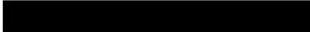


Consultation Response Form

Your name	Simon Coop
Your address	Lichfields Helmont House Churchill Way Cardiff CF10 2HE
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	Lichfields on behalf of Persimmon Homes West Wales

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 anticipated Outcomes are summarised on page 18 of the draft NDF and then considered in more detail on pages 20 and 21. Having reviewed these, we note that the only references to housing are in relation to:

- Point 2 of the summary which seeks *"A Wales where people live in vibrant rural places with access to homes, jobs and services."*
- Detailed Outcome 1 which refers to *"high-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces."*
- Detailed Outcome 5 which refers to Cities as large towns as being *"magnets for jobs and investment, while people are drawn to live and work there..."* and recognises that *"areas outside the urban centres will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services."*

In each case, however, the Outcomes fail to reflect the connection between ensuring an adequate supply of housing and the economic and social wellbeing of Wales. Given this significance, we consider that the NDF should include an Outcome that specifically and exclusively deals with the need to ensure an adequate supply of housing to meet the existing and future needs of the population of Wales.

The identification of Outcomes in the draft NDF is described on page 18 of the document as *"an important step in preparing a strategy for the development plan."* In this context, the absence of an Outcome relating specifically to the delivery of housing represents an even more serious omission. The NDF is set to be the highest tier of the development plan in Wales and its failure to address the critical issue of housing delivery will leave a gap in development plans in relation to this matter. Given that it will inform the preparation of Local Development Plans, the absence of a clear

Outcome relating to housing may also result in local authorities not giving due prominence to this critical issue in their emerging LDPs.

The need for housing is one of the central on-going challenges facing Wales, and the planning system has a critical role to play in the delivery of sufficient housing to meet identified needs. It is therefore fundamental that the NDF seeks to effectively address the issue. A failure to adequately tackle this issue will undermine wider objectives in relation to:

1. The achievement of a good quality of life (Objective 1);
2. Meeting the needs of a diverse population (Objective 1);
3. Ensuring small towns and villages “have bright futures as attractive places to live and work” (Objective 2);
4. The achievement of greater prosperity and well-being (Objective 3);
5. The promotion of the Welsh language (Objective 4);
6. The sustainability of large towns and cities (Objective 5); and,
7. Sustainable movement and dealing with the challenges of climate change (Objectives 7 and 11).

2. Spatial Strategy (policies 1 - 4)

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

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

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

Policy 1 States:

"Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed-use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported".

We have no objection in principle to this policy, which broadly aligns with existing national planning policy in PPW (Edition 10). However, the draft NDF does not appear to recognise that there may be opportunities for other forms of development to come forward that remain appropriate. Critically, this policy raises issues about the importance of ensuring an appropriate choice and range of housing types, recognising that not all households will seek to live in high density urban housing which may not be necessarily practical or meet their lifestyle needs. As such, we consider that the NDF needs to provide greater flexibility by recognising that other growth options exist – such as a range of densities that reflects the character of the local area – and are still capable of being acceptable subject to traditional planning considerations (e.g. environmental considerations, site constraints etc).

Persimmon Homes is promoting the strategic development of land at Llanilid in Rhondda Cynon Taf County Borough. This will comprise a range of uses including approximately 5,000 new homes (of which 1,850 dwellings already benefit from planning permission), B Class employment space, local/district centres and community facilities including new schools and medical centres. This would

comply with the requirements of Policy 1 in that it will be a mixed-use development, with good access to existing urban centres and will be well integrated with the existing rail infrastructure which is included within the proposed Metro network; there potential for an extension and upgrade to the network. It would represent an exemplar development in a sustainable location. The development will be shaped around the principles of sustainability, with particular focus being given to the encouragement of public transport (including through the provision of connections with Llanharan and Pencoed stations) and walking/cycling (through the provision of dedicated routes). The sustainability of the scheme will also be shaped by the approach to green and blue infrastructure, with particular focus being given to the establishment of high-quality landscaping and drainage schemes.

In order to generate a strong sense of place and to build sustainable new communities within the development, it is unlikely that a high density of development would be appropriate across the whole of the site; this should reflect the character of the area and is likely vary across the site. The policy should support an efficient use of land and appropriate densities, rather than simply seeking “*high density*” development.

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?

Whilst we do not object to a policy that seeks to increase the supply of affordable homes in Wales, we are concerned that the NDF is only focused on the delivery of affordable housing when it should address the need to increase the delivery of all forms of housing (market and affordable) in order to tackle the on-going (and worsening) housing crisis in Wales. We are also concerned that the levels of affordable housing that are identified as being required in the plan are unviable and will have an adverse impact on the delivery of much-needed housing across the Country.

Our key concerns can be summarised as:

- While there is a clear focus on affordable housing there is no acknowledgement of the need to increase the supply of market homes;
- The central estimates for affordable housing need and market need fall short of actual housing need in Wales and therefore the NDF should be explicit in presenting them as only a starting point for consideration of need; and,
- To deliver the level of affordable housing identified it will be necessary to increase delivery of housing altogether.

We address these issues in turn below:

Requirement to increase the supply of Market Housing

Policy 5 only relates to affordable homes. The draft NDF does not contain any policy that provides strategic direction for the delivery of housing more generally. We consider this to be a significant oversight given the substantial need in Wales for all types of new homes which is evidenced by increasing house prices and worsening affordability across the Country. The fact that the figures quoted in the draft NDF themselves identify that there is a greater overall requirement for market housing in Wales than affordable housing also calls into question the policy position which focuses solely on affordable housing delivery without any recognition of the need also to increase the supply of market housing.

Failure to plan for an adequate level of housing supply throughout Wales will lead to further

shortages of suitable housing. This will have profound impacts such as:

1. Impacts on the affordability of homes;
2. Detriment to health and well-being; and,
3. A barrier economic growth.

The need for housing is a long-term issue that has a direct impact on the prospects and life chances of future generations, as well as upon the strength of the economy. A lack of housing policy within the NDF would constitute a failure to accord with the requirements of the Wellbeing of Future Generations (Wales) Act. We are particularly concerned that the lack of a detailed housing policy would undermine the achievement of many of the well-being objectives set out in the Welsh Government's National Strategy 2017:

1 Support people and businesses to drive prosperity: Planning for an adequate housing supply drives economic growth and is essential to ensuring an appropriate level of workers in local areas, which itself is critical for healthy businesses and increasing prosperity.

2 Tackle regional inequality and promote fair work: A supply of housing across Wales is critical to ensuring that no area gets left behind.

3 Drive sustainable growth and combat climate change: A failure to fully acknowledge – and respond to – the need for housing undermines the aspirations of sustainable growth, to the very significant disadvantage of current and future generations.

4 Build healthier communities and healthier environments: Residential development is critical to the health and well-being of local communities and, by virtue of its contribution to the natural environment and open spaces, is also essential to the health of the environment.

5 Support young people to make the most of their potential: The provision of an adequate supply of housing is vital in creating the opportunity for people to enter the housing market at a time of their choosing. It is also important in ensuring that young people can live where they want to, rather than being forced to move elsewhere where housing might be more readily available and affordable. In the context of a rapidly ageing population, this will have an important bearing on the economic competitiveness of communities across Wales.

6 Build resilient communities, culture and language: Achieving an appropriate supply of housing is critical to ensuring the strength of local communities and the integrity of the Welsh culture and language. A failure to grow communities in a sustainable manner will undermine the long-term health of communities as younger people are forced to move away.

7 Promote and protect Wales' place in the world: A failure to deliver the level of housing that is required, both now and in the future, will cause significant harm to Wales and will undermine its reputation as a welcoming and attractive place to live, with inclusive economies and an expanding economy.

The NDF should therefore provide a policy framework that encourages a more positive attitude toward all types of housing development and provide strategic direction so that decisions on the delivery of all new homes can be made with confidence.

Central Estimates underestimate actual housing need in Wales

The draft NDF presents details of likely housing requirements in Wales based on the 2018-based national and regional central estimates of housing need in Wales.

The national “central estimates” indicate a need for 8,300 additional dwellings per annum (dpa) for the first five years of the 20-year period (2018/19 to 2023/24), decreasing to an average of 3,600dpa during the last five years of the period (2033/34 to 2037/38) – a 56% fall in estimated housing need over the next 20 years. This slowing rate of growth mirrors that contained in the 2014-based population and household projections which form the basis for the assessment and assume that past trends in respect of demographic change and household formation will continue. The resultant housing need figures fail to reflect the reality that future housing need cannot be assessed solely by reference to past-trend based projections. Instead, they must also consider:

1. The implications of past under-delivery as reflected in market signals and evidence of suppressed household formation;
2. Future economic growth, including specific growth aspirations such as the Cardiff City Deal which is seeking a step change to boost the local economy through an investment of £1.2 billion, the delivery of up to 25,000 new jobs and leverage an additional £4 billion of private sector investment;
3. Policy aspirations regarding the promotion of vibrant and sustainable communities; and,
4. Affordable housing needs.

When taking all of these factors into consideration, there is no evidence that the housing need for Wales is currently as low as 8,300dpa, or that it would fall to less than half that figure by 2038. By identifying a reduction in housing need through the Plan period the NDF is, in effect, planning for decline. This is entirely inconsistent with the wider objectives of the document, as articulated in policies relating to the promotion of managed growth and increasing economic activity. Housing plays a critical role in supporting economic competitiveness and therefore a continuation of the past trends embodied in the 2014-based projections would be contrary to the wider vision for economic growth and increased prosperity across Wales and could jeopardise the delivery of specific growth deals such as the Cardiff City Deal.

In addition to the obvious need to ensure that the whole population has somewhere to live and align jobs with homes, housing also provides direct economic benefits. Research by Lichfields in 2015 quantified the key economic benefits of the house building industry in Wales as including:

1. £481m p.a. in economic output;
2. 13,400 jobs supported;
3. £101m p.a. in National Insurance and PAYE contributions from direct employment;
4. £6.9m in Council Tax payments; and,
5. £119m expenditure p.a. by new residents on goods and services.

The impact of new housing development can make a critical difference to the strength of local economies across Wales. Furthermore, the inclusion of commercial development within large-scale strategic sites such as Llanilid will give rise to an even more significant economic impact through the creation of new job opportunities, generation of GVA, and support for key employment sectors.

In June 2018, RTPI Cymru and the Welsh Government jointly launched a tool that captures the economic, social and environmental value of planning delivered by local planning authorities across Wales. This does not take account of investment by developers and other parties, particularly during the construction phase, or the wider influence of planning in economic development and

regeneration.

Whilst the assessment relates to all planning activities, the contribution of housing to this total value is recognised as being very significant.

£2.35 billion

The value of planning in Wales 2016/17



Source: RTPI Cymru / Welsh Government

It follows that housing requirement policies in the emerging NDF and future SDPs should seek to support the Welsh economy by providing a sufficient number of homes, of a sufficient quality, to attract and retain skilled professionals and should not carry forward the recession-based trends in the most recent projections.

The Welsh Government has previously recognised that the central estimates are policy neutral and do not in themselves constitute housing targets. However, this is not reinforced within the draft NDF whereby the central estimates are presented in an authoritative manner with no reference to their limitations or indication that higher levels of housing delivery will be required to align with the plan's other goals (e.g. focus on manage growth, City Deals, North Wales Growth Deal). Whilst the inclusion of the central estimates in the draft NDF is presented as being equivalent to setting a housing target, the reality is that these figures cannot be relied upon as the sole base for assessing housing needs.

Although the central estimate figures are not disaggregated to a local authority level, we can foresee that they will be used as the starting point for SDPs and LDPs. This will result in a significant risk of failure to plan for an adequate level of new housing (market and affordable). The consequence of this would be that too few dwellings would be made available through the planning system. This will increase competition and undermine affordability and may jeopardise economic stability in Wales.

It is therefore essential that the draft NDF is revised to acknowledge that there are limitations to the calculations and that the central estimates should only serve as a starting point for the consideration of housing need in Wales.

Affordable Housing as a Proportion of All Housing Need

As well as identifying the central estimates for the level of housing need at a national level, the draft NDF also seeks to identify housing need by tenure by reference (on page 30) to the central estimate figure of:

"47% of additional homes should be affordable housing (social housing or intermediate rent) through

2018/19 to 2022/23, with the remaining 53% being market housing. This represents an average of approximately 3,900 affordable homes and 4,440 market homes per year over the five year period”.

Similar statements are also made in terms of the level of affordable housing as a percentage of all housing need within the individual regions that are identified within the draft NDF (see pages 51, 58 and 66).

The draft NDF implies that the 47% affordable housing figure represents a target to be met. We are already aware of officers within local planning authorities that are taking the central estimates at face value, along with media reports that are suggesting that 50% affordable housing should be demanded on all housing developments. There is no evidence that such a high level of affordable housing requirement would be viable anywhere in Wales.

Viability is critical to the deliverability of development, the importance of which is being increasingly recognised by Welsh Government (e.g. changes to planning Policy Wales Edition 10 and draft Development Plan Manual Edition 3). It is therefore important that the NDF does not seek a level of affordable housing that cannot be achieved and which, if taken forward in SDPs or LDPs, render housing sites unviable and undeliverable. Rather, it should be explicit that any affordable housing requirements contained within SDPs and LDPs should be based on a robust assessment of need and viability in the constituent area.

To deliver the level of affordable housing identified it will be necessary to increase delivery of housing altogether

We consider that a step-change in the delivery of housing (of all tenures) is required if the total level of affordable housing identified is to be achieved.

In the 20 years from 1999/2000 to 2018/19, affordable housing constituted only 11% of all completions. Since 2011-12, the highest level of affordable housing delivered in a year was 2,546 units in 2016-17¹ (37% of total completions). This indicates that a requirement for almost half of all housing delivery to constitute affordable homes is not realistic under current delivery mechanisms.

We therefore believe that Welsh Government will need to decide between:

1. Not meeting its delivery target of 3,900 affordable homes per annum; or,
2. Increasing the overall housing requirement for Wales to help achieve the level of identified affordable homes.

Traditionally, private housebuilders have been responsible for delivering a significant proportion of affordable homes (both for social rent and low-cost home ownership) in Wales through Section 106 contributions. For example, for the last five years the private housing building industry have provided over a third of all new affordable homes in Wales. It is expected that this will continue to represent an important mechanism for the delivery of affordable housing. However, experience from existing viability assessments demonstrates that even in the strongest market areas affordable housing provision is rarely higher than 25 to 30%. In many parts of Wales, the level of provision that can be justified is significantly lower.

The implication of this is that a policy framework must be put in place that will stimulate all types of

¹ Additional affordable housing provision by provider and year:

<https://statswales.gov.wales/Catalogue/Housing/Affordable-Housing/Provision/additionalaffordablehousingprovision-by-provider-year>

house building in Wales and increase the delivery of market as well as affordable housing. For example, while the delivery of 3,900 affordable homes per annum would not be feasible under a requirement for 47% affordable housing (out of a total of 8,300 homes), it would be more likely as a smaller proportion of a larger overall housing requirement (e.g. 30% of a total of 13,000 homes). Increasing overall housing delivery would also have the added benefit of improving affordability of open market housing, ensuring a closer alignment between housing and economic growth, and realising the economic benefits associated with residential development.

It is therefore imperative that the NDF includes a policy that promotes the delivery of all housing and clarifies that the central estimates should not be translated directly into housing targets. If enacted in policy, the current published figures would serve to choke off essential delivery of all types of housing, as development would simply be unviable.

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?

No comment / Dim sylw

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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No comment / Dim sylw

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

No comment / Dim sylw

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?

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"/>

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

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

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

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Policy 16 – Strategic Policies for Regional Planning

The policy sets out various strategic issues that should be developed and contained within SDPs which are required to come forward in each of the three regions.

We agree with the principle of the policy i.e. that many policy issues are best considered at the regional scale. However, we have two fundamental concerns:

1. It should be made clear that the list of issues identified under bullet point 6 of the draft policy (e.g. identification of green belts, green corridors and nationally important landscapes) should be taken as options that are to be considered at the regional level as opposed to requirement that have to be fulfilled by the SDPs. The decision as to whether the identification of green belts and green corridors are needed within a region should be based on sound planning judgements. This includes thorough analysis of the level and location of housing, employment and infrastructure required and the available land to deliver these requirements. It would be inappropriate for the NDF to predetermine this work and impose green belts/green corridors.
2. The NDF is requiring substantial policy detail to be developed through the SDPs but gives no clarity or reassurance as to when the SDPs will be adopted. Our experience of the planning system in Wales with both Unitary Development Plans and Local Development Plans is that development plans are typically subject to substantial delays in preparation and adoption. The timescales for delivery of SDPs are likely to be further impeded through the need for multiple authorities to reach agreement on strategy amidst different policy aspirations and political agendas.

This raises the significant concern of a ‘policy vacuum’ whereby strategic issues are not dealt with due to delays in the SDP process, while it is also likely to hinder the delivery of replacement LDPs. The implication of this will be further uncertainty in decision making which is likely to undermine investment and delivery of all types of development in Wales. By way of example, we note that the time period of the Rhondda Cynon Taf LDP will expire in 2021, but the SDP is not expected to be adopted until 2024/25 with the replacement LDP being prepared after that.

We therefore consider that draft policy 16 of the NDF should specifically require that LPAs take active steps to avoid a policy vacuum, through early/immediate reviews of their LDPs where relevant.

Policy 23 – Swansea Bay and Llanelli

We welcome the recognition of Swansea Bay and Llanelli as the main focus for strategic growth in the Mid and South West Wales Region. Going forwards, we consider that the SDP should be informed by the aspirations of the Swansea Bay City Region City Deal and Economic Regeneration Strategy.

Notably, the Swansea Bay City Region Economic Strategy (2013 – 2030) sets out a framework for a “*bold and ambition new economic growth plan*” for the region by focusing on:

1. Business growth and retention;
2. Maximising job creation;

3. The knowledge economy & innovation; and,
4. Establishing 'Distinctive Places & Competitive Infrastructure.

Developing and enhancing the region's housing stock will be paramount to supporting the retention and attraction of talent to the area and meeting the strategic aspirations for the economy of this area. For this reason, we are again concerned about the approach of strictly adhering to the central estimates of housing need for the region; this could undermine the delivery of the economic strategy. We therefore consider that the supporting paragraph on page 58 should be amended as follows:

"Planning and co-ordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. Welsh Government's central estimates help to identify a starting point to ensure sufficient new homes are provided in the region. Further consideration of economic growth aspirations for this region, affordable housing requirements and regeneration objectives should also inform housing requirements, such that the level of need is likely to be higher than past demographic-based figures. Under the Welsh Government central estimates 23,400 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 44% of the additional homes needed should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale."

Policy 24 – Regional Centres

We also support the stated role of the Regional Centres, particularly those in West Wales, such as Carmarthen and the four Haven Towns, as locations for a focus for housing, employment and key services so that they might serve their existing (and future) populations and those of the area around them.

Policy 26 – Swansea Bay Metro

We endorse the support for the development of the Swansea Bay Metro, along with the commitment that Welsh Government will continue to tackle congestion on the M4 and trunk road network through its pinch point programme. Improved connectivity and accessibility is critical to this region as it will allow enhanced opportunities for growth and investment.

Policy 27 – Cardiff

In the South East Wales region, Cardiff is recognised as an internationally competitive city and a core city on the UK stage.

The ten local authority areas in South East Wales have signed up to the £1.2 billion Cardiff Capital Region (CCR) City Deal. It aims to provide a 5% uplift in GVA and create up to 25,000 new jobs by 2036, representing a 40% increase above forecasted levels of growth. It also seeks to attract an additional £4 billion of private sector investment to the region and to deliver the South Wales Metro. Through committing to the City Deal the participating local authorities have made the decision to strive for growth.

In order to achieve this aspirational level of growth, the local economy requires a workforce of sufficient size and with an appropriate mix of skills, retaining working age residents and particularly highly skilled workers. Planning policy has a key role to play in ensuring the right number and types

of homes are provided in the right locations to accommodate the workers that are needed to drive the economy forward.

Research undertaken by Lichfields in October 2017 demonstrated that the CCR has a relatively small economy, which has experienced modest levels of growth and lower representation in high tech sectors compared to the other Core City regions in the UK, while it has also been more vulnerable to economic shocks than other UK Core City regions.

Whilst Cardiff should not and cannot accommodate all of the region's new housing, a strong and growing Cardiff is vital to the success of the CCR, with other areas benefitting from and emulating its strength. This is particularly important given the economic vulnerability of the CCR when compared to the rest of the UK.

However, the draft NDF states that Cardiff is nearing capacity due to geographical constraints and so does not support housing growth in the city. This is despite providing no details of any evidence work to demonstrate the level of capacity in the city for new homes, jobs, infrastructure etc.

Without explicitly stating it the draft framework appears to be diverting strategic growth away from Cardiff, which given its role as the economic driver of the region is a fundamental concern. The strength of Cardiff is critical for the CCR and, although it would not be the sole focus of future strategic growth, the NDF should recognise and support its important role. We consider that it should be for the SDP and LDPs to consider the capacity of the city and surrounding environs (including all of the CCR) to accommodate further growth and not determined by the NDF.

Policy 30 – Green Belts in South East Wales

The policy supports the role of SDPs in identifying and establishing green belts to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region. Furthermore, the supporting text states "*Strategic Development Plans must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff*". (**Our emphasis added**).

We strongly object to the inclusion of draft Policy 30 that has not been supported by any evidence. Due to the significant implications of Green Belt designation and the long-term policy implications it is essential that any such designation is robustly justified and truly necessary. No evidence has been provided by Welsh Government to justify the need for a Green Belt in this location. This is unacceptable and is entirely contrary to Welsh Government's recently adopted PPW 10 that requires their allocation of a Green Belt to be soundly based and only employed where there is a demonstrable need, with no suitable alternative.

We therefore believe that there is no basis for the NDF to include a policy that a Green Belt must be delivered in the South East Wales Region. Draft Policy 30 and its supporting text should therefore be removed from the NDF.

Policy 31 – Growth in Sustainable Transit Orientated Development

We do not disagree with this policy in principle. It is recognised that housing should be delivered in sustainable locations with good connectivity and access to public transport options.

It is noted that the policy states that the focus for development should be land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development. Whilst the Metro proposals are supported, it is not yet known when the scheme will be delivered. It is therefore particularly welcome that Policy 31 refers to land close to existing and proposed new railway stations. Such sites can be highly sustainable locations for future development which can come forward without any reliance on significant new infrastructure. For example, the

proposed Llanilid development benefits from a highly sustainable located close to Pencoed and Llanharan railway stations. Although any future infrastructure would be supported, it would not significantly enhance the inherently strong sustainability attributes of the site.

Lack of consideration to other parts of SE Wales

We note that the draft NDF only contains specific policies in relation to Cardiff, Newport and the Heads of the Valleys. Despite identifying Bridgend, Pontypridd, Caerphilly and Merthyr Tydfil as centres of Regional Growth, it fails to provide any policy recognition or support for their development or future contribution to the Capital City Region. This approach differs to that set out in respect of the North Wales and Mid and West Wales regions as Policies 18 (North Wales Coastal Settlements) and 24 (Regional Centres) respectively consider the future direction of centres of Regional Growth in these areas.

We consider that the NDF should be consistent in its treatment of this tier of regionally important settlements. The proposed development at Llanilid will play an important role in the future development of Bridgend and its contribution to South East Wales. This role should be recognised and supported by the NDF. A failure to adequately recognise the future role of the regional growth centres may militate against their potential contribution to the aspirations and objectives of the Capital City Regions.

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 / Dim sylw

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 / Dim sylw

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 / Dim sylw

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 / Dim sylw

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?

Housing and the Economy

There is a need for the planning system to support the Welsh economy, which remains vulnerable, especially when compared to the other parts of the UK. As is identified in the Challenges section of the document *“economic activity, wages and productivity in Wales are lower than the UK average. Gross value added (GVA) per head in Wales in 2017 was £19,900 compared to the UK average of £27,300”*.

Despite recognition of the need to increase prosperity and build a resilient economy in the Ministerial forewords and throughout the document, there is a striking absence of any strategic economic policies in the draft NDF. Given the status that the NDF will be afforded in both plan preparation and decision making, the plan should contain an economic policy that sets out strategic aspirations for employment growth and provides an indication of employment land requirements.

As previously set out, the document also fails to recognise the link between housing and the economy. Housing is a critical enabler of economic growth and the supply of good quality housing (both market and affordable) is essential to attracting and retaining a workforce of sufficient size

and skill base to encourage inward investment. Housing development can also act as an important catalyst for regeneration and driver of local economic activity in its own right.

Consequently, we consider that there is a need for the NDF to include a specific economic policy to demonstrate the Welsh Government's commitment to achieving a more prosperous Wales with a stronger and resilient economy. This policy should also emphasise the important linkages between housing and the economy and also support the development of mixed use strategic sites that can accommodate housing and employment uses in a sustainable and economically beneficial manner.

New Settlements/Urban Extensions

We consider that the growth of existing settlements is likely to provide the most appropriate option for future housing development, either through the development of existing sites within settlements or through expansion of settlements via urban extensions. However, there are often shortages of suitable land for development around many of the existing urban areas due to various constraints (e.g. environmental, neighbouring use, market viability etc). We therefore consider that there are circumstances whereby the development of new settlements may provide appropriate solutions, subject to their geographic context and the delivery of appropriate services and infrastructure.

Consequently, we believe that the following statement should be removed from the identified spatial strategy in the draft NDF (page 22).

"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."

The language used in the statement is unnecessarily pejorative and fails to recognise that what constitutes an appropriate site for development is nuanced and not simply a binary issue of whether the site is greenfield or brownfield land. For example, many greenfield sites are not resource rich or environmentally sensitive and therefore the use of such sites for housing development can result in significant public benefit (e.g. delivery of housing, services, accessible open space etc.). The approach set out on page 22 of the draft NDF also fails to recognise that some brownfield sites, such as Llanilid, are not located within existing town centres but nevertheless offer considerable opportunities for beneficial and sustainable development. These sites – and many greenfield sites – can relate well to existing built development and designed so that they are not 'sprawling in nature'.

The approach of the draft NDF also therefore conflicts paragraph 3.49 of PPW 10 which recognises the potential for new settlements to come forward:

"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 order to meet the development needs of Wales, a variety of different sites will be required, and it is not possible to adopt a policy approach that would restrict all future residential (and other) development to town-centre brownfield land. The should take a more balanced approach to development, and recognise the opportunities that are afforded by urban extensions and new settlements.

Sites such as Llanilid provide a very clear example of a sustainable location for strategic growth which should be supported as means by which to bring vacant land back into beneficial use. The scale of development that could be accommodated on this site could not be provided within the existing urban area and so pursuing the approach that is currently contained within the draft NDF might result in a failure to meet the development needs of Wales, thereby undermining the social

and economic well-being of existing and future generations.

Need for Examination & Scrutiny

Given the NDF will form part of the statutory development plan we consider that it should be subject to examination and scrutiny to ensure that it meets the tests of soundness that are conventionally required of a development plan.

Proper examination and scrutiny of the draft plan is fundamental given that once adopted the NDF will have major impacts on policy decisions throughout Wales for the duration to 2040. The NDF is set to influence emerging policy at both the regional and local levels through the production of SDPs and LDPs that will be required to align with it. However, there will also be an interim period prior to the adoption of SDPs and new/replacement LDPs whereby a policy vacuum is likely to exist for many LPAs. As such, the NDF will take on a heightened role in decision making due its status as part of the statutory development plan. Given the weight that will be afforded to the NDF it is paramount that the plan is robust and justified on sound evidence and that this is fully scrutinised through examination.

Alternatively, if the draft plan is not to be examined in public, we consider that it should instead only be a material consideration in the formation of SDPs and LDPs, more akin to the role that the Wales Spatial Plan has played in helping local planning authorities prepare their LDPs.

16. Are you...?

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

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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