

From: [Martin Sullivan](#)
To: [NDE](#)
Subject: Fwd: FW: Representation to the draft NDF Consultation
Date: 15 November 2019 15:02:15
Attachments: [NDF.Reps.14-11-19 \(002\).pdf](#)

Representation to the Welsh Government Draft NDF Consultation


Dear Welsh Government

Please find attached my response to the consultation on the Draft National Development Framework(NDF).

I trust that the views on the enclosed consultation form will be taken onto account in finalising the emerging National Development Framework. I would be grateful if you would keep me informed of progress on the emerging Framework.

Yours sincerely,

Martin Sullivan MA. FRSA.



Consultation Response Form

Your name	Martin Sullivan
Your address	<div></div> <div></div> <div></div> <div></div>
Preferred contact details (email/phone/post)	<div></div>
<u>Organisation (if applicable)</u>	

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:

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:

- Point 2 of the summary which seeks *"A Wales where people live in vibrant rural places with access to homes, jobs and services."*
- 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."*
- 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 recognises that *"areas outside the urban centres 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)

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 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:

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 recognise 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)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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.

Our key concerns are:

- While there is a clear focus on affordable housing there is no acknowledgement of the need to increase the supply of market homes;
- 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,
- To deliver the level of affordable housing identified it will be necessary to increase delivery of housing altogether.

We 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.

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.

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 4,4400 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)

- 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?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

6. Green Infrastructure (policies 8 & 9)

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

8. The Regions (policy 16)

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

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" 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.

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.

We 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, we provide a more detailed response in relation to green belts in reply to draft Policies 19 and 30.

2. Our second concern is that the NDF is requiring substantial policy detail to be developed through the SDPs. Our experience of the planning system in Wales with both Unitary Development Plans and Local Development Plans is that development plans are typically mired by substantial delays in preparation and adoption. 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.

We 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 23 – Swansea Bay & Llanelli

We endorse the recognition of Swansea Bay and Llanelli as the main focus for strategic growth in the Mid and South West Wales Region. We agree that the area can accommodate new growth and that the SDP should be informed by the aspirations of the Swansea Bay City Region City Deal and Economic Regeneration Strategy.

Notably, the Swansea Bay City Region Economic Strategy (2013 – 2030) sets out a framework for a “*bold and ambition new economic growth plan*” for the region. The strategy is very much focused on growth of the economy and its strategic aims include:

1. Business growth and retention;
2. Maximising job creation;
3. The knowledge economy & innovation; and,
4. Establishing 'Distinctive Places & Competitive Infrastructure.

Developing and enhancing the region's housing stock will be paramount to supporting the retention and attraction of talent to the area and meeting the strategic aspirations for the economy of this area.

We are again concerned that an approach of strictly adhering to the central estimates of housing need for the region will undermine the delivery of the economic strategy. We therefore consider that the supporting paragraph on page 58 should be amended as follows:

"Planning and co-ordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. Welsh Government's central estimates help to identify a starting point to ensure sufficient new homes are provided in the region. Further consideration of economic growth aspirations for this region, affordable housing requirements and regeneration objectives should also inform housing requirements, such that the level of need is likely to be higher than past demographic-based figures. Under the Welsh Government central estimates 23,400 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 44% of the additional homes needed should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale."

Policy 26 – Swansea Bay Metro

We endorse the NDF's support for the development of the Swansea Bay Metro, along with the commitment that Welsh Government will continue to tackle congestion on the M4 and trunk road network through its pinch point programme.

We consider that improved connectivity and accessibility in this region is particularly important to allow enhanced opportunities for growth and investment in the South West Wales region.

Policy 27 – Cardiff

In the South East Wales region, Cardiff is recognised as an internationally competitive city and a core city on the UK stage.

The ten local authority areas in South East Wales have signed up to the £1.2 billion Cardiff Capital Region (CCR) City Deal. It aims to provide a 5% uplift in GVA and create up to 25,000 new jobs by 2036, representing a 40% increase above forecasted levels of growth. It also sets out to attract an additional £4 billion of private sector investment to the region and to deliver the South Wales Metro. Through committing to the City Deal the participating local authorities have made the decision to strive for growth.

In order to achieve this aspirational level of growth, the local economy requires a workforce of sufficient size and with an appropriate mix of skills, retaining working age residents and particularly

highly skilled workers. Planning policy therefore has a key role to play in ensuring the right number and types of homes are provided in the right locations to accommodate the workers that are needed to drive the economy forward.

Whilst Cardiff should not and cannot accommodate all of the region's new housing, a strong and growing Cardiff is vital to the success of the CCR, with other areas benefitting from and emulating its strength. This is particularly important given the economic vulnerability of the CCR when compared to the rest of the UK.

However, the draft NDF states that Cardiff is nearing capacity due to geographical constraints and so does not support housing growth in the city. This is despite providing no details of any evidence work to demonstrate the level of capacity in the city for new homes, jobs, infrastructure etc.

Without explicitly stating it the draft framework appears to be diverting strategic growth away from Cardiff, which given its role as the economic driver of the region is a fundamental concern. We consider that it should be for the SDP and LDPs to consider the capacity of the city and surrounding environs to accommodate further growth and not determined by the NDF.

Policy 28 – Newport

The draft plan identifies Newport as the focus for strategic housing and economic development in the South East Region, with particular emphasis placed on brownfield regeneration to provide new housing and employment areas.

We do not object to Newport becoming a strategic focus for development in the region. However, we are concerned that the draft policy and supporting text (along with draft Policy 30) are too heavily focused towards existing brownfield sites within the city. The implication of this approach is to limit growth opportunities by restricting the further urban extension of the City.

The draft NDF fails to appreciate that development opportunities within Newport are already constrained due to a variety of issues including flood risk, the location of the M4, availability of sites, and the viability of development on brownfield sites. In addition, much of the brownfield land suitable for development in Newport has already been allocated for development under the adopted LDP (2011-2026) to meet existing/near-term requirements.

The draft NDF states on page 64 that *"The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region"*. For reasons previously explained, housing growth will be necessary to promote economic development and growth. Given the strategic growth the draft NDF envisages for Newport and the constraints outlined above, we consider that it will be necessary to deliver housing developments in locations beyond the existing city limits that provide commuting opportunities.

While the NDF should still promote brownfield site opportunities, there should be recognition that in order to meet the aspirations for Newport a more flexible approach will be required. This will include development on greenfield sites and the delivery of additional housing in neighbouring authorities to support the ambitions for Newport.

Policy 29 – The Heads of the Valleys

We support the principle of the policy that seeks to co-ordinate regeneration and investment in the Heads of the Valleys area to deliver greater prosperity, improve well-being and address social inequality.

We note that the policy states that *“The Welsh Government will work with local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing issues in the Heads of the Valleys area”*.

Unfortunately, the policy again fails to recognise the crucial role of housing plays as a catalyst for regeneration and economic growth and does not provide adequate policy support for housing development. For reasons previously set out, if delivery of significant new businesses and jobs in the Valleys are to be achieved then it will be vital that an appropriate level and choice of housing is delivered to align with ambitions for economic growth. Similarly, a range of good quality housing will be necessary to address issues of well-being and social inequality. We therefore, consider the policy text should detail the need to deliver a suitable variety of housing within the Heads of the Valleys.

The supporting text (on page 66) to the South East Wales region policies also states:

“Planning and co-ordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. Under Welsh Government central estimates 71,200 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 48% of the additional homes needed should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale”.

As per our previous comments in relation to Policy 5 (affordable housing), we are concerned that the draft NDF is effectively setting out the central estimates as development targets and this will unduly influence the housing requirements that are to be reached under the SDP and LDP processes.

This conflicts with the approach set out on page 11 of the draft NDF which recognises that it is not for the NDF to identify the exact location for new development or the scale of growth, with the regional and local tiers of the planning system instead being the most appropriate levels at which to make these decisions. It is important to ensure internal consistency within the document.

We do not consider that the proposed housing figures detailed on page 66 of the draft NDF align with the ambitions of the City Deal or Welsh Government’s aspiration for regeneration and increasing economic growth and prosperity across the region. Housing is a key driver to economic growth and a well-functioning housing market is important for an area to remain competitive and attractive to businesses and economic activity to promote growth. If the central estimate figures set out on page 66 are rigidly adhered to then there will be a shortfall of housing in this region.

We therefore consider that the supporting paragraph on page 66 should be amended as follows:

“Planning and co-ordinating the delivery of new housing to meet identified needs will be an important task for the regional planning process. The central estimates help to identify a starting point to ensure sufficient new homes are provided in the region. Further consideration of economic growth aspirations for this region, affordable housing requirements and regeneration objectives

should also inform housing requirements, such that the level of need is likely to be higher than past demographic-based figures. Under Welsh Government central estimates 71,200 additional homes are needed in the region until 2038 and over the initial five years (2018/19 to 2022/23) 48% of the additional homes needed should be affordable homes. These estimates provide part of the evidence and context on which Housing Requirements for Strategic Development Plans can be based and should be considered at the regional scale". (Suggested replacement text underlined).

The draft NDF does not seem to appreciate viability issues that the Heads of the Valleys suffer which are likely to stifle development, unless there is greater policy flexibility in planning requirements. There are often more acute viability issues in the Heads of the Valleys area due to greater abnormal site costs (e.g. levels, ground conditions) and the lower sales values. Consequently, there is greater difficulty in delivering significant levels of affordable housing on schemes. The draft NDF is silent on the issue of viability, despite its importance in delivering development. To ensure development and investment is not deterred in this area, we consider that NDF should acknowledge viability issues and recognise that there will often need to be flexibility in affordable housing and planning obligation requirements to ensure schemes remain viable and much needed development takes place in the area.

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.

The NDF already acknowledges that there are geographical constraints that will influence the further development of Cardiff, although the draft plan fails to appreciate there are also several constraints

that will impact the future growth of Newport (e.g. flood risk, contamination/viability, city centre sites already allocated, M4 motorway).

Limiting future development to the north of Cardiff and Newport via the imposition of a Green Belt, without a detailed consideration and scrutiny of its impacts will undermine the potential for suitable development opportunities to come forward. It will therefore harm the future economic growth and competitiveness of Cardiff and Newport.

As previously indicated draft Policy 16 (Strategic Policies for Regional Planning) of the NDF already identifies that strategic development plans have the option to identify green belts and green corridors. The requirement for a green belt in the South East Wales region should therefore be considered as part of the relevant SDP process. This will allow for greater account of regional economic policies and regeneration aspirations to be taken as well as the actual need for a green belt. Crucially, the process will also be subject to scrutiny as part of that plan's examination.

We therefore assert that there is no basis for the NDF to include a policy that a green belt must be delivered in the South East Wales Region. Draft Policy 30 and its supporting text should therefore be removed from the NDF.

Policy 31 – Growth in Sustainable Transit Orientated Development

We do not disagree with this policy in principle. It is recognised that housing should be delivered in sustainable locations with good connectivity and access to public transport options.

However, it should be made clear that development in the region should not be required to entirely align with the planned South Wales Metro development. There is uncertainty over the precise nature of the metro proposals which are likely to evolve over time, and it is not yet known when the scheme will be delivered. In the meantime, there is already growing need for housing development in the region, while there are sites that are suitable for development that are not necessarily in close proximity to the intended Metro routes. As such, development should not be delayed by stringently focusing on alignment with possible future metro routes.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No comment

13. Habitats Regulations Assessment

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

- Do you have any comments on the Habitats Regulations Assessment report?

No comment

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment

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

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comment

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?

Housing and the Economy

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”*.

Despite rhetoric in the Ministerial forewords and throughout the document about the need to increase prosperity and build a resilient economy, 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

preparation and decision making, the plan should contain an economic policy that sets out strategic aspirations for employment growth and provides an indication of employment land requirements.

The document currently also neglects to make the link between housing and the economy. Housing is an enabler of economic growth, the supply of good quality housing (both market and affordable) is essential to attracting and retaining a workforce of sufficient size and skill base to encourage inward investment. Housing development can also act as an important catalyst for regeneration and driver of local economic activity in its own right.

Consequently, we consider that there is a need for the NDF to include a specific economic policy to demonstrate commitment to achieving a more prosperous Wales with a stronger and resilient economy. This policy should also emphasise the important linkages between housing and the economy.

New Settlements/Urban Extensions

We recognise that the growth of existing settlements is likely to provide the most appropriate option for future housing development but without an urban capacity study to support this approach, it has to be questioned, is this a realistic and deliverable approach? There are often shortages of suitable land for development around many of the existing urban areas due to various constraints (e.g. environmental, neighbouring use, market viability etc). We therefore consider that there are still circumstances whereby the development of new settlements may provide appropriate solutions, subject to their geographic context and the delivery of appropriate services and infrastructure.

Consequently, we believe that the following statement should be removed from the identified spatial strategy in the draft NDF (page 22).

“Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources.”

The language used in the statement is negative and fails to recognise what constitutes an appropriate site for development is nuanced and not simply a binary issue of whether the site is greenfield or brownfield land. For example, many greenfield sites are not resource rich or environmentally sensitive and therefore the use of such sites for housing development can result in significant public benefit (e.g. delivery of housing, services, accessible open space etc.). Likewise, greenfield sites can relate well to existing built development and designed so that they are not ‘sprawling in nature’.

The view that greenfield sites are appropriate for housing development was recognised by the First Minister in a recent Plenary debate (15/10/2019). In response to a question regarding an increase in greenfield sites being included within the Bridgend replacement local development plan, the First Minister stated:

*“It's always been the policy of the Welsh Government that brownfield sites should be the first priority in terms of redevelopment. But she asks me what I think the reaction of local residents will be, **and I think what local residents will say is that more houses are needed in their areas for their families***

and for people who don't have the housing that they need, and most people recognise that the house that they themselves live in was once a greenfield site itself. So, actually when you talk to people about the housing needs that are there in local communities, what they recognise is that we are talking about their friends, their neighbours, their families and the need for us to invest in housing here in Wales.” (Emphasis added)

The approach set out in the draft NDF therefore conflicts with the views of the First Minister and with PPW which recognises that although previously developed land should be used in preference to greenfield sites this is not always suitable, for example due to site constraints with brownfield land or due to its unsustainable location.

Paragraph 3.49 of PPW 10 also recognises the potential for new settlements to come forward:

“Due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or the NDF. This is due to their significance and impacts extending beyond a single local authority”.

The NDF requires amending to take a more balanced approach to considering the opportunities for greenfield developments, urban extensions and new settlements, and one that is consistent with the other Welsh Government policies.

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”.*

We 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.

Need for Examination & Scrutiny

Given the NDF will form part of the statutory development plan we consider that it should be subject to examination and scrutiny to ensure that it meets the tests of soundness that are conventionally required of a development plan.

Proper examination and scrutiny of the draft plan is fundamental given that once adopted the NDF will have major impacts on policy decisions throughout Wales for the duration of the plan period. The NDF is set to influence emerging policy at both the regional and local levels through the

production of SDPs and LDPs that will be required to align with the NDF. However, there will also be an interim period prior to the adoption of SDPs and new/replacement LDPs whereby a policy vacuum is likely to exist for many LPAs. As such, the NDF will take on a heightened role in decision making due its development plan status. Given the weight that will be afforded to the NDF it is paramount that the plan is robust and justified on sound evidence. Consequently, we consider it is necessary for the plan to be subject to examination and public scrutiny, as per traditional development plans.

Alternatively, if the draft plan is not to be examined in public, we consider that it should instead only be a material consideration in the formation of SDPs and LDPs, more akin to the role that the Wales Spatial Plan has played in helping local planning authorities prepare their LDPs.

16. Are you...?

Providing your own personal response	<input checked="" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

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	<input type="checkbox"/>
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