

Consultation Response Form

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<u>Organisation (if applicable)</u>	Lichfields on behalf of The Trustees of Plymouth Estate

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 there is need for an Outcome that focuses on the delivery of housing.

The anticipated Outcomes are summarised on page 18 of the draft NDF and then considered in more detail on pages 20 and 21.

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, however, the Outcomes fail to reflect the importance of ensuring an adequate supply of housing to the economic and social well-being 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.

Furthermore, 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 homes 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,
7. Sustainable movement and dealing with the challenges of climate change (Objectives 7 and 11).

We also have concerns that the Outcomes identified within the draft NDF are conflicting in nature. For example, they seek to promote the delivery of economic development and affordable housing while at the same time as protecting greenfield land and recovering lost biodiversity. No recognition is provided that the Outcomes are interlinked and potentially contradictory in nature, or how such conflicts are to be resolved. We therefore consider it is unlikely that each Outcome is capable of fully being achieved. We therefore consider that the Outcomes should be refocused as guiding principles.

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".

There is 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.

The current policy suggestion that development within towns/cities is the most appropriate form of growth is over-simplified, especially given that the NDF does not appear to be supported by any urban capacity studies. Focussing development within existing urban settlements can result in overcrowding and increased pressure on infrastructure and open space which is already a concern for existing communities, while there is often limited suitable sites within existing urban areas. Consequently, we question whether the stringent focus on existing town/city centres and urban

areas is credible and deliverable.

For example, in north-west Cardiff, the delivery of the Plasdwr urban extension is creating appropriately balanced and mixed-use communities. Plasdwr is set to deliver up to 7,000 dwellings (5,000 within the LDP plan period), approximately 3,000 new jobs, major open spaces and playing fields, a district centre and 3 further smaller local centres together with associated community facilities including 4 primary schools and a secondary school. Major improvements to public transport networks within and beyond the site are central to the proposal as is the proposed integration and connectivity of the site with neighbouring communities and the local landscape context. The development will therefore for be both sustainable and socially inclusive, while addressing housing need and supporting economic development.

The scale of growth required, which is in-line with Cardiff's housing needs and economic aspirations, made it inevitable that major greenfield sites would need to be allocated. It is unrealistic to believe that the needs of the City could have been met simply from a combination of existing brownfield land and smaller or medium sites. Likewise, the significant infrastructure improvements and public benefits (e.g. significant level of affordable housing, community facilities) that Plasdwr is set to deliver are dependent on market forces and the viability of the proposals.

Sites within existing urban areas, particularly brownfield land, typically face greater constraints, build costs, risks and more fragmented ownership. As such, their delivery is less assured and where projects are delivered the viability is often more marginal, and so schemes would not be capable of delivering similar levels of infrastructure improvements or public benefits. It therefore remains important to allocate land in locations where developers want to build and where development viability is robust enough to support a strong policy requirement for increased levels of affordable housing and other necessary infrastructure.

Consequently, we consider that the NDF needs to provide greater flexibility by recognising that other growth options exist – such as development at the periphery of settlements; development of greenfield sites; development at 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).

Draft Policy 1 should therefore recognise that development on the periphery of settlements can also deliver sustainable development, particularly where transport routes are currently available or can be provided. In addition, an acknowledgement that development may be required to take place at the edges of settlements and on greenfield land will allow a balanced approach to accommodating growth that will enable the most sustainable options to be pursued.

Similarly, while seeking high-density development generally accords with sustainability principles, it is unlikely to be appropriate or desirable in all contexts. The policy should therefore instead support an efficient use of land and appropriate densities, rather than simply seeking “*high density*” development.

In line with the above, we also 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 above statement is unnecessarily pejorative and fails to recognise that 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 should therefore be amended to take a more balanced approach to considering the opportunities for greenfield developments, urban extensions, new settlements, appropriate densities. Such an approach would be consistent with the other Welsh Government policies.

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 do not object to a policy that seeks to increase the supply of affordable homes in Wales, 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. Furthermore, 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.

There is substantial need in Wales for all types of new homes. This is evidenced by increasing house prices and worsening affordability across the Country. Additionally, the figures quoted in the draft NDF themselves identify that there is a greater overall requirement for market housing in Wales than affordable housing and yet there is no policy recognition of the need to increase the supply of

all types of housing.

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, such as 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. We are concerned that the lack of a detailed housing policy would undermine the achievement of many of the well-being objectives set out in the Welsh Government's National Strategy 2017:

1 Support people and businesses to drive prosperity: planning for an adequate housing supply drives economic growth and is essential to ensuring an appropriate level of workers in local areas, which itself is critical for healthy businesses and increasing prosperity.

2 Tackle regional inequality and promote fair work: a supply of housing across Wales is critical to ensuring that no area gets left behind.

3 Drive sustainable growth and combat climate change: a failure to fully acknowledge – and respond to – the need for housing undermines the aspirations of sustainable growth, to the very significant disadvantage of current and future generations.

4 Build healthier communities and healthier environments: residential development is critical to the health and well-being of local communities and, by virtue of its contribution to the natural environment and open spaces, is also essential to the health of the environment.

5 Support young people to make the most of their potential: the provision of an adequate supply of housing is vital in creating the opportunity for people to enter the housing market at a time of their choosing. It is also important in ensuring that young people can live where they want to, rather than being forced to move elsewhere where housing might be more readily available and affordable. In the context of a rapidly ageing population, this will have an important bearing on the economic competitiveness of communities across Wales.

6 Build resilient communities, culture and language: achieving an appropriate supply of housing is critical to ensuring the strength of local communities and the integrity of the Welsh culture and language. A failure to grow communities in a sustainable manner will undermine the long-term health of communities as younger people are forced to move away.

7 Promote and protect Wales' place in the world: a failure to deliver the level of housing that is required, both now and in the future, will cause significant harm to Wales and will undermine its reputation as a welcoming and attractive place to live, with inclusive economies and an expanding economy.

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.

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.

Furthermore, 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.

We consider that the central estimates significantly underestimate the number of houses that are likely to be needed in Wales in both the short-term and throughout the plan period. This results in a misalignment with other policies and aspirations in the draft NDF. Therefore, the projections cannot be relied upon as the sole base for assessing housing needs and should be seen as a minimum starting point for the assessment of future housing need. This has previously been acknowledged by the Welsh Government which has made it clear that the central estimates are policy neutral and do not in themselves constitute housing targets. However, this is not reinforced within the draft NDF whereby the central estimates are presented in an authoritative manner with no reference to their limitations or indication that higher levels of housing delivery will be required to align with the plan's other goals (e.g. focus on manage growth, City Deals, North Wales Growth Deal). We consider that the appearance of the central estimates in the draft NDF is currently akin to setting a housing target. We note from draft representations prepared by various local authorities/public bodies¹ that they also share the view that the figures presented within the draft NDF appear as targets.

Although the central estimate figures are not disaggregated to a local authority level, we can foresee that they will be used as the starting point for SDPs and LDPs unless the draft NDF is revised to acknowledge that there are limitations to the calculations and that the central estimates should only serve as a starting point for the consideration of housing need in Wales.

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 therefore 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

¹ Cardiff Capital Region Cabinet Report 21 October 2019; Monmouthshire County Council Cabinet Report 23 October 2019; Caerphilly County Borough Council Cabinet Report 2 October 2019; Vale of Glamorgan Council Environment and Regeneration Scrutiny Committee Report 16 October 2019.

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.

To deliver the level of affordable housing identified it will be necessary to increase delivery of housing altogether

If the total level of affordable housing identified is to be achieved we consider that it will require a step-change in the delivery of all housing in Wales.

In the 20 years from 1999/2000 to 2018/19, affordable housing constituted only 11% of all completions (Stats Wales). Since 2011-12, the highest level of affordable housing delivered in a year was 2,546 units (2016-17) (Stats Wales²). This indicates that a requirement for almost half of all housing delivery to constitute affordable homes is not realistic under current delivery mechanisms.

We therefore believe that Welsh Government will need to decide between:

1. Not meeting its delivery target of 3,900 affordable homes per annum; or,
2. Increasing the overall housing requirement for Wales to help achieve the level of identified affordable homes.

Traditionally, private housebuilders have been responsible for delivering a significant proportion of affordable homes (both for social rent and low-cost home ownership) in Wales through Section 106 contributions. For example, for the last five years the private housing building industry have provided over a third of all new affordable homes in Wales (Stats Wales³).

The draft NDF appears to indicate that the increase in affordable housing supply will be delivered entirely through the public sector, RSL, Council housing and support for SME builders. Although this is a commendable ambition, the draft NDF appears to be highly dismissive of the role the private sector, in particular volume house-builders, have in delivering affordable housing, which has been

² Additional affordable housing provision by provider and year:

<https://statswales.gov.wales/Catalogue/Housing/Affordable-Housing/Provision/additionalaffordablehousingprovision-by-provider-year>

³ Ibid

significant in the last 20 years.

If the challenge of delivering record levels of affordable housing units is to be met the contribution of affordable homes through Section 106 planning obligations will remain an important component of this delivery. However, experience from existing viability assessments demonstrates that even in the strongest market areas affordable housing provision is rarely higher than 25 to 30%. In many parts of Wales, the level of provision that can be justified is significantly lower.

As such, we consider it will be essential that a policy framework is put in place that will stimulate all types of house building in Wales and increase the delivery of market housing as well as affordable housing. For example, while the delivery of 3,900 affordable homes per annum would not be feasible under a requirement for 47% affordable housing (out of a total of 8,300 homes), it would be more likely as a smaller proportion of a larger overall housing requirement (e.g. 30% of a total of 13,000 homes). Increasing overall housing delivery would also have the added benefit of improving affordability of open market housing and ensuing a closer alignment between housing and economic growth.

It is therefore imperative that the NDF includes a policy that promotes the delivery of all housing and clarifies that the central estimates should not be translated directly into housing targets. If enacted in policy, the current published figures would serve to choke off essential delivery of all types of housing, as development would simply be unviable.

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 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?

[illegible]

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

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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?

[illegible]

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

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, especially as the SDPs are likely to have a more robust and detailed evidence base than is apparent for the NDF. 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. We have concerns that some of the policy issues raised are too prescriptive, particularly due to the lack of evidence to support them. For example, 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 regional capacity studies to analysis 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 Policy 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 27 – Cardiff

In the South East Wales region, Cardiff is recognised as an internationally competitive city and a core city on the UK stage. However, draft Policy 27 and its supporting text does not appear to support its further growth citing that the city is nearing its physical limits.

We note that the responses to the draft NDF that have been prepared by both Cardiff Council and

the Cardiff Capital Region Cabinet both of which raise concern that the policies in the draft NDF will undermine the future development potential of Cardiff and are not based on any robust evidence, with each party's response stating:

"the National Development Framework, as currently drafted, significantly underplays the major opportunity Cardiff's population and economic growth represents for Wales, placing a disproportionate emphasis on the challenges associated with growth. We consider that the Framework should respond to the national trends outlined above through seeking to support the Cardiff's population and economic growth, and the unique role the city economy plays in the national economy, whilst ensuring that the benefits of this growth are felt across the wider Capital Region".

We agree with the views of Cardiff Council and the Capital Region Cabinet. The notion in the draft NDF that Cardiff is constrained from future growth is not substantiated by any evidence and is entirely at odds with the Council's LDP (which is underpinned by a robust evidence base) that demonstrates significant capacity for Cardiff to grow sustainably and in accordance with place-making principles for the duration of the plan period.

It is also pertinent to note that Cardiff is projected to be the fastest growing UK Core City and over the next 20 years is projected to grow by more than every other Welsh Local Authority combined. Additionally, Cardiff is the economic powerhouse of Wales and is therefore likely to remain a key area of market demand and driver of growth.

Furthermore, 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.

Research undertaken by Lichfields in October 2017 demonstrated that the CCR has a relatively small economy, which has experienced modest levels of growth and lower representation in high tech sectors compared to the other Core City regions in the UK, while it has also been shown to be more vulnerable to economic shocks than other UK Core City regions.

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.

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 29 – The Heads of the Valleys

The supporting text to Policy 29 (on page 66) 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”.

Firstly, the inclusion of housing estimate figures under a policy on the Heads of the Valleys causes confusion in respect of whether they relate to the Heads of the Valleys area/authorities only, or whether they relate to the South East Wales Region as a whole. It should be made explicit that these figures relate to the whole region.

As per our previous comments in relation to Policy 5 (affordable housing), we are also 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.

In addition, for reasons previously specified, the level of affordable housing need is incorrectly being reported as a proportion of all housing need in the South East Wales 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).

Policy 30 – Green Belts in South East Wales

The policy supports the role of SDPs in identifying and establishing green belts 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**).

We strongly object to the inclusion of draft Policy 30 that has 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. This is unacceptable and 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 therefore believe 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 acknowledged that development 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 scheme. 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 development in the region, while there are sites that are suitable for delivery that are not necessarily dependent on the Metro for accessibility. 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.

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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?

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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?

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.

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.

Need for Examination & Scrutiny

The Development Plan system is founded on demonstrating plans are 'sound' with an evidence base that establishes the viability and deliverability of its proposals. No evidence has been provided to support the draft NDF policies or outcomes or to indicate that they are deliverable. Future SDPs and LDPs will need to conform to the NDF but also prove through examination that they are deliverable, based on robust evidence. There is significant potential for conflict between the untested NDF and the evidence-based SDPs and LDPs that could seriously jeopardise development plan preparation and undermine the plan led system.

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 as once adopted the NDF will have major impacts on policy decisions throughout Wales for the duration of the plan period. In addition to influencing the production of SDPs and LDPs, 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 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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