

Listed below are our detailed responses to the various headings contained in the consultation document.

**1. NDF Outcomes (Chapter 3);**

Whilst the aspiration of the outcomes is welcome, there is little in the way of substance demonstrating how the competing and contradictory outcomes will be reconciled. Until such time as these have been reconciled the outcomes cannot be regarded as realistic outcomes. We do not, however, object to their inclusion as ambitions,

**2. Spatial Strategy (Policies 1 – 4);**

**Policy 1 – Sustainable Urban Growth**

The spatial strategy prescribed by policy 1 appears to have been developed in isolation of the guidance contained in paragraphs 3.39 & 3.40 of Planning Policy Wales (10<sup>th</sup> Edition) which prescribes a comprehensive sequential approach for identifying suitable sites which includes previously developed land, greenfield sites within or on the edge of settlements, and new settlements. Exclusion of greenfield sites within or on the edge of settlements and new settlements from the spatial strategy risks undermining the ability to secure affordable housing on the scale required by policy 5 of the draft framework.

**Policy 2 – Supporting Urban Centres**

No comment.

**Policy 3 – Public Investment, Public Buildings and Publicly Owned Land**

We fear exclusion of the private sector from public land disposals will have a counterproductive impact on the supply of affordable housing which will prejudice the framework's ability to secure affordable housing on the scale required by policy 5 of the draft framework. We would contend the wording of the policy and its supporting text should contain an explicit acknowledgement / recognition of the successful partnerships between the public sector, registered social landlords, and the private sector.

**3. Affordable Housing (Policy 5);**

We support the principle of increasing the supply of affordable homes, however, we would contend that the scope of policy 5 should be broadened to include open-market housing in recognition of the relationship between open-market and affordable housing as a proportionate increase in open market housing will inevitably deliver an increase in affordable housing.

Framing the policy in such narrow terms ignores the significant contribution made by the private sector in recent years e.g. on average Persimmon Homes East Wales contributed 29% of the total number of affordable homes in its operating region<sup>i</sup> and 13% of the total number of affordable homes in Wales between 2014 - 2019 (these figures exclude the contribution made by our sister company Persimmon Homes West Wales and are based on the statistics published by Stats Wales). We were, therefore, disappointed to read the supporting text that accompanied policy 5, which conflated an increase in the 'delivery gap' with a greater reliance upon the private sector. Such a simplistic narrative ignores the realities of housing delivery in Wales, fails to acknowledge the findings of independent reports such as the 'Longitudinal Viability Study of the Planning Process' and represents a misunderstanding of the data offered in support of the narrative, which instead, illustrates a proportionately greater decline in the contribution by the public sector.

Broadening the scope of the policy to include open-market housing will also provide an opportunity to capture the socio-economic benefits associated with housing development, which in turn, will make a

significant contribution to the vitality and vibrancy of the urban areas and centres that policies 1 and 2 seek to promote. To put this into perspective, Persimmon Homes East Wales has forecast to construct 7,153 dwellings between 2019 – 2029 which will:

- Support 9,012 construction jobs;
- Support 12,875 supply chain jobs;
- Contribute £10,729,500 in s.106 planning obligations;
- Contribute £124,488,408 per annum in Gross Value Added;
- Generate £153,952,588 in total gross household expenditure; and
- Generate £7,975,595 per annum in Council tax receipts;

**4. Mobile Action Zones (Policy 6);**

No comment.

**5. Low Emissions Vehicles (Policy 7);**

We support the use of ultra-low emission vehicles, and are committed to the inclusion, where capacity exists, of electric vehicle charging infrastructure within our strategic development.

**6. Green Infrastructure (Policies 8 & 9);**

**Policy 8 - Strategic framework for biodiversity enhancement and ecosystem resilience**

We support the policy aspirations of policy 8 and are committed to safeguarding and enhancing green infrastructure as evidenced on our strategic developments at St Edeyrns, Pontprennau, Cardiff and land to the north of Junction 33 of the M4, Cardiff, where a significant investment in green infrastructure has been made.

**Policy 9 – National forest**

Whilst we have no objection in principle to the identification and development of a national forest, we would appreciate further information on the scale and location of the national forest.

**7. Renewable Energy and District Heat Networks (Policies 10 – 15);**

We support the principle of renewable energy and district heat networks, and are committed to reducing the carbon footprint of housing development in Wales through the incorporation of green technologies, materials and construction methods. Successful implementation of renewable energy and district heat networks will be dependent upon securing an appropriate quantum / critical mass, as such we would contend that strategic developments in excess of 1,000 dwellings are best placed to deliver renewable energy and district heat networks.

**8. The Regions (Policy 16);**

We support the development of a regional policy framework and will actively engage with the relevant stakeholder to ensure its delivery. The timescales associated with the preparation of each development plan tier are however a cause for concern, and could result in the preparation of local development plans devoid of any strategic direction as the next iteration of development plans will be prepared in a regional and national strategic policy vacuum.

**9. North Wales (Policies 17 – 22);**

No comment.

**10. Mid and South West Wales (Policies 23 – 26);**

No comment.

**11. South East Wales (Policies 27 – 33);**

**Policy 27 – Cardiff**

We support the continued role of Cardiff as a centre for culture, sport, leisure, media, the night time economy and finance and the commitment to regional development to addresses the opportunities and challenges arising from its geographic location and function as a capital city.

**Policy 28 – Newport**

We welcome the identification of Newport as a focus for regional growth, investment, strategic housing and economic growth, and will actively engage with emerging local development plans, the strategic development plan and various actors to ensure Newport fulfils its potential as a second focal point for the region.

**Policy 29 – The Heads of the Valleys**

Whilst we support the identification of the Heads of the Valleys as a priority area, the supporting text contains no evidence to suggest that the scale of growth proposed can be accommodated, nor does it offer any comfort that the historic challenges evident in these areas, such as viability and deliverability can be overcome. If the ambition of regenerating the Heads of the Valleys area is to be realised and the prescribed growth accommodated, it will be necessary to prescribe the mechanisms that will support the delivery of housing in this priority area.

We would also welcome clarification of the relationship between this policy and policy 1 – Sustainable Urban Growth as the policy aspiration to concentrate growth around towns and cities that are compact, and orientated around integrated public transport may not be compatible with the aims of the policy owing to the scale of growth proposed.

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

Paragraph 3.60 of Planning Policy Wales (10<sup>th</sup> Edition) states that proposals for "*Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust*". The supporting text that accompanies policy 30 contains no evidence of a demonstrable need to protect the urban area to the north of the M4 from the Severn Crossings to North Cardiff, accordingly, it cannot be said to be soundly based in accordance with the requirements of Planning Policy Wales.

Furthermore, the requirement for a green belt of the prescribed form would prejudice decisions on the spatial distribution and scale of growth in the affected authorities, which in turn would undermine their ability to deliver sustainable urban growth in transit orientated settlements in accordance with the aims of policies 1 and 31 of the draft National Development Framework.

**Policy 31 – Growth in sustainable transit orientated settlements**

Whilst we support the principle of focussing growth in places with good active travel and public transport connectivity we are concerned that the policy is over reliant upon new mainline railway and metro stations which have yet to be delivered. A spatial strategy premised on infrastructure that has yet to be delivered is inherently risky and could frustrate the ambition of delivering the quantum of housing envisaged during the initial years of the framework. The spatial strategy advocated by the policy could also undermine the aims of policy 1 of the framework as many of settlements in the Vale of Glamorgan

and Heads of the Valleys area capable of accommodating growth are not readily served by mainline railway or metro stations.

**12. Integrated Sustainability Appraisal;**

We are concerned the findings of the Integrated Sustainability Appraisal report have not been expressed in the policies formulated as part of the draft framework. Specifically, the framework fails to express support for significant economic growth and new housing, nor does it ensure that identified housing needs are satisfied at national, regional and local levels. Instead the policies contained in the draft framework are confined to general statements on the provision of affordable housing with no policies concerning housing more generally.

**13. Habitats Regulations Assessment**

No comment.

**14. Welsh Language**

No comment.

**15. Further Comments**

Persimmon Homes is committed to a plan-led approach to the delivery of housing in Wales, and will continue to engage with the various stakeholders to ensure the next iteration of local development plans are not hamstrung by unviable, undeliverable allocations. Accordingly, we the preparation of a national development framework that will inform the content of strategic development plans and subsequently local development plans to ensure that decisions on the development and use of land are considered at the appropriate scale is cause for optimism.

Unfortunately, the framework in its current form represents a missed opportunity. To deliver a truly strategic framework that will guide decisions on strategic development of national and regional significance, the policies contained therein need to be evidenced based, concise, prescriptive and rooted in Planning Policy Wales, with supporting text that outlines the mechanisms that will facilitate the desired outcomes.

We would contend that housing is uniquely placed to deliver the overarching and interrelated aims and objectives of sustainable development, and the Well-being goals, as such the scope of policy 5 should be broadened to include open market housing. Specifically, the wording of the policy and its supporting text should contain an evidence based housing requirement; identify a broad spatial distribution of strategic housing developments; and acknowledge all the stakeholders involved in the delivery of housing.

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<sup>i</sup> Persimmon Homes East Wales operates in Blaenau Gwent, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport and Torfaen

## Consultation Response Form

Your name	Jason Price Persimmon Homes East Wales
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Preferred contact details (email/phone/post)	jason.price@persimmonhomes.com [REDACTED]
Organisation (if applicable)	Persimmon Homes East Wales

## 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 checked="" 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:

Please see accompanying correspondence for detailed comments

## 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 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 checked="" 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:

Please see accompanying correspondence for detailed comments



### 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?

Please see accompanying correspondence for detailed comments

### 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 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 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 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?

## 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 see accompanying correspondence for detailed comments

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

Please see accompanying correspondence for detailed 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.

Please see accompanying correspondence for detailed comments

### **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?

Please see accompanying correspondence for detailed comments

### **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 see accompanying correspondence for detailed comments

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.

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### 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?

Please see accompanying correspondence for detailed comments
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### 16. Are you...?

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

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