

Draft National Development Framework Consultation Response
Prepared by: Powells Chartered Surveyors
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Introduction

Powells Chartered Surveyors have been instructed on behalf of various landowning clients throughout Monmouthshire to prepare and submit a response in respect of the draft National Development Framework produced by the Welsh government for consultation. The consultation runs until the extended deadline of 15 November 2019.

The National Development Framework seeks to shape planning policy in Wales over the next twenty years and provides strategy for doing so.

Planning Policy

The National Development Framework sets out some radical shifts in policy and looks to apply a new policy in respect of Greenbelt of which we have specific comments on.

Our response in respect of the National Development Framework is in respect of the greenbelt designation itself. The Welsh government appear to be forcing a position of a new greenbelt designation in southern Monmouthshire of which they have indicated should reflect the Greenbelt boundary in and around Bristol.

We believe the Welsh government have misinterpreted the purpose of Greenbelt and also the permanence of Greenbelt. The purpose of Greenbelt is that it is to last for a multi-plan period and therefore it would not only serve the purpose of this plan but would then also serve the purpose of other plans moving forwards over a thirty to fifty year period. There is a clear lack of evidence presented by the Welsh Government to support the new Greenbelt proposals. If the government wishes to apply specific development designations to sterilise areas for development for a period, then an alternative and more flexible solution should be considered. It is our view that a greenbelt designation over the southern part of Monmouthshire would in actual fact have a severely negative impact on the Welsh rural economy within Monmouthshire. Greenbelt designation not only prevents housing development but it also prevents all other forms of development other than development which is generally accepted in open countryside, such as the construction of rural workers' dwellings and barn conversions, for example.

There is very much a focus in greenbelt policy to check any form of development which would damage the "openness" of the greenbelt.

We, as a firm, undertake development work and planning consultancy in a number of counties both in England and Wales. We are finding that in our recent experience of dealing with the greenbelts in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy area, there has been a significant release of greenbelt in and around Cheltenham and Gloucester principally because greenbelt has been far too restrictive over the previous years. The restriction has only led to a significant undersupply of housing which in turn has led to a much more significant release of greenbelt than later. If the greenbelt had been absent, there is an argument to say smaller scale development

could have taken place on a more organic basis over the period of years rather than it all being clumped together within one plan period to satisfy identified need.

In addition to this, the Welsh government should also be aware that the greenbelt around Bristol is also now under pressure because of significant increase in housing need. The Greenbelt designation around the city is under threat, and because there are a large quantity of people interested in living in Bristol but there are not enough houses to support the population. As a result of this, people are having to live outside of Bristol which increases the pressure on other settlements.

The Welsh government, if they are going to apply greenbelt designation, should apply this carefully and not on a blanket approach. The purpose of greenbelt is to check coalescence of settlement and maintain the openness and we do not believe that by applying greenbelt in a way in which the Welsh government is proposing under the draft NDF that it will provide any suitable form of meeting those urban sprawl and openness criteria that would be expected from a greenbelt designation.

The proposed designation in addition to generally sprawling over a very large area of Monmouthshire also looks to check development in an area which is considered the most sustainable area within the Monmouthshire. The Severnside region, including Rogiet, Caldicot and Undy, for example, would be the most sustainable location in Monmouthshire for residential development. Those areas are closest to the employment regions of Newport and Cardiff and Bristol, all provide access to a large number of jobs and other employment. There are also reasonable transport connections between the Severn side region and those urban centres to provide employment. It makes absolutely no sense for the Welsh government to be checking urban sprawl in those locations during the plan period.

The government has a lack of evidence base to support its position in respect of requiring greenbelt on this location and it should expect a robust fight and resistance from the industry and also business in retaliation to the proposal for such a designation.

Conclusion

The information set out above demonstrates quite clearly that our position as a professional firm of planning consultants and development agents is that there are no grounds for any such designation and that the Welsh government should consider carefully the proposals for greenbelt and potentially remove any such proposals for greenbelt out of the National Development Framework.