural hinterlands (Monmouth, Abergavenny etc).

**Intra-urban connectivity** – it is unclear what the signs on the plan mean, as they do not appear to connect urban areas.

**South Wales Metro** – we support the provision of the metro system across Wales, it can play an important role in countering the existing unsustainable pattern of growth and development across the Region. However, we believe that there will be opportunities to enhance the existing high level plan through investment associated with new development. For instance, improvements could be made in Monmouthshire that could seek to provide greater cross county links (from Monmouth to Abergavenny) using existing underutilised and uncongested routes. It is important that all parts of the region are comprehensively planned for in this way.

**Need** – the identification of a need for 71,200 additional homes by 2038 (rather than 2040) seems to be a significant under estimation given that the need for the area in the period up to c.2026 is over 100,000 in existing plans. An underestimation of need will not help achieve the stated outcomes.

**National Growth Areas (NGA)** – given the importance of the area, we are strongly of the view that the entire region should be recognised as a National Growth Area. However, it appears that the NGA excludes much of Monmouthshire. Given the problems identified within the evidence prepared at the local level this seems highly inappropriate and in conflict with local requirements. Indeed, as we have noted earlier, rural areas including Monmouthshire have experienced some of the most significant social and economic issues (including lack of affordability, ageing population, commuting). As such they are precisely the areas that require strong policy interventions to provide a more sustainable future for residents. They have good existing highway links to the Midlands and South West as well as across to the mid and Heads of the Valley and the M4 corridor.

**M4** – we are surprised that no mention is made of any alternatives to the M4 relief road. This is a key problem of national significance that will only worsen absent a robust policy intervention. Given the rise in out commuting, the increase in traffic delays causing pollution and delivery inefficiencies, a continuation of existing

patterns of growth won't remedy the problem. Rather a step change in the provision of homes and jobs is required.

**Urban Capacity** – we are concerned that the strategy seems to be reliant upon finding brownfield sites. Absent any evidence that this is possible, it seems a more positive approach to all solutions is required, including sustainable extensions to settlements and new settlements;

**New settlements** - There should be a recognition of the potential for new settlements to be considered in the SDP in accordance with Planning Policy Wales. It is inappropriate not to properly plan for a policy mechanism / intervention that can make a significant contribution to achieving the overarching aims of PPW and the Well Being Goals. Indeed, the Town and Country Planning Association (TCPA) indicates “that the full range of planning solutions – urban regeneration, sustainable urban extensions or, where appropriate, new settlements – should be available to communities to choose from as they search for the most sustainable pattern of development locally”.

Indeed, guidance set out by the TCPA indicates that holistically planned new settlements can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities.

They also note that “Major planned developments such as new settlements and urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes”. In this regard, recently proposed new settlement in Wales demonstrate a new approach to development in Wales that would set the agenda for best practice sustainable development. Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the Country.

**Greenbelt** – we support the principle of the identification of a green belt subject to the tests in PPW 10 however, absent any evidence in respect of it we consider that it is only appropriate in exceptional cases and in suitable locations to be determined through local plans. We are concerned that the NDF is too prescriptive and the most appropriate means for detailed designations would be through SDP's and LDP's if it is considered appropriate at that level. Indeed, given their permanence such designations will need to be subject to very detailed considerations and rigorous scrutiny as the socio and economic impacts of constraint could be very damaging.

We are strongly of the view that any designation must not rule out what would otherwise be sustainable growth for instance, there are existing settlements to the north of Newport City (within the County) that will have needs to be met. To restrict growth and the ability of communities to meet needs in such locations (eg Rogerstone, Bassaleg, Rhiwderin, Risca, Bettws/Malpas) would only have adverse impacts upon existing residents (further increasing house prices, loss of younger people and families, out commuting etc.) in these areas and contradict many of the outcomes sought.



## 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.

No comment

## 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?

No comment

## 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?

No comment

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.

No comment

## 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 are concerned at the lack of evidence and transparency for how important decisions were achieved. Whilst we support the aspirations for growth in jobs and housing, we have numerous concerns, which include:

- lack of consideration of rural areas and addressing the key challenges that are faced which could significantly adversely impact upon existing challenges faced (including lack of affordability, out commuting, ageing population and loss of younger families and rural workers);
- lack of underlying evidence base to justify the decisions taken and ensure that they are sound and credible approaches;
- ruling out key policy interventions that should be available at the local level absent a detailed evidence base or understanding of issues. This could result in LDP's

favouring a strategy that conflicts with the NDF;

- an unrealistic focus on town and city centres absent any evidence to suggest they are capable of delivering the growth needed;
- over reliance on brownfield and high density development in town and cities when the health benefits of living in greener, pollution free environments in terms of mental health and well-being are self-evident.
- the apparent disregard for the well being and future success of rural communities which comprise large areas of the Country is disappointing particularly now that the Country's working population is more mobile and less building orientated means that opportunities exist for people to live in less developed areas where opportunities for lifestyle and health enhancement exist.
- A re-assessment of the capability of less densely populated areas to deliver high-tech employment opportunities for skilled workers cannot be under estimated in terms of supporting less affluent, less populated rural areas where service provision is expensive and difficult to deliver and local authority services are stretched beyond their useful capacity in an era where the population is ageing and requires additional support

We are concerned that despite the overarching outcomes, that the strategy is unlikely to deliver the sustainable development needed to meet the needs of the future generations of Wales.

**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"/> |
|--|--------------------------|