

Consultation Response Form

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

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

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input 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:

The outcomes describe an 11 point vision for Wales that the NDF will help to deliver.

On the face of it, they are solid and good-hearted. However, they are basically unremarkable and the key messages are often lost – especially in the longer explanations on pages 20 and 21. Economic development is particularly weakly expressed – with any ambition delegated to local development plans. Surely, the NDF is the place to explain what *its own* objectives are for economic development and progress over the next 20 years.

The outcomes are also unlikely to add little to the forward planning exercises that the NDF will inform. A settlement hierarchy, for example, is broadly mapped out – with compact co-located growth primarily directed to Wales' cities and larger towns. This is nothing new (although it is applied much more rigidly in the NDF's policies).

Looked at like this, whilst the outcomes are a missed opportunity (to explain a new part of the Welsh development plan that is concise, energizing, spatial and fresh) they will do little harm.

However, the outcomes signal a troubling approach to context which is underlined by the NDF's *focus on Wales as a place to live for its population*. Together with a virtual silence on economic conditions and ambitions, there is little reference to geography, relationship or responsibility (or opportunity) beyond Welsh borders (see the point below on the Spatial Strategy Diagram) and this signals an inward looking nature that cannot be the author's intention.

Of equal concern is the way in which the draft then seeks to deliver the outcomes. This is a theme (or concern) that runs through the rest of our 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	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 checked="" 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:

Policies 1 and 2 and the text that supports them describe a high level spatial strategy. This highlights key existing settlements for growth and investment and confirms the focus on cities and large towns as the main development areas.

Large scale economic growth and housing is directed "*predominantly, though not exclusively*" to three main urban clusters: Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; and Wrexham and Deeside.

The NDF leaves the definition of large scale growth to local planning authorities, who "*should be confident in defining what constituted development of a 'significant scale' for their area. Appropriate definitions can be produced through an understanding of the type and scale of development an area can expect, the quality of the public transport they will rely upon and with local consultation*"

Away from these places and a list of regional centres (Carmarthen, the Pembrokeshire Haven towns, Aberystwyth, Llandrindod Wells, Newtown, Caernarfon, Bangor and the coastal towns from Llandudno to Prestatyn), development will be:

"in towns and villages to support local aspiration and need (complementing rather than competing with efforts to grow cities and towns) and.....channeled away from the countryside and from productive agricultural land"

The emphasis on compact, “*transit orientated development*” features in Policy 1, whilst Policy 2 directs new public service facilities of a significant scale to town and city centres.

The NDF then strongly discourages what it sees as the alternative:

“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”.

This is very binary analysis of good and bad growth, and one which does not reflect history or opportunities.

In terms of form, it is very restrictive and risks (if not invites) resistance to all greenfield growth wherever it is proposed and whatever its form. This is important because, unless the reduction in housing numbers and the absence of policy on economic development is designed to switch it off, greenfield growth will be needed during the next 20 years. Even the largest urban areas have limits and capacities – and the NDF recognizes this in its comments about Cardiff.

The NDF needs to be clearer in this respect to manage expectations (signaling that growth will take various forms and that properly considered greenfield development will or can be one of them).

If it cannot condone new towns or settlements it certainly should not dismiss them. This is the approach in PPW10 (which also recognises the scope for greenfield growth)

In terms of location it is equally narrow. Large scale growth is not defined (although it will be informed by the quantities of housing that come later and in the text associated with Policy 2). As it stands it (namely large scale growth) could be limited to anything within or on the edge of a very small number of named places. Anything else would be restricted to development that meets local aspirations and needs. Adjustments are therefore necessary unless the very small list of places is extended or there is express provision for local authorities to define their own settlement hierarchies (and key settlements).

This lack of clarity feeds through into the spatial diagram. Together with the limited text, this:

- a) Adds designations but fails to explain them
- b) Is inconsistent in linkages between regions or within them
- c) Fails to place Wales in its geographical context – especially with respect to linkages to the rest of the UK. There is no distinction between the graphic treatment of the Irish Sea and England.

A specific gap is the absence of any written attempt to define what a national or regional growth area is or what policy there (or for or in them) will be.

Policy 3 underscores the “leading the way” point made earlier in the draft and confirms the role of the public sector (and its decisions on investment and its landholdings) in delivering sustainable places. LDPs will review public landholdings and promote redevelopment where this is appropriate. The NDF sends a clear signal to the public sector (about the use of land that it owns). Even with a requirement for public landholdings to be reviewed through LDPs, it is doubtful, however, that this warrants a policy in the NDF.

What it does require though is a much stronger reference to the role of public sector land and investment in new infrastructure provision (and not just new development and redevelopment). This is a point we come back to at the end of this response.

Policy 4 encourages growth in rural towns and villages *“which is appropriate, proportionate to the needs of the settlement and the wider rural area it serves and where it has been planned through the evidence based, consultative development plan process”*

Whilst having good intentions, this policy could also artificially limit growth strategies and options for rural areas. This is because, set against the NDF’s very narrow list of named urban settlements, very large rural areas could be defined where growth would be limited to meeting current statistical needs rather than future ambitions. Experience suggests that this is likely to see towns and villages compete in a race to the bottom – with minimal change and growth championed regardless of the merits or consequences.

The text goes some way towards recognising this by making the distinction between different types of rural area. It says that a location *“within proximity of the major urban areas experiences a different set of issues in terms of access to housing, employment, essential health, education and transport services than a rural location in central mid Wales and it may not be appropriate for rural focused policy to be applied to both types of location equally. Through an understanding of the issues and geography of an area and through the preparation of development plans, appropriate definitions can be prepared”*

This is a helpful, common sense statement and is especially necessary given the very narrow definition of acceptable rural growth that is contained in the policy. Leaving the definition to development plans though could mean a substantial period of uncertainty

More is, however, required on the economic challenges facing rural areas. The WG has reported that Brexit will have a significant economic impact in rural communities. There are opportunities too – Prosperity for All has themes and (foundation) sectors which have a specific rural dimension and these could shape what the NDF says about rural economic development.

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?

The NDF's approach to the delivery of affordable housing is bound to our concerns with the NDF's overall approach to housing which is set out at the end of this response.

There are two more specific and connected points to make.

The first is that care should be taken when referring to percentages of affordable housing – especially if current definitions of what qualifies are retained. The risk is that the high levels described in the section on housing (and in the regional sections as well) will be used as targets in future development plan documents, including the forthcoming Strategic Development Plans (SDPs).

If delivery by new methods or new sources fails then targets will backfire by making new housing schemes unviable.

The reasons for this are well rehearsed and broadly understood and accepted by planners in the public and private sectors. They are particularly relevant to some schemes where for a number of reasons a different approach to affordable housing provision may be needed (to allow them to proceed and deliver a range of wider benefits). This is the second key point we wish to make.

In these circumstances, we recommend that further work is required on the NDF's approach to affordable housing. This should:

- Either remove the percentages or make it clear that they are not targets and will inform what is said in the evidence based SDPs and LDPs.
- recognise that there are fundamentally good projects that deliver benefits but may not be able to meet target levels of affordable housing (and should not be penalised because of this)
- provide some flexibility in the definitions of affordable housing (or allow this to be considered)

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]

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

National Forest

The NDF commits WG to developing a National Forest. The supporting text explains that the target is to increase woodland cover in Wales by 2000 hectares a year from 2020. It recognizes that the Forest will be dispersed across a number of locations

This is a major ambition: 2000 ha each year is about 4.5 square kilometres or 2.8 square miles. No information is given (even indicatively on any spatial diagram or plan) on the location or extent of the Forest. It also fails to explain how decisions will be made on its delivery and the type of planting and its purpose. Without some additional guidance there is a risk that it could conflict with other NDF ambitions (particularly on energy – see below) or be used to obstruct proposals.

Renewable Energy

The NDF is a major opportunity to establish a long term framework for innovation in infrastructure investment and energy generation. Its starting point is that Wales has significant capacity to generate renewable energy and WG is clearly committed to maximizing this potential. This leads to the NDF's targets which include:

- a) 70% of electricity consumption to be generated from renewable energy by 2030
- b) 1GW of renewable energy capacity to be locally owned by 2030
- c) New renewable energy projects to have at least an element of local ownership by 2020.

The NDF reminds readers that large scale energy development are classed as Developments of National Significance to be determined by Welsh Ministers. These comprise all onshore wind generation over 10MW and other renewable energy generation sites with generating power of between 10MW and 350MW.

The NDF identifies Priority Areas for Wind and Solar Energy on page 42. There is a presumption in favour of large scale wind and solar developments in these areas where there is an acceptance of landscape change and a focus on maximizing benefits and minimizing impacts (especially significant cumulative impacts).

NDF states that WG will use its policy levers to assist in the delivery of renewable energy projects in the priority areas. WG will work with relevant stakeholders to help unlock the renewable energy potential of these areas and the economic, social and environmental benefits they can bring to communities.

To deliver this the NDF includes a traffic light based approach on large scale wind and solar renewable energy projects:

- a) Red: National Parks and AONB – Not suitable for large scale developments
- b) Amber: Areas not within priority areas. These will not carry explicit Welsh Government support and proposals will be determined on their individual merits.
- c) Green: Priority Areas for Solar and wind energy where there is a presumption in favour of development and where the principle of landscape change is accepted (these are the priority areas illustrated on page 42 of the draft and referred to above).

Policy 10 applies this to wind and Solar energy in Priority Areas and confirms the presumption in favour of large scale development there (and the acceptance of landscape change). It tempers this by noting that not all locations within the Priority Areas are considered suitable for development. A statement is also made that further guidance on the development of large scale solar and wind will be produced.

Policy 11 provides guidance for wind and solar projects Outside Priority Areas. Here policy sets out criteria and asks planning applications to demonstrate how social, economic and environmental benefits have been maximized and that there are (basically) no unacceptable adverse effects.

Policy 12 – simply says that large scale onshore wind and solar energy development is not acceptable within the National Parks or Areas of Outstanding Natural Beauty

Policy 13 applies the guidance and criteria set out in Policy 11 to other forms of Renewable Energy Generation Developments.

There are three main points that this approach raises.

The first is the **missing assessment of grid infrastructure and grid capacity**. This is fundamental to the projects and targets the NDF describes and promotes but nothing is said about current issues and performance or future priorities for investment and improvement.

The starting point for a project will be the ability to connect to grid (access to market), and current grid capacity means that there are only limited locations where projects can go. If there is to be new or reinforced grid, the lead in time for projects can be between 7-10 years). In this way whilst The sentiment of target setting is good although there is no information in terms of practical delivery of WG targets.

The second point concerns **local ownership** and what this means in practice. This is important because in a subsidy free world, the commerciality of large scale developments which could have an element of local ownership is a significant challenge for developers

On one hand, the NDF's light touch on definitions could help by providing flexibility for ownership concepts to be explored and tailored to specific circumstances and opportunities. However, the main concern with Policy 13 is that it either does or could imply a literal definition of 'ownership' when other parts of WG have referred to it as signalling control by companies in Wales or where revenues stay in Wales and where local communities which host the project have a say or stake in the schemes. Care and clarity is clearly needed here so that definitions do not get in the way of progress.

It would also be unhelpful to link ownership to community energy projects. This is a difficult model to repeat – as once a community has developed or invested in their scheme they do not move on to the next community to develop another. Community scale projects might not be relevant to the NDF (which should focus on projects generating more than 10MW).

The third point is the WG approach to **Priority Areas**. This might appear helpful but:

- It is highly unlikely that developers would be searching in National Parks or AONBs.
- Amber provides an incorrect and confusing signal.
- Defining green areas is unlikely to be appropriate at this level.

On the third point, there has been significant criticism by renewables developers of the methodology used to define the areas shown on page 42. This could lead to immediate tensions between applications and policy. The failure to assess grid infrastructure also raises significant concerns about the reliability of the areas shown. This is simply because grid assessment would be a first task for any developer considering a renewable project.

In this context changes are clearly needed so that the NDF's positive intentions for national significant renewable energy projects can be delivered. The core changes proposed are:

- a) A clear statement that there is an established, and urgent, need for a significant increase in development of renewable energy generation projects **and associated grid infrastructure** (such as overhead lines and substations) to meet decarbonisation targets and prosperity goals; and that substantial weight will be given to the contribution of projects towards meeting these targets;
- b) A 'presumption-in-favour' policy, which will reduce consenting risk for renewable energy developments of national significance and associated infrastructure.
- c) A criteria-based policy framework to guide new renewable energy developments of national significance to the most appropriate locations, including principal policy objectives and a proportionate framework for addressing impacts;
- d) Policy for projects associated with renewable energy schemes (such as grid management schemes and interventions by the National Infrastructure Commission for Wales).
- e) Clarity and flexibility on ownership concepts

To make sure this is deliverable as well as (positively) challenging, a working group which includes the industry should be tasked with preparing any revised policy framework. Our understanding is that RUK Cymru would be pleased to facilitate collaboration between industry and Welsh Government to develop draft criteria-based policy. The group could also advise on:

- a) energy generating projects that are not renewable source but would provide necessary capacity in an acceptable form.
- b) Mapping capacity - where can the system tolerate more consumption (this could be key to understanding how to plan for EV infrastructure).
- c) The relationship between generation and consumption (co-location is a golden thread between land use and transport but it must also reflect grid capacity and constraints).
- d) Energy storage projects

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 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 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 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.

There are two general points to make on the NDFs approach to the regions and a number of more specific concerns that apply to the policies proposed.

The first general point concerns the **extent and number of the regions**. There is limited explanation for the selection of the NDF's regions and – outside South East Wales - the definition makes little spatial sense. The WSP had six spatial areas and WG research for the NDF carried out by Cardiff University recommended four. Both were better reflections of geography, context, opportunity and challenge.

The second general point is **Policy for SDPs**. Policy 16 sets out what SDP's should cover with the list including:

- *A spatial strategy*
- *A settlement hierarchy*
- *The housing provision and requirement*
- *The Employment provision*
- *The spatial areas for strategic housing and employment growth, renewable energy and the identification of green belts*
- *A coordinated framework for minerals extraction and the circular economy, including*

waste treatment and disposal

SDPs are required to come forward in each region.

On the face of it, this unpicks some of the concerns expressed elsewhere about named places, hierarchies and housing numbers

However, given how specific the preceding chapters and policies are about spatial choices, locations for growth and numbers (for housing at least), and given what comes later in the regional sections, this policy could imply more freedom for SDP's than it actually delivers. The SDPs will all be prepared in the context of this version of the NDF, although the prospect of a 5 year review does raise some questions about the NDFs relationship to the SDP process. The SE Wales SDP, for example, is programmed for adoption in 2024/25 (at about the time of the first review of the NDF).

These concerns and the role of the NDF (before SDPs are in place) are not tackled in the Development Plans Manual which was recently consulted on.

North Wales

The section on the smallest of the three regions begins with a focus on its unique landscape, important environment and natural resources. A northern arc is introduced to highlight the concentration of the population along the North Wales coast from the Menai Strait to the English border. A strong emphasis is placed on collaborative working, a holistic approach and the region's connections with Mid & South West Wales, Cheshire West and Chester and North West England.

Key headlines include:

- a) A primary focus for growth in Wrexham and Deeside (and their respective industrial estates) together with reference to the built up area in-between which includes Broughton to the east and Buckley to the west (Policy 17).
- b) Secondary growth is focused along the North Wales coastal arc which is a corridor of settlements extending from Caernarfon to Prestatyn, with Bangor, Llandudno, Colwyn Bay and Rhyl named (Policy 18).
- c) An emphasis on regional decision making to manage urban growth with SDP's asked to define a green belt to the north east of Wrexham (Policy 19).
- d) A need for 19,400 homes over the NDF's initial five years with 51% being affordable.
- e) Support for better cross-border connectivity through Welsh Government investment in the development of Holyhead Port (Policy 20) and transport links to North West England through the creation of a North Wales Metro (Policy 21).
- f) Economic development for the region led by energy projects with the north west's potential for delivery of low carbon renewable energy (Policy 22) highlighted.
- g) Strong references are made to wind, solar and tidal with nuclear and Small Medium Reactors discussed

Support is also given to a North West Nuclear Arc (which is a UK Government initiative) with the Anglesey Energy Island programme named as a coordinator for energy development

In **response**, there are five basic concerns with the NDF's proposals for North Wales.

The first is the **housing figures** which are significantly lower than recent planned provision. The NDF allocates 19% proportion of national housing need to North Wales which equates to 19400 homes over a 20 year period. This figure divided by 20 equates to an annual housing need of 970 homes.

The combined annual figure for the current LDPs (noting that Flintshire and Wrexham are deposit plans so this figure may change) is 2376. The NDF housing figure is 59% lower, and 47% of the total is to be affordable (social housing or intermediate rent).

The initial five year figure is slightly better, as it generates a need for 1,577 homes, which is nearly 70% of the current LDP figure. As stated elsewhere, though, this does mean that if the NDF figures stay as they are, the number for the remaining 15 years will be very low indeed.

For well-rehearsed reasons (which are recognised in national policy), very low housing figures present a significant risk to the NDF's social and economic objectives.

The second concern is the treatment of the **National Growth Area**. What this means is not explained at all (and this is a consistent theme for all of the regions). A specific issue is the treatment of **Holyhead**. In the context of Brexit, Holyhead Port is likely to experience significant change. The NDF recognises it as a primary port town, but its connectivity in terms of the wider North East Wales proposals is unclear from both the diagram and the text that supports it.

The third concern is other **infrastructure and enabling activity**. Current/planned road projects which could have an influence on this region include the Third Menai Crossing, the Caernarfon Bypass (last section of North to South improvements) and the Pinch point improvement schemes (which will see the removal of roundabouts on A55). The first two schemes will improve accessibility and North-South connectivity (which is poorly represented on the regional diagram). Little reference is given to the A55 being the primary arterial route running through the region.

Away from roads, other than its recognition on the regional diagram there is no reference to Anglesey Airport, its interconnectivity with the capital, the potential for expansion or its relationship with the other transport links in the region.

A related point is that Policy 22 does not recognize the new area of marine aggregate in Liverpool Bay (this is in the draft Wales National Marine Plan). This will have implications for supply elsewhere in the region and there may be a need for new facilities to enable extraction at Mostyn Port (potentially because Holyhead will be primarily concerned with ferry freight).

The **proposed green belt** is the fourth concern. As shown on the regional diagram it appears to sterilize growth around Wrexham and Deeside and will constrain or limit its relationship with North West England (which is prioritised elsewhere). Without any explanation or adjustment there is clear conflict between the national growth area and the green belt designation.

The final concern is **provision for energy**. North West Wales is recognized as a location for new energy development, with Anglesey designated as an Energy Island (on the diagram). Both points are welcome and reflect the clear potential for renewable and other forms of energy generation (including nuclear). However, the concepts need at least some explanation in text and Policy 22 as currently drafted has very little meaning.

Mid and South West Wales

Following an introduction which emphasizes the diversity of this region, the headlines of the strategy are:

- a) An invitation to split the region into two sub regions – with one including the built up areas around Swansea, Neath Port Talbot, Southern Carmarthenshire and the Haven towns and the other the dispersed settlements in a wider rural hinterland across North Pembrokeshire, Ceredigion, Powys and Northern Carmarthenshire
- b) A primary focus for regional scale growth at Swansea Bay (Neath, Port Talbot and Swansea) and Llanelli (Policy 23)
- c) A broad depiction of extent of this area (as a National Growth Area) on the diagram
- d) Secondary growth around the Haven Towns, Carmarthen, Aberystwyth, Llandrindod Wells and Newtown (Policy 24)
- e) Promotion of the Haven Waterway and a Metro project for Swansea Bay
- f) A need for 23,400 homes across the region, with 44% of these being affordable homes in the initial five years

In **response**, the recognition of regional variation (and the effective division of this region into two parts) is welcome. The scope for two SDPs or joint LDPs is not clear and the choice may not in fact be critical if the NDF provided more guidance on what the national growth areas meant and what policy within them should be. For the Swansea Bay and Llanelli NGA, any description could capture a series of existing strategic initiatives which include:

- Swansea City Centre
- Neath Town Centre
- Coed Darcy
- Port Talbot and Baglan (as an energy and industrial cluster)
- Fabian Way Innovation Corridor
- The Tidal Lagoon
- Milford Haven in the context of decarbonisation
- Fishguard
- Pembroke Dock

As with North Wales, the housing figures are significantly lower than recent planned provision. The 23,400 total divided by 20 gives an annual figure of 1170 homes. The combined figure from Swansea and Neath Port Talbot's current LDPs is 1560 and if Carmarthenshire is added it is 2,450. The NDF proposal is 75% of the first and 50% of the second figure, and nearly half of the figure is to be affordable housing.

The proposals for the initial five years increase the annual total to 1,992 homes which is slightly higher than the current figure for Swansea and NPT and over 90% of the Swansea, NPT and Carmarthenshire figure. As for North Wales, the annual figure will be much lower for the remaining 15 years of the NDF (unless a review sees housing need increase).

The commitment to the Swansea Bay Metro (in Policy 26) is helpful, although the icon on the diagram is badly placed (namely it's in the wrong Bay). Elsewhere, some of the proposals on the plan (especially the connectivity points) warrant further explanation.

South East Wales

The NDF stresses the need for housing and economic growth to be planned on a whole region basis, with a single SDP making decisions on the scale and location of growth. The focus is on the most sustainable and accessible locations, which reduce congestion and car based commuting, and improve air quality.

The strategy includes policies on:

- a) Cardiff (Policy 27) which reinforces the Capital City function and role, but is supported by text which warns that it is reaching its physical limits (and emphasizes the scope for Metro related development in settlements outside the City)
- b) Newport (Policy 28) which is very enthusiastic with the WG *“determined to see development and growth...allowing the City to fulfill its potential as a second focal point for the region”*. It goes further to say *“Growth at Newport will help manage the development pressures in Cardiff and provide a strategic focus for the eastern part of the region. Strategic growth should be focused in and immediately adjoining Newport, itself to support brownfield regeneration”* (page 65)
- c) The Heads of the Valleys (Policy 29)
- d) Green Belts (Policy 30) which is supported by text which says: *“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”*.
- e) Growth in sustainable transport orientated settlements (Policy 31) which requires alignment between decisions on growth and improved accessibility and investment in public transport (including the Metro). *“Land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development”*
- f) Cardiff Airport (policy 32) which is described as an essential part of Wales’ strategic transport infrastructure and a key driver within the Welsh economy. Improvements to capacity and accessibility are emphasized

The text and graphics add four more important points

- a) On the infographic at the beginning one of the captions confirms that rural areas in the east and south of the regions(sic) are well connected to main urban centres
- b) The spatial diagram indicates the extent of the proposed green belt (which overlaps with the proposed national growth area)
- c) Provision of 71,200 new homes is made to 2038, with 48% being affordable in the first five years (page 66). The NDF says that *“it is vital that housing is considered at the regional level and not on the basis of the aspirations of individual local planning authorities”*
- d) Four key Metro related centres are identified as Merthyr Tydfil, Pontypridd, Caerphilly and Bridgend

In **response**, the NDF’s proposals for SE Wales are some of the most difficult to understand. On the face of it there is strong encouragement for growth to reflect the region’s economic potential and it’s genuinely national role.

However this is contradicted by:

- a) A failure to explain what the national growth area means
- b) Very limited references to inter regional linkage (to the north, west and east)
- c) A significant reduction (almost 50%) in the level of housing. The NDF requirement divided equally gives an annual figure of 3,560 dwellings per year. The last round of LDPs proposed an annual target of 6, 832. As with the other regions, the position improves over the first five years when annual provision will be 4,731 or a little under 70% of the current combined LDP figure. However, this also means that without adjustment the figure for the remaining fifteen years is much lower. It is also important to note that 48% of the total is expected to be affordable housing.
- d) The very small list of named growth locations. The WSP listed 14 key settlements, the NDF includes six. The WSP identified three strategic opportunity areas (SOAs), the NDF applies a NGA which is unclear in intention or effect.
- e) The proposed green belt which is harmful to strategy and does not support it. As for the comment on North Wales, the extent of the green belt shown (and described) is also at odds with the proposed NGA for SE Wales
- f) The virtual silence on economic growth or priority sectors (apart from strong support in text for the creation of a word class compound semi-conductor cluster) and the fact that there is no policy on it at all
- g) The treatment of infrastructure which in policy is limited to the Metro and Cardiff Airport. There is support for the growth of Ports, but the only mention of the M4 is *"the WG will maintain its commitment to tackling congestion on the M4...including through its Pinch Point programme of small scale interventions aimed at addressing congestion pinch points on the main road network"*
- h) No substantial reference to minerals, energy and waste.

These issues are parked with the regional SDP which has clear priority in the NDF (and will have a lot of responsibility). Two quotes underscore this point:

"Strategic decisions on the location of development, key services and infrastructure should....be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations within the context of the whole region" (para 2, column 2, page 66)

"A strategic Development Plan will need to consider where people live, work and shop and spend their leisure time...and the location of the key health, education and social infrastructure they rely on. It should consider how the energy the region requires will be generated and transported; how waste will be managed; and the digital infrastructure required.... By focusing on improving accessibility and identifying the most sustainable locations, a strategic development plan should make clear choices on strategic locations and plan for the region as a cohesive whole" (para 4, column 2, page 67)

These responsibilities reinforce the significance of the SE Wales SDP. It also raises questions about the numbers or general approaches that will prevail over the next few years. Until it is prepared (and as LDPs across the region approach expiry) decisions could be influenced by the content of the NDF. In this context, it is vital that the NDF confirms that it will not interfere with decision making while the guidance it includes is considered in a much more substantial and evidence based way in the preparation of SDP's and/or LDPs

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?

As signalled in the responses given already, we have three general comments to make on the NDF. These come from:

- a) The provision for economic development
- b) The approach to housing
- c) Proposals for Infrastructure

There are also two connected concerns about the operation of the NDF:

- d) The level of precision (and how much it actually leaves SDPs and LDPs to do)
- e) What happens once the NDF is adopted and how it will be applied in a strategic policy vacuum

Economic development

The whole document, from beginning to end, is extremely light on economic development in Wales. The early parts fail to make any reference to the priority to be given to economic development in Wales – with the list of 5 key matters excluding it (see the second sentence of the second paragraph of second column on page 9). The same can be said for the key Challenges and Opportunities identified on Pages 15 and 17. This feeds into the Outcomes which we addressed at the beginning of this response when we said:

The point on economic development is particularly weakly expressed – with any ambition delegated to local development plans. Surely the NDF is the place to explain what its own objectives are for economic development and progress over the next 20 years.

Whilst alarming in itself, it is a particular concern in the context of Brexit. WG recognizes this to be a national issue with implications for infrastructure that will be required (ports - passenger and freight, air, sea and land), and the intervention to mitigate economic effects, (which are predicted to have a profound effect on the areas and rural communities that feature highly on the WIMD index).

It may be the case that the NDF simply assumes that economic development is a priority and that this – together with the Government's Prosperity for All agenda – is fully understood. However, and even if this is the case, revisions to the NDF are needed to:

- a) Include the key messages from Prosperity for All at an early stage in the document. This would define what economic development meant in (and to) Wales
- b) Revise the NDF's outcomes to include a much clearer reference to the priority to be given to economic development
- c) Introduce a specific national policy (after the Policy 1,2, 3 and 4 cluster).
- d) Recognise (in the supporting text) the clear linkage between economic growth and the NDF's other policies and provisions – including those on housing, infrastructure and policy and proposals for the regions
- e) Add regional policies on economic development which would provide a clear spatial dimension and reinforce the points made at d) above

Housing

The NDF's approach to housing is based on a very blunt initial analysis of the current position. The problems this causes are compounded by the two short pages on housing which

- Only gives priority to meeting our housing needs
- Proposes a 20 year housing need (to 2038) of 114,000 new homes across Wales
- Includes a chart recording housing completions in Wales from 1974 to 2018, broken down into private sector, RSL and Local authority categories
- Provides a higher than average annual figure for the first five years (the initial 5 years) of 8,300 homes across Wales

- Allocates 57% of the initial 5 year figure to the south east Wales region, 24% in Mid and SW Wales, and 19% in North Wales
- States that nearly half, 47%, of the total should be (current definition compliant) affordable homes meaning 3,900 affordable homes and 4,400 market homes will be built annually across Wales for the first five years of the NDF
- Includes policy (5) on delivering affordable homes that tasks authorities with setting targets, identifying sites for affordable housing led developments and exploring all opportunities to increase the supply of affordable housing
- Includes no equivalent policy for market housing
- Repeats the earlier blame for housing delivery failure on the private sector (model)
- And encourages local authorities, RSLs and Small and Medium sized builders to build (a lot) more

The NDF says that its housing need figure comes from the central estimate of a series of Estimates of Housing Needs in Wales. Whilst the authors of these estimates make it clear that they should not be used as housing policy targets, there is a very real risk that they will be.

In this way, and without adjustment, the NDF signals a radical and immediate change in the delivery of housing in Wales. The standout points are a change in language with needs replacing requirements and priority only given to affordable housing; a significant change in numbers; and an emphasis on public sector provision (in place of large scale builder private sector development).

On numbers, the chart (on page 30) clarifies what this means.

- a) In 2018, about 6,600 homes were built. This was higher than the average for the last ten years.
- b) About 5,600 came from the private sector with the other 1,000 being RSL dwellings.
- c) The NDF proposes a higher annual amount of 8,300 homes over the next five years.
- d) However this is 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).
- e) This is expected to take place from 2018/19 for the next five years.

Whilst intelligence from elsewhere suggests the chart might be wrong (or use the wrong source), it does form part of the NDF which is what are being asked to comment on.

Whatever the position is though, the concerns are obvious and significant. The overall requirement and annual figures are much lower than current LDP housing provision and the depression of current market housing performance is at complete odds with efforts to improve delivery for all those who need a house (but might not qualify for an affordable one). All sectors will need to work together to deliver the homes that are required (even if they stay as low as currently proposed).

Slight comfort is taken from the fact that the housing requirement figure is not included in Policy (although without clarification there is a clear risk that it will be used in SDP/LDP preparation) and from the higher initial period annual figure. **This higher initial figure does, however, mean that without adjustment during any review of the NDF, annual housing provision in the remaining 15 years will be very low indeed.**

In this light, the NDFs provisions for housing require significant revision. Key changes include the addition of new policy on housing (not just affordable housing) and an urgent need to make it clear that any figures are provided for guidance purposes only (with housing requirements established by SDPs and LDPs).

An alternative, which is certainly available and appropriate (given the stated purpose of the NDF), would be for it not to make any reference to figures or statistics at all.

Infrastructure

There are two additional points to make on infrastructure.

The first asks for clarification that the leading the way approach described elsewhere in the NDF will apply to public sector decisions on infrastructure as well as its decisions on public land. This needs to go further than a connection to the Wales Infrastructure Investment Plan (WIIP) – or an intention to follow what it says. That plan has a 2012 base date and includes an aging set of initiatives and is basically a record of capital investment projects.

What would be much more appropriate would be for the NDF to list and prioritize a series of key projects and what they enable or support. This could be bring together current initiatives (from AMP5, DNO/TNO business plans, long term waste, transport, aggregates/minerals, ports, digital/telecoms strategies) and would allow the NDF to focus on key gaps and interventions. Ports (and docks) should be recognized too, as tools to support economic growth (in logistics, resource recovery, manufacturing) and as new post Brexit international front doors.

The second point is that the transit orientated emphasis to development should be matched by a much clearer connection between growth and infrastructure and energy capacity. This is essential (and warrants attention at a national level because of the scale of intervention required).

Precision, SDP's and the "meantime"

As signalled in our comments on the regions, The NDF could quickly be part of the development plan and for some time it is likely to be the most recently adopted part of it. This is clearly significant and underlines the need for its content – and especially its policies - to be very carefully crafted. There are two key dimensions to this:

- a) The first is that the NDF needs to provide proper flexibility for SDPs and LDPs to make their own decisions on key growth issues. That is not there as it stands, with the NDF being very precise in some areas – including housing and green belts – and very quiet on others.
- b) The second is that the NDF needs to be very clear about its position and status in the meantime. This is vital for the reasons already set out – namely that it should not interfere with decision making for the next five years whilst the next round of more robust evidence based forward plans are prepared.

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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