

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Agree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them

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

CHC agrees that the 11 outcomes are a realistic vision for the NDF; however, we are concerned about the ability of the NDF to monitor these outcomes. The document is not clear at this stage on how the objectives will be consistently monitored and success measured. In addition, there are many objectives and priorities within the NDF, several of which will compete with each other at times. In its current form it is difficult to know if any given objective is more important than another. We suggest that priority status could be reflected through the development of a monitoring framework.

2. Spatial Strategy (policies 1 - 4)

Q3. 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)		X					
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

CHC agrees with the spatial strategy and key principles for development within the framework, however we are concerned about the over reliance on concentrating new development in existing urban areas. There is no mention of new settlements within the NDF, and as a result, some of the priorities within the document do appear to conflict. As an example, the vision to concentrate all development in existing urban areas could conflict with 'supporting rural communities' with appropriate housing and infrastructure, as detailed in policy 4.

The omission of new settlements in the NDF rules out the opportunity to deliver sustainable growth in the longer term, and is in contrast to Planning Policy Wales edition 10, which sets out the circumstances where they may be appropriate. 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 existing settlements 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.

Recommendation: The NDF should be amended to acknowledge the potential and necessity for new settlements in areas where there is need and demand.

We would also like to see specific reference made to the challenges and opportunities provided by the delivery of affordable housing within 'policy 4'. Further information on this point is provided in the 'affordable housing' section of our response.

3. Affordable Housing (policy 5)

Q5. 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?

Agree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The draft National Development Framework (NDF) rightly prioritises an increase in the delivery of affordable housing. We welcome policy 5 and the proposal for funding for affordable homes to be effectively allocated and utilised, however we believe this must be met with greater investment beyond the existing levels of public subsidy in order to meet the housing development ambitions set out in the framework.

The framework suggests that from 2018-2023 an additional 8,300 homes will be required annually to meet housing need, and on average 47% of these should be affordable housing. Welsh housing associations are in a position to make a significant contribution to this delivery and have an ambition to deliver 75,000 homes by 2036. With continued and consistent support from Welsh Government we are confident we can make that ambition a reality. Over the last year (2018/2019), housing associations in Wales have increased the number of homes they have built by over 20%, demonstrating that the commitment to increase the delivery of affordable housing can be achieved.

We do however warn on the use of the housing need estimates within the NDF, and would like to see additional context and explanation within the document to ensure that these estimates are used cautiously. Housing need figures are an estimated, constantly moving ballpark figure and the figures presented in the document are already out of date due to the recent publication of the 2018-based national population projections. There is the danger that these figures will become a development target rather than a starting point for further, regular, analysis of local need. Similarly, where housing need figures are quoted for the various regions, these need to translate back to the all Wales figures or explain why there are differences in order to maintain consistency/credibility of this data.

Recommendation: Due to the fluidity of housing need figures we would like consideration to be given to the development of a separate 'live' document that hosts the housing need and additional homes estimates outside of the NDF, for Strategic Development Plans (SDPs) and Local Development Plans

(LDPs) to consider as part of their review. The 2018 independent review of affordable housing policy in Wales recognised that more should be done to make better use of data generated by local authorities and others to shape local and national policy. National figures updated regularly, reflecting the most recent LHMA findings, would be more valid than an estimate that is updated every 5 years as part of NDF review process.

Recommendation: We would like to see a glossary of terminology supporting the NDF to explain the definitions and types of affordable housing, including 'social housing' and 'intermediate rent'.

Policy 16

In addition, we would like to see reference made to the need for consistency and improvements to the processes and data used to estimate housing need across Wales. The Affordable Housing Review recognised that the dispersed nature of estimating housing need has often led to conflicting estimates in different parts of the policy making process, and recommended that the Welsh Government statistical service should work with local authorities to agree data sets for use in Local Housing Market Assessments, Local Development Plans, and other housing requirements work.

Recommendation: Policy 16 'strategic policies for regional planning' should reference the need for consistent use of data when identifying housing provision and requirement across Wales.

Policy 3

CHC welcomes the recognition that a 'shift in the delivery model' is required to build affordable homes at scale and pace. The reuse of publicly owned land will be important to the delivery of these homes and we welcome policy 3 which states that 'Strategic and Local Development Plans should review publicly owned land' and 'identify potential sites for affordable housing developments'.

We are supportive of the recent establishment of a Welsh Government 'Land Division' to assist with the development of public land. There is a clear role for Welsh Government in de-risking complex sites to ensure their viability for affordable housing. Where larger sites exist, housing associations are willing to collaborate to unlock the viability and share the risk with other housing associations, local authorities and private developers. The North Wales Growth Deal is an example of where this is already happening, and the potential models being explored in that instance could be replicated across Wales.

Whilst we are supportive of the vision to deliver affordable housing we would like to see recognition that deliverability at 'scale and pace', as referenced in policy 3, is not always appropriate for certain parts of Wales, particularly rural areas. Some rural communities will need a gradual and phased development which may not be in keeping with some developer intentions and aspirations for large scale (more than 10 units) schemes. There needs to be a bespoke approach to rural community housing developments, as large schemes do not answer the needs of small rural communities.

Recommendation: There is an opportunity for the National Development Framework to go a step further to support the development of public land by requiring the mapping of all public land. Access to affordable land is critical to the viability of affordable housing schemes in Wales and housing associations have identified this as one of the main barriers to bringing forward more ambitious developments. A number of housing associations have raised the identification of available public sector land as an issue, relating to the LDP process and the identification of suitable sites. We are aware that there is some good practice emerging in the Cwm Taf Morgannwg Health Board area and in Denbighshire Council in regard to land identification and mapping which is assisting developers, and we would welcome the nationwide roll-out of such an approach elsewhere. All public sector bodies have land ownership mapped on a GIS system, and this infrastructure provides an opportunity for the greater transparency which would unlock further homebuilding.

Policy 4

CHC is disappointed to see the lack of reference to the distinct challenges experienced in the provision of rural housing within policy 4 'supporting rural communities' and policy 5 'delivering affordable homes'. Affordable housing is a central pillar within rural communities and an important element to unlock community potential and solve wider social challenges. Ensuring the viability and sustainability of rural housing requires dedicated and specialist knowledge and experience. The Welsh Government supported 'Rural Housing Enablers', hosted by housing associations, provide this specialist support to overcome the unique challenges experienced in the delivery of affordable housing in rural communities, such as identifying appropriate sites, assessing local needs, and engaging with the local community on new development. They work closely with those involved in the provision of other services and infrastructure within their communities. The proposed NDF encourages and focusses growth in existing settlements and 'the regions', but there is the risk that this vision contradicts policy 4 to 'support rural communities'.

Recommendation: We consider more detail on supporting rural housing policy is required for the NDF

to drive effective action on this challenge, in recognition that if adequate and affordable housing is in place, rural residents are less likely to need to move out of their area and therefore appropriate growth in rural towns and villages will continue.

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No opinion

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No opinion

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No opinion

7. Renewable Energy and District Heat Networks (policies 10-15)

Q12. 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	Don't know	No opinion
Large scale wind and solar developments							X
District heat networks							X
							X

Q13. 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?

No Response

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

Agree

9. North Wales (policies 17-22)

Q15. 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?

No opinion

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

Q16. 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?

No opinion

11. South East Wales (policies 27-33)

Q17. 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?

No opinion

Q18. 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.

We agree with the principle of developing SDPs at a regional scale, and recognise that the delivery of the policies and principles within the NDF is reliant on the establishment of robust SDPs, in a timely manner. We are pleased to see that a formal process will be developed to monitor formal progress on the preparation of SDPs, however we would like to see consideration made to cross-regional developments and opportunities for engagement between SDPs, given that the boundaries set for the regions can be artificial when developing housing.

Recommendation: We would like to take this opportunity to echo the point we made earlier in our response on the importance of consistent housing need measurement, and would like to see policy 16 referencing the need for consistent use of data when identifying housing provision and requirement across Wales.

12. Integrated Sustainability Appraisal

Q19. As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development. Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No Response

13. Habitats Regulations Assessment

Q20. As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds. Do you have any comments on the Habitats Regulations Assessment report?

No Response

14. Welsh Language

Q21. 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?

CHC would like to see recognition within the NDF that supporting rural communities has a positive effect on the use of the Welsh language. Addressing housing needs in rural areas will ensure that Welsh speakers can remain in their communities.

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

CHC would like to see recognition within the NDF that supporting rural communities has a positive effect on the use of the Welsh language. Addressing housing needs in rural areas will ensure that Welsh speakers can remain in their communities.

The following has been taken from the Welsh Governments 2050 Welsh Language Strategy and we would like to see these points strengthened in the NDF:

Areas with a high density of Welsh speakers create the most favourable circumstances to foster Welsh speakers: the higher the number of speakers living in a geographical area, the higher the probability of opportunities being available to them to use the language in day-to-day communication. These are also the places which have the highest number of fluent Welsh speakers. These areas tend to be characterised by the fact that they are rural in nature, with economies that currently depend largely on the public sector, agriculture and tourism, with towns acting as centres serving wide areas for services and employment. There is no easy answer to the challenges facing these communities. However, we are clear about the need for language planning and economic development to work in tandem in order to create Welsh-speaking communities that are economically and linguistically viable. We need to sustain and grow communities with a high density of Welsh speakers.

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

No Response

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Hayley Macnamara
Organisation (if applicable)	Community Housing Cymru
Preferred contact details (email/phone/post)	<div></div>

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response