

Consultation Response Form

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<u>Organisation (if applicable)</u>	RPS Planning & Development on behalf of Bovis Homes Limited

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

- If you disagree with any of the 11 Outcomes, please tell us why:

There can be no doubt that housing is one of the key issues facing Wales at the moment, quite simply we don't have enough homes. In June of this year the Welsh Government in their article on the 'Estimates of Housing Need in Wales' confirmed that approximately 4,400 market housing home and 3,900 affordable housing homes will be required each year from 2018/19 to 2022/23 to meet need (using central estimates of housing need calculated from 2014-based principal household projections). It further confirms that the delivery levels of homes in Wales has been falling for the last three years and has not been at the suggested level (8,300 units per annum) since 2007/8.

Yet surprisingly there is little reference to the housing crisis in Chapter 2 of the draft NDF which sets out the key challenges and opportunities facing Wales over the next 20 years. Chapter 2, on page 17, gives recognition to the fact that there is a need to increase the delivery of homes across Wales by advising that the NDF will '*ensure we take action to meet the needs of those struggling to access housing and that the places we create make us happier and healthier*'. And it goes on to advise that '*Good quality affordable homes are the bedrock of communities and form the basis for individuals and families to flourish in all aspects of their lives. The NDF provides evidence of the need for housing across Wales at both a national and regional level. In particular, this evidence demonstrates the need for a focus on increasing the delivery of affordable homes. The Welsh Government is targeting its housing and planning interventions towards achieving this aim within the broader context of increasing supply and responding to different needs.*' However, the document makes reference to 'affordable housing' only and fails to recognise that good quality homes are needed for all members of society including those that aren't eligible for social housing. It is important therefore that the NDF acknowledges, at the very start of the document, the wider need for housing in Wales across all tenures including market housing. This would ensure

the NDF is in accordance with PPW10 which advises, at section 4.2, that new housing development should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities. PPW 10 goes on to advise that the planning system must identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures.

The current housing crisis should be clearly identified as a challenge in Chapter 2 of the NDF as the lack of suitable housing puts at risk the effective implementation of health, education, economic and other policies.

This should then feed in to a revised Outcome 1 in Chapter 3. The amended Outcome 1 should read as follows:

“Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes, including both affordable and open market housing, to meeting the needs of all members of society should will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services”.

In addition, it is suggested that the NDF also needs to show firm support for market housing by providing a high-level policy to show how and where this element of the housing need is to be provided. The plan-led system is fundamental to the delivery of homes in Wales as it not only allocates sites for development, but it provides certainty for the industry, therefore, allowing longer-term investment decisions to be made. The failure of LDPs to deliver as intended and the housing shortage is no coincidence. If Development Plans fail to provide guidance for developers, it will make it far more difficult for them to make the longer-term investment decisions needed to ensure that the supply of land is maintained at a level which will give at least some chance of delivering the level of new housing needed in Wales.

Changes Required:

1. The current housing crisis should be clearly identified as a challenge in Chapter 2 of the NDF.
2. Outcome 1 in Chapter 3 should be amended to read as follows:

“Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes, **including both affordable and open market housing**, to ~~meeting~~ the needs of **all members of society should will** be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services”.
3. The NDF should acknowledge the wider need for housing in Wales across all tenures including market housing and needs to show firm support for market housing by providing a high-level policy to show how and where this element of the housing need is to be provided.

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

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The draft NDF at Chapter 4 advises that the focus for growth should be in cities and large towns as the main development area and states ***'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 spatial strategy is very urban centric rejecting the development of new settlements on greenfield land in favour of focusing development on existing settlements with good public transport connectivity.

This contradicts with the guidance given in PPW10 which doesn't rule out new settlements but instead advises at paragraph 3.50 that *'new settlements should only be proposed where such development would offer significant environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements and the potential delivery of a large number of homes is supported by all the facilities, jobs and services that people need in order to create a Sustainable Place'*. PPW10 further advises that *'new settlements need to be self-contained, linked to high frequency public transport and include essential social infrastructure including primary and secondary schools, health care provision, retail and employment opportunities'*.

In view of the shortage of land for housing development in Wales and the large number of constraints associated with development in Wales particularly around some of the existing urban areas, such as flood risk, topography and green wedges, we would suggest that removing the ability to consider new settlements for the next 20 years is short sighted and could further limit the delivery of new homes in Wales.

It also introduces inflexibility into the system which is at odds with the views of the Housing Minister who states at the very start of the NDF that 'The challenge for a plan like the NDF is not necessarily to predict how Wales might change over the next 20 years, but to make sure we can build a society and an economy that is flexible and resilient to enable all of us to benefit from the changes in a sustainable way'.

Our comments on the policies are as follows:

Policy 1 – Sustainable Urban Growth

Whilst we have no objection in principle to this Policy, it suggests that 'urban growth' is the only form of development which is being supported for the next 20 years in Wales. This is a blinkered approach that will further limit the delivery of new homes in Wales. No capacity assessment has been undertaken to determine whether there is enough land in the limited areas identified in the plan (centres of national and regional growth along with the transport hubs) to provide the level of development needed.

As explained in the earlier section Wales has not been delivering the number of homes it needs for several years and it is considered that this policy will only further limit the land available for development and puts at risk the delivery of homes to meet the needs of the people of Wales.

Policy 3 – Public Investment, Public Buildings and Publicly Owned Land

Publicly owned land has traditionally come to the open market and then bought by house builders who have provided a percentage of affordable housing in line with the relevant current planning policies, subject to viability considerations.

There is concern that the suggested use of such land for only affordable housing will result in less land being available to the private house builder which in turn is likely to reduce the level of new homes delivered across Wales. We are also not convinced that such a policy on its own will change the mindset of the public owners who will still be looking to maximise the capital receipt from the land. If they are not allowed to do this then they may not bring the land forward resulting in fewer new homes being delivered. Historically, even when the public sector has brought land to the market, it has often taken much longer than initially thought for example the Former Paper Mill, Ely, Cardiff.

Changes Required:

1. The concentration of new development in existing urban areas is not supported by a robust evidence base. To reduce the risk of delivering of new homes to meet the needs of the people of Wales Policy 1 of the NDF should not rule out the creation of new settlements but instead it should adopt the approach site search sequence identified in PPW10.
2. Policy 3 should be reworded so that it is clear that the WG are supportive of publicly owned land being redeveloped for both market-led and affordable housing.

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?

Policy 5 acknowledges the need to deliver more affordable homes, however, there is absolutely no recognition of the need to deliver market housing alongside affordable housing and we object therefore to Policy 5 being the only policy on housing.

We also object to the Housing Minister's Statement that market led housing provision has failed to meet the needs of far too many people. The private house building industry has played a significant part in contributing to the Welsh Government's affordable homes target by providing a proportion of affordable homes as part of private housing developments. Yet there are no policies within the draft NDF on open market housing. Accordingly, it is considered that an additional policy should be included to refer to the need to provide new homes for all tenures.

The primary mechanism proposed to address the Ministers issue, that market led housing provision has failed, will be ensuring that funding for affordable homes is effectively allocated and utilised. The source of this funding however isn't presented. If the funding and capacity to deliver affordable homes in single tenure developments isn't available, then the supply of market led housing with higher proportions of affordable housing would be necessary. This needs to be tested in terms of the brownfield focus and viability.

Based on a range of high-level Welsh Government documents including some already referenced in our representations, housing across all tenures is one of Welsh Governments priority areas. The provision of housing is often identified as a basic human right, and this applies across all tenures. The NDF as currently written provides no advice on how this need should be planned for other than to identify the latest needs statistics.

In terms of the need identified the document states 'The central estimate suggests a need for an additional 114,000 homes across Wales up to 2038. During the initial five years (2018/19 to 2022/23) it is estimated that on average 8,300 additional homes will be required annually...It is estimated under the central estimate that on average 47% of additional homes should be affordable housing (social housing or intermediate rent) throughout 2018/19 to 2022/23, with the remaining 53% being market housing.'

It is noted that when these housing need estimates were released in January 2019 the Housing Minister Julie James made a statement which included several important points, firstly;

'The new Estimates of Housing Need will inform plans and strategies at a national and regional level across many policy areas. They will be central to the formulation of future housing and planning policy across my portfolio and inform areas such as the National Development Framework (NDF), which is due to be published in 2020.' We would argue that this has not actually happened as the NDF includes no policies which help guide the delivery of the 53% of the housing identified as needed.

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

It is considered that the NDF as well as providing a policy on open market housing should also make the same statement about the estimates not being used as a housing target, within the supporting text, as the NDF is the lead policy document which all other plans such as the SDP and LDP's have to be in compliance with. This is a critical point and as currently referenced the housing need figure could be misread as the housing target for Wales.

Changes Required:

1. The NDF should include a policy supporting the need for market housing that shows how and where this element of the housing need is to be provided.
2. The new estimates of housing need should not be used as a housing target.

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

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 checked="" 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?

No Comments

6. Green Infrastructure (Policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

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

It is considered that the term 'Green Infrastructure' needs to be defined clearly so that it is clear what does and what doesn't constitute Green Infrastructure. The NDF should also explain how drainage (SUDS) and public open space fits into the definition of Green Infrastructure. Clearly there is the potential for conflict between habitat protection and public open space but at the moment it's all being grouped under the same umbrella as Green Infrastructure.

The NDF should set out a GI hierarchy at the top of which is protected species habitats followed by SUDS and then public open space requirements.

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

There is no objection in principle to the concept of establishing district heat networks however the policy context is too broad. We agree that it is sensible to identify priority areas based on the density of new developments, but we consider there should be a threshold for when this consideration is definitely required.

Furthermore, there needs to be an interface between Policies 14 and 15 and consistency between the two policies.

The definition of mixed-use developments should be better defined in terms of the split and what can be accommodated for example waste from energy and homes. The scale at which DHN is considered in the Priority Areas, where density is most likely to lend itself to DHN, needs to be set.

In addition, there needs to be a recognition of viability related issues in accordance with the guidance contained within the soon to be published 3rd edition of the Development Plan Manual.

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"/>

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

10. Mid and South West Wales (Policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 27 and the accompanying text recognises Cardiff as an internationally competitive city and a core city on the UK stage. However, the document notes that Cardiff is nearing capacity due to geographical constraints such as the Caerphilly and Garth mountains to the north and the Bristol channel to the south. The NDF appears to be diverting strategic growth housing away from Cardiff, which given its role as the economic driver of the region is a fundamental concern. Newport is to be the focus for housing and economic development.

In terms of Newport, much emphasis is placed on brownfield regeneration. However, the remaining brownfield sites in Newport are probably the most difficult to deliver and the brownfield emphasis and focus is inconsistent with the intention to increase the scale and pace of delivery. The soon to be published 3rd edition of Development Plans Manual recognises that over reliance on brownfield sites to deliver housing can often lead to the development plan housing requirement not being met. On this point there is no recognition of what effect planning can realistically have to increase scale and pace and it is clear that planning policy alone cannot unlock brownfield sites. To realistically unlock brownfield sites needs a suite of interventions of which planning is just the policy context.

Consequently, the high level of existing brownfield allocations together with significant flood risk constraints (Newport sits astride a major river, the Usk, and borders the Severn Estuary) as well as ecological designations around Newport limits the opportunity for significant new allocations. It is clear therefore that Newport potentially suffers from similar capacity issues which could limit growth to those in Cardiff.

Policy 30 together with the accompanying text requires that the SDP must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff. The designation of such a large area, which includes a significant portion of Monmouthshire, would impede growth in an area of high demand strategically located between Newport and Bristol. No justification or evidence has been provided to support such a major long-term policy direction as a green belt. Indeed, it is noted that there was no mention of the need to identify a Green Belt in the 2018 NDF Issues and Options Paper.

This is also in conflict with the very clear guidance given in PPW10 which from paragraph 3.60 onwards advises:

‘Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust’.....‘When including Green Belt and green wedge policies in their plans, planning authorities must demonstrate why normal planning and development management policies would not provide the necessary protection’.

This is clearly not the case as in terms of the areas surrounding Cardiff, much of the area adjacent to Cardiff’s boundary is covered by other designations (such as SSSI’s and SLA’s) which support development restraint and afford a degree of protection to these areas.

PPW 10 goes on to advise that *‘Green Belt and green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term.....The spatial form of Green Belts should be appropriate to the location and will not necessarily need to extend in a continuous band around an urban area’.* It is not clear due to the lack of evidence how the NDF has established a need for a Green Belt in the area shown on page 63.

In addition, PPW 10 advises that *‘When considering Green Belt designations, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this’.*

The NDF makes it clear that the green belt will be put in place (and boundaries finalised) via the SDP. There is a query therefore as to whether it exists just because it is in the NDF and, if so, what status it can have if it is not fully defined and justified. Why therefore should an SDP inherit the requirement to designate a green belt. The designation of such a large area, which includes a significant portion of Monmouthshire, would impede growth in an area of high demand strategically located between Newport and Bristol. The green belt as proposed contradicts the growth and spatial options preferred by Monmouthshire. The green belt curtails the opportunity for the City Region to capture growth.

By diverting development away from Monmouthshire and the Vale of Glamorgan, and elevating Newport specifically, the NDF isn’t setting strategic direction it is straying into development management.

Changes Required:

1. An assessment of the constraints faced by Newport should be undertaken.
2. Policy 30 of the NDF should be reworded to read as follows:

The Welsh Government requires the Strategic Development Plan for South East Wales to explore whether there is a need to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region through the identification of a Green Belt. If necessary regional plans should consider the relationship of any new green belts with the green belt around Bristol.

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 Comments

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 Comments

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 Comments

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 Comments

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?

Policy 16 states: 'The Welsh Government requires Strategic Development Plans to come forward in each of the three regions to deliver the requirements of this policy.'

It is not clear how this will be achieved particularly as the supporting text goes on to say, 'The Welsh Government will work with local planning authorities to support the establishment of Strategic Development Plans.' The NDF requires significant policy detail to be provided by the proposed SDP's, yet there appears to be no clarity on how and when SDP's will be adopted. This raises the concern of a 'policy vacuum' being created in which strategic issues are not dealt with due to the lack of detailed policy guidance within an SDP, resulting in decisions continuing to be made at a local level as part of the ongoing round of LDP reviews. The HBF suggests that this undermines the reason for creating the SDP and NDF levels of Planning control and is likely to result in less homes being built than are needed.

Hierarchy of Plans

It is understood that the WG are aiming to adopt and publish the NDF next year in 2020. Following which, five or six revised LDPs will be adopted before the SDP is adopted in 2024. A policy vacuum or policy contradiction will not help deliver the NDF outcomes. SDP's that will set housing numbers are an absolute requirement. Informal arrangements to complete a joint LDP will not be accepted. It is entirely possible that the SDP for South east Wales will be delayed given that so far only two of the ten local authorities have approved to proceed with the SDP. This is a particular issue for Monmouthshire given the growth approach being adopted for the LDP.

Overall it is felt that a national planning framework is a useful addition to the development plan documents in Wales. However, the NDF is quite precise in some areas (e.g. growth in certain urban areas) but is vague in others, just offering general support/proposals. Even though Chapter 3 lists a set of outcomes there is still a lack of clarity/certainty as to what exactly the NDF is trying to achieve. In comparison to PPW 10, that is littered with outcomes and objectives, there is no clear ambition in the NDF. The NDF should set a national direction by being more positive towards growth and where/how this is achieved.

The lack of progress to implement LDPs has made delivery a key concern for WG. The Draft Local Development Plan Manual (3) is littered with requirements to address the shortcomings of allocations made in LDPs. This is partly driven by a recognition that unviable brownfield sites were included in LDPs.

Adoption

A letter dated 15th December 2015 states Section 3 of the Planning Act enables the Welsh Ministers to prepare the National Development Framework for Wales (NDF), which will set out the strategic land use policies that the Welsh Ministers consider are appropriate. The NDF will broadly follow the same preparation process as a Local Development Plan (LDP) and, once published, will require all other forms of development plan, such as Strategic Development Plans (SDPs) and LDPs, to conform to the policies within it. However we understand that Welsh Government officers will report the NDF consultation and draft version to the AMs rather than an Inspector considering it at examination. This means that the NDF will not have undergone a 'test of soundness'.

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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