

# National Development Framework: Easy Read questionnaire

## Part A – the main points of the NDF

Q1. 1. Do you think we are aiming to do the right things with our plan?

Yes

**Comments:**

The Royal Society of Architects in Wales, commends the aims of this draft National development framework, particularly the ambition of an overarching spatial strategy for Wales. We do feel that this document is a little vague in some areas and needs to be more specific, which we have outlined through this survey: The NDF should suite the RDP's and LDP's, but it doesn't make it clear, how it interacts with spacial plans. Do pre-existing LDP's and RDP's need revisiting or amending as they would have come from the previous Wales Spacial policies and aims? We would suggest that existing spatial plans at all levels remain, are supported by supplementary planning guidance addendums to incorporate the NDF's policies, as the work and time involved in revoking and readopting a LDP would be infeasible and further strain local authority resources. However the draft document should make this approach explicit.

Q2. 2. We have 10 aims in the NDF. Should we think about anything else? Tell us anything we've missed out

Not sure

Q3. 3. Do you think the Plan will help achieve healthy and well-planned places?

Yes

Q4. 4. Do you think the plan will help us take care of our environment?

Not sure

## Part B – different parts of Wales

Q5. 5. Do you agree with our plans for North Wales?

Not sure

Q6. 6. Do you agree with our plans for Mid and South West Wales?

Not sure

**Comments:**

The relationship of Regional Strategic Plans to the National Development Framework is unclear. In the spatial policy section the draft document suggests using a RSP to coordinate policy across target regions such as the Haven Towns, or the Heads of the Valleys. However it is not explicit about what spatial criteria or concerns are needed to prompt the implementation of a RSP. Without clear, guidance on how and when RSP's should be implemented, Local Authorities may be resistant to cooperating and investing substantial time and money to produce a much needed coordinated spatial strategy for these target regions.

Q7. 7. Do you agree with our plans for South East Wales?

Not sure

**Comments:**

The document makes reference to key Welsh Government-led development initiatives such as the South Wales and Swansea Metro, and the Cardiff Capital Region, however it falls short of recommending RSP's to guide implementation. We suggest large multi-authority development initiatives are a key criteria that should prompt the introduction of an RSP, and this should be explicit in the NDF for it to function as intended.

**Part C**

#### Q8. 8. Do you have any other comments you would like to make about this plan?

We commend the aim of introducing a higher level of affordable housing provision to level social inequality and address the housing crisis. However the draft document suggests this could be achieved by public land release, and while we support this approach, the document does not address potential side effects of this policy decision. Public land is has traditionally been offered to developers who can produce the highest capital receipt for the authority releasing it. Requiring a higher level of affordable provision will likely mean developers are forced to increase the density of any proposed development on a released site (both the affordable and open market units) in order to make the scheme viable, and to be able to justify the large investment needed to secure the land from the local authority initially. This may work on urban sites to create dense attractive settlements which meet the NDF's aims, but on fringe and allocated sites this will like produce unusual crowded developments of the exact kind the NDF seeks to discourage.

The other suggested method of raising affordable housing provision is by empowering housing associations and small to medium size developers. The document is vague on how this is to be achieved; with no suggested legislative or business policy changes to help these bodies. Currently the only way housing associations can produce viable developments of any scale is via the Social Housing Grant, and the levels of this being offered have been in decline for several years. This needs to be addressed, or more support explicitly enshrined in the NDF.

Moreover, without additional funding, small to medium sized developers are often unable to produce developments of any scale because of the huge financial and time investment needed to secure a planning consent. The draft document must address this in order to meet its policy aims. Planning consents have become a barrier to development in recent years and it is an accepted truth that Local Authority Planning Departments are overstretched and not functioning. This barrier to development has only been made worse with the disastrous implementation of the SAB process; and the National Development Framework must acknowledge this and propose policy steps to overcome these issues.

We commend the drive for mixed use developments, however we are concerned their reference in the NDF draft document is not informed by a research based approach. Mixed use developments, outside of super dense urban centres such as Greater London, function based on economies of scale, both in their commercial and residential provision. The high street is already in decline (as mentioned in the draft document), therefore the insertion of several small commercial units into the street scape of a residential development will often result in these units remaining unoccupied as there is simply not the market demand for units of this size packed so closely together. While sometimes such a 'mixed use' approach can be propped up by social enterprises or low commercial rent levels, these often frequently fail as there are simply not enough enterprises in any one urban area. Food retail is particularly problematic, as a small scale supermarket unit will not be rented by any commercially sound provider if it is anywhere near a larger superstore; and these are currently littered around our towns and cities.

We suggest the NDF looks at best practice research to establish how much residential or office provision is required in an area to make insertion of commercial or leisure uses viable, and provides some suggested levels.

Finally, while we appreciate the target spatial areas of the draft NDF are mainly urban centres; the document does make reference to sustaining vibrant rural settlements. However it provides no policies on how best to achieve this. Rural settlements rely on good employment opportunities to attract and retain residents, and these are currently in decline across rural Wales. We suggest the NDF again looks at best practice research, and revises its scope to provide some spatial policies specifically addressing rural decline, and proposing how best to develop rural residential developments sustain rural communities.

**Submit your response**

Q9. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Where are you from?

[REDACTED]

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Q10. If you want to receive a receipt of your response, please provide an email address.  
Email address

[REDACTED]

Q11. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous