

**From:** [Kim Davies](#)  
**To:** [NDF](#)  
**Subject:** MHA and Monmouthshire PSB Response to NDF  
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**Attachments:** [image002.jpg](#)  
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[MHA\\_Final \(to be submitted 15.11.19\).docx](#)  
[NDF\\_Summary\\_Response\\_.docx](#)  
[PSB\\_Final \(to be submitted 15.11.19\).docx](#)

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Good afternoon

Please find attached both the Monmouthshire Public Services Board and Monmouthshire Housing Association response to the NDF.

Please also find attached a summary of the main points.

Warm regards

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## NDF consultation response – summary points

### **1. Monitoring and evaluation framework/NDF outcomes and policies:**

- The NDF isn't ambitious enough for Wales and it's too inward looking.
- There are massive issues around deliverability of the outcomes and policies that the NDF just doesn't cover. The evidence base for deliverability is very weak.
- The NDF lacks any kind of detail on how outcomes will be measured.
- Most of the outcomes are not really outcomes, they're more visionary statements.
- It's not clear how targets in relation to decarbonisation and affordable housing in particular will realistically be delivered.
- The current position from Welsh Government to have a plan led framework is detrimental to the provision of housing. The lack of flexibility to allocate other sites during each plan period will result in targets not being achieved.
- The NDF ignores Monmouthshire's strategic position.
- The NDF gives no understanding or guidance on how to prioritise competing outcomes and policies.

### **2. Green belt/affordable housing/funding/land:**

- The green belt is too expansive and limits development. It will have serious negative implications for rural communities, including meeting health and social care and economic development.
- Seemingly no real evidence base has been used to inform the green belt in South East Wales. Under Monmouthshire's current LDP, the previous green belt was rejected by the Planning Inspector because of the potential impact. The NDF green belt won't be checked by an independent inspector. Arguably higher quality landscapes are also north of the current proposed green belt.
- The green belt in NDF circumvents planning policy. It also contradicts NDF policies to develop affordable housing, including in rural areas.
- The green belt should be smaller and further north to cover areas with more amenity value e.g. between St Arvans outside Chepstow to Llanfrechfa in the West and from Little Mill to Monmouth.
- Limiting development and stagnating communities will encourage crime in Monmouthshire. It will also place increased pressure on social and health services, which can't be shored up by families/social networks. Vulnerable people will suffer the most.
- ISA objectives 11 – asks will the NDF create opportunities to reduce levels of crime and fear of crime? But the NDF pays no attention to crime at all.
- The lack of affordable housing will curtail the foundational economy and this is big concern, as Monmouthshire is already struggling to recruit and retain a social care workforce.
- There could be issues with disabled facilities grant and more households being forced to move further away from family and social networks because of the size of the green belt.
- Monmouthshire will increasingly become the preserve of the wealthy under the current NDF.
- There is a worry that curtailing affordable housing/the lack of understanding connected to developing affordable housing will increasingly promote political instability in Wales.

- Restricting affordable housing development means Wales will make poorer use of existing housing stock being currently under-occupied.
- Lack of affordable housing equates to poorer job opportunities.
- Developing in Monmouthshire could help to ease traffic congestion in the region.
- There needs to be better understanding of land availability and continued work undertaken by the Welsh Government to keep viable development land affordable.
- The NDF should incorporate consideration of compulsory purchase orders.
- It should be open to new housing developments where reasonable/viable. Prohibition of new settlements goes against PPW10.
- Provision for older people/rural need: all areas need at least some provision to grow and develop and not stagnate. Limited long-term thinking counter-acts the Wellbeing of Future Generations Act.
- The proposed green belt is highly likely to push up house prices in Monmouthshire.
- The decarbonisation agenda should be embedded much more in each of the policies 1-4 (spatial strategy).
- Poor consideration is given to the reality of delivering affordable housing – funding and local and regional context. There seems to be limited understanding of the barriers to delivering affordable housing.
- There is small recognition of open market housing development. Yet the main house developers make a vital contribution to affordable housing delivery.
- Developing public land with 50% affordable housing will be extremely difficult to do in Monmouthshire at the moment - most of their land is located within the proposed greenbelt.
- There's no detail on future funding for affordable housing. To maintain affordable housing, social housing providers need funding and a new model of housing affordability.
- The logical sequence should be to finish the NDF, cascade to and finish strategic development plans and then complete the local development plan. At the moment LDPs are expected to progress ahead of the NDF and SDP.

### **3. Mobile action zones:**

- Improved connectivity helps staff to work more efficiently and reduces our carbon footprint by limiting travel requirements.
- Telecoms companies are going to have to be willing investors to progress this policy.

### **4. Low emission vehicles:**

- Detail on how the infrastructure will be developed in parallel to low emission vehicles is lacking, as is any focus on public subsidy. Although the NDF does say a strategy for electric charging infrastructure will be developed. The NDF expects business and industry to drive much of the roll out of charging infrastructure. But state intervention/funding is probably essential to start momentum e.g. as with solar panels and wind farms.
- Welsh Gov expects business and industry to drive much of the roll out of the charging infrastructure. But the massive cost for businesses is not considered in the NDF.
- There's no recognition of how the grid will cope with increased demand for electricity.
- There's also no mention of hydrogen fuel cell technology in the NDF.

- The NDF seems to hold virtually no detail/concept of deliverability on this policy. For example, electric cars currently account for less than 1% of new sales in the market.
- There's no consideration giving to the environmental impact of actually building the new vehicles, tech and infrastructure and how to off-set and mitigate the impact.

## **5. Green infrastructure:**

- There should be more recognition in the NDF that development supports conservation.

## **6. District heat networks/on shore large scale wind/solar development/energy infrastructure:**

- District Heat Networks (DHN) have historically been fraught with problems: as well as power outages they can be expensive to maintain.
- DHNs are not a sensible option for Monmouthshire. It's not mapped for DHNs and issues such as fuel storage, transport and the increased emissions from burning fuel – means for Monmouthshire the most effective approach to lower carbon emissions is through wind and solar.
- Planning and funding for wind farms needs to be improved. Any developments in would have to go through strict planning. Expedited planning also needs to take place. A new TAN should be created to expedite planning. Land Planning submissions – need to be submitted within the next 2 years.
- The NDF makes no mention of supporting energy generation from tidal power via the Severn barrage.
- The proposed spatial strategy for allocating suitable areas in the NDF for wind energy is too limiting in terms of the massive need to decarbonise the Welsh economy. None of the priority areas are in Monmouthshire.
- We support a criteria based approach to the planning of wind farms.
- There needs to be a fairer rate to buy back electric to encourage companies to use solar and wind. Battery storage technology also needs to be improved too.
- How will the grid be able to cope without massive investment? Massive national enterprise and capital investment in the infrastructure is needed now.

## **7. Welsh Language:**

- The cost to businesses of integrating the Welsh language into services needs to be given proper consideration along with how the impact of this could be further improved by financial support from the Welsh Government.

## **8. Transport/Regional Connectivity/Economy:**

- There's limited connection between Monmouthshire and the Metro.
- The Metro doesn't go far enough. Developing more affordable housing in Monmouthshire means there is a need for far better transport links.
- Understanding of Monmouthshire's strategic position in relation to transport/economy/developing jobs is extremely poor in the NDF.
- The emphasis on South East Wales' interconnectivity with other strong city economies is virtually non-existent in the NDF. For example links to London

and Bristol are mentioned only once in passing and only in relation to Newport.

- Inter connectivity should also be shown between SE Wales region and England and Mid Wales. The M4 connectivity is shown but surprisingly (given the significant public investment and importance to the valleys) the heads of the valleys route is not shown.
- Alignment with economic aspirations is also poor e.g. Cardiff City deal. The NDF does not reflect committed strategies for economic growth and regeneration.
- There is hardly any attention given to the reality of developing in Newport e.g. many of the brownfield sites have been developed in recent years.

## Consultation Response Form: National Development Framework

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

MHA has held discussions with several other agencies we work with to inform this response. Over the last two months we have reflected a great deal with colleagues on the points we want to raise, recognising the magnitude of the NDF for both Monmouthshire and Wales' future. Our hope is that our feedback leads to very real changes to the draft NDF before it is placed before the Senedd.

We welcome the document and its aspirations but are disappointed in its lack of ambition. For Wales to truly thrive as a dynamic region within the U.K. and Europe, the levels of economic activity required will not be delivered by this plan. The seeds are there but the means to achieve success are too limited. To achieve the wellbeing objectives set by the Monmouthshire Public Service Board (PSB), partners are working collaboratively to create future development and investment opportunities in Monmouthshire. But being open and realistic, the NDF 2020-40 neither provides significant development opportunities nor assurance of future investment in Monmouthshire.

StatsWales projects that Wales' population will grow by 3.6 per cent over the 2018-2038 period. Whereas – The Republic of Ireland – a significantly richer country already and one of our nearest economic competitors is projected to grow by 16.4% during the same timeframe according to Central Statistics Office data. Not only will it grow much faster demographically, but a significantly larger proportion of the population will be economically active. We fear the rates of growth and the plans in the NDF will consign Wales to a slow economic and demographic death during the lifetime of the NDF. To match our competitor's

levels of growth, whilst doing so sustainably, is well within the means and ambition of Wales. As a country if we aim low and set low targets it could encourage an expectation where we mightn't even meet them.

Considering the outcomes overall, their content is clearly valid and informed by a large amount of research, carried out over a significant period of time. However, the objectives themselves seem more like visionary statements than specific and measureable outcomes. It's not clear at this stage how the objectives will be consistently monitored and success measured. It is also difficult to decipher the specific actions that will need to be taken to drive the NDF outcomes (and policies) forward. Realistically, for example, what exactly needs to take place between now and 2030 for 70 per cent of electricity consumption to be generated from renewable energy? Is the NDF covering that and is it going to make it happen? Meeting that target will involve significant and rapid planning decisions in the next few years due to lead-in times to improve energy infrastructure. As a country are we ready and prepared to make the very difficult but necessary decisions to achieve this and other targets? The grid north of the A465 road – cannot support this target at the moment, will the necessary planning decisions be made in time to bring the necessary infrastructure to the area?

We want to draw attention to the near insurmountable challenge of decarbonising power, heat and transport in time to meet the carbon reduction targets. To achieve those ambitions will necessitate an open, non-restrictive spatial planning approach. Prescribing Energy Priority Areas is likely to be too limiting; a more, open, criteria-based approach to renewables is what is needed.

Decarbonisation should not be limited to places of habitation as stated but to all regions of Wales which will have a role in addressing global heating and the climate crisis, and which is especially likely to include rural areas. Decarbonisation will arise from the utilisation of non-inhabited areas for renewable energy and energy storage, for example. It is suggested that revisions are made that explain the contribution that all regions, regardless of places in which people live, need to make to the decarbonisation agenda and efforts to halt global heating.

The NDF is not sufficiently clear on how we will achieve many other aims either. Whilst it's appreciated the NDF is a national-scale document, ideally clearer detail should be provided to guide the social, private and third sector to achieve the outcomes. Condensing and making clearer specific actions that need to take place to achieve the NDF seems like it would encourage more buy-in and make delivery of the NDF more likely. It could also provide clearer criteria to monitor against.

Table 2-9 in the ISA proposes a draft monitoring framework for ISA objectives. Similarly monitoring of the NDF might also be condensed into a table/framework – building on the table at the end of the draft NDF. Monitoring of the NDF objectives and associated documentation should be amalgamated and made as easy to follow as possible. To meet all of the NDF outcomes and policies there will always be a certain amount of capital to available for Wales to invest. We need to ask ourselves what's the most effective way of spending? What's the best way to get the best return on the capital? That is an extremely important consideration, one which can be tracked and measured during the lifetime of the NDF.

Monmouthshire holds the key to unlocking and attracting considerable wealth into Wales. The potential to using the county to tap into surrounding wealth to the benefit of South East Wales and Wales as a whole is being ignored. There is the very real opportunity to use Monmouthshire as a catalyst to redistribute wealth to economically deprived areas, for example in Torfaen, Blaenau Gwent, Caerphilly and Merthyr. There is no need to get caught

up in the Newport 'bottleneck' – a significant barrier to business that is constantly mentioned to us by businesses we engage with in the region. We implore the Welsh Government to think long and hard about the untapped potential for Monmouthshire to be used to attract money into Wales, especially into economically deprived areas. Many households want to live in Monmouthshire, but the NDF does not recognise that fact. Bristol are currently re-zoning large tracts of land for developing. If Wales does not seize the opportunity Monmouthshire represents, wealth may simply move away from the region and Wales. Fundamentally the NDF is constraining localised planning far too much via the imposition of a very large green belt on land with low amenity value in the south of the county.

The NDF in its present form does not exploit Monmouthshire's geographic position. It's no accident that wealthy households have congregated in Monmouthshire over the years compared to surrounding local authorities, commuting outside of the borough to work all the while pushing property prices increasingly higher. That is largely reflective of Monmouthshire's strategic position on the map. Removal of the Severn bridge tolls has boosted businesses in South Wales, with entrepreneurs and businesses relocating from Bristol and the West of England, attracted by the skills level of our population and the good quality of life. Monmouthshire is the gateway to Wales and is the ideal county to capitalise on this increasing wave of business relations to increase the size of the Welsh economy. The greenbelt within the NDF will hamper Wales' ability to do that. There is a collective concern from the Public Service Board (PSB) that the location of the proposed greenbelt covering much of the south of Monmouthshire will limit the ability to deliver the objectives within the well-being plan in its current form. We are not opposed to having a greenbelt within the county but have many concerns about the implications for Wales due to its scale and location.

The development/planning system, is predicated on robust evidence showing viability and deliverability – which the outcomes are lacking. The NDF is setting outcomes that Strategic Development Plans (SDP) and Local Development Plans (LDP) will need to conform to. This could lead to a conflict between the NDF and the evidence based SDPs and LDPs that could seriously hamper development plan preparations. Where is the evidence, for example, that that NDF outcomes and policies will integrate with key localised evidence bases such as local Housing Market Assessments?

The link between Wrexham and Deeside in North Wales to adjacent city regions is well documented in the NDF, but the link between South East Wales and the far wealthier city region in Bristol – the city with the highest Gross Value Added (GVA) in the UK south of Birmingham and outside of London – barely merits a mention. Incredibly London is mentioned only once in the entire NDF, where it's acknowledged the South East area benefits from established rail and road links with London. Regional connectivity and economies must be considered further and better reflected between the South East Wales region and England and Mid Wales. We cannot stress that enough. To do otherwise would mean the NDF neglects areas of massive strategic importance for the future. There should be a much stronger focus on how economic and transport links will be maintained and enhanced.

There are many elements to the NDF and a number of objectives (several of which will compete with each other at times). Seemingly all hold the same priority status. At the moment it's difficult to know if any given objective is more important than another. Priority status could also be reflected in monitoring framework.

## **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... Urban areas (Policies 1, 2 & 3)

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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- To what extent do you agree or disagree with the spatial strategy and key principles for development in... Rural areas (Policy 4)

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Monmouthshire is largely a rural County and we agree SDPs/LDPs should plan positively to meet the needs (including housing) of rural communities. Policy 4 notes that *'the future for rural areas are best planned at the regional and local level'*. However, the large green belt that the NDF proposes through Monmouthshire completely contradicts that point.

The NDF explains the green belt is for *'managing and planning urban growth'*. Although it's not clear what evidence has been used to inform the proposed green belt, which will prevent the ability to wholly *'meet the needs of rural communities with regard to housing'* in Monmouthshire. Designation of a greenbelt is a major long-term policy decision that must be based on robust evidence. Policy Wales edition 10 (PPW10) also states that before designating land around an urban area as green belt land, the local planning authority must consider and justify it. The Welsh Government appears not to have considered the permanence and restrictive nature of the proposed greenbelt within South East Wales. For Monmouthshire, its extent will mean a significant barrier to development across a large swathe of rural Monmouthshire.

It's important to note that when Monmouthshire's current adopted LDP was considered at deposit plan stage – a far smaller green belt was incorporated and subsequently rejected by the Planning Inspector at plan examination. The permanence of the greenbelt and its harm to the vitality and viability of communities in Monmouthshire was recognised by the Inspector. These issues are equally applicable to the far larger greenbelt now proposed affecting the whole of Severnside and beyond. Very careful consideration should also be given by the Welsh Government to emerging development plans in Bristol where the authority is now seeking to de-designate parts of the greenbelt because it has overly constrained growth.

In principle we do not oppose a smaller and re-positioned green belt. The reality is the belt is too large and too far south at the moment. It should be smaller and further north to cover areas with more amenity value e.g. between St Arvans outside Chepstow to Llanfrechfa in the West and from Little Mill to Monmouth. All of the land is of high amenity and visual value and creates a real 'green lung' in Monmouthshire. But there has to be some provision for housing, especially affordable housing. People are living longer and all areas need at least some provision to grow and develop and not stagnate.

The PSB Wellbeing Assessment in 2017 projected that there would be a 27% reduction in people aged 18-24 from 2017-35 for Monmouthshire, a reduction of 15% for those aged 25-35% and an increase of 38% for people aged over 65. If we do not provide affordable housing in Monmouthshire, as younger people are forced to move out older people will become more isolated and as confirmed by our police colleagues Monmouthshire will become more vulnerable to crime.

Monmouthshire has historically suffered from the effects of travelling criminals using the A465/M50 and M4 corridors as escape routes. When there is a healthy mix of people of all ages living in a community there is a natural deterrent to criminals because on the whole younger people do tend to look out for their elderly neighbours and vice versa. Our police colleagues (who have experience and tacit knowledge) anticipate a rise in offences, especially doorstep crime and burglary, should affordable housing developments be unreasonably constrained in Monmouthshire.

Similarly there is a worry that county lines drug dealing could unintentionally be supported too if affordable housing is unreasonably constrained and communities stagnate in Monmouthshire. Also trafficking and modern day slavery encouraged, as vulnerable children and adults are increasingly targeted. We fear those are the very real consequences that await the most vulnerable in Monmouthshire, if we do not develop affordable housing and sustainable communities and Monmouthshire communities stagnate and contract.

An ageing population for Wales will undoubtedly bring opportunities, however, we know that the number of people living with long term conditions who are very often living on their own is going to increase pressure on health, social care and housing services in Wales. Wage levels available for local jobs in Monmouthshire are lower than the average for Wales and the UK. When coupled with the current high property prices and with the limited land currently available for future housing development this makes it difficult for young people to live and work locally. This was one of the most significant issues that emerged from the consultation for the wellbeing assessment carried out under the Wellbeing of Future Generations Act.

Monmouthshire is already struggling to recruit and retain a social care workforce to care for the increasing number of people living with long term conditions. Limiting development would force young families to move outside the area which would accelerate the break-up of family networks and have a negative impact on the PSBs objective to develop a model of care built on wellbeing and looking after each other rather than through formal care provision. We must ensure a supply of affordable housing in the south of Monmouthshire for key workers in the foundational economy. Developing the foundational economy is an important area for the Welsh Government. People who provide the backbone of the local economy (health and social care services) and those working in agriculture should be able to live locally and those on the lowest salaries should not have to commute long distances to sustain those able to afford homes, whose prices will rise as the supply of land is cut off by the proposed greenbelt in the NDF. The only realistic solution to help mitigate the pressure will be where communities, families and social networks step in to shore up services. Without sufficient affordable housing being available in Monmouthshire to form the bedrock of that, it will reduce the opportunity for that to happen.

We have a concern that in some cases the green belt may perhaps limit access to Disabled Facilities Grant i.e. if required extensions can't be built onto properties to address the needs of some households. That mitigates the idea of life time homes and flexibility. It could also impact a household's social wellbeing if they're forced to move home away from their community/family/social networks with, again, the resulting costs passed onto social care and health.

For older settlements to thrive there always has to be an influx of new people. The PSB do not want Monmouthshire to be a 'chocolate box' hideaway and nor should the Welsh Government. We want it to be seen as a vibrant cultural and social destination. The kind of place where you want to raise a family, not go to pass your last days. Quite simply we want Monmouthshire to be an affordable place for younger people to live; whilst also having sufficient provision for attractive older person's provision too. The Welsh Government are constraining Monmouthshire in the NDF and we strongly feel this is indicative of overall development/economic ambitions reflected in the NDF. More consideration must be given to long-term thinking as per the Wellbeing of Future Generations Act. The green belt in its present form will restrict economic growth and jeopardise the maintenance of services and amenities for older people. Yet the NDF states: 'growth in the countryside will be based on what people who live there need and want....we need to get and keep people of working age living in the countryside. This will help us keep and grow services there'. Under the current draft NDF Monmouthshire is going to increasingly become the preserve of the wealthy impacting on the national wellbeing goal of a more equal Wales making it much harder to build sustainable and resilient communities. It is essential that the needs of future generations are also considered, alongside the social sustainability of more rural settlements.

The Welsh Government should consider that if large swathes of families and younger and politically engaged households move from Monmouthshire for example (where their families and social networks are) due to the unreasonable limitations put on affordable housing, there's potential they will become increasingly resentful of both the local and Welsh Government - if they're forced to move into surrounding local authorities. In addition we know many young people of voting age are unable to move out from their parent's homes throughout Wales (often referred to as 'hidden homelessness'). The relatively balanced political stability enjoyed in Wales for many years (which has massively benefitted the social housing sector) could be jeopardised, if affordable housing development is unreasonably constrained over the coming decades.

Restricting affordable housing development in many of our communities, as well as disadvantaging young people, will make it harder for older people to downsize to free up space in under-occupied family homes. Yet extensive amounts of policy decisions taken by the Welsh Government in recent years (such as ending right to buy/right to acquire) clearly advocate making best use of Wales' affordable housing stock.

Providing job opportunities and sustaining community services will require demographically mixed and resilient communities. Employers will be attracted by a workforce, which requires affordable housing that retains younger people and families in areas. The supporting text should be expanded to state that job opportunities, community services and appropriate levels of housing will be supported in rural areas.

By developing more affordable housing we are also particularly interested in attracting high technology clusters to move from Bristol to take advantage of lower land and house prices across the region. However, with current traffic congestion they will not be as willing to move west of Newport at the moment. In connection with transport and economic prosperity the rejection of the M4 relief Road is not reflected in the NDF, yet for everyone in South Wales this is a massive issue. All the NDF says is that, 'the Welsh Government will maintain its commitment to tackling congestion on the M4'. If the plan was more ambitious economically then more homes would be required along public transport routes and arterial routes, both of which exist in good measure in Monmouthshire.

Policy 4 states that strong rural economies support strong and resilient communities, can reduce the need to travel and reduce the reliance on a small number of larger economic

centres. Yet the proposed green belt limits the ability of actors in Monmouthshire to secure viable and sustainable future for many of our rural communities.

The proposed release of additional land is to be welcomed, particularly if land values are adjusted to enable delivery on sites that are currently unviable. However, it's also important that the use of public land is in addition to the identification of other, potentially more appropriate, sites as well. Land needs to be used to its full capacity in Monmouthshire to act as a strategic bridge between Bristol, London and the South East region of Wales. Land viabilities are difficult especially in Monmouthshire. It's important to emphasise that currently most of Monmouthshire Council's land viable for development is located within the proposed green belt in the NDF. There is an opportunity for the NDF to go a step further to support the development of public land by requiring the mapping of all public land.

The PSB is eager to play a part in reviewing publicly owned land to identify further sites for development. The reality in Monmouthshire is that the best way to deliver this to scale and get most value for money is via a new settlement. A prime example of where this has been a success in the South East Wales region in the past is Cwmbran. We need to ask the question why can't this be repeated on a smaller scale in Monmouthshire? We have the land, the finances and the ambition to do it. But most of all we have the location, a sure fire winner for Monmouthshire and Wales.

There also needs to be recognition of the necessity to incorporate the themes of global heating, climate change and decarbonisation in both the urban and rural policies running as a central thread through the above policies.

So overall restrictions to sustainable growth in Monmouthshire fails to address the county's very real issues centred around our ageing demography, housing supply and affordability and the social sustainability of our communities. Ultimately the NDF in its present form will thwart the council's ability to achieve its core purpose of helping to build sustainable and resilient communities. The policy wording relating to the greenbelt should especially be re-written to invite the SDP to consider the need to move and reduce its size. It is imperative that the green belt policy is highly informed and is absolutely right given its status as part of the development plan covering Monmouthshire and given that its inclusion in the NDF will effectively remove independent examination of the green belt.

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

The '*development plan targets based on regional estimates of housing need and local assessments*' is circumvented by the proposed green belt running through Monmouthshire. As already stated the vastness of the proposed green belt will negatively impact the provision of affordable housing to meet local need. Unreasonably restricting development

means that there will be less ability to readdress the supply and mix of housing stock to ensure suitable and affordable housing is available to all demographic groups. That is one of the key actions within the PSB's wellbeing plan and is clearly aligned to policy 5 of the NDF to deliver affordable homes.

The NDF concentrates new development on existing urban areas with no mention of new settlements. Considering higher density regions around the world, such as Singapore for example, this type of strategy makes a lot of sense. However, in Wales it does not when there are large tracts of land ripe for new settlements. Ignoring the potential for any new settlements in Wales is short-sighted. Constantly adding to existing settlements supports poorly planned urban sprawl. Enabling developers to add to towns and cities piecemeal will not, on its own, support many of the intentions within the NDF. Allowing larger new settlements, with supplementary planning can help deliver a real vision in real time. This will be essential in helping ensure the NDF (and other related policies and frameworks) meet social, health and decarbonisation targets – attaining better educational, economic and health outcomes in the process.

One of the best ways to capitalise on Monmouthshire's geographic position would be to be open to the potential for a new town within Monmouthshire. It would be easy to surround a new settlement with green belt with amenity value. Therefore we believe new settlements should be covered within the NDF (providing the opportunity for SDPs to at least consider). The omission of new towns in the NDF rules out the opportunity to deliver sustainable growth in the longer term via the development of new settlements, in contrast to PPW edition 10, which sets out the circumstances where they may be appropriate.

Little consideration is given to the reality of delivering affordable housing. To develop affordable housing, we need adequate funding – a new and more sustainable model to be developed in Wales. There also needs to be a sustainable rent settlement (which should be released shortly) for the social housing sector to make sure rents are affordable and help make future funds available to develop affordable housing. Government funding/subsidy for affordable homes must be effectively allocated and utilised – but the NDF does not indicate how funding will be distributed in the future. It is unclear what assistance there will be in increasing supply of affordable housing during the lifetime of the NDF. It's absolutely essential to get this right because of the Welsh Government's intention to include higher levels of affordable housing in new housing developments. If the expectation is to rely on cross-subsidy the simple reality is that it will make most development sites unviable where 50% affordable housing is required. Delivering homes will also be determined on a local/regional basis and be subject to the scrutiny of independent examination – a massive factor that will affect deliverability along with the funding aspect.

The current position from Welsh Government to have a plan led framework is detrimental to the provision of housing. The lack of flexibility to allocate other sites during each plan period will result in targets not being achieved. There are many flaws and impediments in the forecasting of demand and the ability to deliver existing allocated projects. The 'straight jacket' approach to planning policy will not work and may simply make land more expensive and thus the end product of a poorer quality and unaffordable. Constraining demand will become an inflationary policy.

The need to deliver open market housing does not come through strongly enough in the NDF. Private sector and large volume house builders have a part to play in securing more affordable housing. National House builders' schemes are continuing to bring forward new affordable homes in Wales and this should be emphasised. In relation to the green belt it's important to emphasise that developers want to build and people want to live in the south of Monmouthshire.

The draft NDF does not set a national housing target but it references the central estimate of need from the 2018-based Estimates of Housing Need: 8,300 additional homes per annum from 2018/19 to 2022/23. The estimates are based on the 2014-based household projections. They likely fall short of actual housing need in Wales.

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

We support better mobile and telecommunications coverage. As Monmouthshire is semi-rural, coverage can be an issue, especially when staff are working in the more rural areas. Improved connectivity helps staff to work more efficiently and reduces our carbon footprint by limiting travel requirements.

The county faces issues of rural loneliness and transport deprivation. The PSB has been exploring technology led solutions to make better use of existing resources but poor coverage is a limiting factor.

Close partnership working and collaboration between tele-comms operators and planning authorities will undoubtedly form the basis of moving this policy forward. Both will need to be pro-active and work together. However, the reality is that developing better mobile coverage will largely depend on willing investment by telecommunications companies.

**Policy 7 – Ultra Low Emission Vehicles** - The Welsh Government supports the increasing use of ultra-low emission vehicles. We will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.

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

New development providing ease of access for commuting along major transport corridors, are easier to scale in the south of Monmouthshire. This includes active travel for the first and final parts of journeys, again much easier to achieve from developments in the south making a positive contribution to physical and mental health and well-being. It is important that transport is enhanced ensuring that the Brynglas Tunnels do not become a barrier that

limits people's ability to immerse themselves fully in the language and culture of Wales to the west of Newport. The PSB is acutely aware of the issues around air quality and congestion on the M4 and make ourselves available as a test bed to pilot solutions for the transport service of the future, indeed our well-being plan commits the PSB to develop new technologies for improving rural transport and we have secured over £1m of Cabinet Office funding to progress this.

The NDF expects business and industry to drive much of the development and roll-out of the charging infrastructure. But the massive cost of this is not really considered, with organisations seemingly expected to be entirely willing participants. The Welsh Government has to be realistic of viability of investment; if it's not attractive then businesses won't invest. For example, Monmouthshire Housing Association has capacity to install an additional electric charging point at our headquarters (we currently have two). To do that we would need to upgrade the main switch that feeds the headquarters and we have been advised this would cost anywhere between £10K to £50K.

Rapid state intervention/funding is going to be essential to start momentum and activate and drive markets e.g. see previous photo voltaic panels/wind generation subsidies. Whilst the five councils in Gwent have recently received £458,724.50 to install 73 charge points with 146 individual sockets across the region, much larger scale public investment will be needed to develop the infrastructure to support low emission vehicles. In addition, if charging points are incorporated into new build properties in the future that should also be supported by government subsidy.

If many charging points are developed the electrical grid infrastructure will also have to be developed in parallel. Otherwise there is real concern that it would be able to cope with the massive increased demand for electricity. A 2017 report by the think tank 'Green Alliance' warned that as few as six vehicles charging at the same time, close to each other, could cause localised power drops. However, it's appreciated that future technology may help alleviate this. Smart charging, which intelligently controls when vehicles draw electricity from the grid to avoid peaks and troughs, is one way of managing the situation. It is a developing technology. There is also speculation that in the future car batteries could return power to the grid to help smooth out demand.

The NDF notes that the Welsh Government will set out a strategy for electric charging infrastructure. This must be done as soon as possible to support Policy 7 and must provide the necessary detail to demonstrate how the Policy will be delivered. There needs to be far more detail provided by the Welsh Government – recognising for example that electric cars currently accounting for less than 1% of new car sales.

This work must be carried out rapidly for the government to realistically be in a position to ban petrol and diesel cars. There also needs to be a lot of thought given to the buy-in from consumers/motorists who will be heavily influenced by the cost of transitioning. More detail needs to be provided by the Welsh Government on how that will take place. Whilst there are government grants available for people to have charging points installed at their home address, this may not be a viable option in many cases.

There's also no mention of hydrogen fuel cell technology in the NDF. Toyota, for example, has recently developed a mass production fuel cell vehicle that produces only water from the tail-pipe. Like the development of electric cars, hydrogen fuel cell vehicles will get more advanced over time, with the technology getting cheaper as the range from fill-ups increases. This will make fuel cell cars more appealing to more people, and will help them become more widespread.

Policy 7 should also recognise that the growth of low emissions vehicles is predicated upon decarbonised fuel, whether clean electric or hydrogen, which will need rapid and extensive delivery to meet requirements. To decarbonise transport fuel, substantial capacities of new renewables will be required, meaning policy development towards renewables should not be restrictive in any way. As a further aside any further strategies/plans etc developed by the Welsh Government should also evaluate the environmental impact of actually manufacturing the new vehicles/their components/developing the infrastructure, providing direction on how that impact can be increasingly mitigated and off-set in the future.

## 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>
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The NDF should support greater awareness around development being used to protect conservation. Many off-setting measures can be included from bird habitats to rewilding, adding more biodiversity than will exist in current sites.

Again linking in with the earlier comment on the NDF providing greater clarity on priorities between outcomes/policies – high quality developments should not be refused where they include clear and viable off-setting as part of the development.

Concerning green infrastructure and the green belt there is infrastructure in the south better able to cope with new developments, minimising the residual environmental impact of new settlements on environmental assets such as rivers. The environmental impact of concentrating more development in the north will be higher. Forcing more developments into the north of the county will also take people further away from economic centres and transport infrastructure and would be at odds with NDF outcomes of Wales where people live in places where travel is sustainable.

Appropriate management of land via development reduces the risk of fire and reduces the threat to human and indigenous animal life.

## 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... Large scale wind and solar developments

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using... District heat networks

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
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- 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?

District Heat Networks (DHN) have historically been fraught with problems: as well as power outages they can be expensive to maintain for example requiring back-up generators. Monmouthshire has not been mapped like Cardiff for a DHN.

To meet the ambitions of these policies a national coordinated enterprise is needed now along with capital investment in the infrastructure. For example, land planning submissions for wind farms need to be made within the next 2 years. Expedited planning needs to take place as there has to be 2 to 3 years of wind monitoring beforehand. Ideally we need a new technical advice note for wind farms. So once finance in place planning can be fast-tracked. There should be more clarity on who will pay for the electric infra-structure upgrades needed to accommodate increased generation of wind powered electricity.

The lifetime of solar panels isn't considered and there's also no recognition that their construction may produce more carbon to make than they save.

The renewable energy policies should refer to the opportunities for tidal lagoon power. The region has the second highest tidal range in the world and tidal power represents a huge opportunity for carbon neutral energy production on a large scale. The challenges of bringing forward tidal powered schemes are appreciated and acknowledged, but not including its potential within the NDF seems to be an over-sight. Likewise neither is the potential to also use a tidal powered scheme to mitigate the chance of flooding.

The proposed spatial strategy for allocating suitable areas in the NDF for wind energy is too limiting in terms of the massive need to decarbonise the Welsh economy. Therefore we do not support the allocation of defined spatial areas (Priority Areas) as this approach will be too restrictive and is unlikely to bring about the delivery of sufficient new renewables capacity to decarbonise power and heat generation, and the needs for the clean electrification of transport. We would advocate instead a criteria based approach whereby the majority of Wales, outside of the principal national designations (National Parks, Ramsar etc), should be open for business.

We also believe that, given the current climate emergency, all renewables should be subject to a presumption in favour of development unless major material reasons indicate otherwise. Renewables needs greater policy merit to 'weigh in the balance' given the critical need for new capacity.

The policies as they stand are unlikely to deliver on the 2025 renewable capacity and 2050 near zero GHG emissions targets. They are too limiting and do not reflect the scale of new capacity required.

Monmouthshire Housing Association is part of a consortium of non-traditional players in the renewables sector that is looking into potential de-carbonisation opportunities that would reduce the carbon footprint of our housing stock and activities. We have already explored and delivered what carbon reduction measures in the housing stock we feel are achievable, and we are now investigating other options. Currently we are looking into the potential for investment in locally based, large scale wind energy schemes. The realisation of these potential sites would be cast into doubt if the approach on the Priority Areas is progressed and enshrined in the NDF.

We recommend that instead of specific defined Priority Areas it would more helpful to apply a criteria-based approach to all parts of Wales, outside of landscape and environmental designations. Such an approach would retain the 'checks and balances' of policy safeguards and development control management thereby ensuring full disclosure and consideration of potential environmental impacts, whether positive or adverse. Furthermore, this suggested approach must be supported in general by an application of the presumption in favour to all new renewables capacity given the extremely critical need for more renewables capacity and effective action on global heating.

## 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>
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Policy 16 explains '*Strategic Development Plans....should establish... the identification of green belts*'. Similarly to other comments already made, the large green belt that the NDF proposes through Monmouthshire seemingly circumvents this policy.

Policy 16 should also reference using consistent data when identifying housing provision and requirements across Wales.

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>
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N/A

## 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>
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N/A
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## 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>
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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.

As stated several times, the NDF circumvents local determination of the green belt in Monmouthshire. Policy 30 requires the identification of 'green belts' in SE Wales through the SDP. At the same time though, the supporting text explicitly states 'The Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff'.

PPW10 states that green belts "*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.*" The NDF's policies on green belts does not appear to comply with PPW – there's no sound base, as the evidence isn't supplied. As for alternative policy mechanisms, reasonably alternative approaches have been assessed in the ISA, but there is no discernible difference between the scoring.

Whilst there is emphasis on and support for the South Wales Metro, Monmouthshire is very much on the periphery of this wider scheme. The Welsh Government is limiting its vision

and showing limited intention regarding public transport connectivity in the region. As an example, Abergavenny station has a train running every two hours, limiting the area's ability to deliver its well-being objective to 'develop opportunities for communities and businesses to be part of an economically thriving and well-connected county'. As affordable housing is developed there is a need for far better transport links. There needs to be much more consideration given to the extension of the network in Monmouthshire. Magor for example would likely benefit massively from a train station.

As already noted in detail, regional connectivity is surprisingly poor in the NDF. There is no mention at all, for example, of the A40 a major trunk road that connects London to the region. Neither is any connection made between the A465 and the midlands.

The approach on regional connectivity for South East Wales is juxtaposed to the sections on North Wales. Policy 17 states Wrexham and Deeside's role within the North region and wider cross border areas of Cheshire West, Chester and Liverpool City Region should be maintained and enhanced. It's bewildering why a similar approach is not taken in the South East.

The NDF needs to reflect more on how Severnside and associated settlements can grow rather than be subject to the Greenbelt. It's equally important that housing supply isn't curtailed because an area will not benefit from Metro investment as well. The entire greenbelt running across such a large area of South East Wales will potentially impede growth in an area strategically located between Newport and Bristol. The proposed green belt could also potentially push up house prices in an area that is generally an expensive part of Wales to buy in.

The proposed green belt covers a significant proportion of the south of Monmouthshire. This part of the county has the best links to transport infrastructure, including train stations at Chepstow, Caldicot and Severn Tunnel junction, with access to the economic centres of Cardiff, Newport as well as links to London. Monmouthshire has some of the largest levels of micro-enterprises in Wales and it's important that the NDF does not restrict the ability of indigenous businesses to expand and create more jobs as part of the springboard of sustainable growth sought within the NDF. Policy 28 recognises the city's established road and rail links with Cardiff, Bristol and London. But that equally applies to parts of Severnside. It is therefore vital to the social sustainability of communities that the proposed greenbelt be wholly re-thought and properly evidenced based.

Policy 28 - The NDF identifies Newport as a focus for strategic housing and economic development, with emphasis placed on brownfield regeneration. However, the high level of existing brownfield allocations together with flood risk and ecological designations around Newport seemingly limits opportunity for significant new allocations. Further analysis is recommended, but it's likely Newport suffers from limitations to growth similar to Cardiff. The draft NDF does not appear to be evidenced by urban capacity studies or similar for Newport. Many of the brownfield sites have been developed in recent years for housing and they are a finite resource. An over reliance on growth within existing settlements could stifle growth within other parts of the region and undermine the delivery of the NDF and its outcomes. Any focus on growth in Newport should not and need not be at the expense of the opportunities for other parts of the region to grow appropriately to meet their needs.

If as the NDF suggests new development is focused around Newport and the Valleys areas, we need to be mindful of the physical challenges and accompanying abnormal costs that the latter areas can present. Particularly with a focus on brownfield sites. Many of which are in the middle of existing industrial areas and are wholly unsuitable for housing anyway.

## 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.

N/A

## 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?

N/A

## 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?

The cost to businesses of integrating the Welsh language into services needs to be given proper consideration and how the impact of this could be further improved by financial support from the Welsh Government.

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.

N/A

## 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?

Table 1-5 in the ISA. ISA objectives 11 – asks will the NDF create opportunities to reduce levels of crime and fear of crime? IPSOS MORI Survey on the most important issue facing Britain today consistently flags up crime/law and order/ASB as a key issue. The NDF appears to give no thought to crime though and its connection with other policy areas such as housing and transport.

Local authorities are expected to revise local development plans when the NDF is still being developed. The logical sequence should be to finish the NDF, cascade to and finish strategic development plans and then complete the LDP. At the moment LDPs are expected to progress ahead of the NDF and SDP.

More detail on supporting rural housing policy is required in the NDF.

We need to be much more robust on land supply/access to land. Land needs to be low enough in cost to develop affordable housing – especially important given the Welsh Government's ambitions to develop 50% affordable housing. With that in mind it needs to consider incorporating compulsory purchase into the NDF.

The NDF does not reflect committed strategies for economic growth and regeneration. It is vital that the NDF aligns more and integrates with economic aspirations such as those within the Cardiff Capital Region City Deal. The Welsh Government needs to increasingly identify clusters of industry connected to the South East and link in with them (hence the importance of the connections for example with Bristol, London and Birmingham). Infrastructure should seek to promote those business interactions to tap into the economy and not hinder those connections. The reality is though that the NDF is very light on any substance relating to the economic prosperity, investment or growth of the nation. On a regional basis the NDF does not align with the ambition of the City Deal.

Key routes for regional connectivity should be referenced and shown, namely the A465 Heads of the Valleys Road and the A449/A40 road and rail from Wales to the Midlands and the A470 link from south to north Wales. In addition not going ahead with the M4 relief road will restrict the ambitions that can be delivered. Infrastructure must be improved not to impede trade and business in the future. An increase in the population around the M4 corridor may also have a compounding affect in terms of traffic congestion, air pollution and additional road traffic collisions.

Bridge tolls have gone and house prices have gone up in Monmouthshire. The need for affordable housing in the county is pressing. The Welsh Government should radically change their mind on Monmouthshire as a place to live and get employment for younger generations. Monmouthshire is an under-developed county with higher quality landscapes north of the current proposed green belt.

There needs to be a fairer rate to buy back electric to encourage companies to use solar and wind. Battery storage needs to be improved too.

Our colleagues in the Fire Brigade also note that legislation requiring sprinkler systems in all new builds in Wales makes homes much safer. In particular for vulnerable people. They agree that a key part of the future is to continue providing low carbon and well insulated and safe homes. They recognise that technology and transport has an important part to play with connectivity and safety in the home. They completely agree that affordable housing

ensures that all sections of the community have the ability to live in decent affordable homes.

The upcoming socio economic duty for Wales is not mentioned in the NDF and should be represented more. This is because socio economic disadvantage is affected by many elements encompassed by the NDF – including (for example) transport, fuel poverty, affordable housing and care services.

There should be more detail on how outcomes/policies will be measured. For example, if a similar measuring framework was developed like the wellbeing indicators with the Future Generations Act, then an indicator for the NDF might be Local Housing Market Assessments, in connection with affordable housing development.

Links between the NDF and foundational economy should be emphasised more. E.g. supporting the development of affordable housing as much as possible, is only one example where the NDF encompasses and has considerable power to support the foundational economy going forward.

## **16. Are you...?**

Submitting a response on behalf of Monmouthshire Housing Association and the Monmouthshire's Public Service Board.

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

## **Consultation Response Form**

Your name	John Keegan
Your address	Monmouthshire PSB; County Hall, The Rhadyr, Usk, NP15 1GA
Preferred contact details (email/phone/post)	John.Keegan@monmouthshirehousing.co.uk
<u>Organisation (if applicable)</u>	Monmouthshire Public Services Board

### **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:

Monmouthshire PSB supports the outcomes of the National Development Framework. Partners have responded on behalf of their own organisations addressing many of the specific questions in the consultation. However there is a collective concern from the PSB that the NDF:

- Lacks a clear evidence base, particularly with regard to the location of the Greenbelt within the county;
- Lacks ambition, both with regard to sustainable growth and climate change

- Steps into a policy space that belongs to regions to determine their own futures by overly constraining local development plans.

We welcome the document and its aspirations but are disappointed in its lack of ambition. For Wales to truly thrive as a dynamic region within the U.K. and Europe, the levels of economic activity required will not be delivered by this plan. The seeds are there but the means to achieve success are too limited. To achieve the wellbeing objectives set by the Monmouthshire Public Service Board (PSB), partners are working collaboratively to create future development and investment opportunities in Monmouthshire. But being open and realistic, the NDF 2020-40 neither provides significant development opportunities nor assurance of future investment in Monmouthshire.

StatsWales projects that Wales' population will grow by 3.6 per cent over the 2018-2038 period. Whereas The Republic of Ireland – a significantly richer country already and one of our nearest economic competitors - is projected to grow by 16.4% during the same timeframe according to Central Statistics Office data. Not only will it grow much faster demographically, but a significantly larger proportion of the population will be economically active. We fear the rates of growth and the plans in the NDF will consign Wales to a slow economic and demographic death during the lifetime of the NDF. To match our competitor's levels of growth, whilst doing so sustainably, is well within the means and ambition of Wales. As a country if we aim low and set low targets it could encourage an expectation where we mightn't even meet them.

Renewable energy - as a country are we ready and prepared to make the very difficult but necessary decisions to achieve this and other targets? The grid north of the A465 road – cannot support this target at the moment. Will the necessary planning decisions be made in time to bring the necessary infrastructure to the area?

We want to draw attention to the near insurmountable challenge of decarbonising power, heat and transport in time to meet the carbon reduction targets. To achieve those ambitions will necessitate an open, non-restrictive spatial planning approach. Prescribing Energy Priority Areas is likely to be too limiting; a more, open, criteria-based approach to renewables is what is needed.

Whilst it's appreciated the NDF is a national-scale document, it will fetter local ambition by overly constraining local development plans

Monmouthshire holds the key to unlocking and attracting considerable wealth into Wales. The potential to use the county to tap into surrounding wealth to the benefit of South East Wales and Wales as a whole is being ignored. There is the very real opportunity to use Monmouthshire as a catalyst to redistribute wealth to economically deprived areas, for example in Torfaen, Blaenau Gwent, Caerphilly and Merthyr. There is no need to get caught up in the Newport 'bottleneck' – a significant barrier to business that is constantly mentioned to us by businesses we

engage with in the region. We implore the Welsh Government to think long and hard about the untapped potential for Monmouthshire to be used to attract money into Wales, especially into economically deprived areas. Many households want to live in Monmouthshire, but the NDF does not recognise that fact. Bristol are currently rezoning large tracts of land for developing. If Wales does not seize the opportunity Monmouthshire represents, wealth may simply move away from the region and Wales. Fundamentally the NDF is constraining localised planning far too much via the imposition of a very large green belt on land with low amenity value in the south of the county.

The NDF in its present form does not exploit Monmouthshire's geographic position. It's no accident that wealthy households have congregated in Monmouthshire over the years compared to surrounding local authorities, commuting outside of the borough to work all the while pushing property prices increasingly higher. That is largely reflective of Monmouthshire's strategic position on the map. Removal of the Severn bridge tolls has boosted businesses in South Wales, with entrepreneurs and businesses relocating from Bristol and the West of England, attracted by the skills level of our population and the good quality of life. Monmouthshire is the gateway to Wales and is the ideal county to capitalise on this increasing wave of business relations to increase the size of the Welsh economy. The greenbelt within the NDF will hamper Wales' ability to do that. There is a collective concern from the Public Service Board (PSB) that the location of the proposed greenbelt covering much of the south of Monmouthshire will limit the ability to deliver the objectives within the well-being plan in its current form. We are not opposed to having a greenbelt within the county but have many concerns about the implications for Wales due to its scale and location.

The development/planning system, is predicated on robust evidence showing viability and deliverability – which the outcomes are lacking. The NDF is setting outcomes that Strategic Development Plans (SDP) and Local Development Plans (LDP) will need to conform to. This could lead to a conflict between the NDF and the evidence based SDPs and LDPs that could seriously hamper development plan preparations. Where is the evidence, for example, that that NDF outcomes and policies will integrate with key localised evidence bases such as local Housing Market Assessments?

The link between Wrexham and Deeside in North Wales to adjacent city regions is well documented in the NDF, but the link between South East Wales and the far wealthier city region in Bristol – the city with the highest Gross Value Added (GVA) in the UK south of Birmingham and outside of London – barely merits a mention. Incredibly London is mentioned only once in the entire NDF, where it's acknowledged the South East area benefits from established rail and road links with London. Regional connectivity and economies must be considered further and better reflected between the South East Wales region and England and Mid Wales. We cannot stress that enough. To do otherwise would mean the NDF neglects areas of

massive strategic importance for the future. There should be a much stronger focus on how economic and transport links will be maintained and enhanced.

There are many elements to the NDF and a number of objectives (several of which will compete with each other at times). Seemingly all hold the same priority status. At the moment it's difficult to know if any given objective is more important than another. Priority status could also be reflected in monitoring framework.

## 2. Spatial Strategy (policies 1 - 4)

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

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

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

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

Monmouthshire is largely a rural County and we agree SDPs/LDPs should plan positively to meet the needs (including housing) of rural communities. Policy 4 notes that *'the future for rural areas are best planned at the regional and local level'*. However, the large green belt that the NDF proposes through Monmouthshire completely contradicts that point.

The NDF explains the green belt is for *'managing and planning urban growth'*. Although it's not clear what evidence has been used to inform the proposed green belt, which will prevent the ability to wholly *'meet the needs of rural communities with regard to housing'* in Monmouthshire. Designation of a greenbelt is a major long-term policy decision that must be based on robust evidence. Policy Wales

edition 10 (PPW10) also states that before designating land around an urban area as green belt land, the local planning authority must consider and justify it. The Welsh Government appears not to have considered the permanence and restrictive nature of the proposed greenbelt within South East Wales. For Monmouthshire, its extent will mean a significant barrier to development across a large swathe of rural Monmouthshire.

It's important to note that when Monmouthshire's current adopted LDP was considered at deposit plan stage – a far smaller green belt was incorporated and subsequently rejected by the Planning Inspector at plan examination. The permanence of the greenbelt and its harm to the vitality and viability of communities in Monmouthshire was recognised by the Inspector. These issues are equally applicable to the far larger greenbelt now proposed affecting the whole of Severnside and beyond. Very careful consideration should also be given by the Welsh Government to emerging development plans in Bristol where the authority is now seeking to de-designate parts of the greenbelt because it has overly constrained growth.

In principle we would support other policy mechanisms to safeguard the most sensitive areas if additional policy protection is required. This could cover a smaller area further north to cover areas with more amenity value e.g. between St Arvans outside Chepstow to Llanfrechfa in the West and from Little Mill to Monmouth. All of the land is of high amenity and visual value and creates a real 'green lung' in Monmouthshire. But there has to be some provision for housing, especially affordable housing. People are living longer and all areas need at least some provision to grow and develop and not stagnate.

The PSB Wellbeing Assessment in 2017 projected that there would be a 27% reduction in people aged 18-24 from 2017-35 for Monmouthshire, a reduction of 15% for those aged 25-35% and an increase of 38% for people aged over 65. If we do not provide affordable housing in Monmouthshire, as younger people are forced to move out older people will become more isolated and as confirmed by our police colleagues Monmouthshire will become more vulnerable to crime.

An ageing population for Wales will undoubtedly bring opportunities, however, we know that the number of people living with long term conditions who are very often living on their own is going to increase pressure on health, social care and housing services in Wales. Wage levels available for local jobs in Monmouthshire are lower than the average for Wales and the UK. When coupled with the current high property prices and with the limited land currently available for future housing development this makes it difficult for young people to live and work locally. This was one of the most significant issues that emerged from the consultation for the wellbeing assessment carried out under the Wellbeing of Future Generations Act.

Monmouthshire is already struggling to recruit and retain a social care workforce to care for the increasing number of people living with long term conditions. Limiting development would force young families to move outside the area which would accelerate the break-up of family networks and have a negative impact on the PSBs objective to develop a model of care built on wellbeing and looking after each other rather than through formal care provision. We must ensure a supply of affordable housing in the south of Monmouthshire for key workers in the foundational economy. Developing the foundational economy is an important area for the Welsh Government. People who provide the backbone of the local economy (health and social care services) and those working in agriculture should be able to live locally and those on the lowest salaries should not have to commute long distances to sustain those able to afford homes, whose prices will rise as the supply of land is cut off by the proposed greenbelt in the NDF. The only realistic solution to help mitigate the pressure will be where communities, families and social networks step in to shore up services. Without sufficient affordable housing being available in Monmouthshire to form the bedrock of that, it will reduce the opportunity for that to happen.

For older settlements to thrive there always has to be an influx of new people. The PSB do not want Monmouthshire to be a 'chocolate box' hideaway and nor should the Welsh Government. We want it to be seen as a vibrant cultural and social destination. The kind of place where you want to raise a family, not go to pass your last days. Quite simply we want Monmouthshire to be an affordable place for younger people to live; whilst also having sufficient provision for attractive older person's provision too. The Welsh Government are constraining Monmouthshire in the NDF and we strongly feel this is indicative of overall development/economic ambitions reflected in the NDF. More consideration must be given to long-term thinking as per the Wellbeing of Future Generations Act. The green belt in its present form will restrict economic growth and jeopardise the maintenance of services and amenities for older people. Yet the NDF states: 'growth in the countryside will be based on what people who live there need and want....we need to get and keep people of working age living in the countryside. This will help us keep and grow services there'. Under the current draft NDF Monmouthshire is going to increasingly become the preserve of the wealthy impacting on the national wellbeing goal of a more equal Wales making it much harder to build sustainable and resilient communities. It is essential that the needs of future generations are also considered, alongside the social sustainability of more rural settlements.

Restricting affordable housing development in many of our communities, as well as disadvantaging young people, will make it harder for older people to downsize to free up space in under-occupied family homes. Yet extensive amounts of policy decisions taken by the Welsh Government in recent years (such as ending right to buy/right to acquire) clearly advocate making best use of Wales' affordable housing stock.

Providing job opportunities and sustaining community services will require demographically mixed and resilient communities. Employers will be attracted by a workforce, which requires affordable housing that retains younger people and families in areas. The supporting text should be expanded to state that job opportunities, community services and appropriate levels of housing will be supported in rural areas.

By developing more affordable housing we are also particularly interested in attracting high technology clusters to move from Bristol to take advantage of lower land and house prices across the region. However, with current traffic congestion they will not be as willing to move west of Newport at the moment. In connection with transport and economic prosperity the rejection of the M4 relief Road is not reflected in the NDF, yet for everyone in South Wales this is a massive issue. All the NDF says is that, 'the Welsh Government will maintain its commitment to tackling congestion on the M4'. If the plan was more ambitious economically then more homes would be required along public transport routes and arterial routes, both of which exist in good measure in Monmouthshire.

Policy 4 states that strong rural economies support strong and resilient communities, can reduce the need to travel and reduce the reliance on a small number of larger economic centres. Yet the proposed green belt limits the ability of actors in Monmouthshire to secure viable and sustainable future for many of our rural communities.

Land needs to be used to its full capacity in Monmouthshire to act as a strategic bridge between Bristol, London and the South East region of Wales. Land viabilities are difficult especially in Monmouthshire. It's important to emphasise that currently most of Monmouthshire Council's land viable for development is located within the proposed green belt in the NDF. There is an opportunity for the NDF to go a step further to support the development of public land by requiring the mapping of all public land.

The PSB is eager to play a part in reviewing publicly owned land to identify further sites for development. The reality in Monmouthshire is that the best way to deliver this to scale and get most value for money is via a new settlement. A prime example of where this has been a success in the South East Wales region in the past is Cwmbran. We need to ask the question why can't this be repeated on a smaller scale in Monmouthshire? We have the land, the finances and the ambition to do it. But most of all we have the location, a sure fire winner for Monmouthshire and Wales.

There also needs to be recognition of the necessity to incorporate the themes of global heating, climate change and decarbonisation in both the urban and rural policies running as a central thread through the above policies.

Ultimately the NDF in its present form will thwart the Public Service Board's ability to achieve its core purpose of helping to build sustainable and resilient communities and takes away ground that belongs to regions to set their own agendas based on local evidence and need. The policy wording relating to the greenbelt should especially be re-written to invite the SDP to consider the need to move and reduce its size. It is imperative that the green belt policy is highly informed and is absolutely right given its status as part of the development plan covering Monmouthshire and given that its inclusion in the NDF will effectively remove independent examination of the green belt.

### 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?

As already stated the vastness of the proposed green belt will negatively impact the provision of affordable housing to meet local need. Unreasonably restricting development means that there will be less ability to readdress the supply and mix of housing stock to ensure suitable and affordable housing is available to all demographic groups. That is one of the key actions within the PSB's wellbeing plan and is clearly aligned to policy 5 of the NDF to deliver affordable homes.

The NDF concentrates new development on existing urban areas with no mention of new settlements. Considering higher density regions around the world, such as Singapore for example, this type of strategy makes a lot of sense. However, in Wales it does not when there are large tracts of land ripe for new settlements. Ignoring the potential for any new settlements in Wales is short-sighted. Constantly adding to existing settlements supports urban sprawl. Enabling developers to add to towns and cities piecemeal will not, on its own, support many of the intentions within the NDF. Allowing larger new settlements, with supplementary planning can help deliver a real vision in real time.

One of the best ways to capitalise on Monmouthshire's geographic position would be to be open to the potential for a new town within Monmouthshire. It would be

easy to surround a new settlement with green belt with amenity value. Therefore we believe new settlements should be covered within the NDF (providing the opportunity for SDPs to at least consider). The omission of new towns in the NDF rules out the opportunity to deliver sustainable growth in the longer term via the development of new settlements, in contrast to PPW edition 10, which sets out the circumstances where they may be appropriate.

#### 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?

We support better mobile and telecommunications coverage. As Monmouthshire is semi-rural, coverage can be an issue.

The county faces issues of rural loneliness and transport deprivation. The PSB has been exploring technology led solutions to make better use of existing resources but poor coverage is a limiting factor

#### 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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

We welcome policy 7 which aspires to new development providing ease of access for commuting along major transport corridors. These opportunities are easier to scale in the south of our county. This includes active travel for the first and final parts of journeys, again much easier to achieve from developments in the south

making a positive contribution to physical and mental health and well-being. It is important that transport is enhanced ensuring that the Brynglas Tunnels do not become a barrier that limits people's ability to immerse themselves fully in the language and culture of Wales to the west of Newport. We are acutely aware of the issues around air quality and congestion on the M4 and make ourselves available as a test bed to pilot solutions for the transport service of the future, indeed our well-being plan commits this PSB to develop new technologies for improving rural transport and we have secured over £1m of Cabinet Office funding to progress this. Whilst the five councils in Gwent have recently received £458,724.50 to install 73 charge points with 146 individual sockets across the region, much larger scale public investment will be needed to develop the infrastructure to support low emission vehicles necessary to meet the PSBs ambitions to mitigate the impact of climate change.

The NDF notes that the Welsh Government will set out a strategy for electric charging infrastructure. This must be done as soon as possible to support Policy 7 and must provide the necessary detail to demonstrate how the Policy will be delivered.

There's also no mention of hydrogen fuel cell technology in the NDF. Monmouthshire is working with Powys based company Riversimple to pilot a fleet of hydrogen powered cars in Abergavenny whose only emissions will be water. This technology will advance over time and its potential should be recognised within the NDF.

Policy 7 should also recognise that the growth of low emissions vehicles is predicated upon decarbonised fuel, whether clean electric or hydrogen, which will need rapid and extensive delivery to meet requirements. To decarbonise transport fuel, substantial capacities of new renewables will be required, meaning policy development towards renewables should not be restrictive in any way. As a further aside any further strategies/plans etc developed by the Welsh Government should also evaluate the environmental impact of actually manufacturing the new vehicles/their components/developing the infrastructure, providing direction on how that impact can be increasingly mitigated and off-set in the future.

## 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>
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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We recognise that green infrastructure is vital if we are to reduce our net carbon position to zero by 2030 and support policy 8 which sets out a strategic framework for biodiversity enhancement and ecosystem resilience. However it is easier to achieve in geographies that are already rural in nature such as northern and central Monmouthshire – but these are not the parts covered by the proposed green belt. There is greater infrastructure in the south which is better able to cope with new developments, minimising the residual environmental impact of new settlements on environmental assets such as rivers. The environmental impact of concentrating development in the north of Monmouthshire, without a clear evidence based for doing so, will be higher. Forcing new developments into the north of the county will take people further away from economic centres and existing transport infrastructure and would be at odds with NDF outcome of a Wales where people live in places where travel is sustainable.

The NDF should support greater awareness around development being used to protect conservation. Many off-setting measures can be included from bird habitats to rewilding, adding more biodiversity than will exist in current sites.

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

The renewable energy policies should refer to the opportunities for tidal lagoon power. The region has the second highest tidal range in the world and tidal power

We also believe that, given the current climate emergency, all renewables should be subject to a presumption in favour of development unless major material reasons indicate otherwise. Renewables needs greater policy merit to 'weigh in the balance' given the critical need for new capacity.

[illegible]

## 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 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.

As stated several times, the NDF circumvents local determination of the green belt in Monmouthshire. Policy 30 requires the identification of 'green belts' in SE Wales through the SDP. At the same time though, the supporting text explicitly states 'The Strategic Development Plan must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff'.

PPW10 states that green belts *“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.”* The NDF’s policies on green belts does not appear to comply with PPW – there’s no sound evidence base, as the evidence isn’t supplied.

Whilst there is emphasis on and support for the South Wales Metro, Monmouthshire is very much on the periphery of this wider scheme. The Welsh Government is limiting its vision and showing limited intention regarding public transport connectivity in the region. As an example, Abergavenny station has a train running every two hours, limiting the area’s ability to deliver its well-being objective to ‘Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county’

There needs to be much more consideration given to the extension of the network in Monmouthshire. Magor for example would likely benefit massively from a train station.

As already noted in detail, regional connectivity is surprisingly poor in the NDF. There is no mention at all, for example, of the A40 a major trunk road that connects London to the region. Neither is any connection made between the A465 and the midlands.

The approach on regional connectivity for South East Wales is juxtaposed to the sections on North Wales. Policy 17 states Wrexham and Deeside’s role within the North region and wider cross border areas of Cheshire West, Chester and Liverpool City Region should be maintained and enhanced. It’s bewildering why a similar approach is not taken in the South East.

The NDF needs to reflect more on how Severnside and associated settlements can grow in a sustainable way rather than be subject to the Greenbelt. It’s equally important that housing supply isn’t curtailed because an area will not benefit from Metro investment as well. The entire greenbelt running across such a large area of South East Wales will potentially impede growth in an area strategically located between Newport and Bristol. The proposed green belt could also potentially push up house prices in an area that is generally an expensive part of Wales to buy in.

The proposed green belt covers a significant proportion of the south of Monmouthshire. This part of the county has the best links to transport infrastructure, including train stations at Chepstow, Caldicot and Severn Tunnel junction, with access to the economic centres of Cardiff, Newport as well as links to London. Monmouthshire has some of the largest levels of micro-enterprises in Wales and it’s important that the NDF does not restrict the ability of indigenous businesses to expand and create more jobs as part of the springboard of sustainable growth sought within the NDF. Policy 28 recognises the city’s established road and rail links

with Cardiff, Bristol and London. But that equally applies to parts of Severnside. It is therefore vital to the social sustainability of communities that the proposed greenbelt be wholly re-thought and properly evidenced based.

## 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?

It is important that transport is enhanced ensuring that the Brynglas Tunnels do not become a barrier that limits people's ability to immerse themselves fully in the language and cultural opportunities to the west of Newport.

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 NDF does not reflect committed strategies for economic growth and regeneration. It is vital that the NDF aligns more and integrates with economic aspirations such as those within the Cardiff Capital Region City Deal. The Welsh Government needs to increasingly identify clusters of industry connected to the South East and link in with them (hence the importance of the connections for example with Bristol, London and Birmingham). Infrastructure should seek to promote those business interactions to tap into the economy and not hinder those connections. The reality is though that the NDF is very light on any substance relating to the economic prosperity, investment or growth of the nation. On a regional basis the NDF does not align with the ambition of the City Deal.

Bridge tolls have gone and house prices have gone up in Monmouthshire. The need for affordable housing in the county is pressing. The Welsh Government should radically change their mind on Monmouthshire as a place to live and get employment for younger generations. Monmouthshire is an under-developed county with higher quality landscapes north of the current proposed green belt.

## 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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