

# DRAFT NATIONAL DEVELOPMENT FRAMEWORK

REPRESENTATIONS ON BEHALF OF BOVIS HOMES  
NOVEMBER 2019

## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by Walsingham Planning Ltd (WP) on behalf of Bovis Homes Limited (Bovis Homes) and relate to consultation on the Draft National Development Framework (hereafter referred to as the Consultation Paper).
- 1.2 Bovis Homes is one of the UK's leading home builders with a reputation for building high quality new homes. Bovis Homes is not simply a land promoter, it is first and foremost a builder with an enviable track record of delivering new homes, making 3,759 completions in FY2018. Bovis Homes has active interests in South Wales where it is seeking to deliver homes in sustainable locations connected to existing towns. It has specific land interests at Monmouth, Chepstow and Magor Undy.
- 1.3 For many years demand for housing has outstripped supply in Wales, with the rate of housing delivery failing to meet the Welsh Governments own assessment of need<sup>1</sup>. As a result, one of the key issues facing Wales is the need to increase housing delivery. The National Assembly's Research Service wrote in their publication Key Issues for the Fifth Assembly:
- “Wales is not building enough homes. An inadequate supply of housing has a negative impact not just on an individual's welfare, but on a nation's economic wellbeing. That is why increasing housing supply should be a high priority for the new Welsh Government.”*
- 1.4 The principle of increasing the delivery of new homes is a good thing. New homes are essential to ensuring that everyone has access to secure, quality homes that they can afford. They also generate growth in the economy and create jobs. Not having enough homes restricts labour market mobility, raises business costs and exacerbates inequality, all of which constrains economic growth and social mobility.
- 1.5 It is against this context and within its capacity as a house builder that Bovis Homes comments on the Consultation Document and those policies of relevance to the delivery of homes. These comments are made specifically in relation to Bovis Homes land interests at Chepstow, we will therefore comment in more detail on the South East Region, in which Chepstow is located.
- 1.6 For ease of reference these representations have been structured as per the Consultation Response form submitted alongside this document.

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<sup>1</sup> Welsh Government. New House Building in Wales series

## 2.0 NDF OUTCOMES (CHAPTER 3)

- 2.1 The 11 Outcomes set out in the Consultation Document each represent an important component of achieving sustainable growth. However, the outcomes fail to recognise and clearly articulate the pressing need to increase housing delivery. As we set out above, one of the key issues facing Wales is the need to increase housing delivery and we will comment on this issue in more detail in later sections. What is clear is that the planning system plays a central role in the delivery of housing and increasing housing delivery should be a central outcome of the NDF. Bovis Homes consider that the 11 outcomes set out in the consultation document do not reflect this in a clear and unambiguous manner. We would suggest that a further outcome is added that states:

**“Everybody has access to a secure and quality home that they can afford. Housing delivery will increase to meet the objectively assessed needs of communities.”**

- 2.2 In addition, we would also suggest that Outcome 1 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”.**

### 3.0 SPATIAL STRATEGY (POLICIES 1-4)

- 3.1 The Consultation Document does not contain a clear high-level policy that sets out the 'Spatial Strategy' and provides a clear guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. The Integrated Sustainability Appraisal states that the 'Spatial Strategy' of the NDF is the overall approach taken to the distribution and location of development, which emerges from its policies. The high-level spatial policies would appear to be Policies 1- 4. However, we consider that these policies constitute a set of guiding principles rather than a clear spatial strategy. The Consultation Document does contain a key diagram on Page 25 that is entitled Spatial Strategy. However, there is no explanatory text related to the diagram and it is unclear how it is meant to be interpreted and what status it holds.
- 3.2 As we understand it the 'Spatial Strategy' focuses on growing urban areas by promoting higher density urban development, in order to protect the countryside from development pressures. It divides the country into three regions, which will in turn be subject to Strategic Development Plans (SDPs). Within these regions it identifies three main urban clusters of cities and towns around which three national growth areas are identified. It also identifies a range of regional centres as focal points for commercial and public services in their areas. Notwithstanding our concerns with this 'Spatial Strategy', which we will discuss below, we consider that the NDF would benefit from a high-level policy that sets out a clear Spatial Strategy. We will comment further below on high-level spatial policies specifically relevant to the location of housing.

#### Policy 1: Sustainable Urban Growth

- 3.3 In effect the 'Spatial Strategy' is to prioritise brownfield development and promote higher density development in areas with good access to public transport, jobs and services, as defined by Policy 1. The supporting text on Page 27 states that these principles are applicable to town and cities with good public transport links throughout Wales. Prioritising brownfield land and supporting sustainable patterns of development is at the core of the Welsh planning system as set out by Planning Policy Wales 10 (PPW10). Bovis Homes supports the principle of prioritising brownfield land and focusing development on existing settlements with good access to services and amenities. However, it is concerned that the 'Spatial Strategy' in the Consultation Document places an overreliance on brownfield development and does not provide a clear framework for sustainable greenfield development.
- 3.4 As we have noted above, over the last decade Wales has consistently failed to build enough homes. At the same time the preference for the re-use of brownfield land has been a central feature throughout the various editions of PPW. Whilst it is right that brownfield land is the first place to look, a strategy that relies solely on brownfield land will not provide the increase in housing delivery required to address historic undersupply and issues of affordability.

- 3.5 For a further example of this, we can look at the experience of planning in Greater London. Since the first London Plan was published in 2004, its strategy has been to prioritise brownfield land and optimise development densities, whilst rigorously defending the Metropolitan Green Belt that prevents London from expanding. Yet despite the priority given to brownfield land and optimisation of development, repeated in each subsequent round of the London Plan for over 10 years, this strategy has consistently failed to meet housing targets<sup>2</sup>. The result has been a well-documented increase in housing costs and a consequent affordability crisis that means the average London home costs more than 12 times the average London wage<sup>3</sup>.
- 3.6 PPW 10 sets out the priority that spatial strategies must give to brownfield land but also provides a sequential test for identifying sites in Local Development Plans (LDPs). It states that consideration should first be given to previously developed land/underutilised sites within existing settlements, then such sites on the edge of settlements and only then should consideration be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements must only be considered in exceptional circumstances.
- 3.7 The Consultation Document does not articulate this sequential test clearly or in its entirety. There are no guarantees that higher density urban growth will provide the increase in housing delivery that Wales urgently needs. Indeed, the evidence both in Wales and Greater London would suggest that it will not. Some greenfield development around existing settlements will be required in order to allow for the sustainable growth of those settlements and to meet local housing need. Whilst higher density mixed use development can be appropriate around urban centres within existing settlements, development on the edge of settlements will often have to take a lower density form to overcome environmental constraints, provide strategic green infrastructure and reflect the market demand for such locations.
- 3.8 As such, Bovis Homes suggests that Policy 1 be modified to read as follows:
- “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. Development that enables the sustainable expansion of towns and cities will also be supported where required to meet housing needs.”

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<sup>2</sup> GLA Monitoring Reports

<sup>3</sup> The Guardian, Revealed: the widening gulf between salaries and house prices, 2 September 2015, based on Land Registry and HMRC data.

#### Policy 4: Supporting Rural Communities

- 3.9 Policy 4 sets out the Welsh Governments support for sustainable rural communities and proportionate growth in rural towns and villages. It states that the future for rural areas are best planned at the regional and local level. Bovis Homes supports this approach and agrees that strategic and local plans should plan positively to meet the needs of rural communities. However, Bovis Homes is concerned about the impact that the top down direction that large swathes of the countryside should be designated as Green Belt will have on the ability to support rural communities and facilitate proportionate growth in rural towns and villages. Villages must be allowed to grow organically, with small quantities of well-designed new homes aimed at local people and the 'Spatial Strategy' that emerges from the policies within the Consultation Document does not support this.

#### 4.0 AFFORDABLE HOUSING (POLICY 5)

##### Increasing Delivery of Housing of All Tenures

- 4.1 As we have previously noted, one of the key issues facing Wales is the need to increase housing delivery. New homes are essential to ensuring that everyone has access to a quality, secure homes that they can afford. They also generate growth in the economy and create jobs. Not having enough homes restricts labour market mobility, raises business costs and exacerbates inequality, all of which constrains economic growth and social mobility. Policy 5 acknowledges the need to increase affordable housing delivery, however, there is absolutely no recognition of the need to deliver market housing alongside affordable housing.
- 4.2 Bovis Homes considers that increasing housing delivery should be a central outcome of the NDF. Whilst delivering affordable homes should clearly be a fundamental part of that, it is not enough that the only policy within the NDF concerned with housing delivery, relates solely to delivering affordable homes. This fails to recognise the importance of market housing and the contribution it makes towards meeting housing needs. Bovis Homes considers that Policy 5 should be modified to apply to all tenures of housing, market included. As it is currently drafted the NDF does not comply with PPW10, which requires planning authorities to develop evidence-based market and affordable housing policies. PPW10 states 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;” [emphasis added]*

- 4.3 On this basis Bovis Homes strongly objects to the Policy 5 as it is currently drafted and would suggest that either the policy is modified to relate to all tenures as follows:

“The Welsh Government will increase housing delivery through partnership working with stakeholders across the public, private and third sectors. The Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised.

Strategic and Local Development Plans should develop strong evidence based policy frameworks to deliver market and affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, they should identify sites for housing development, including affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”

##### Estimates of Housing Need

- 4.4 Alongside the Consultation Document the Welsh Government has published a range of ‘Estimates of housing need in wales’ based on different demographic scenarios<sup>4</sup>. The

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<sup>4</sup> Statistics for Wales. Estimates of Housing Need in Wales by Tenure (2018-based)

central estimate quoted in the Consultation Document 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. However, this estimate is a significantly lower than previous estimates that have been put to the Welsh Government. Whilst we acknowledge that there is much debate regarding the accuracy of estimates of housing need, Bovis Homes is concerned that the estimate of need quoted in the Consultation Document is based on assumptions that suppress the level of need and reflect trends associated with issues of affordability that have prevented first time buyers purchasing their first home.

- 4.5 Research carried out in 2010 by the late Dr Alan Holmans – acknowledged as the UK’s pre-eminent expert in projecting future housing need and demand – suggested that Wales could need as many as 12,000 new homes each year over the period 2006 to 2026<sup>5</sup>. The Public Policy Institute for Wales (PPIW) commissioned a further report by Dr Holmans, published in 2015, which formulated a new estimate of housing need in Wales over the period 2011 to 2031<sup>6</sup>. This report presented two estimates one based on the Welsh Government’s official projections for the growth in the number of households (the ‘principal projection’), the other based on a projection developed by Dr Holmans (the ‘alternative projection’), who argued that the Welsh Government may have under-estimated future growth in the number of households.
- 4.6 Based on the principle projection, Dr Holmans estimated that in the period 2011-2031, an additional 174,000 houses or flats will be needed, which equates to a need for 8,700 new homes each year. The principal projection is based on data for the rate of household formation between 2001 and 2011. During this period, household formation was lower than historic trends, with the consequence that the projections which flow from these data are also lower than previously expected. A significant factor in the rate of household formation is the relative affordability of housing, with a high disparity between house prices and income meaning many first-time buyers are unable to purchase their first home. The alternative projection gives a higher estimate of need and demand: 240,000 units over the period, or 12,000 a year. The alternative projection assumes a higher household projection than the principal projection on the basis that eventually there will be a return to ‘trend’ as issues of affordability are addressed.
- 4.7 When viewed against the historic shortfall in housing delivery, the idea that housing need has decreased significantly since Dr Holmans research in 2010 is not credible. Housing delivery fell away sharply following the 2008 worldwide financial crisis and ‘credit crunch’. It remained at around 5,500 homes a year between 2010-11 and 2012-13 before rising steadily between 13/14 and 14/15 to a post-crash peak of 6,900 but has remained below 7,000 since. Therefore, whichever estimate of housing need is

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<sup>5</sup> Holmans, A and Monk, S. (2010) *Housing Need and Demand in Wales 2006 to 2026*.

<sup>6</sup> Future Need and Demand for Housing in Wales (2015)



used there has been a consistent shortfall in housing delivery, which can only have exacerbated need.

- 4.8 As we noted previously, housing estimates will always be subject to debate, they are estimates after all. However, it is worth considering a statement made by the Housing Minister Julie James when the housing need estimates were released in January 2009:

*“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.”*

- 4.9 On that basis, we would suggest that the NDF should include a 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 an important point because as currently referenced the housing need figure could be misread as the housing target for Wales.

#### Delivering Affordable Housing

- 4.10 One of the most obvious consequences of not building enough homes year on year is the widening gap between income and house prices. According to figures published in 2018, more than 60,500 households are on social housing waiting lists in Wales, a situation Shelter Cymru describes as a housing crisis. The Consultation Document is clear that the delivery of affordable homes should become a key focus of housing delivery and Bovis Homes supports this in principle. However, Bovis Homes considers that to increase the delivery of affordable housing, the overall rate of housing delivery must be increased.
- 4.11 The Consultation Document suggests that 8,300 additional homes a year are needed, throughout 2018/19 to 2022/23, of which 4,400 should be market housing and 3,900 affordable housing. These stark figures indicate a need for almost half of all dwellings in Wales to be provided as affordable housing. By comparison, in the 20 years from 1999/2000 to 2018/19, affordable housing constituted only 11% of all completions<sup>7</sup>. As such, there is no evidence to suggest that such a high proportion of affordable housing can be delivered using existing mechanisms, given that a substantial proportion of affordable housing is delivered through s106 agreements where viability considerations limit the proportion of affordable housing that can be provided. Bovis Homes is concerned that if these figures were to be translated directly into SDPs and LDPs, it would choke off delivery of all types of housing by rendering development unviable.
- 4.12 Policy 5 seeks to increase affordable housing delivery by ensuring that funding for affordable homes is effectively allocated and utilised. Bovis Homes supports the effective utilisation of funding to increase affordable housing delivery, which can help

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<sup>7</sup> Lichfields. Planning Matters – Welsh Government Housing Need Estimates by Tenure

de-risk developments and speed up delivery. However, it is not clear whether the amount of funding required to deliver the increase in affordable housing has been quantified and will be available.

- 4.13 The Welsh Government has asked an independent panel to review affordable housing supply in Wales. The panel found that in 2017/18 the average grant approved per general needs social rented homes in Wales ranged between £70k and £85k. The Panel found that overall, 1,641 homes were being provided in that period for a total grant of £125.9m at an average grant of £76,739<sup>8</sup>. During 2017-18 a total of 1,198 new social sector dwellings were completed<sup>9</sup>. Based on the above figures we estimate that additional grant funding of between £189m and £230m would be required to meet the estimate of affordable housing need quoted in the Consultation Document.
- 4.14 The Panel considered how to reform the grant system to ensure that funding is effectively allocated and utilised. The Panel found that if Wales could achieve a reduction in the average level of grant per home by c.15% or £11.5k – to an average of £65,200, it would equate to an increase in supply from 130 homes to 150 homes for every £10m of grant funding. Even so, if grant funding was to be used to deliver the uplift in affordable housing required from the 2017/18 figures, an additional £180m would be required.
- 4.15 Bovis Homes considers overall housing delivery must be increased to help deliver additional affordable housing through both s106 agreements and funding. There is simply no evidence to suggest that the delivery of 3,900 affordable homes per annum would be feasible under a requirement for 47% affordable housing. However, it would be more likely as a smaller proportion of a larger overall housing requirement. As previously noted, reliance on the 2014 projections would have the undesired outcome of 'baking in' low household formation trends associated with the lack of housing supply and consequent affordability issues. A more ambitious overall figure is required if the NDF is to drive a return to rates of house building not seen for almost 20 years and deliver an increase in the rate of growth of affordable housing. Moreover, consideration must be given to the links between homes and jobs, which are so important for the functioning of sustainable communities. Again, this will rely on moving away from past trends (which are reflected in the 2014-based household projections) to result in different outcomes in the future.
- 4.16 Across the border, the Government remains committed to their target of delivering 300,000 new homes a year in England. For Wales a proportionate target based on population would be 14,000 new homes a year. This is admittedly a crude estimate, but it serves to illustrate how low the figure put forward in the Consultation Document is in comparison. A more evidentially justified approach would be to utilise the 'alternative projection' suggested in Dr Holmans 2015 research, or at least the methodology behind

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<sup>8</sup> Independent Review of Affordable Housing supply

<sup>9</sup> Statistics Wales. New House Building April 2017 to March 2018

it. As a proportion of the 12,000 homes suggested by the 'alternative projection' the delivery of 3,900 affordable homes would equate to 32.5%, a proportion closer to that which can be found in many adopted LDPs.

- 4.17 On that basis, we would suggest that the supporting text for Policy 5 is re-drafted to reflect the 'alternative projection' or a similar estimate of need that assumes a return to trend on household formation to arrive at a higher overall estimate of need of which 3,900 affordable homes is a lower proportion.

## 5.0 GREEN INFRASTRUCTURE (POLICY 8)

- 5.1 Bovis Homes' sites are subject to extensive ecological assessments. The ecology assessments include an evaluation of the suitability of habitats for protected species and proposals to mitigate the impact of the development and incorporate biodiversity enhancements. Open space and green infrastructure form an integral part of Bovis Homes developments. As such Bovis Homes supports Policy 8 and the identification of:

*“opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.”*

- 5.2 The provision of strategic green infrastructure as part of development proposals can make land that currently has limited public accessibility, accessible to residents of existing and future communities. It can also result in net biodiversity gains on greenfield sites of limited ecological interest. Such opportunities often exist on the edge of existing settlements and result in lower density forms of development. This should be considered within the context of our comments on Policy 1, which only provides specific support for higher density and mixed-use development.

## 6.0 DISTRICT HEAT NETWORKS

- 6.1 Bovis Homes recognise that district heat networks (DHN) can form part of a package measures to reduce the carbon footprint of developments. The characteristics of DHN's lend them well to dense areas with a mix of residential and non-residential buildings as it creates a more stable heat load profile all year long <sup>10</sup>. On that basis the identification of priority areas for district heat networks in the consultation document should assist the growth of DHN's in Wales. However, the establishment of district heat networks can be complex with a number of technical and non-technical barriers that must be overcome. They can also have an impact on scheme viability that must be weighed against other policy objectives such as the delivery of affordable housing. On that basis we would suggest the following modification to the wording of Policy 14:

*"Within Priority Areas for District Heat Networks, planning authorities should identify opportunities for District Heat Networks and ensure they are integrated within new and existing development **where feasible and viable.**"*

- 6.2 As noted above DHN's tend to be most suitable in dense areas with a mix of uses and the identification of priority areas is logical within that context. However, Policy 15 is not linked to those priority areas and would suggest that the feasibility of DHNs should be considered for any large-scale mixed-use development, which is defined as 100 dwellings or more. In our view DHN's are more likely to be feasible on much larger, high-density mixed-use developments. On that basis we would suggest the following modification to the wording of the fourth paragraph of page 43:

*"As a minimum, proposals for large scale, mixed use developments of ~~100~~ 500 dwellings or more should consider the potential for a District Heat Network. There is also potential for them below this threshold."*

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<sup>10</sup>The Association for Decentralised Energy - Market Report: Heat Networks in the UK January 2018

## 7.0 THE REGIONS (POLICY 16)

7.1 Through the preparation of the Planning (Wales) Act 2015, the Welsh Government initially identified three potential SDP areas that were more restricted in geographical scope: Cardiff; Swansea Bay and A55 Corridor. However, the strategic and political landscape evolved, and three regional areas were subsequently identified:

- North Wales.
- Mid and West Wales.
- South East Wales.

7.2 Policy 16 of the Consultation Document sets out the requirement for Strategic Development Plans (SDPs) to come forward in each of these three region areas. It sets out what an SDP should contain and in doing so provides a clear scope for the preparation of the documents, which is welcomed. However, it is not clear how the level of policy detail; required will be achieved and more importantly when. 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.

7.3 Chapter 5 of the Consultation Document contains a key diagram and policies for each region to provide direction for the preparation of SDPs and LDPs. Bovis Homes is concerned that there is no real explanation of the key diagrams and that they could be interpreted too literally. This is of particular concern in relation to the identification of new Green Belt, which we shall comment on further below.

## 8.0 SOUTH EAST WALES (POLICIES 27-33)

### Spatial Strategy

- 8.1 The South East Wales region identified in the Consultation Document is a diverse regional area that comprises 10 local authorities. Despite being the smallest region in terms of area, it is home to almost half of the population of Wales and includes the capital city Cardiff. The policies contained within the chapter on South East Wales outline a strategy that is focussed on the major urban areas of Cardiff and Newport, identifies the Heads of the Valleys area as a priority area for regeneration and investment, requires the identification of Green Belt around Newport and the eastern part of the region and supports development in Centres of Regional Growth (Merthyr Tydfil; Pontypridd; Caerphilly; and Bridgend).
- 8.2 Bovis Homes is concerned that there is an inherent imbalance in this strategy. It relies heavily on brownfield regeneration in Newport being able to deliver significant housing. However, as previously noted there is no evidence to suggest that such a strategy will deliver the increase in housing needed. It also fails to recognise the important role of Monmouthshire in the east of the Region.
- 8.3 The Severn Estuary is a key feature in the region, yet it is barely mentioned in the Consultation Document. There are a number of strategically important crossings that provide key routes for movement of people and goods across the border, which are only given minimal recognition in the key diagram. The Consultation Document is silent on the important economic relationship between the South East of Wales and the South West of England, in which the Severn crossings play a key role.
- 8.4 Located on the Severn Estuary at a key strategic location close to the national connections afforded by the crossings, is the thriving market town of Chepstow. Chepstow is one of the main settlements in the County of Monmouthshire and was identified in the Wales Spatial Plan (updated 2008) as a key settlement in the South East Wales Area. With a population of over 12,000 people, it may not be as large as the other Centres of Regional Growth in the South East, but it is comparable in size to Centres of Regional Growth in the other regions. It is served by both local and national bus routes and a railway station with direct connections to Cardiff, Newport and Gloucester. Importantly Chepstow will form part of the Cardiff Capital Region Metro system with significant investment in Chepstow station scheduled from 2025.
- 8.5 With the removal of the Severn crossing tolls and the planned investment in the rail station and system, Chepstow is becoming an increasingly attractive location that affords good access to Cardiff, Newport, Bristol and Cheltenham. It is attractive to not only commuters but also businesses that operate across the national boundaries providing potential for meaningful economic growth. Bovis Homes considers that the NDF should support and promote this growth by identifying Chepstow as a Centre for Regional Growth.

### Green Belt (Policy 30)

- 8.6 Policy 30 requires the identification of green belts in South East Wales through an SDP. The Consultation Document states 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.”* Bovis Homes is concerned that this area as indicated on the key diagram, if translated directly into policy, would place an insurmountable constraint on meeting housing need in the east of the Region. If the diagram is providing a broad and indicative area of search for new Green Belt, this should be clearly stated.
- 8.7 As currently shown, the area includes a significant portion of Monmouthshire, which would impede growth in an area of high demand strategically located between Newport and Bristol. It would appear to cut across a number of key settlements including Chepstow and Cwmbran limiting their potential to grow and contribute to housing delivery. It would also make it particularly difficult for rural communities to meet local housing need.
- 8.8 Bovis Homes objects to the principle of Policy 30 and the identification of new Green Belt at a time when the Country is faced by an acute shortage of housing and a pressing need to increase housing delivery. It is an unnecessary policy exercise and burden when the aim of preventing development in open countryside can be achieved through conventional SDP and LDP policies such as settlement boundaries and prioritising brownfield land in site selection. The characteristic permanence of Green Belt makes it by definition inflexible, reducing strategic options should the push for higher density urban growth not yield the amount of new housing needed.
- 8.9 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:
- ‘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’.*
- 8.10 The Consultation Document and the evidence base published alongside it have not met this high evidential bar. They have neither set out the demonstrable need to protect the urban form nor why normal planning and development management policies would not provide the necessary protection. In our view, the soundness of any subsequent SDP identified Green Belt would be undermined by the fact that it is based on a requirement in the NDF, which itself is unsound.



## 9.0 CONCLUSION

- 9.1 Bovis Homes is concerned that as currently drafted the NDF does not provide an effective framework for delivering the homes that Wales needs to address issues of affordability and promote a strong economy. In particular, the complete disregard for market housing and the unjustified requirement to identify Green Belt would, in our opinion, render the NDF contrary to PPW10 and unsound. This is of particular concern as 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'.
- 9.2 Overall it is felt that the NDF could be a useful addition to the development plan documents in Wales. However, the Consultation Document is quite precise in some areas (e.g. growth in certain urban areas) but vague in others and completely silent on some (e.g. market housing). 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.

## **Consultation Response Form**

Your name	<b>Russell Smith on behalf of Bovis Homes Limited</b>
Your address	<b>Walsingham Planning, 1 Gas Ferry Road, Bristol, BS1 6UN</b>
Preferred contact details (email/phone/post)	<b>russell.smith@walsingplan.co.uk</b>
<u>Organisation (if applicable)</u>	<b>Walsingham Planning on behalf of Bovis Homes Limited</b>

## 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:

See Section 2 of attached representations.

## 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 checked="" 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:

See Section 3 of attached representations

### 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?

See Section 4 of attached representations

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

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

See Section 6 of attached representations

## 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 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.

See Section 8 of attached representations.

## 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?

See Section 9 of the attached representations.

**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"/>
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