

## **Consultation Response Form**

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

SMDL doesn't disagree with any of the outcomes (which is the trigger for further explanation). It does, however, have two key concerns which are described below.

The first is the utility of the outcomes. On one hand, the headlines listed on page 18 describe decent ambitions which are difficult to disagree with. However (and perhaps for this reason), it is equally difficult to see what they add to the task of forward planning in Wales over the next 20 years. Much of what is said in the expansion on pages 20 and 21 is already happening or has been programmed or is controlled by existing policy or legislation (or features in Planning Policy Wales).

On this basis the outcomes should have a more practical emphasis. A spatial dimension could also be introduced which would differentiate the NDF from PPW and other plans and programmes. One specific way this could be done, would be to add a reference to the SOA concept which we describe later in this response.

The second concern, is the need for any list of outcomes to include a stronger commitment to economic development and urban regeneration. This is buried a little in the outcomes as they are currently expressed (with the longer list only asking development plans to have positive attitude to economic development). A clearer reference would prepare the ground for a policy on economic development which is currently missing from the draft NDF. It would also allow the NDF to look at broader definitions of economic development. Both of these points are expanded on general comments made at the end of this response.

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

The draft NDF directs significant new development to key locations – with the emphasis on named cities and large towns which are well served and accessible. This approach is sensible and largely reflects how planning for growth has been carried out in Wales. However, the list is very short and the depiction (and explanation) of what this means and how it will be applied is equally brief. This risks misapplication or misunderstanding of the NDF once it is approved (which is important as the NDF will be a development plan document and may be the most recent part of the development plan for some time).

One way of improving the NDF in this respect would be to provide additional information on the national growth area concept. This is a good basic idea and the authors of the NDF clearly have something in mind by defining and applying these to the spatial strategy and regional diagrams. However, there is very little information on what they mean, what (or how) projects will be prioritised within them and how they will inform the preparation of SDPs. The suggestion we make (at the end of this response) is the reintroduction of the strategic opportunity area concept and this could go a long to define what the NGA's are and what strategy should be within them.

### 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 checked="" 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?

There are two connected points that the NDF's approach to affordable housing raises. There is also a general point on housing policy which we make at the end of this response form.

The first is whether the quite dramatic shift in housing delivery can be achieved in the timescale (or at all). The figures provided in the draft NDF expect a much more significant number of affordable homes to come from the public sector almost immediately and there are clear practical difficulties in achieving this. This is accompanied by a lower contribution (than is currently being delivered) of other housing from the private sector. We doubt whether it is the intention of the NDF to suppress current performance (or overstretch the public sector without significant extra resources), but as it stands this could be the result.

The second point is the need to take care when referring to percentages of affordable housing – especially if current definitions of what qualifies as affordable housing are retained. The danger is that the high levels described in the section on housing (and in the regional sections as well) will be used as targets in future development plan documents, including the forthcoming Strategic Development Plans (SDPs).

If delivery by new methods or new sources fails then targets will backfire by making new housing schemes unviable. The reasons for this are well rehearsed and broadly understood and accepted by planners in the public and private sectors.

They are particularly relevant to regeneration schemes which can have substantial and fixed development costs, together with challenging markets (and uncertain values). Research commissioned by the Welsh Government recognises these circumstances and recommends that some projects – which have wider benefits and meet strategic objectives – may warrant a different approach to affordable housing provision.

In these circumstances, we recommend that further work is required on the NDF's approach to affordable housing and housing generally. At the very least this should:

- a) reconsider the balance between public and private sector provision to reflect the practicalities
- b) reconsider whether it is appropriate to simply apply statistics to derive the split in the first place
- c) make it clear that the figures are not targets and will inform housing requirements (for all housing and affordable housing) which will be established in the SDPs and LDPs.
- d) recognise that there are some projects that do good things but may not be able to meet target levels of affordable housing (and should not be penalised because of this)
- e) include some flexibility in the definitions of affordable housing (or allow this to be considered)

#### 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" value="x"/>

- 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...

	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 checked="" 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?

Policies on large scale wind and solar developments should recognise the differences between the two forms of energy (just as the plan on page 42 does). It may be appropriate for two separate policies to be drafted to ensure that solar projects outside the priority areas that pass the 10mw threshold (but are nowhere near the upper limit of 350mw) are not discouraged or over tested.

Policy on District Heat Networks (DHNs) needs to recognise the practicalities associated with them. In some cases they are simply unrealistic whatever the scale of development proposed.

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

### Mid and South West Wales (MSWW)

SMDL has a number of very significant schemes underway in the MSSWR. These include:

- a) Coed Darcy – a mixed use, residential led scheme on the previously developed site of the former BP Llandarcy Oil Refinery. It is the definition of a transformational strategic regeneration project and will deliver about 4,000 new homes, new schools and facilities and significant areas of open space and new commercial and business floorspace. It will be the stimulus for a very large number of jobs and requires substantial investment. The site is located at the heart of the NDF's proposed Swansea Bay and Llanelli national growth area (SBLNGA) and is one of the LDP's cornerstone projects.
- b) Baglan Bay – a large area of previously developed land (which is again the legacy of BP's historic activities in the area). Employment led redevelopment of the site is proposed, although there is also clear potential for a range of projects including renewable energy schemes and civic uses and activities. Like Coed Darcy, Baglan Bay is within the proposed SBLNGA and is a key part of the Neath Port Talbot's LDP.
- c) Swansea University Campus (and Fabian Way). This scheme is well progressed and is one of the largest education initiatives in Wales. It is a driver for innovation and sustainable economic growth which comes from the significant investment made, the daily operation of the campus (and its staff and students) and from what it teaches and the research it carries out

All of these schemes fall within the defined National Growth Area which is centred on Swansea Bay and Llanelli, which the NDF describes as a focus for strategic growth. This clearly makes sense and is supported. Policy 23 also places proper emphasis on the need for public sector decision making and investment to promote growth and regeneration in the area (which may be necessary to unlock major regeneration schemes and make development viable).

The other provisions (about a strong city region and the Swansea Bay Metro) are also supported and underscore the need for strong public sector leadership and targeted public investment. An SDP for the NGA may be a sensible idea (and could be an opportunity to prioritise the projects listed above, as well as others). However, it should not (and need not) be something that current initiatives rely on in the meantime.

### **South East Wales Region (SEW)**

SMDL's key scheme in SEW is the continued transformation of the former Llanwern Steelworks site on the eastern edge of Newport. Significant progress has been made here with about a quarter of the 4000 home new neighbourhood either occupied, being constructed or currently waiting for detailed approval. A new primary school was opened in September this year and a substantial area of new open space has been created. At the eastern end of the site, work on a strategic business park is well underway with existing occupiers including Amazon and CAF and with further investment in additional space imminent. Proposals for a new station (which are being pursued by Welsh Government) are also at and

The whole scheme – which is known as Glan Llyn – sits on 600 acres of previously developed land and is an example of what can be achieved in challenging market and technical conditions. It is a cornerstone of Newport's Local Development Plan and its delivery will create thousands of jobs as well as thousands of new homes.

Because of its location and its characteristics, continuing and accelerating regeneration at Glan Llyn is a regional and national priority. The NDF's helps (and does nothing to hinder this) by placing the scheme well within the proposed National Growth Area, by emphasising the potential of well connected brownfield sites in and around Newport to accommodate regional growth requirements and by elevating the City's overall position. However, it could do more by confirming that preference should be given to the regeneration and redevelopment of brownfield before other forms of growth are considered. This would also focus WG funding and investment and reinforce the leading by example theme that runs through the draft.

An SDP would be useful way of doing this, but (as for the SDP proposed for the MSSW region) it's preparation should not hold up current initiatives which clearly (and already) follow the draft NDF's locational guidance

## 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?

There are three main additional points that we wish to make on the draft NDF.

These come from SMDL's current activity on a number of large scale regeneration initiatives - including those listed in the further comments response to questions 10 and 11 above (the regions). SMDL has an excellent track record in delivering complex schemes in challenging conditions and many of its' projects are of regional if not national significance. This is broadly recognised in current local development plans – with many of the sites forming part of medium and long term growth strategies.

All of the projects meet the key tests set by the draft NDF for sustainable development:

- a) They sit centrally and sustainably within the draft NDFs key growth locations or corridors and well within the defined National Growth Areas (and well outside any areas of sensitivity or constraint)
- b) They are true regeneration projects that will transform very large areas of previously developed or brownfield land
- c) They are strategic schemes that clearly can deliver growth over a significant part of the proposed NDF period

In this context, the first additional point SMDL wishes to make is that **the scale of the projects and their significance means that they deserve recognition in the NDF**. This would help to anchor the NDF to the real world by signalling where strategic growth can take place and the type of project that can deliver it (and should therefore be prioritised or accelerated). This “where and how” would also provide a focus for public sector decision making and investment on infrastructure and facilities – which would align well with the NDF's intentions to lead the way where it can. Naming some projects would provide a useful steer for the proposed SDPs as well and offer some regional guidance in the period whilst these SDP's are being prepared.

Given what the draft NDF already has to say about Newport (as part of the SE Region policies and explanation), this approach could be targeted to the Mid and South West Wales Region (MSWW). Here adding a list of projects would support the main thrust of policy and help to explain how the proposed National Growth Area will work. The list should include Coed Darcy, Baglan Bay and the Swansea University Campus (and Fabian Way Corridor) where there is substantial existing momentum and the real prospect of accelerated growth.

An alternative approach would be to consider updating and reapplying the concept of **strategic opportunity areas (or SOAs)** from the Wales Spatial Plan. This was a helpful component of the WSP and may be especially useful given the intention to prepare a series of SDPs (and the timescales associated with those plans). If this was accepted, key candidates for SOA designation would be the area to east of Newport (centred on Glan Llyn) and the cluster of initiatives listed to the east of Swansea.

The second point is that the NDF needs to be more explicit about its **policy for economic growth and development**. At the moment it is broadly silent on how it expects SDPs or LDPs to deal with this matter or how it expects the NDF to help boost prosperity (in what may be very challenging conditions) and ensure that it is spread equitably and sustainably. Without some form of specific guidance or direction for SDPs, outcome 6 (and the Welsh Government's Prosperity for All agenda) appears to be largely forgotten.

It would also help if the NDF recognises that some activities contribute to more than one outcome. Housing not only provides places for people to live, but creates jobs, drives innovation and (in some cases) recycles and transforms land. This is broad spectrum economic activity and also meets the much wider definitions either used or implied in national economic development policy. That Policy specifically recognises the multiple dividends from new housing and it would be helpful if the NDF did that too.

This point is connected to the third general concern which is the draft NDF's **general treatment of housing**. As it stands there are very few references to housing, and where it does appear, the focus is mainly (if not solely) given to current definition compliant affordable housing. Whilst this is important, it does not mean that other forms of housing (which under any analysis will account for the majority of new homes built over the NDF period) should be ignored. A policy should be introduced which encourages all forms of housing where they meet the draft NDF's other locational guidance and which recognises the multiple (and fundamental) social, economic and environmental benefits that new housing delivers.

## 16. Are you...?

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