

15 November 2019

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**VIA EMAIL: NDF@GOV.WALES**

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Dear Sir / Madam

**DRAFT NATIONAL DEVELOPMENT FRAMEWORK – RESPONSE ON BEHALF OF CANCER RESEARCH UK AND THE ROYAL SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS**

Savills is instructed by Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals (RSPCA) to make representations on the draft NDF in respect of the proposals within it to direct that the South East Wales Strategic Development Plan (SEWSDP) must include a Green Belt.

Cancer Research UK and the RSPCA has land holdings within Monmouthshire, north of the M4 where the draft NDF indicates should be designated as Green Belt. Although due to the diagrammatic nature of the plan on page 63 it is unclear whether the land is within the proposed Green Belt area the objection is raised on an 'in principle' basis to the Green Belt proposal. An objection is also raised on the proposed extent of the Green Belt, described as it is as being 'north of the M4'.

This representation sets out Cancer Research UK and the RSPCA's objection to the Green Belt proposals within the draft NDF and to the related policies, text and diagrams.

Draft Policy 30 – Green Belts in South East Wales states that:

*"The Welsh Government requires the identification of Green Belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.*

*Regional plans should consider the relationship of any new Green Belts with the Green Belt around Bristol."*

Cancer Research UK and the RSPCA objects to Policy 30 in its entirety, and to the proposal that the SEWSDP must include a Green Belt north of the M4 within Monmouthshire for the following reasons.

***Objection in Principle: The NDF dictates that the SDP should include a Green Belt without any published evidence base or assessment to support it.***

Supporting text to Policy 30 on page 66 states that:

*"Strategic decisions on the location of development, key services and infrastructure should support the region's cities and Valleys communities and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations within the context of the whole region. The Welsh Government supports the use of Green Belts in the South East region in managing and planning urban growth. Planning Policy Wales sets out the policy context for them. The Strategic Development Plan must identify a Green Belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff."*

The first point to make here is that there is a fundamental contradiction between the first half of the paragraph (which encourages decisions to be taken on a regional basis for sustainable growth) and the second half (which makes a top down declaration that could immediately rule out the most sustainable locations for growth). This point is explained later in this representation.

The second point is equally obvious and is the absence of measured or evidence based consideration of either the need for a Green Belt or for its coverage. It is clear from the feedback from the SEWSDP Local Planning Authorities (LPAs) that they were not consulted on this before the publication of the draft. There is no indication anywhere else in the draft that this is anything more than a concept or idea that has been introduced without proper consideration or evidenced need.

No assessment of the areas affected or the justification for the need to protect them has been included within the NDF. Whilst the NDF avoids a test of soundness, the SDP (and the Local Development Plans (LDPs) that will sit with it) will need to be sound. Policy 30 makes a groundless assumption that a Green Belt is necessary, which would prejudice the ability of the SEWSDP to plan for its needs and for it to be sound.

The Sustainability Assessment that accompanies the Draft NDF fails to properly consider the implications of Policy 30.

The consideration of the impacts on physical, mental and social health and wellbeing for all, including contributing towards a reduction in health inequalities across Wales assumes that development will be restricted to the most sustainable locations. If settlements cannot expand onto green field land then the unintended consequence would be to overcrowd existing urban areas or stifle required new housebuilding, having a negative impact upon physical, mental and social health and wellbeing.

The assessment says that Green Belts would not have an impact upon the goal of creating opportunities for sustainable economic growth, diversity and business competitiveness. Constraining growth in accessible and sustainable locations would have a negative impact here, which has not been recorded.

The same can be applied in terms of the assessment of impacts upon air quality, the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups and for the provision of good quality, safe, affordable housing that meets identified needs. In each of these topics the Sustainability Assessment has failed to properly assess the implications of the proposed Green Belt policy and its negative connotations.

***Objection in Principle: The designation of a Green Belt through the NDF prejudices the ability of the SEWSDP to properly plan for the region by imposing a long term restriction on a large swathe of the plan area. Other policies and strategies indicate a heavy reliance on urban/previously developed land and a lack of greenfield development, which is not supported by any assessment of capacity.***

This is another straightforward and significant point. Imposing a Green Belt ahead of understanding the needs within the SDP area and the capacity of urban areas to accommodate those needs could lead to either unsustainable overcrowding of existing towns and cities or; stifling development through an unrealistic strategy thereby harming growth, prejudicial to the economy and prosperity of South East Wales.

Greenfield growth will inevitably be needed during the next 20 years simply because some urban areas (including some very large ones such as Cardiff and Newport) do have limits and capacities. This is not only our view, it is the position recorded by the various Cardiff Capital Region (CCR) authorities in their representations to the draft NDF. Given the circumstances, greenfield releases outside of existing settlement limits will be essential.

PPW sets out the land use planning policies of the Welsh Government (WG). The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the WBFGA and other key legislation.

Section 3 requires that development plans must feature a spatial strategy informed by a sustainability appraisal which informs the identification of areas and sites for new development. A hierarchy of priority is set out requiring that LPAs must initially prioritise suitable and sustainable previously development land and/or underutilised sites, firstly within existing settlements or sites within neighboring authority areas. Where this cannot be achieved through clear demonstration that a need for new sites still exists, consideration can be given to suitable and sustainable greenfield sites.

The proposed Green Belt and the statements that refer to it within the draft NDF appear to take a short cut to deciding that settlements north of the M4 should not expand. Not only would this undermine the ability of the authorities to undertake the well-established search sequence enshrined within PPW, the draft NDF does not rely on any evidence base that shows that existing settlements and previously developed land can adequately meet future development needs.

Representations from LPAs and the CCR express considerable reservations about this assumption and the fact that there is no evidence that an urban capacity study has been undertaken. Monmouthshire, Cardiff, Caerphilly, the Vale of Glamorgan, Newport and the CCR have all expressed (in their representations to the draft NDF) the view that existing urban areas do not have the capacity to continue to absorb new development in a sustainable manner.

Imposing a Green Belt would unnecessarily restrict the ability of the SEWSDP to properly plan for its needs and prejudice the need for greenfield development without the proper evidence base.

***Objection in Principle: The degree of permanency could also undermine the ability of development plans within the region to react to changing needs for growth and undermine LDPs that are coming forward.***

A Green Belt is a permanent protective designation that should look to protect an area from development for the long term, and certainly over more than one development plan period.

Designation of a Green Belt is a major long term policy decision that should only be based on robust evidence.

Several LDPs are progressing within the SWESDP area, with Monmouthshire and Bridgend the most advanced. Imposing a Green Belt undermines the ability of the various authorities to plan on an evidence led basis in both the short term and for at least the next few plan cycles.

The degree of permanency of a Green Belt designation means that it should not be imposed without due consideration and an understanding of its consequences. As the CCR say in their representations, it is not reasonable that the NDF has a lower bar (than SDPs) for evidence required to support it when it is being so prescriptive.

***Objection in Principle: A Green Belt Designation could lead to unsustainable growth***

Other than utilising urban land (where capacity exists) PPW indicates that development on the edge of settlements is the next most sustainable option. We can see from above that the LPAs are saying that greenfield releases will be essential to allow growth. Imposing a Green Belt across such a wide area, and including a range of settlements will lead to a sterilisation of land which represents the most sustainable and technically suitable option for accommodating sustainable growth.

Land on the edge of many settlements within the proposed Green Belt area has the inherent benefit of proximity to existing essential facilities, employment and commercial uses. In many cases it will also benefit from existing active travel and public transport routes.

A poorly thought through Green Belt could come with significant and unintended costs. Preventing growth on the edge of a sustainable settlement could push development further away from essential facilities and employment areas, leading to a lack of choice for active travel and public transport. In turn this could lead to longer commutes, worse congestion and impacts upon air quality.

Evidence in England suggests that Green Belts increase social inequality, inflate house prices and restrict housing development.

***The above views are consistent with those of the CCR/SEWSDP authorities***

Several of the constituent authorities have published their representations through committee papers.<sup>1</sup>

As the body responsible for the SWESDP, the CCR make some highly significant objections, which align with the concerns of Cancer Research UK and the RSPCA. They say:

- the draft NDF is too prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement.
- If it were proposed as part of an SDP or LDP in this way it would not meet the tests of soundness without robust evidence to support it and it is not reasonable that the NDF has a lower bar for evidence required to support it when it is being so prescriptive.
- It would act to hinder growth in an areas of significant demand and potential.
- It would undermine the role of the SDP and pre-determine the growth strategy to follow which needs to be supported by robust evidence.
- The strategy (to restrict greenfield releases) is unlikely to deliver the sustainable development needed to meet the needs of the future generations of Wales.

The Vale of Glamorgan response echo's the above points.

Monmouthshire state that they cannot support the draft NDF as it stands. They believe that a Green Belt would be an obstruction to sustainable growth and thwart their ability to plan for sustainable and resilient communities and would frustrate the Welsh Government's aspirations to achieve sustainable development and prosperity for all. They say that the policy wording relating to the Green Belt should be re-written to invite the SDPs to consider if there is evidence supporting the need for a Green Belt in the region and that it is vital to the social sustainability of its communities that the proposed Green Belt be wholly re-thought and properly evidence-based.

Caerphilly Council states that it:

*"... has never supported a Green Belt as other policies can more than satisfactorily protect the area identified in the NDF for Green Belt. Green Belts are permanent designations and as such will sterilise the land within the designation. This could severely restrict development within the two cities in the region, both of which have been identified for national growth, and in some of the main towns identified for regional growth, such as Cwmbran and Caerphilly. The designation of the Green Belt could result in the growth aspirations for this region not being realised due to the restrictions on development around the M4 or the mainline railway, or at least not realised in the locations stated in the NDF."*

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<sup>1</sup> Representations by the various authorities have been endorsed through the following committee papers:

<https://cardiff.moderngov.co.uk/documents/s34741/Cabinet%2010%20Oct%202019%20NDF.pdf>  
<https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Scrutiny-ER/2019/19-10-16/National-Development-Framework.pdf>  
<http://www.newport.gov.uk/documents/One-Newport/Meetings/PSB-Full-Papers-03.10.19.pdf>  
<https://www.cardiffcapitalregion.wales/wp-content/uploads/2019/10/item-6-ndf-framework-with-appendices.pdf>  
<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=147&MId=3909>  
<https://democracy.caerphilly.gov.uk/documents/s30421/Welsh%20Government%20Consultation%20on%20the%20draft%20National%20Development%20Framework.pdf?LLL=0>

There is a high degree of consistency in what the authorities are saying about the Green Belt policy. Each of the authorities make the point that greenfield releases will be required. All are concerned about how such a prescriptive Green Belt policy could prevent them from planning properly for their areas.

### **Objection to including land south of the M48 within the proposed Green Belt**

Cancer Research UK and the RSPCA land interests lie south of the M48, but north of the M4. The blanket designation suggested within the draft NDF indicates that the SEWSDP must identify a Green Belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff.

Land between the M4 and the M48 already includes a substantial urban area stretching from Rogiet to Portskewett. The settlements include extensive employment, education, community and retail facilities.

The existing settlements have inherent sustainability. Opportunities within this area exist for green field releases proximate to a range of services including a number of other primary schools and a secondary school. The settlements already provide a full range of shopping and day to day facilities which, importantly, are accessible through public transport or active travel.

Importantly the area between the M4 and the M48 includes 2 railway stations, Severn Tunnel Junction (STJ) and Caldicot. STJ features on the Metro map and is referred to within the Metro Phase 2 as an anchor station from which to establish new stations to Cardiff as set out in the National Transport Finance Plan.

STJ already provides frequent services to Newport, Cardiff and Bristol. Given the decision not to proceed with an M4 relief road it will have an increasingly important role in promoting sustainable travel to Newport and Cardiff from the east of the Brynglas Tunnels. Furthermore, Grand Union Trains have recently made an application to run a new hourly express train between Cardiff and London which will call at STJ which, if implemented, will add to the importance of the station in providing routes to Cardiff and London. The area is also well served by bus services.

Policy 31 of the draft NDF states “*Development plans must ensure long term strategic decisions maximise opportunities in areas that will benefit from improved accessibility and investment in public transport, including from the Metro.*”

As well as the inherent sustainability of the area, the existing public transport facilities and potential importance of STJ for the Metro mean that imposing a Green Belt through the NDF south of the M48 would constrain a significant opportunity to plan for sustainable growth. There is a fundamental tension between Policy 30 and Policy 31 in this case, and there are likely to be others.

The Green Belt proposed would not only prevent Monmouthshire capitalising on this opportunity as part of the emerging LDP, it would remove the opportunity for several LDP cycles, having a negative impact on the ability to plan for the sustainable growth required and, would lead to opportunities to benefit from the Metro being overlooked.

### **Conclusions**

Cancer Research UK and the RSPCA objects to the draft NDF proposal to prescribe that the SEWSDP designates a Green Belt. This letter makes the case that:

1. The Green Belt has been proposed without any published evidence base or assessment to support it.
2. As drafted the NDF prejudices the ability of the SEWSDP to properly plan for the region by imposing a long term restriction on a large swathe of the plan area.
3. The degree of permanency of a Green Belt will undermine the ability of development plans to react to changing needs for growth and undermine LDPs that are coming forward.
4. A Green Belt designation is likely to lead to unsustainable growth beyond it and/or unintended consequences of increased house prices and negative impacts on well-being through stifling development.

5. The area prescribed for the Green Belt south of the M48 and north of the M4 includes significant opportunities to benefit from managed and sustainable growth where existing public transport facilities exist and there are opportunities to benefit from the Metro. The proposed Green Belt in this area would waste opportunities to plan for development around public transport facilities, contrary to the aim of Policies 1 and 31.

The above themes are also cited in the significant and consistent objections from the CCR/SEWSDP authorities.

PPW states that before designating land around an urban area as Green Belt the local planning authority must consider and, importantly, justify which would be the most appropriate means of protection. Fundamentally, there is no evidence that Policy 30 of the draft NDF has been based on any such assessment.

There is every justification to remove Policy 30 of the draft NDF and references within the document to the need for a Green Belt.

As an alternative the draft NDF should only state that the SEWSDP could consider designating a Green Belt if evidence indicates that it is necessary, in the round with the other competing sustainability and development needs across the region. Finally, there is a compelling case that the land south of the M48 and north of the M4 should be specifically excluded from any Green Belt, and the text within the draft NDF should reflect this if a Green Belt reference is to be retained.

Yours sincerely



**Nick Heard**  
Planner

## **Consultation Response Form**

Your name	Nick Heard
Your address	Savills 2 Kingsway Cardiff CF10 3FD
Preferred contact details (email/phone/post)	nheard@savills.com
<u>Organisation (if applicable)</u>	<b><u>On behalf of Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals</u></b>

## 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?

[illegible]

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

[illegible]

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

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## 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 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:

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

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

### 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...

[illegible]

- 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?

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## 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?

[illegible]





## 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	Don't know	No opinion
<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.

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*East region in managing and planning urban growth. Planning Policy Wales sets out the policy context for them. The Strategic Development Plan must identify a Green Belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff."*

The first point to make here is that there is a fundamental contradiction between the first half of the paragraph (which encourages decisions to be taken on a regional basis for sustainable growth) and the second half (which makes a top down declaration that could immediately rule out the most sustainable locations for growth). This point is explained later in this representation.

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<sup>1</sup> Representations by the various authorities have been endorsed through the following committee papers:

<https://cardiff.moderngov.co.uk/documents/s34741/Cabinet%2010%20Oct%202019%20NDF.pdf>

<https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Scrutiny-ER/2019/19-10-16/National-Development-Framework.pdf>

<http://www.newport.gov.uk/documents/One-Newport/Meetings/PSB-Full-Papers-03.10.19.pdf>

<https://www.cardiffcapitalregion.wales/wp-content/uploads/2019/10/item-6-ndf-framework-with-appendices.pdf>

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=147&MIId=3909>

<https://democracy.caerphilly.gov.uk/documents/s30421/Welsh%20Government%20Consultation%20on%20the%20draft%20National%20Development%20Framework.pdf?LLL=0>

Caerphilly Council states that it:

*“.... has never supported a Green Belt as other policies can more than satisfactorily protect the area identified in the NDF for Green Belt. Green Belts are permanent designations and as such will sterilise the land within the designation. This could severely restrict development within the two cities in the region, both of which have been identified for national growth, and in some of the main towns identified for regional growth, such as Cwmbran and Caerphilly. The designation of the Green Belt could result in the growth aspirations for this region not being realised due to the restrictions on development around the M4 or the mainline railway, or at least not realised in the locations stated in the NDF.”*

There is a high degree of consistency in what the authorities are saying about the Green Belt policy. Each of the authorities make the point that greenfield releases will be required. All are concerned about how such a prescriptive Green Belt policy could prevent them from planning properly for their areas.

### **Objection to including land south of the M48 within the proposed Green Belt**

Cancer Research UK and the RSPCA land interests lie south of the M48, but north of the M4. The blanket designation suggested within the draft NDF indicates that the SEWSDP must identify a Green Belt that includes the area to the north of the M4 from the Severn Crossings to North Cardiff.

Land between the M4 and the M48 already includes a substantial urban area stretching from Rogiet to Portskewett. The settlements include extensive employment, education, community and retail facilities.

The existing settlements have inherent sustainability. Opportunities within this area exist for green field releases proximate to a range of services including a number of other primary schools and a secondary school. The settlements already provide a full range of shopping and day to day facilities which, importantly, are accessible through public transport or active travel.

Importantly the area between the M4 and the M48 includes 2 railway stations, Severn Tunnel Junction (STJ) and Caldicot. STJ features on the Metro map and is referred to within the Metro Phase 2 as an anchor station from which to establish new stations to Cardiff as set out in the National Transport Finance Plan.

STJ already provides frequent services to Newport, Cardiff and Bristol. Given the decision not to proceed with an M4 relief road it will have an increasingly important role in promoting sustainable travel to Newport and Cardiff from the east of the Brynglas Tunnels. Furthermore, Grand Union Trains have recently made an application to run a new hourly express train between Cardiff and London which will call at STJ which, if implemented, will add to the importance of the station in providing routes to Cardiff and London. The area is also well served by bus services.

Policy 31 of the draft NDF states *“Development plans must ensure long term strategic decisions maximise opportunities in areas that will benefit from improved accessibility and investment in public transport, including from the Metro.”*

As well as the inherent sustainability of the area, the existing public transport facilities and potential importance of STJ for the Metro mean that imposing a Green Belt through the NDF south of the M48 would constrain a significant opportunity to plan for sustainable growth. There is a fundamental tension between Policy 30 and Policy 31 in this case, and there are likely to be others.

The Green Belt proposed would not only prevent Monmouthshire capitalising on this opportunity as part of the emerging LDP, it would remove the opportunity for several LDP cycles, having a negative impact on the ability to plan for the sustainable growth required and, would lead to opportunities to benefit from the Metro being overlooked.

### **Conclusions**

Cancer Research UK and the RSPCA objects to the draft NDF proposal to prescribe that the SEWSDP designates a Green Belt. This letter makes the case that:

1. The Green Belt has been proposed without any published evidence base or assessment to support it.
2. As drafted the NDF prejudices the ability of the SEWSDP to properly plan for the region by imposing a long term restriction on a large swathe of the plan area.
3. The degree of permanency of a Green Belt will undermine the ability of development plans to react to changing needs for growth and undermine LDPs that are coming forward.
4. A Green Belt designation is likely to lead to unsustainable growth beyond it and/or unintended consequences of increased house prices and negative impacts on well-being through stifling development.
5. The area prescribed for the Green Belt south of the M48 and north of the M4 includes significant opportunities to benefit from managed and sustainable growth where existing public transport facilities exist and there are opportunities to benefit from the Metro. The proposed Green Belt in this area would waste opportunities to plan for development around public transport facilities, contrary to the aim of Policies 1 and 31.

The above themes are also cited in the significant and consistent objections from the CCR/SEWSDP authorities.

PPW states that before designating land around an urban area as Green Belt the local planning authority must consider and, importantly, justify which would be the most appropriate means of protection. Fundamentally, there is no evidence that Policy 30 of the draft NDF has been based on any such assessment.

There is every justification to remove Policy 30 of the draft NDF and references within the document to the need for a Green Belt.

As an alternative the draft NDF should only state that the SEWSDP could consider designating a Green Belt if evidence indicates that it is necessary, in the round with the other competing sustainability and development needs across the region. Finally, there is a compelling case that the land south of the M48 and north of the M4 should be specifically excluded from any Green Belt, and the text within the draft NDF should reflect this if a Green Belt reference is to be retained.

## **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.

## **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?

## 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?

Pages 30 and 31 of the draft NDF refer to housing growth. The projections propose a higher annual need of 8,300 homes over the next five years (compared to the recent past), but a significant drop off thereafter. This is however predicated on market housing provision falling from 5,600 to 4,400 (a 20%+ reduction in 2018 figure) and local authority/RSL provision rising from 1,000 to 3,900 (a 290% increase). This is expected to take place from 2018/19 for the next five years.

The concerns are obvious and equally significant. The overall need predicted and annual figures are much lower than current LDP housing provision (circa 50% lower); the apparently deliberate depression of current market housing performance is at complete odds with efforts to improve delivery; and (especially as) the immediate expectation of a 290% rise in RSL/Public sector provision appears unachievable based upon current performance and a lack of a clear strategy to do so.

The NDF should make a clear statement about the need estimates not being used as a housing target, within the supporting text. This is a critical point as the housing need figure could be misread as the housing target for Wales.

The NDF currently fails to acknowledge the importance of all housebuilding in general. It should provide a policy which supports all forms of housebuilding, and not be restricted to references to affordable housing.

The lack of any economic growth policy in the NDF is concerning. The NDF is lacking an important message to investors in Wales and this needs to be rectified.

Allied to this is the relationship between jobs and new homes and the need to house the workforce. The estimates above are based on past trends, so if the City Growth Deals and other WG initiatives are successful in attracting a range of new jobs then the future housing supply will need to exceed current estimates.

**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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