

28 October 2019

WELSH GOVERNMENT - 1

31 OCT 2019



NDF Team,
Planning Policy Branch,
Welsh Government,
Cathays Park,
Cardiff
CF10 3NQ



t: [REDACTED]

e: enquiries@melinhomes.co.uk

w: www.melinhomes.co.uk

www.twitter.com/melinhomes

www.facebook.com/melinhomes

Dear Sir/Madam,

Consultation – National Development Framework 2020-2040

Further to your release of the above draft National Development Framework (NDF), for consultation, I have pleasure in returning comments and observations on behalf of Melin Homes Limited.

We are very supportive of the draft NDF and its aims and objectives in replacing the Wales Spatial Plan, by providing a distinct vision for the country and its future for the next 20 years. In addition, we welcome and endorse the comments from the First Minister in seeing the NDF **as a building block in making Wales a fair, green and prosperous place.**

Also, we are encouraged and agree with the comments of the Minister for Housing & Local Government who **wants to ensure everyone has access to a good home** and importantly that **we all want a planning system that consistently delivers the homes that meet our needs.**

Turning to the contents of the document, there are specific points I would like to set out as follows;

1. Decarbonisation

In April this year, the Minister for Environment, Energy and Rural Affairs announced a climate emergency in Wales and we appreciate the importance of this statement. The draft NDF identifies decarbonisation as a key national priority to address for all in Wales. However, we believe that this could provide a major opportunity especially in terms of new build housing, in how we construct and manage our homes in Wales.



2. Future Growth

The draft NDF advocates that future development in Wales is entirely based around existing settlements and although the close proximity of England is mentioned, is there a need for us to reflect on how we will work, commute and travel in terms of the main adjoining cities in SW England?

In addition, does the document then need to reflect on how Severnside and associated settlements can grow rather than be subject to a Greenbelt? An alternative could be that key areas could have a protected designation but growth in agreed areas could be considered, subject to pre-agreed criteria being fulfilled. A blanket designation appears to be too restrictive, given the lifespan of the NDF.

Also, a NDF based entirely around existing settlements only offers one solution and seems to be missing opportunity. For example, Melin is investing in a brand-new scheme at Crick Road working in partnership with Monmouthshire Council and this would not be forthcoming if the greenbelt had been in place. However, we appreciate that any new schemes need to be a balance between development and preserving the character of the area and ultimately Wales.

3. Tidal Power

The NDF acknowledges the unique tidal range that benefits Wales, whilst also giving detailed direction regarding the potential location of on-shore solar and wind development. However, although the challenges of bringing forward tidal powered schemes are appreciated and acknowledged, not including its potential within the NDF seems to be an over-sight.

4. Affordable Housing

There are a number of areas within the NDF that acknowledge the importance of bringing forward new, affordable housing in Wales. Indeed, the document recognises that **good quality, affordable homes are the bedrock to communities and form the basis for individuals and families to flourish in all aspects of their lives.** This is wholly supported by Melin and is a fundamental point in our approach to our homes and residents.

Regarding the delivery of affordable homes, the NDF **recognises that providing housing in Wales at levels which meet our needs is a priority.** This is particularly important to Melin as the draft document confirms that 57% of new homes will be required in SE Wales, a large part of which is within Melin's zoned area of operation as a regionally based Housing Association.

Project viability is fundamentally important to ensure that a continuing programme of development activity is maintained. If, as the NDF suggests, new development is focused around Newport and the Valleys areas, we need to be mindful of the physical challenges and accompanying abnormal costs that the latter areas can

present, plus the fact that the supply of new homes needs to be geared towards the areas and location of most need.

However, we take comfort in the commitment which the NDF provides in that ***Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised.***

Enabling the delivery of new homes through the early identification of potential new sites is vital. The fact that the NDF advocates that ***Welsh Government investments and land holdings will support sustainable placesand that SDP's and LDP's should review publicly owned land ultimately to identify potential sites for development,*** is seen as business like, better informed and a more granular approach for unlocking opportunities throughout Wales. This is a key opportunity which we must take advantage of and utilise.

Turning to the role of national housebuilders in Wales, their schemes are continuing to bring forward new affordable homes in Wales and this needs to be emphasised. Indeed, this contribution will in turn become increasingly more significant, if in the future 50% of all sites in Wales are affordable.

5. NDF Outcomes

The 11 x outcomes of the NDF very much align with our business and we believe the ambition outlined is both realistic and achievable.

We appreciate that the document is a framework which will set the direction of travel for Wales for the next 20 years. However, given our aging population and their needs, plus continuing changes in lifestyle and technology, do we need to be more ambitious in our aspirations for the future, which in turn will help us retain and also attract younger people to study, live and work in Wales.

Yours faithfully


Gerrard Williams
Development Director
Gerrard.williams@melinhomes.co.uk