

Consultation Response Form

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Preferred contact details (email/phone/post)	[REDACTED]
<u>Organisation (if applicable)</u>	Housing Justice (Charitable Organisation providing a Christian voice and action on homelessness and housing need)

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

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

It is essential that to achieve the outcome that the national/regional/local plan integration is embedded as an approach and that collaborative working is fostered to achieve the integration in practice. Infra-structure planning of every kind will be essential to create the prerequisite conditions and environments to deliver upon the framework aspirations.

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	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" 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:

With regard to urban policies the support, growth and consolidation of existing centres is a sustainable approach but redevelopment and regeneration will be key especially to upgrade and replace obsolete and outdated infra-structure. It is essential that a framework is created that allows town and city centres to 'reinvent' themselves and responded to 21st Century life and patterns, hence the refocus of centres to provides viable and sustainable retail uses but importantly these centres should have renewed community, social, leisure, cultural and residential uses and activities as their new foundation. The achievement of these urban goals will be encouraged by public sector investment decisions and a unified approach to public sector land disposal terms. Finally, it is essential that viability of delivery is uppermost in thinking as creating better places to live, work and play is important but can often be a reason for overly regulated development or application and implementation of standards that undermines viability. Similarly, simple resistance and inertia as say in the consistent refusal of highways authorities to work to these themes and aspirations can frustrate the achievement of goals, and in the extreme cases can result in new development being put 'on stop' for months on end through overly onerous application of legislation. All organisations and agencies must sign up to the principles with 'opting out' of the collaboration and partnership manifest in the NDF not an option on the basis of it being for others to do or worse still through an expressed and overt lack of interest.

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

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

Whilst financial support through funding programmes is a key component to increase affordable housing supply, the availability of public sector land and a consistent model for its disposal will be equally important in cases where grant support is neither available nor appropriate. Secondly, capacity building and creation of more resilience in the construction industry are important considerations and hence the need to achieve a step change in the scale of activity through say the introduction of Modern Methods of Construction (MMC) or Off Site Manufacturing (OSM). Thirdly, delivery is fundamentally based upon viability and hence the balance between standards, regulation and cost/value must be addressed as a major balancing equation. Finally, there needs to be a considered, yet pragmatic means by which sensitive buildings can be repurposed to provide residential accommodation eg listed buildings which were previously places of worship but which have seen the cessation of that use. Overall, it is important that the NDF closely follows, and is consistent with, the findings and recommendations of the recently commissioned and published Affordable Housing Review in Wales.

4. Mobile Action Zones (policy 6)

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

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

The extended mobile phone and related coverage is a major consideration in urban and rural areas with important economic development benefits. However, there should also be a recognition of the unintended health and well-being negative consequences of such coverage, particularly in issues around mental health, social isolation and potential undermining of community building and development.

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

It is important to exploit technological advances for environmental benefit and whilst charging point infra-structure, the essential factor to be addressed is the inadequacy of the electricity generation and storage infra-structure as manifest in the inability of the grid to fully accommodate energy generation from renewable sources or 'active' or power generating buildings eg Homes as Power Stations. This is a function of obsolete infra-structure or lack of capacity and it is important that the development industry which will deliver the aims of the NDF is not unduly burdened by meeting the cost of addressing these infra-structure issues and thereby undermining viability.

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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Please refer to previous comments concerning grid infra-structure capacity issues.

District heating systems will need careful framing in their long term management and maintenance and of course the avoidance of 'free riders'. However, on the back of public sector development, there exists an opportunity to create template approaches for wider application.

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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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.

North Wales – critical that development is not frustrated by flood risk issues and hence the need to prioritise a strategic plan for implementation in order that other aspects of the NDF can be delivered.

Mid and South West Wales – this is a large geographical area and true integration of plans will be challenging as a consequence of this scale but more as a consequence of the diversity of the region and reconciling and harmonising difference. For example, the Swansea Bay and Llanelli sub-region is very much more akin to the character of South East Wales. Also, the enhancement of the quality of the connectivity within the region in terms of transport especially north and west from Swansea is a key factor in determining the success of this region.

South East Wales – aside from the inequalities that prevail across this region, the greatest that risks undermines successful policy delivery is congestion along the M4 Corridor with the area around Newport being a particular issue. Hence, the enhanced strategic role being promoted for Newport must address this congestion issue as part of the framework.

Across all regions there is an identified affordable housing need which will call for innovative interventions to deliver upon the scale and step change in delivery needed, as reference within Policy 5 comments.

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.

The ISA has defined a comprehensive range of outcomes that address health and well-being, economic development and environmental protection and enhancement. It is also comprehensive and inclusive in its spatial consideration. Important to the on-going use of the ISA tool should be to ensure that it remains consistent with the key components of the Well-Being and Future Generations Act.

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?

As the HRA feeds into the wider Integrated Sustainability Appraisal the necessary checks and balances exist to ensure that all factors are addressed whether of a complementary or competing nature.

14. Welsh Language

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

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

The effects of the NDF will be manifest in how integral the Welsh language is to the social fabric of an area and by definition this will vary geographically across Wales.

Similarly, certain policies within the NDF will have greater impact and potential for impact whether positive or negative. These policies will be those related to economic development/employment and secondly to housing development.

In terms of mitigation or enhancing positive effects, there will need to be an assessment of the impact of the following on Welsh language arising from the NDF policy areas related to:

- Population and demographics including new migration flows
- Quality of Life indicators including those measures relating to health and well-being and the environment
- Economic development
- Physical and social infra-structure development
- Social and cultural schemes

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.

Practical considerations could be developed to ensure consistent means of screening and impact assessments through defined and consistently applied methodologies irrespective of location. Secondly, language issues could be addressed at source in terms of plan and strategy preparation akin to those used in the LDP preparation process including community involvement schemes and sustainability appraisals where the language impact is included in the balancing of all other social, physical, economic and environmental considerations arising from development. At a very detailed level, considerations such as phasing of say, housing developments could be used to mitigate and monitor impacts as well as the use of bilingual signage policies and possibly use of the contract clauses around the language akin to those used for community benefits when schemes are being developed.

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?

None

16. Are you...?

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