

## **Consultation Response Form**

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<u>Organisation (if applicable)</u>	Representations submitted on behalf of: L&Q Estates

## 1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

When considered individually, the 11 outcomes identified in the Draft NDF are both plausible and deliverable. They reflect the aim (confirmed in Planning Policy Wales 10 (PPW10)) of ensuring that the planning system in Wales contributes towards the delivery of sustainable development. That is, ensuring the planning system contributes towards improving the social, economic, environmental and cultural well-being of Wales.

However, the Draft NDF does not recognise the inter-relationship between, and often competing nature of, the outcomes. It fails to make it clear that the outcomes are not criteria against which every plan making or development management decision should be made. This is a fundamental flaw that undermines the deliverability of the Outcomes and that of the Framework as a whole.

The Draft NDF does not take into account the need for a wider, sustainable and ambitious approach to be at the heart of the planning system. It risks decision makers at all plan making and development management levels having to operate in a fragmented manner. This is unsound and will not deliver sustainable development in sustainable locations.

The Draft NDF should be amended to explicitly recognise that sound plan and decision making will rely on an evidenced and balanced interpretation of the outcomes, taking into account local circumstances. If amended in this manner, the Draft will ensure that decision makers at all plan making and development management levels have the ability to focus on integrating and adapting multiple

(often competing) matters.

Only by doing so will the Draft NDF present Government priorities in a single, coherent direction and/or indicate the land use implications of key Government goals and objectives in the manner required by the Planning Act. This is required to ensure the Draft NDF sets a realistic and ambitious vision, which is both flexible and capable of facilitating sustainable development in sustainable places, in a manner that responds to local matters and opportunities.

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

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

### Support

The spatial strategy recognises the three national growth areas. This includes the 'Cardiff, Newport and the Valleys' area which covers most of South East Wales. This recognition reflects Wales' historic settlement pattern, which has seen people and development drawn to where jobs are available. The status of the three nationally significant areas and support for their continued growth and regeneration in the Draft NDF is welcomed.

The national spatial strategy will be delivered through Strategic and Local Development Plans, taking into account regional and local priorities. Implementing this regional and local approach will be dependent upon the availability and use of the appropriate evidence. This element of the framework is supported.

### Unnecessarily Restrictive Approach

Beyond this high level support, the Draft NDF applies an unsubstantiated and restrictive policy which seeks to focus growth and development to existing settlements and infrastructure corridors in Wales. Any such restrictions should be fully evidenced and justified taking into account local circumstances through subsequent regional and local tiers of development plan policy. This approach fails



to recognise the diverse nature of, and differences both within and between, the national growth areas. In doing so, it is likely to restrict the ability of emerging strategic development and local plans to deliver appropriate strategies capable of delivering sustainable development.

The unnecessary restrictions applied in the draft include:

- **Growth in existing settlements** – Policies 1, 2 and 3 provide a clear focus on urban growth and development within existing town and city centres. This focus is applied without any flexible alternative and without evidence to substantiate the need for growth and/or urban capacity to accommodate this need. Whilst this is supported in principle, the unsubstantiated and rigid nature of the Draft NDF risks limiting or excluding growth in certain areas, where other forms of development may be more appropriate or preferred. The focus on existing settlements should not be used to limit growth in areas where there is a lack of suitable sites or a where a better strategy exists, based upon constraints and opportunities of an area, such as new settlements.

The Draft NDF recognises that the development of urban areas to enhance their performance will be challenging. It should not limit growth to challenging areas. The framework must be more flexible in allowing for alternative forms of sustainable development and growth where justified by objective evidence (in the Strategic Development Plan (SDP) and Local Development Plan (LDP) tiers of plan making).

The NDF should also recognise the potential for growth in appropriate locations that are not necessarily urban (or less urban). Development in such locations can contribute positively to sustainable placemaking and in some locations, make better use of existing brownfield sites. It can also provide more job opportunities, better access to services and facilities, and improved accessibility by public transport. This is particularly the case where brownfield sites are closely related to established employment areas.

The variable nature of the different growth areas set out in the Draft NDF provides evidence that development outside of main urban areas has made a positive contribution in Wales. The settlement pattern in the Vale of Glamorgan is an example of where appropriate growth outside of the main urban areas can contribute positively to the sustainability of the County. Another example is seen in areas of the valley communities that have grown through housing delivery on brownfield sites near employment uses. This pattern has resulted in sustainable benefits for those locations.

The Draft NDF fails to provide appropriate flexibility to allow for the positive impacts of appropriate development in a variety of locations and forms, including in communities outside of existing urban areas.

- **Potential of new settlements** – page 22 of the Draft NDF could be interpreted as ruling out the development of new on the basis that they would *'enable sprawling greenfield development'*. It resists strongly the development

of new towns and settlements, noting that that they would always be inappropriate or would 'squander key assets'. We disagree strongly with this view as this is not always the case.

Where justified by appropriate evidence (taking into account local circumstances), new towns and settlements could deliver significant opportunities through sustainable development and be the right response to the challenges and opportunities of an area. This includes where there is a pressing need for the development of sustainable new towns and settlements in locations where there is demand for growth and a lack of suitable and viable alternative urban sites. Where justified, new towns and settlements can be a valid and sustainable growth option. They can control unacceptable adverse impacts on the character of existing settlements, prevent urban sprawl and avoid coalescence.

The NDF's position on new settlements is at odds with PPW10. PPW correctly recognises that brownfield and then non-brownfield sites within settlements (followed by edge of settlement sites) should be considered first, but goes on to recognise that '*not all sites of this nature are suitable for all types of development*' (paragraph 3.39). The Draft NDF should be amended to comply and complement PPW10 and allow for the identification of new settlements in appropriate circumstances, particularly on brownfield sites.

These circumstances should be evidenced through forthcoming SDP's. This includes evidence which demonstrates that new settlements offer significant environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements. This includes where there are significant areas of underutilised brownfield land, the potential to link a new settlement with existing strategic employment locations and planned transport and infrastructure improvements, and opportunities to enhance green infrastructure provision. New settlements in such locations can deliver a critical mass capable of delivering very high quality and sustainable places, particularly where they have a critical mass capable of delivering the right infrastructure improvements. Such infrastructure improvements can make an invaluable contribution to planned infrastructure, such as the South Wales Metro and other transport enhancements.

For example, the Vale of Glamorgan is a principally rural authority that has a consistently high demand for housing. It forms part of the South East Wales National Growth Area. There are limited brownfield development opportunities in urban areas, many of which have seen significant development in recent years. In addition, existing towns and villages have also seen significant development, including through urban extensions on greenfield sites. Further development of this nature may well result in unacceptable impacts on the character of the County and local communities. It is restricted in many areas by environmental considerations and the need to avoid unacceptable urban sprawl/coalescence. These potential adverse impacts on the character of those settlements and the County as a whole are likely to be considered unacceptable. In such circumstances, the Draft NDF presents little flexibility to overcome such constraints and deliver sustainable growth to meet local need.

The significant potential of appropriate new settlements and their resulting contribution to the nationally significant growth areas should not be unnecessarily ruled out by the Draft NDF. The document should be amended to present a more flexible and positive stance on new settlements, where justified by appropriate evidence. This evidence would be considered and assessed through SDP's, taking into account local circumstances.

### **Proposed Amendments**

The Draft NDF should be amended to complement the key principles set out in the spatial strategy section to present a more flexible range of sustainable growth and development strategies across the national growth areas. This flexibility is key to being able to deliver sustainable development that:

- Reduces the reliance on a small number of larger economic centres.
- Better utilises brownfield land in delivering balanced growth in (existing and new) sustainable locations served by strategic infrastructure.
- Distributes prosperity across the national growth areas and the whole of Wales.
- Supports the long-term success and resilience of strategic employment locations in urban and rural areas.
- Is of high quality design, taking into account health, active travel and the need to minimise the need to travel.
- Balanced and sustainable communities that cater inclusively for all identified needs in Wales.
- Is designed on the basis of best practice and sustainability principles, taking into account local circumstances.

This flexibility is essential in establishing a clear, robust and ambitious planning framework for Wales.

### 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 checked="" 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?

The NDF recognises the need to increase the delivery of affordable housing, which is a well-established and accepted requirement. Our client is supportive of initiatives to increase the delivery of affordable housing.

Policy 5 and the NDF is unbalanced and it represents a significant missed opportunity to deliver a sufficient and balanced mix of sustainable housing growth to meet identified need in Wales. It will not ensure the planning system fulfils its role in helping to address the housing crisis.

Policy 5 should not be restricted solely to affordable housing. The Estimates for Housing Need cited are based on a given set of assumptions. They are intended as the basis to inform policy decisions on housing (market and affordable) provision in Wales. They form part of the evidence base for affordable housing targets, only.

The Draft NDF should be amended to:

- Reflect the status of these estimates as a baseline and not a target.
- Confirm the estimates are a starting point rather than a target.
- Provide that the estimates will be regularly updated, with the most recent projections at any time being used to calculate housing targets.
- Avoid the 47% affordable housing estimate being interpreted as a target.
- Require housing targets to be policy decisions based on the estimates.
- To allow for ambition in housing targets calculated from this baseline.
- Allow for economic ambitions to be factored into housing targets.
- Ensure affordability and historic under-provision are reflected in housing targets for today.
- Require housing targets that reflect future ambition for growth and to improve the lives of communities they cover.
- Provide the mix of house types and tenures that people need in the right places to address current shortfalls in supply.



Policy 5 should clarify the need for SDP/LDP's to have a robust and new housing evidence base, including the potential for market layering and policy integration. This requirement of the SDP tier of plan making would allow for a strategic and comprehensive approach to the distribution of housing sites, alongside employment locations and infrastructure delivery.

This approach would ensure housing delivery in places where people want to live and where development viability is strong enough to support high levels of affordable provision. In turn, this would allow Government support and subsidy to be targeted to areas of weaker market demand and viability, or significant development cost. This level of intervention will complement market provision to help deliver challenging sites in areas of need.

Being explicit in requiring a new policy based approach to housing delivery over and above the baseline estimates is the only means of ensuring an ambitious approach capable of overcoming the housing crisis. Only then will the Draft NDF provide the ambitious framework to overcome the deficiencies of existing development plan policies in delivering housing in the right locations.

Policy 5 fails to recognise the contribution that market housing developers have made, and will continue to make, in providing new housing, importantly including affordable housing. There is no recognition that the private sector and particularly volume house builders (who are not mentioned at all) have a significant role to play in delivering affordable housing.

Reference to the 'Housing Completions 1974-2018: Wales' at page 30 of the Draft NDF illustrates the need to recognise the contribution that the private sector plays in providing for a range and mix of house types and tenures. Private sector developments need to be brought forward in viable locations to ensure that schemes are deliverable. This is essential if these developments will make a significant contribution to the required delivery of affordable housing.

Historic trends in Wales confirm that housing and affordable housing delivery is greatest when it involves a mix of the private sector, registered social landlords and local authority provision. The Draft NDF must recognise this. Without the private sector, the NDF will fail to provide for affordable housing needs.

Policy 5 should be amended to recognise the need for an ambitious and evidence based approach to housing targets, over and above the baseline estimates. It must recognise the need to balance housing providers and delivery. Only then will it establish a positive framework capable of facilitating the required step change in housing and affordable housing provision.

#### **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 checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No comment.

### Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

No comment.

### 5. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Policy 8 & 9 recognise the importance of biodiversity and increasing the resilience of ecosystems. Our client supports and welcomes this approach. However, Policy 8 focusses too heavily on restrictions and designations. This lends itself more towards a restrictive development management policy, as opposed to an overarching national spatial framework that guides an effective plan-led approach.

The Draft NDF misses the opportunity to promote green infrastructure through enhancements delivered by new development. The Draft NDF should be amended to guide more effectively a plan-led response to opportunities to enhance publically accessible green infrastructure through new development. This is a fundamental element in the delivery of high quality and sustainable development in Wales.

## 6. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

The NDF should recognise that the use of District Heating Networks may not be the most appropriate solution for all large mixed use developments, particularly residential. The blanket approach requiring District Heating Networks is unsubstantiated. Without sufficient evidence to demonstrate that the networks are the most appropriate, efficient and viable technology on a case by case basis, this policy requirement should not be included in the Draft NDF. It does not include sufficient flexibility to allow for a range of different technologies and/or changes and advances in sustainable technology over the plan period. Policy 15 should be amended to ensure promote a range of renewable solutions and technologies over the plan period. It should confirm that other energy supply options may be more appropriate in certain circumstances. The specific circumstances should be evidenced on a case-by-case basis, including through the identification of development allocations at the regional (SDP) and local (LDP) levels.

## 7. 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 checked="" 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.

## 8. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 9. 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>
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		disagree				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 10. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

### Comprehensive Approach

Our client supports the NDF's focus for growth within the South East Region. The focus on growth in this area of national significance recognises the strategic importance of the Cardiff Capital Region.

The requirement in the Draft NDF (page 62) for a collaborative and holistic approach across the region to address strategic matters of housing, economic growth and connectivity infrastructure is supported. The reliance on the SDP to make clear decisions on the scale and location of growth to ensure all parts of the region are working together to achieve collective goals is supported. We agree this is vital to achieving an integrated approach to land-use and transport planning and build on the strength of the national growth area, and to collaboratively respond to the relevant needs, constraints and opportunities of each authority.

### Missed Opportunity

The majority of the South East Wales section of the Draft NDF (policies 27, 28 and 29) focuses solely on Cardiff, Newport and the Valleys, and fails to consider other important areas, such as the Vale of Glamorgan. This deficiency undermines the soundness of the Draft in providing a robust framework for balanced and sustainable growth across the region. The Draft NDF ignores some parts of the region and places significant restrictive policies on development upon others. No evidence is provided to substantiate this approach, which has significant implications for the future of the region.

The Draft NDF dictates a spatial strategy within the national growth area that is both premature and unsubstantiated. The spatial strategy should be determined through a comprehensive and co-ordinated evidence based approach at the regional level. The SDP is the correct vehicle for this analysis and plan making.

The absence of any policy framework addressing the constraints and opportunities outside of the three (Cardiff, Newport and the Valleys) areas is an oversight that must be rectified. There are opportunities for sustainable growth in these areas that should be addressed in the Draft NDF. For example, the areas west of Cardiff that could make a significant contribution to housing growth in locations that are accessible, better utilise brownfield land and are closely related to established employment opportunities. Failing to address these opportunities could have significant detrimental implications for the development of various parts of the region as a whole. The Draft NDF contradicts the requirement for a comprehensive approach to spatial planning across a varied the region.

For example, the west of the region makes a significant contribution to the high degree of integration between the city of Cardiff and its adjoining areas. This relationship between the city and the principally rural areas to the west shape the roles and functions of the settlements in this part of the region. The Vale of Glamorgan is strategically located adjacent to Cardiff and with high quality transport links into the city. It is home to Cardiff Airport (discussed in isolation within Policy 32) and the Cardiff Airport and St Athan Enterprise Zone. There is a clear focus for economic growth within the region which has not been reflected within the Draft NDF.

The NDF has failed to grasp the opportunity which the Vale of Glamorgan presents to assist in providing for the growth required across the region, including:

- Significant regeneration opportunities.
- Areas where there is evidence of significant demand for housing over a prolonged period of time.
- The viability of housing sites in accessible locations.
- The proximity of such sites to strategic employment locations.
- Potential infrastructure improvements and regional connectivity.

To deliver balanced and sustainable growth in sustainable places, it is important to capitalise on this high value market area by building new homes, employment opportunities and delivering infrastructure in appropriate locations to the west of Cardiff. Greater viability and housing deliverability, connectivity between places to live and work, and the countryside ensure the potential for sustainable growth and place-making at an appropriate scale in this part of the region. The NDF should provide a framework to capitalise on this opportunity, subject to appropriate evidence and strategic planning at a regional level.

### **Role of New Settlements**

Policy 31 seeks to focus growth in sustainable transit orientated settlements, with particular reference given to locations with mainline railway and Metro stations.



Whilst the need for high quality transport links is accepted, this policy should provide flexibility on how this is addressed. As noted earlier in these representations, new settlements (which consider active travel and public transport options as an integral part of the masterplanning process) can address and provide sustainable transport options in a comprehensive and sustainable manner.

### **Housing Estimates**

Welsh Government estimates for new housing confirm that 71,200 additional homes are needed in the region until 2038 (page 66), of which 47% should be affordable within the initial five years. The NDF should either remove these specific figures, or further acknowledge and highlight that these estimates are a starting point only. They should not be regarded as targets. The estimates should form a part of the evidence base and context which should be considered when housing requirements are confirmed through the preparation of SDP's.

### **Clarity of Plans**

The South East Wales regional plan (provided on page 63) appears to show the National Growth Area as covering approximately half of the Vale of Glamorgan, excluding the Cardiff Airport and Cardiff Enterprise Zone. In contrast, the all-Wales spatial strategy plan (page 25) shows the majority of the Vale of Glamorgan falling within the National Growth Area. Whilst it is acknowledged that these plans are indicative only, the inconsistency is both confusing and misleading. The South East Wales regional plan (page 63) is incorrect and should therefore be amended to reflect the growth area indicated on the all-Wales plan (page 25).

### **Amendments**

The Draft NDF should be amended to better reflect its own requirement for a comprehensive, evidenced based approach to spatial planning across the region. It must present a more ambitious, flexible and deliverable framework for development across South East Wales. This will facilitate the delivery of a robust plan-led approach at the regional level (through an SDP) capable of building on the excellent contribution the region has made to date to positive and sustainable growth of Wales.

## 11. 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.

No comment.

## 12. 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?

No comment.

### 13. 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 favorably than English.

- What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

No comment.

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 favorably 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 favorably than the English language.

Please refer to comments made in relation to each topic above.

### 14. 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?

No comment.

**15. 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 checked="" type="checkbox"/>
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