

Consultation Response to the Welsh Governments Draft National Development Framework

Prepared by Powells Chartered Surveyors

Singleton Court Business Park

Wonastow Road

Monmouth

NP25 5JA

November 2019

1. Introduction

- 1.1. This consultation response has been prepared as a submission to the Welsh Governments consultation on the draft National Development Framework. Powells as a firm of Chartered Surveyors, Development Consultants and Planning Consultants act for various landowners across Wales.
- 1.2. Powells have responded selectively to the consultation to areas we feel are most important in terms of housing delivery and sustainable growth throughout the next plan period.

2. Levels of Growth

- 2.1. The draft NDF sets out unambitious levels of growth for the entirety of Wales and fails to recognise the significant housing need. The basis of the need has been drawn from estimating a significant economic downturn. One would assume this is a projection made based on the exit of the UK from the EU. There are many factors which will drive housing need, one being the ability for those in the county being able to afford a house. Significant student debt and lack of housing land supply skew the projections giving a false indication that the demand for housing over the next 20 years is low.
- 2.2. Monmouthshire has a range of urban and rural settlements which all require a minimum of proportionate growth during the NDF period. The NDF fails to recognise this, and focusses development into the valleys, and attempts to restrict development in Monmouthshire to an unreasonable level. There will inevitably be a significant migration from the city of Bristol into the county of Monmouthshire due to rises in property prices in Bristol and the abolishment of the Severn Bridge tolls. The Welsh Government should not deter this movement of people into Monmouthshire, because it will in time bring the average age of the demographic of Monmouthshire down. As a county, Monmouthshire has a large aging population, with a significant lack of younger people to support the older generation. The Monmouthshire County Council Growth and Spatial Options consultation clearly identified the need for housing and the migration of people from Bristol.
- 2.3. The approach the Welsh Government are taking by applying a blanket Greenbelt in the south of the county completely contradicts the evidence base in support of the emerging Monmouthshire LDP. By applying a Greenbelt of this nature, it will damage Monmouthshire's economy on a macro level as a county. On a localised level, the proposed designation will damage the rural economy severely. The Welsh Government must realise that the Greenbelt

designation is severely restrictive. We speak with direct experience of acting professionally in several English Greenbelt authorities (Tewkesbury Borough, Cheltenham Borough, Gloucester City, Bristol City and Tandridge District). Greenbelt by its very nature would prevent reasonable growth and diversification of rural businesses in order to protect openness, which in a predominantly rural county, the damage would be significant and far reaching to farms and other rural businesses. The borough of Tewkesbury is a sound example where this is the case. As Monmouthshire is a county which relies heavily on tourism, the indirect impact of such a Greenbelt proposal would be significant.

3. Planning Policy relating to Greenbelt

- 3.1. The National Development Framework sets out some radical shifts in policy and looks to apply a new policy in respect of Greenbelt of which we have specific comments on.
- 3.2. Our response in respect of the National Development Framework is in respect of the greenbelt designation itself. The Welsh government appear to be forcing a position of a new greenbelt designation in southern Monmouthshire of which they have indicated should reflect the Greenbelt boundary in and around Bristol.
- 3.3. We believe the Welsh government have misinterpreted the purpose of Greenbelt and also the permanence of Greenbelt. The purpose of Greenbelt is that it is to last for a multi-plan period and therefore it would not only serve the purpose of this plan but would then also serve the purpose of other plans moving forwards over a thirty to fifty year period. There is a clear lack of evidence presented by the Welsh Government to support the need for a new Greenbelt. If the government wishes to apply specific development designations to sterilise areas for development for a period, then an alternative and more flexible solution should be considered. It is our view that a greenbelt designation over the southern part of Monmouthshire would in fact have a severely negative impact on the Welsh rural economy within Monmouthshire. Greenbelt designation not only prevents housing development but it also prevents all other forms of development other than development which is generally accepted in open countryside, such as the construction of rural workers' dwellings and barn conversions, for example. Any new development other than this is generally prohibited.
- 3.4. There is very much a focus in greenbelt policy to check any form of development which would damage the "openness" of the greenbelt.
- 3.5. We, as a firm, undertake development work and planning consultancy in a number of counties both in England and Wales. We are finding that in our recent experience of dealing with the greenbelts in the Gloucester, Cheltenham and Tewkesbury under the Joint Core Strategy area, there has been a significant release of greenbelt in and around Cheltenham and Gloucester principally because greenbelt has been far too restrictive over the previous 40 years or so. The restriction has only led to a significant undersupply of housing which in turn has led to a much more significant release of greenbelt then later on a disproportionate level. If the greenbelt policy had been absent, there is an argument to say smaller scale development could have taken place on a more organic basis over the period of years rather

than it all being clumped together within one plan period to satisfy objectively assessed and identified need.

- 3.6. In addition to this, the Welsh government should also be aware that the greenbelt around Bristol is also now under pressure because of significant increase in housing need. The Greenbelt designation around the city is under threat, because there are a large quantity of people interested in living in Bristol because of employment but there are not enough houses to support the population. As a result of this, people are having to live outside of Bristol which increases the pressure on other settlements which will in turn need to respond and growth (i.e Monmouthshire).
- 3.7. The Welsh government, if they are going to apply greenbelt designation, should apply this carefully and not on a blanket approach. The purpose of greenbelt is to check coalescence of settlements and maintain the openness and we do not believe that by applying greenbelt in a way in which the Welsh government is proposing under the draft NDF that it will provide any suitable form of meeting those urban sprawl and openness criteria that would be expected from a greenbelt designation. Its sole purpose would be to block the development of Monmouthshire for the long term, at the counties detriment.
- 3.8. The proposed designation in addition to generally sprawling over a very large area of Monmouthshire also looks to check development in an area which is considered the most sustainable area within the Monmouthshire. The Severnside region, including Rogiet, Caldicot and Undy, for example, would be the most sustainable location in Monmouthshire for residential development. Those areas are closest to the employment regions of Newport and Cardiff and Bristol, all providing access to a large number of jobs and other employment and sustainable transport links. It makes absolutely no sense for the Welsh government to be checking urban development in those locations during the plan period, because it would be at the detriment of the wider Welsh economy.
- 3.9. In short, the Welsh government has a lack of evidence base to support its position in respect of requiring greenbelt on this location and it should expect a robust fight and resistance from the industry and business in retaliation to the proposal for such a designation. Between this proposal and the abandonment of the M4 relief road proposals, the current Welsh Government will cause sever damage to the Welsh economy including the valleys for a long period to come.

4. Conclusion

- 4.1. The information set out above demonstrates quite clearly that our position as a professional firm of planning consultants and development agents is that there are no grounds for any such designation and that the Welsh government should consider carefully the proposals for greenbelt and potentially remove any such proposals for greenbelt out of the National Development Framework. They must recognise the likely significant growth in population in Monmouthshire during the next 20 years and their strategy must not restrict this.

END