



14 November 2018

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Dear Sir/Madam,

Response to the Draft NDF Consultation

These representations express concern that the draft NDF, as it is currently worded, would restrict a full and proper assessment of the options to deliver sustainable growth across Wales, and in particular through the preparation of the South East Wales Strategic Development Plan (SEWSDP). A number of important changes to the NDF are recommended and these are explained below.

The objections are made on behalf of Redrow Homes (South Wales) Ltd & Llandow Consortium.

NB: The main objection is set out within this letter, the text of which is repeated in full within the enclosed consultation response form alongside other related comments.

The main criticism is that elements of the draft NDF would prejudice a proper evidence based approach to planning for Wales and for the Cardiff City Region (CCR) through the SEWSDP by:

1. Lacking any real substance relating to the promotion of economic prosperity, investment or growth.
2. Failing to make proper provision for new market housing (or even encourage SDPs to do this)
3. Setting out a hierarchy of settlements ahead of a proper assessment through any SDP.
4. Failing to take into account existing opportunities for economic development and the need to plan for sustainable growth to support them.
5. Assuming that there is capacity within urban areas to accommodate development without having undertaken any proper assessment.

These failings allow the draft NDF to make very broad and very wrong conclusions about 'New Towns' (or 'New Settlements' as they are termed in PPW) across Wales. By doing this the draft NDF is clearly at odds with guidance which allows them to be considered as an option within Planning Policy Wales and the Development Plans Manual Edition 3 (Consultation draft June 2019). The NDF will have development plan status and must accord with PPW.

Importantly, these are not only the views of Redrow Homes (South Wales) Ltd & Llandow Consortium. The same concerns have been raised in responses from the individual local authorities within the CCR, and by the CCR itself. Their representations are also concerned about how the draft NDF refers to new settlements and urge for the NDF to set a more positive context.ⁱ

This response highlights where the issues identified above arise within the draft NDF and how they can be resolved, before setting out specific responses to the questions raised within the consultation document.



The Benefits of New Settlements

New settlements can deliver significant benefits. At a high level, they can accommodate large amounts of growth sustainably and creatively and can act as a catalyst to fund and accelerate new infrastructure and housing delivery.

They can improve on existing public transport provision and deliver new services and they can do this often without a call on public money or resources. This is particularly important in South East Wales and the CCR where there are clear and obvious opportunities to add new stations to the Metro network. This could dramatically improve accessibility along key corridors (and achieve much better modal split performance) and could be delivered through new settlements.

There are situations where new settlements will be a preferable solution to expanding constrained existing settlements and alleviate pressures on facilities and transport networks within them. Co-locating new settlements with existing regeneration and employment expansion areas could minimise the need for travel and provide an acceleration to the development of such areas by providing attractive places to live and facilities nearby. There are some obvious strategic employment areas that could be linked sustainably to new settlements in the SEWSDP area.

The economic impacts of new settlements are also a major factor as to why they should be supported as an option to deliver essential new market and affordable housing.

When planned properly and in the right circumstances, new settlements can play a major role in delivering a sustainable and exemplar solution to solving the housing, social, transport and economic growth requirements in Wales. Furthermore, a new settlement would score highly in meeting the Well-being goals.

Reference to New Settlements within the draft NDF and other guidance

The draft NDF makes a single reference to new towns/settlements in text on page 22 as follows:

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" (Top of second column)

This is a very narrow and simplistic analysis of 'good' and 'bad' growth, and one which does not reflect history or opportunities. It is very restrictive and the concern is that it risks (if not invites) resistance to all greenfield growth wherever it is proposed and whatever its form.

Greenfield growth will inevitably be needed during the next 20 years simply because some urban areas (including some very large ones as acknowledged by the draft NDF where it discusses Cardiff) do have limits and capacities. This is not only our view, it is the position recorded by the various CCR authorities in their representations to the draft NDF. Given the circumstances, new settlements need to be an available option too and this is the approach set out in PPW which the draft NDF fails to acknowledge.

PPW sets out the land use planning policies of the Welsh Government (WG). The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the WBFGA and other key legislation.

Section 2 of PPW 10 sets out that plan making must embrace the concept of placemaking. At this high level the primary placemaking consideration is concerned with meeting the Strategic and Spatial Choices issues, which are outlined in section 3.

Section 3 requires that development plans must feature a spatial strategy informed by a sustainability appraisal which informs the identification of areas and sites for new development. A hierarchy of priority is set out requiring that LPA must initially prioritise suitable and sustainable previously developed land and/or underutilised sites, firstly within existing settlements or sites within neighboring authority areas. Where this cannot be achieved through clear demonstration that a need for new sites still exists, consideration can be given to suitable and sustainable greenfield sites.

The statement on Page 22 of the draft NDF appears to take a short cut to deciding that greenfield developments and new settlements will not satisfy the well-established search sequence enshrined within PPW.

There are number of obvious flaws in this approach that can be easily corrected.

The first point to make is that not all new settlement proposals would necessarily rely solely on greenfield land, or land which has value as productive countryside or for natural resources. New settlement proposals could utilise substantial areas of brownfield land and take place where the principle of development has already been established through alternative allocations which might be better repurposed to deliver required mixed use growth.

A second, and equally fundamental point is that the comment in the draft NDF does not rely on any evidence base that shows that existing settlements and previously developed land can adequately meet future development needs. Representations from LPAs and the CCR express considerable reservations about this assumption and the fact that there is no evidence that an urban capacity study has been undertaken. Monmouthshire, Cardiff, Caerphilly, the Vale of Glamorgan, Newport and the CCR have all expressed (in their representations to the draft NDF) the view that existing urban areas do not have the capacity to continue to absorb new development in a sustainable manner.

The third point concerns alignment with other and existing policy. Paragraph 3.40 of PPW makes a clear statement about the principle of new settlements. Whilst it states that they should only be considered in exceptional circumstances and subject to further considerations set out under section 3, it acknowledges that they can form part of the solution for delivering sustainable housing growth. The comment within the draft NDF highlighted above undermines this important aspect of national policy.

Para 3.50 of PPW sets out circumstances where new settlements could be appropriate, including where they would offer significant environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements.

In addition to PPW, the Development Plans Manual Edition 3 (Consultation draft June 2019) provides some further detail on what WG expects an SDP will deliver. Whilst this remains a consultation draft it provides a very clear indication that SDPs should consider the option of new settlements.

The guidance indicates that a settlement hierarchy will need to be established within an SDP. When preparing an SDP a functional hierarchy of settlements, based on a range of factors will need to be identified before determining the scale and geographical distribution of growth. Para 10.23 states that to support an SDP an Urban Capacity Study (UCS) will be necessary for those settlements key to delivering the plan, demonstrating the growth contribution they can make. An assessment of the numerical contribution of homes and jobs that can be delivered within existing defined urban boundaries, reflecting the Placemaking approach, will be essential.

Paragraph 10.26 onwards sets out some potential scenarios for spatial options that could be considered in preparing the SPD. Specifically, new settlements are set out as one potential solution for an SDP's growth.

We know from the representations from the SEWSDP constituent authorities that they are concerned about the capacity of their existing settlements to accommodate future growth sustainably, and are very clear that greenfield allocations will be required to meet future needs.

Following the process set out within PPW, as amplified within the latest draft of the Development Plans Manual, could lead to a conclusion that a new settlement is an appropriate solution. Indeed the authorities themselves make the point that the NDF should not narrow their ability to plan for all eventualities and consider all options.

The following provides a summary of what the authorities have said about new settlements:

Monmouthshire states– (the text on page 22) would appear to rule out the opportunity to deliver sustainable growth in the longer term via the development of new settlements, in contrast to Planning Policy Wales edition 10 (PPW10) setting out the circumstances where they may be appropriate. The draft NDF should be amended to reflect the policy advice in PPW10 and recognise that there may be a role for new settlements if they create more sustainable places than the continued incremental growth of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies.

The Vale of Glamorgan states- The Council considers that the commentary on new settlements is too prescriptive in the draft NDF ...This would appear to rule out proposals for new settlements despite Planning Policy Wales (PPW) setting out the exceptional circumstances where they may be appropriate. In contrast the NDF should reflect the policy advice in PPW and recognise there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies.

Caerphilly states - it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development on settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development.

The CCR states - There should be a recognition of the potential for new settlements in the South East Region, to be considered in the SDP in accordance with the policy advice in Planning Policy Wales. Delivering the necessary homes to meet the region's need is going to require a range of approaches and the potential for a new settlement needs to be explored rather than dismissed as it appears to be at present.

Newport does not make any reference to new settlements, but they state very clearly that greenfield development and controlled expansion is inevitable as there is simply insufficient brownfield land within urban boundaries. Cardiff raise concerns on a similar theme pointing out that there is an absence of a robust evidence base that justifies the draft NDF's very restrictive approach to strategic forward planning

In short and as it stands in the draft NDF, the wording highlighted on Page 22 is at complete odds with established national guidance in the form of PPW and with the draft Development Plans Manual. It has raised some very specific comments from the SEWSDP constituent authorities who are rightly concerned about the lack of evidence and the need to ensure that all sustainable options remain available. They have all made a clear case that new settlements should be an option for them to consider in the SDP for the region.

The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives. The NDF should allow those decisions to be taken on an informed, evidence backed basis, which it does not in its draft form.

Redrow Homes (South Wales) Ltd & Llandow Consortium share these concerns and point out that limiting the options set out in PPW will result in an overreliance on existing settlements. This would likely stifle growth and undermine the delivery of the development to meet the needs of current and future generations. The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives.

The solution to this would be to delete the following text from page 22:

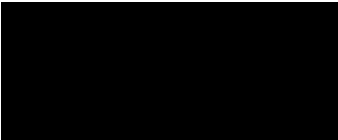
~~Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public~~

~~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 following is suggested as a replacement:

New homes, facilities and supporting infrastructure will be provided in line with the search sequence set out within Planning Policy Wales. The potential for new settlements will be considered through SDPs and Joint LDPs where they meet the criteria set out within Planning Policy Wales.

Yours faithfully



Paul Williams

Associate Director

Enc: Completed Consultation Document

ⁱ Representations by the various authorities have been endorsed through the following committee papers:

<https://cardiff.moderngov.co.uk/documents/s34741/Cabinet%2010%20Oct%202019%20NDF.pdf>

https://www.valeofglamorgan.gov.uk/Documents/_Committee%20Reports/Scrutiny-ER/2019/19-10-16/National-Development-Framework.pdf

<http://www.newport.gov.uk/documents/One-Newport/Meetings/PSB-Full-Papers-03.10.19.pdf>

<https://www.cardiffcapitalregion.wales/wp-content/uploads/2019/10/item-6-ndf-framework-with-appendices.pdf>

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=147&MId=3909>

<https://democracy.caerphilly.gov.uk/documents/s30421/Welsh%20Government%20Consultation%20on%20the%20draft%20National%20Development%20Framework.pdf?LLL=0>

Consultation Response Form

Your name	Redrow Homes (South Wales) Ltd & Llandow Consortium
Your address	c/o Paul Williams, Savills, 2 Kingsway, Cardiff, CF10 3FD
Preferred contact details (email/phone/post)	pjwilliams@savills.com
<u>Organisation (if applicable)</u>	Redrow Homes (South Wales) Ltd & Llandow Consortium

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?

[illegible]

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

[illegible]

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

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2. Spatial Strategy (policies 1 - 4)

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

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

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

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

Spatial Strategy

The Spatial Strategy: Where will Wales Grow? (page 24) directs large scale economic growth and housing “predominantly, though not exclusively” to three main urban clusters: Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; and Wrexham and Deeside

Away from these places and a list of regional centres (Carmarthen, the Pembrokeshire Haven towns, Aberystwyth, Llandrindod Wells, Newtown, Caernarfon, Bangor and the coastal towns from Llandudno to Prestatyn), development will be:

“in towns and villages to support local aspiration and need (complementing rather than competing with efforts to grow cities and towns) channeled away from the countryside and from productive agricultural land”

Large scale growth is not defined (apart from a worrying reference to 100 dwellings or more in the section on district heating networks). Aside from this, large scale

growth could be read as anything other than development that meets local aspirations and needs.

The lack of clarity feeds through into the spatial diagram (below) and into the regional diagrams (see later). There is very little explanation of the concepts shown on the diagrams.

Much clearer and ideally express provision should be made for local authorities to define their own settlement hierarchies (and key settlements) which should be set out at a regional or local level, as in fact is advocated within Policy 16 which states that Strategic Development Plans should establish for the region (and where required constituent LDPs):

- a spatial strategy;
- a settlement hierarchy;
- the housing provision and requirement; should be set out.

The emphasis should not be so heavily weighted to the named clusters, but instead widened to the national growth areas.

Spatial Strategy & Diagrams

There is a general lack of clarity on the spatial strategy. The concepts shown on the plans are not well explained. There is no written attempt to define what a national or regional growth area is or what policy there (or for/in them) will be. This requires further clarification.

There is clear inconsistency between the plans on pages 25 and 63. The national plans indicates that the growth area covers most of the Vale of Glamorgan as far as the Glamorgan Heritage Coast. The regional plan (page 25) indicates a much smaller National Growth Area. The latter would exclude significant areas such as Cardiff Airport and the Enterprise Zones, which is presumed to be in error. To avoid misinterpretation the extent of the national growth area should be should be amended to reflect the plan on pg 25, i.e. to extend it as far as the Glamorgan Heritage Coast.

Policy 1 – Sustainable Urban Growth 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.

Add the sentence – *Growth will also be supported where it would offer significant*

environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements.

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

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

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 type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

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?

[illegible]

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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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?

[illegible]

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...

[illegible]

- 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?

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?

[illegible]

11. South East Wales (policies 27-33)

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

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

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

The South East Wales policies place a focus growth on existing town/city centres and urban areas within the nationally important growth area, in particular on previously developed land within Newport and the Valleys.

Newport Council has made representations to the effect that greenfield development and controlled expansion into the countryside is inevitable as there is simply insufficient brownfield land within its urban boundaries. Caerphilly has made similar representations expressing concern over the capacity of existing urban areas.

The number of available and deliverable vacant sites within existing settlements in the region is limited. The draft NDF's policies for SEW are not evidenced by urban capacity studies. An overreliance on growth within existing settlements will impact upon the ability to consider longer term, strategic and sustainable options to relieve pressure on existing facilities and infrastructure.

The NDF needs to be much clearer in this respect to manage expectations by signalling now that growth will take various forms and that properly considered greenfield development will or can be one of them. This should include the encouragement for the SDP to explore the option/need for new settlements.

Policy 31 (Growth in Sustainable Transit Orientated Settlements) states that:

"Development and growth in the region should be focussed in places with good active travel and public transport connectivity. Land in close proximity to existing and

committed new mainline railway and Metro stations should be the focus for development. Strategic and Local Development Plans should plan growth to maximise the potential opportunities arising from better regional connectivity. The Welsh Government supports the development of the South Wales Metro and will work with agencies to enable its delivery.”

As it stands Policy 31 makes specific reference to existing places and land in proximity to existing and committed new mainline and Metro stations. This ignores the potential for new stations to be created where they could act as a focus for new mixed use developments. Opportunities exist on existing Metro lines for additional stations which could be delivered through private investment as part of major new developments. Policy 31 should be revised to avoid ruling out such opportunities. This could be done simply through deleting ‘committed’ as follows:

Land in close proximity to existing and ~~committed~~ new mainline railway and Metro stations should be the focus for development.

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.

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?

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?

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.

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?

The main criticism is that elements of the draft NDF would prejudice a proper evidence based approach to planning for Wales and for the Cardiff City Region (CCR) through the SEWSDP by:

1. Lacking any real substance relating to the promotion of economic prosperity, investment or growth.
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3. Setting out a hierarchy of settlements ahead of a proper assessment through any SDP.
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be essential.

Paragraph 10.26 onwards sets out some potential scenarios for spatial options that could be considered in preparing the SPD. Specifically, new settlements are set out as one potential solution for an SDP's growth.

We know from the representations from the SEWSDP constituent authorities that they are concerned about the capacity of their existing settlements to accommodate future growth sustainably, and are very clear that greenfield allocations will be required to meet future needs.

Following the process set out within PPW, as amplified within the latest draft of the Development Plans Manual, could lead to a conclusion that a new settlement is an appropriate solution. Indeed the authorities themselves make the point that the NDF should not narrow their ability to plan for all eventualities and consider all options.

The following provides a summary of what the authorities have said about new settlements:

Monmouthshire states– (the text on page 22) would appear to rule out the opportunity to deliver sustainable growth in the longer term via the development of new settlements, in contrast to Planning Policy Wales edition 10 (PPW10) setting out the circumstances where they may be appropriate. The draft NDF should be amended to reflect the policy advice in PPW10 and recognise that there may be a role for new settlements if they create more sustainable places than the continued incremental growth of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies.

The Vale of Glamorgan states- The Council considers that the commentary on new settlements is too prescriptive in the draft NDF ...This would appear to rule out proposals for new settlements despite Planning Policy Wales (PPW) setting out the exceptional circumstances where they may be appropriate. In contrast the NDF should reflect the policy advice in PPW and recognise there may be a role for new settlements if they create more sustainable places than urban sprawl at the edge of existing settlements. Such matters should be given detailed consideration as part of SDP and LDP strategies.

Caerphilly states - it is quite feasible that the most sustainable form of development could be a new settlement outside existing settlements rather than increasing development on settlements where infrastructure and quality of life are already challenged. This policy does not allow this form of development and as such could perpetuate less sustainable development.

The CCR states - There should be a recognition of the potential for new settlements in the South East Region, to be considered in the SDP in accordance with the policy advice in Planning Policy Wales. Delivering the necessary homes to meet the region's need is going to require a range of approaches and the potential for a new settlement needs to be explored rather than dismissed as it appears to be at present.

Newport does not make any reference to new settlements, but they state very clearly

that greenfield development and controlled expansion is inevitable as there is simply insufficient brownfield land within urban boundaries. Cardiff raise concerns on a similar theme pointing out that there is an absence of a robust evidence base that justifies the draft NDF's very restrictive approach to strategic forward planning

In short and as it stands in the draft NDF, the wording highlighted on Page 22 is at complete odds with established national guidance in the form of PPW and with the draft Development Plans Manual. It has raised some very specific comments from the SEWSDP constituent authorities who are rightly concerned about the lack of evidence and the need to ensure that all sustainable options remain available. They have all made a clear case that new settlements should be an option for them to consider in the SDP for the region.

The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives. The NDF should allow those decisions to be taken on an informed, evidence backed basis, which it does not in its draft form.

Redrow Homes (South Wales) Ltd & Llandow Consortium share these concerns and point out that limiting the options set out in PPW will result in an overreliance on existing settlements. This would likely stifle growth and undermine the delivery of the development to meet the needs of current and future generations. The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives.

The solution to this would be to delete the following text from 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 following is suggested as replacement text:

New homes, facilities and supporting infrastructure will be provided in line with the search sequence set out within Planning Policy Wales. The potential for new settlements will be considered through SDPs and Joint LDPs where they meet the criteria set out within Planning Policy Wales.

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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ⁱ Representations by the various authorities have been endorsed through the following committee papers:

<https://cardiff.moderngov.co.uk/documents/s34741/Cabinet%2010%20Oct%202019%20NDF.pdf>

https://www.valeofglamorgan.gov.uk/Documents/_Committee%20Reports/Scrutiny-ER/2019/19-10-16/National-Development-Framework.pdf

<http://www.newport.gov.uk/documents/One-Newport/Meetings/PSB-Full-Papers-03.10.19.pdf>

<https://www.cardiffcapitalregion.wales/wp-content/uploads/2019/10/item-6-ndf-framework-with-appendices.pdf>

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=147&MId=3909>

<https://democracy.caerphilly.gov.uk/documents/s30421/Welsh%20Government%20Consultation%20on%20the%20draft%20National%20Development%20Framework.pdf?LLL=0>