

# 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?

Disagree

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

Agree with some of them

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

Chapter 3 'NDF Outcomes' We consider that the deliverability of these Outcomes is questionable. Some (2,3,5,6,8) support growth, although fail to include one that focuses on the delivery of housing. Outcomes 9,10 and 11 conflict with these earlier outcomes in seeking to protect and enhance natural resources and the environment. These conflicting objectives cannot deliver sustainable growth. The NDF is silent on how these conflicts are to be resolved and this is further compounded by the lack of evidential analysis of information, exactly the type which is required when producing the other lower order plans such as SDP's and LDP's The particular concern is that the anticipated Outcomes as summarised on page 18 of the draft NDF and then considered in more detail on pages 20 and 21 make very limited reference to housing. The only references to housing are in relation to: 1. Point 2 of the summary which seeks "A Wales where people live in vibrant rural places with access to homes, jobs and services." 2. Detailed Outcome 1 which refers to "high-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces." 3. Detailed Outcome 5 which refers to Cities as large towns as being "magnets for jobs and investment, while people are drawn to live and work there..." and recognizes that "areas outside the urban centers will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services." In each case, the Outcomes fail to reflect the importance of ensuring an adequate supply of housing to the economic and social well-being of Wales. We consider the NDF should include an Outcome that specifically and exclusively deals with the need to ensure an adequate supply of housing to meet the existing and future needs of the population of Wales. The identification of Outcomes in the draft NDF is described on page 18 of the document as "an important step in preparing a strategy for the development plan." In this context, the absence of an Outcome relating specifically to the delivery of housing represents an even more significant omission. The NDF is set to be the highest tier of the development plan in Wales and its failure to adequately address the critical issue of housing delivery will leave a gap in the development plan in relation to this matter. Given that it will inform the preparation of Local Development Plans, the absence of a clear Outcome relating to housing may also result in local authorities not giving due prominence to this critical issue in their emerging LDPs. In addition, the NDF appears to provide a policy framework of 'environmental protection of everything first', which runs counter to the need for economic growth and significant increases in housing, particularly affordable housing. Whilst the protection of the environment is an acceptable principle of sustainable development, the NDF is making greenfield development which is essential to meet housing and economic development aspirations, almost impossible to plan for. To ensure that the economic and social elements of sustainable development are delivered through land use planning, it is essential to balance all sustainability objectives which this draft NDF does not achieve. The need for housing is one of the central on-going challenges facing Wales, and the planning system has a critical role to play in the delivery of sufficient housing to meet identified needs. It is therefore fundamental that the NDF seeks to effectively address the issue. A failure to adequately tackle this issue will undermine wider objectives in relation to: 1. The achievement of a good quality of life (Objective 1); 2. Meeting the needs of a diverse population (Objective 1); 3. Ensuring small towns and villages "have bright futures as attractive places to live and work" (Objective 2); 4. The achievement of greater prosperity and well-being (Objective 3); 5. The promotion of the Welsh language (Objective 4); 6. The sustainability of large towns and cities (Objective 5); and, Sustainable movement and dealing with the challenges of climate change (Objectives 7 and 11).

## 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)							

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

Policy 1: Sustainable Urban Growth

Policy 1 States:

"Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed-use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported".

We have no objection in principle to this policy, which broadly aligns with existing national planning policy in PPW (Edition 10). However, the draft NDF does not appear to recognise that there may be opportunities for other forms of development to come forward that remain appropriate. Or that the NDF has been informed by any urban capacity study.

Critically, this policy raises issues about the importance of ensuring an appropriate choice and range of housing types, recognising that not all homebuyers will seek to live in high density urban housing which may not be necessarily practical or meet their lifestyle needs. As such, we consider that the NDF needs to provide greater flexibility by recognising that other growth options exist – such as a range of densities that reflects the character of the local area – and are still capable of being acceptable subject to traditional planning considerations (e.g. environmental considerations, site constraints etc).

Policy 3: Public Investment, Public Buildings and Publicly Owned Land

The supporting text to Policy 3 infers that publicly owned land should be used for the delivery of affordable housing developments as opposed to market led housing developments. We consider that the encouragement of reuse of public land for housing development in itself is positive. However, the heavy focus of the draft policy on affordable housing developments fails to recognize that public benefits can be delivered through housing developments more generally. We are also concerned that the policy will not only hinder the development of market housing (which remains a need in Wales) but could also obstruct the delivery of affordable units.

In addition, the policy sets out that should be a focus for mixed use and sustainable communities. However, the focus on the redevelopment of public land for affordable housing (only) would not contribute towards the achievement of mixed or balanced communities which, by definition, would depend on the co-location of houses of different tenures (market and affordable, and different types of affordable housing), types and sizes.

The planning system should deliver sustainable development in locations that represent the best compromise between the competing sustainability objectives and this is what the NDF should be addressing rather than dictating where such developments should only be located.

### 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?

Strongly disagree

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

Whilst we accept this is a laudable policy ambition, the NDF appears to be somewhat dismissive of the role of the private sector. I am concerned that the NDF is only focused on the delivery of affordable housing and that the levels of affordable housing that are identified as being required in the plan are being presented out of context. I strongly object to the absence of a general housing policy within the NDF.

Our key concerns are:

1. While there is a clear focus on affordable housing there is no acknowledgement of the need to increase the supply of market homes;
2. The central estimates for affordable housing need and market need fall short of actual housing need in Wales and therefore the NDF should be explicit in presenting them as only a starting point for consideration of need; and,
3. To deliver the level of affordable housing identified it will be necessary to increase delivery of housing altogether.

I address these issues in turn below:

Requirement to increase the supply of Market Housing

Policy 5 (affordable housing) only relates to affordable homes, while there is no policy in the draft NDF that provides strategic direction for the delivery of housing more generally. We consider this to be a significant oversight, when there is substantial need in Wales for all types of new homes. A cynic would also suggest that by ramping up the social housing % the local authority would achieve its new homes targets.

Failure to plan for an adequate provision of housing throughout Wales will lead to further shortages of suitable housing being delivered. This will have profound societal impacts, on affordability of homes, detriments to health and well-being and acting as a barrier economic growth.

Furthermore, the need for housing is a long-term issue that has a direct impact on the prospects and life chances of future generations, as well as upon the strength of the economy. A lack of housing policy within the NDF is therefore considered to also fail against the requirements of the Well-being of Future Generations (Wales) Act.

The NDF should therefore provide a policy framework that encourages a more positive attitude toward all types of housing development and provide strategic direction so that decisions on the delivery of all new homes can be made with confidence.

The NDF and lower order policy framework in subsequent SDP's and LDP's will be seeking to deliver quality places with cohesive communities where people want to live. New housing developments need to deliver a mix of house types and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable housing is too large and fails to create a sustainable mixed community.

Central Estimates underestimate actual housing need in Wales

The draft NDF presents details of likely housing requirements in Wales based on the 2018-based national and regional central estimates of housing need in Wales.

The national "central estimates" indicate a need for 8,300 additional dwellings per annum (dpa) for the first five years of the 20-year period (2018/19 to 2023/24), decreasing to an average of 3,600dpa during the last five years of the period (2033/34 to 2037/38) – a 56% fall in estimated housing need over the next 20 years. This slowing rate of growth mirrors that contained in the 2014-based household projections, which form the basis for the assessment, but fails to reflect the reality that future housing need cannot be assessed solely by reference to past-trend based projections, but must also consider:

1. The implications of past under-delivery as reflected in market signals and evidence of suppressed household formation which are not considered by the Welsh Government projections;
2. Future economic growth;
3. Policy aspirations regarding the promotion of vibrant and sustainable communities; and,
4. Affordable housing needs.

When taking all of these factors into consideration, there is no evidence that the housing need for Wales is as low as 8,300dpa, or that it would fall to less than half that figure by 2038. By identifying a reduction in housing need through the Plan period, the NDF is, in effect, planning for decline. This is entirely inconsistent with the wider objectives of the draft document, as articulated in policies relating to the promotion of managed growth and increasing economic activity. The very close connection between housing growth and economic well-being is such that a failure to make adequate provision for future residential development will militate against the achievement of the wider vision for economic growth and increased prosperity across Wales.

Affordable Housing as a Proportion of All Housing Need

As well as identifying the central estimates for the level of housing need at a national level, the draft NDF also seeks to identify housing need by tenure by reference on page 30 to the central estimate

figure of:

"47% of additional homes should be affordable housing (social housing or intermediate rent) through 2018/19 to 2022/23, with the remaining 53% being market housing. This represents an average of approximately 3,900 affordable homes and 4,400 market homes per year over the five year period". Similar statements are also made in term of the level of affordable housing as a percentage of all housing need within the individual regions that are identified within the draft NDF.

On numerous occasions, the draft NDF implies that the 47% affordable housing figure represents a target to be met. We are already aware of officers within local planning authorities that are taking the central estimates at face value, along with media reports that are suggesting that 50% affordable housing should be demanded on all housing developments. There is no evidence that such a high Whilst we accept this is a laudable policy ambition, the NDF appears to be somewhat dismissive of the role of the private sector. We are concerned that the NDF is only focused on the delivery of affordable housing and that the levels of affordable housing that are identified as being required in the plan are being presented out of context. We strongly object to the absence of a general housing policy within the NDF.

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Failure to plan for an adequate provision of housing throughout Wales will lead to further shortages of suitable housing being delivered. This will have profound societal impacts, on affordability of homes, detriments to health and well-being and acting as a barrier economic growth.

Furthermore, the need for housing is a long-term issue that has a direct impact on the prospects and life chances of future generations, as well as upon the strength of the economy. A lack of housing policy within the NDF is therefore considered to also fail against the requirements of the Well-being of Future Generations (Wales) Act.

The NDF should therefore provide a policy framework that encourages a more positive attitude toward all types of housing development and provide strategic direction so that decisions on the delivery of all new homes can be made with confidence.

The NDF and lower order policy framework in subsequent SDP's and LDP's will be seeking to deliver quality places with cohesive communities where people want to live. New housing developments need to deliver a mix of house types and tenures. It would be inappropriate to plan for large scale housing developments where the proportion of affordable housing is too large and fails to create a sustainable mixed community.

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2. Future economic growth;
3. Policy aspirations regarding the promotion of vibrant and sustainable communities; and,
4. Affordable housing needs.

When taking all of these factors into consideration, there is no evidence that the housing need for Wales is as low as 8,300dpa, or that it would fall to less than half that figure by 2038. By identifying a reduction in housing need through the Plan period, the NDF is, in effect, planning for decline. This is entirely inconsistent with the wider objectives of the draft document, as articulated in policies relating to the promotion of managed growth and increasing economic activity. The very close connection between housing growth and economic well-being is such that a failure to make adequate provision for future residential development will militate against the achievement of the wider vision for economic

growth and increased prosperity across Wales.

The Central Estimates presented in the draft NDF are subject to significant limitations in that whilst the estimates are identified as "2018-based", they are actually derived from the 2014-based household projections. There are several concerns with the use of household projections as the basis for assessing housing need, principally stemming from the fact they are based on past demographic trend calculations that are assumed will continue.

In the case of the 2014-based projections, the principal projection is based on trends experienced between 2009 and 2014. This data was therefore collected primarily during the recession years, which saw a significantly reduced level of net in-migration and suppressed levels of household formation because of reduced housing delivery. As a result, they are not capable of providing a robust indication of new houses that will be needed in Wales during a time of economic growth.

The central estimates do not take any account of economic or policy considerations which might result in different demographic trends in the future (e.g. economic growth ambitions, affordable housing requirements, regeneration objectives). For example, in South East Wales, the Cardiff City Deal is seeking a step change to boost the local economy through an investment of £1.2 billion, which is intended to support the delivery of up to 25,000 new jobs and leverage an additional £4 billion of private sector investment. Housing plays a critical role in supporting economic competitiveness and therefore a continuation of the past trends embodied in the 2014-based projections would be contrary to this strategy and could jeopardise delivery of the City Deal.

It follows that housing requirement policies in the emerging NDF and future SDPs should seek to support the Welsh economy by providing a sufficient number of homes, of a sufficient quality, to attract and retain skilled professionals and should not carry forward the recession-based trends in the most recent projections.

The failure to plan for an adequate level of new housing (market and affordable) would result in too few dwellings being made available through the planning system. This will increase competition and undermine affordability and as a result may jeopardise economic stability in Wales. It is essential that the NDF confirms that the estimates are minimum starting points and not targets.

**Affordable Housing as a Proportion of All Housing Need**

As well as identifying the central estimates for the level of housing need at a national level, the draft NDF also seeks to identify housing need by tenure by reference on page 30 to the central estimate figure of:

"47% of additional homes should be affordable housing (social housing or intermediate rent) through 2018/19 to 2022/23, with the remaining 53% being market housing. This represents an average of approximately 3,900 affordable homes and 4,440 market homes per year over the five year period". Similar statements are also made in term of the level of affordable housing as a percentage of all housing need within the individual regions that are identified within the draft NDF.

On numerous occasions, the draft NDF implies that the 47% affordable housing figure represents a target to be met. We are already aware of officers within local planning authorities that are taking the central estimates at face value, along with media reports that are suggesting that 50% affordable housing should be demanded on all housing developments. There is no evidence that such a high level of affordable housing requirement would be viable anywhere in Wales.

Viability is critical to the deliverability of development, the importance of which is being increasingly recognised by Welsh Government (e.g. changes to planning Policy Wales Edition 10 and draft Development Plan Manual Edition 3). It is therefore important that the NDF is not misleading in terms of the proportion of affordable housing that should be achieved across sites in Wales which if taken forward in SDPs or LDPs would render schemes unviable.

Given the inaccuracies and the potential implications on policy, we consider it is essential that the NDF is amended so that it does not set out the levels of affordable housing as a proportion of all housing need at both the national and regional levels, and that it is explicit that any affordable housing requirements contained within SDPs and LDPs should be based on a robust assessment of need and viability in the constituent area.

There is a danger that Welsh Government's policies on housing will push the national house builders out of Wales, and this would undermine the ability to meet housing need across a range and mix of house types and at the scale necessary to meet the NDF outcomes.

The NDF must have the same rigorous approach to delivery as that required of Local Planning Authorities when preparing their Strategic and Local Development Plans, which must be in conformity with the NDF.

## **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?

Neither agree nor disagree

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?

Agree

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?

I think this is a positive step forward

## 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?

Neither agree nor disagree

## 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

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?

Neither agree nor disagree

## 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?

Agree

## 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?

Strongly disagree

**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.**

**Policy 16 – Strategic Policies for Regional Planning**

The policy sets out various strategic issues that should be developed and contained within SDPs. The policy also states that Welsh Government requires SDPs to come forward in each of the three regions to deliver the requirements of this policy.

I agree with the principle of the policy i.e. that many policy issues are best considered at the regional scale. However, we have two fundamental concerns:

1. It should be made clear that the list of issues identified under bullet point 6 of the draft policy (e.g. identification of green belts, green corridors and nationally important landscapes) should be taken as options that are to be considered at the regional level as opposed to requirement that have to be fulfilled by the SDPs. The decision as to whether the identification of green belts and green corridors are needed within a region should be made based on sound planning judgements. This includes thorough analysis of the level and location of housing, employment and infrastructure required and the available land to deliver these requirements. It would be inappropriate for the NDF to predetermine this work and impose green belts/green corridors.

Please note, I provide a more detailed response in relation to green belts in reply to draft Policies 19 and 30.

2. My second concern is that the NDF is requiring substantial policy detail to be developed through the SDPs. The timescales for delivery of SDPs are likely to be further impeded through the need for multiple authorities to reach agreement on strategy amidst different policy aspirations and political agendas.

This raises the significant concern of a 'policy vacuum' whereby strategic issues are not dealt with due to delays in the SDP process, while it is also likely to hinder the delivery of replacement LDPs. This will create further uncertainty in decision making which is likely to undermine investment and delivery of all types of development in Wales.

I therefore consider that draft policy 16 of the NDF should specifically require that LPAs take active steps to avoid a policy vacuum, through early/immediate reviews of their LDPs where relevant.

**Policy 30 – Green Belts in South East Wales**

The policy requires the identification of Green Belts through the SDP, to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.

Furthermore, the supporting text states "Strategic Development Plans must identify a green belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff". (Our emphasis added).

As per our response to draft Policy 19 (Green Belts in North Wales), we strongly object to the inclusion of draft Policy 30 that has again not been supported by any evidence.

Due to the significant implications of Green Belt designation and the long-term policy implications, it is essential that any such designation is robustly justified and truly necessary. No evidence has been provided by Welsh Government to justify the need for a green belt in this location, while the draft NDF will not be subject to examination.

It is not acceptable that a Green Belt is to be imposed through the NDF without the provision of any evidence of its justification or a scrutiny process. This is entirely contrary to Welsh Government's recently adopted PPW 10 that requires their allocation of a green belt to be soundly based and only employed where there is a demonstrable need, with no suitable alternative.

We agree with the NDF identifying that Cardiff and Newport should be the economic focal points for the South East Wales region. In South East Wales, much work has already taken place on the Cardiff City Deal and Western Powerhouse that would logically see both Cardiff and Newport as key areas of growth in the region. Availability of land both in and around Cardiff and Newport for employment and housing development will be essential to support the aspirations for economic growth in these areas.

## **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?

No Comment

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.

No Comment

### 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?

There is a need for the planning system to support the Welsh economy, which remains vulnerable, especially when compared to the other parts of the UK. As is identified in the Challenges section of the document "economic activity, wages and productivity in Wales are lower than the UK average. Gross value added (GVA) per head in Wales in 2017 was £19,900 compared to the UK average of £27,300". There is a striking absence of any strategic economic policies in the draft NDF. Given the status that the NDF will be afforded in both plan

NDF should not be setting out the scale of housing delivery required

The Introduction to the NDF sets out that "It does not seek to identify the exact location for new development, the scale of growth in individual settlements or prescribe precise boundaries of areas where development should not take place. The regional and local tiers are the most appropriate level at which to take these decisions, involving communities as they do so".

I agree with this approach; the scale and location of growth is best identified at the regional and local levels where there is greater knowledge and understanding of local issues, for example, regeneration initiatives, growth strategies, market areas and constraints. Furthermore, given that there is currently no intention for the NDF to be subject to examination it is vital that the scale and location of growth are developed and identified under SDPs and LDPs to ensure that the proposals are subject to appropriate scrutiny; the NDF should help frame the work to be carried out under SDPs and LDPs but not define it.

The draft NDF needs to be explicit in that it is not setting out the scale of growth at any level, but instead provide an indication of the minimum likely requirements. As previously highlighted, we are concerned that the central estimates of housing need detailed in the plan are effectively being presented as targets and will further suppress the delivery of much needed housing in Wales.

## 16. Are you...?

Q24. Are you:

Providing your own personal response

## 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

[REDACTED]

Organisation (if applicable)

[REDACTED]

Preferred contact details (email/phone/post)

[REDACTED]

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

[REDACTED]

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

Keep my response anonymous