

Consultation Response Form

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<u>Organisation (if applicable)</u>	Submitted on behalf of Richborough 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The 11 'Outcomes' identified in the Draft NDF are, when considered individually, generally supported as overarching ambitions. They broadly reflect the requirement for the planning system in Wales to facilitate the delivery of sustainable development (in terms of the social, economic, environmental and cultural well-being of Wales).

Whilst the Draft NDF notes that the Outcomes are inter-related and inter-dependent, it is not sufficiently clear that they do not represent 'criteria' against which every planning decision (both plan making and development management) can comply with. It would not be a realistic vision for the NDF to expect all 11 Outcomes to be achieved in all instances.

The NDF should acknowledge that a number of the Outcomes compete against each other. For example, Outcomes 2, 3, 5, 6 and 8 support growth, whilst Outcomes 9, 10 and 11 seek to protect and enhance natural resources and the environment.

As drafted, the NDF does not reflect the need for decision making to be based on balanced judgements in order to deliver sustainable development. The NDF should be amended to recognise that sound decision making will rely on a balanced interpretation of the 11 Outcomes set out. This would allow the decision maker to consider the multiple and competing Outcomes as part of an overall balance.

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 checked="" 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:

A focus on National Growth Areas and the layering of plan-making

The spatial strategy identifies three main urban clusters of cities and towns as nationally significant places. This includes the 'Cardiff, Newport and the Valleys' area, which (as depicted on the map on p.25) covers a large proportion of South East Wales.

The three areas identified reflect Wales' historic settlement pattern, which has seen people and development drawn to where jobs were available. The strategy supports their continued growth and regeneration. The status of the three nationally significant areas, and support for their continued growth and regeneration, in the Draft NDF is welcomed. We do, however, object to the exclusion of a significant proportion of Monmouthshire from the 'National Growth Area' indicated for South East Wales (see further comments in relation to Question 11 below).

The Draft NDF states that the spatial strategy empowers local policy and decision makers to develop the national priorities through Strategic and Local Development Plans (p.24). In doing so, the NDF seeks to enable local and regional plan makers to identify areas and issues of significance to their particular area.

Our client agrees with the encouragement of regional planning in the Draft NDF. Joint plan-making across local authority boundaries, at city region scale or housing or economic market areas, can enable more holistic and strategic planning. It delivers benefit from pooling of resources and economies of scale. It is, however, critical that the spatial strategy (and wider framework within the NDF) allows Strategic and Local Development Plans sufficient flexibility to address the areas/issues of significance identified.

A Spatial Strategy which reflects the Welsh Government's ambitions for growth

In appraising the appropriateness of the proposed spatial strategy, it is necessary for the NDF to provide greater clarity as to the broad scale of new development that will be supported and provided for nationally.

In providing this clarity, the NDF should overtly acknowledge and respond to the Welsh Government's obvious ambition to enable the economic growth of the country to ensure its future resilience, which is already reflected in the City Deals. The importance of this cannot be understated at a time when the nation and the UK as a whole faces a period of weak growth and economic uncertainty. National planning policy is a vital mechanism for growth and rebalancing the economy.

The NDF should include a clear economic growth policy. The absence of such a policy in the Draft NDF represents a significant omission.

Addressing the housing challenge

To provide a clear policy steer, the NDF must recognise that delivering enough of the right type of housing in the right places across Wales is essential to attract and retain a workforce that can sustain economic growth. After years of under-provision, the country faces a critical shortage of homes and escalating prices.

The NDF must provide a clearer indication of the full range of factors it views as driving future development needs at a national level. This must include economic, market and demographic factors and will influence all forms of provision for new development. In the context of the provision of new housing, it must explicitly recognise, define and respond to “*the scale of the housing challenge*” already referenced in the NDF (at p.30).

In the absence of a recognition of the causes of this housing challenge, the Draft NDF limits itself to a reference to the Welsh Government published ‘Estimates of housing need in Wales’. This is fundamentally insufficient if the NDF is to provide a suitably representative position on the need for housing which Strategic and Local Development Plans must respond to.

In introducing these estimates, the NDF must confirm that they are a baseline, or starting point indicator of need only, and not to be taken as a target or ceiling. This important distinction was made by the Minister when the figures were released in June 2019 and is clearly stated in the supporting documents.

In referencing the estimates of housing need, the NDF should also highlight the limitations associated with the projections, e.g. their fundamental reliance on historic trends to project future needs. The NDF acknowledges a need to provide for more homes than have been provided in recent years. It also recognises the requirement for a step-change in the economies of the identified growth areas in order to realise their ambitions and the positive benefits of ongoing and planned investment. Significantly, this includes the City Deals for Cardiff and Swansea, which are in turn expected to have significant positive implications for the economic growth potential of these two key conurbations.

The Draft NDF recognises the “*need to retain and attract young people*” (at p.17). This is in the context of an acceptance of an ageing of its resident population based on the continuation of past trends.

At a local authority, or even sub-regional level, understanding the scale of changes to the demographic profile of an area will be critical to achieving the stated aim of balancing jobs and homes. This is recognised by the Welsh Government in the Consultation Draft Development Plan Manual Edition 3 (June 2019) which states (at Paragraph 5.49):

“LPAs should not consider employment forecasts in isolation, but the relationship between economic and demographic/population projections. Demographic and population projections will be a key consideration in understanding the potential of a future population to accommodate economic growth options (and vice versa). What is the relationship between the number of jobs generated and the economically active element of the projected population? Will a population provide sufficient homes so as not to import labour and hence increase in-commuting?”

Importantly it continues by confirming that:

“The critical point is ensuring that both economic and housing growth are broadly aligned, accepting there is no direct mathematical relationship. Both forecasts and

the scale of growth should be similar to support each other. This is a symbiotic relationship; it is important to evidence how the assumptions underpinning forecasting for jobs and homes broadly align, to reduce the need for commuting” (Paragraph 5.50).

The importance of this aspect in providing integrated and robust policies, that will support positive planning outcomes, is illustrated by the evidence assembled to inform the Monmouthshire Replacement Local Development Plan (consulted on in summer 2019).

Case Study: Monmouthshire Replacement Local Development Plan Housing Need Evidence Base

In summer 2019 Monmouthshire County Council consulted on the growth and spatial options for its Replacement Local Development Plan. In informing the presentation of growth options, the Council assembled a comparatively detailed evidence base, including bespoke demographic analysis from an external consultancy as well as a separate study into the future economic potential of Monmouthshire.

The evidence assembled affirmed to the Council the potential need to depart from the official household projections, and therefore by implication the Welsh Government housing need estimates. This departure would be required if the plan is to fully recognise housing needs associated with recent demographic data and economic ambitions.

For example, the evidence presented confirms that in the last four years the population of Monmouthshire grew by almost three times the rate anticipated by the official 2014-based population projections. This strongly suggests that the trend-based official projection is unlikely to be representative of future demographic growth.

It is equally apparent that past delivery provides a misrepresentative indication of future need. The evidence base shows that the long-term provision of only 287 homes each year since 2004 has not improved, but reinforced the status of Monmouthshire as the least affordable area in Wales. Entry-level house prices equate to almost nine years’ earnings, relative to the Welsh average of less than six years (ONS (2019) Housing affordability in England and Wales, house price to workplace-based earnings (lower quartile).

Most importantly the detailed modelling presented confirmed that the lower growth scenarios would fail to support the Council’s objectives for economic growth. This was illustrated by the modelling through the implied impact of an ageing population associated with a continuation of historic trends. This is illustrated in the table of options presented below, which is based on the evidence base published by the Council.

Summary of the Implications of Selected Growth Options (2018-33) (Edge Analytics, 2019)

Option and description	Type	Homes needed	
		Total	Annual
1 Net nil migration , with inflows and outflows balanced	Demographic	-	-
2 WG 2014-based principal projection , deriving migration trends from then-latest five year period (2009-14)	Demographic	1,725	115
3 Dwelling-led based on average annual housing delivery in past 15 years (2004-19)	Dwelling-led	4,305	287
4 Underperforming economic sectors uplifted from baseline forecast to match UK growth rates	Employment	5,055	337
5 Lower estimate of radical structural change , with slight reduction in out-commuting	Employment	5,790	386
6 Long-term migration trends, adjusted to reflect recently higher inflows from Bristol and South Gloucestershire	Demographic	8,010	534
7 Higher estimate of radical structural change , with higher job growth and slight reduction in out-commuting	Employment	9,465	631
8 Higher estimate of radical structural change , with higher job growth but no change in the rate of out-commuting	Employment	10,155	677

Alongside acknowledging the limitations of the housing need estimates, the NDF must recognise and reference the important linkages between economic growth and housing need. It must be explicit in referencing what this will mean at a national level if the country is to realise its ambition to achieve more than achieved historically. This must present a sufficiently clear guiding framework for Strategic and Local Plans to work within.

The NDF should, on this basis, provide a clear policy requirement, reflecting emerging national guidance. This must support the requirement for plan-makers to demonstrate that their assessment of, and strategies for, housing and employment and other uses are integrated. Adequate consideration must also be given to the alignment of evidence within adjacent areas, including those covered by SDPs.

Unnecessarily Restrictive Approach

Page 18 of the Draft NDF confirms that in order to achieve the outcomes it aspires to, development will need to be provided *"in the right places for the right reasons"*.

Our client supports the underlying principle of encouraging sustainable and efficient

patterns of development, “*based on co-locating homes with jobs and vital services and the efficient use of resources*” (p.22). Providing for new homes in urban areas forms an important component of achieving this goal. However, our client has significant concerns that the strategy proposed in the Draft NDF, in applying this principle, represents an unsubstantiated and restrictive approach to new development.

This approach fails to recognise the diverse nature of, and differences both within and between, the national growth areas. This failing is likely to restrict the ability of emerging Strategic and Local Development Plans to deliver appropriate strategies capable of delivering sustainable development.

Policies 1, 2 and 3 extoll a clear focus on urban growth and development within existing towns and cities. New development in these areas, it is agreed, will be an important part of fulfilling the ambitions of each of the national growth areas. The Draft NDF, however, fails to acknowledge the need for flexibility in applying the spatial principles in order to respond to the inherent limitations of such supply. There is a danger that an over reliance on existing settlements will stifle growth within the National Growth Areas and undermine the delivery of the NDF and its outcomes.

This reflects an absence of any evidence to substantiate the reliance on urban growth and development of the urban centres, as well as public land ownerships. There is no clear evidence that the Draft NDF has considered whether sufficient capacity exists in urban areas to support this approach (e.g. by undertaking urban capacity studies). It is also apparent that no consideration has been given to evidence that such an approach in the past has represented a critical contributing factor to the acknowledged decreasing levels of new homes constructed each year (as shown in the figure on p.30 of the Draft NDF).

It is critical that the NDF is amended to affirm the importance of Strategic and Local Development Plans in assessing the deliverability of the identified urban land supply. The NDF must also provide sufficient flexibility to support alternative spatial strategies where it is apparent that such a supply will not enable needs to be met in full.

In this context, the NDF must recognise that development on the periphery of settlements can also deliver sustainable development. It should be acknowledged that it can be entirely appropriate (and necessary) for development to take place adjoining existing settlement edges and on greenfield land. The NDF should be amended to remove unnecessarily emotive statements such as “*enabling sprawling greenfield development*” (at p.22). This is not substantiated, and is far too sweeping and generic. Clearly not all greenfield development will be ‘sprawling’ and such development can be entirely appropriate and sustainable, coming forward alongside development on brownfield land within urban areas.

Recognising the need for such flexibility, the NDF should acknowledge the potential for growth in appropriate areas that are not necessarily urban (or less urban). As considered in the context of Policy 4 below, such development locations can contribute positively to sustainable placemaking and the sustainability of such locations.

Supporting Rural Communities

The points made above form essential context for the importance that must be given to supporting rural communities within the NDF. The identification of a specific policy (Policy 4) in this regard is strongly supported.

This recognises that the implications of changing demographics are also critical at the settlement level. Whilst encouraging development in the cities, large towns and main development areas will be important, the future vitality of smaller settlements, most of which are in more rural areas, cannot be ignored. In this context, the Draft NDF itself recognises (at p.28) that large parts of Wales are rural in character, with 40% of the population living in settlements of less than 10,000 people in Wales.

We support the recognition that communities in rural areas should be “*strongly supported*” with the aim of securing “*sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services*” (p.24). Should the sentiment of Policy 4 not be delivered, the consequences for rural settlements include a risk that current challenges, related in particular to an ageing demographic, are sustained or exacerbated.

The reality of this issue is emphasised by the evidence presented to inform the emerging spatial options within the Replacement Monmouthshire Local Development Plan (Growth and Spatial Options Paper, 2019). In its assessment of spatial options, the Council’s evidence base identifies a risk that the future vitality of settlements could be threatened where future growth was limited or constrained. This recognises that many of the settlements across the rural parts of Monmouthshire are characterised by an ageing population, something that is common across many areas of Wales. The absence of new housing in such locations over recent years has limited their ability to retain and attract younger households, which in turn has had consequences for local services and facilities. In many of the rural parts of Monmouthshire the imbalance between supply and demand has created worsening affordability issues, thereby limiting the ability of younger generations to remain in close proximity to family.

The NDF should reinforce the principles established in Policy 4 by explicitly requiring Strategic and Local Development Plans to undertake an in depth, evidenced based assessment of current challenges facing their rural communities. It is then critical that a level of proportionate growth is identified, which it is reasonable to assume will ensure the more sustainable future of the settlement over the plan period. It is also important that Strategic and Local Development Plans move away from the tendency to retain allocations which have proven to be unattractive for development, rather than recognising through an evidence base the comparative need for housing in other more rural areas and settlements.

Our client is also concerned that policies included elsewhere in the Draft NDF contradict and restrict the aim of providing a “*positive framework for economic development, diversification and meeting local housing needs*” in rural areas. This is particularly evident in policies relating to the South East Wales Region (e.g. the ‘requirement’ for a future SDP to identify a Green Belt). This point is returned to below in response to Question 11.

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 Draft NDF (p.17) recognises the need for housing across Wales at both a national and regional level. It continues by stating that, in particular, the NDF provides evidence that “*demonstrates the need for a focus on increasing the delivery of affordable homes.*”

Our client agrees that Wales is facing ‘housing challenges’. This is demonstrated by the inclusion of the need to increase affordable housing provision as one of the 11 NDF Outcomes. This increase is recognised as being required to ensure that the ‘challenges’ are addressed over the plan period, as opposed to worsening.

Critically, however, the NDF fundamentally fails to acknowledge, or even recognise, that the solution to overcoming these ‘challenges’ more widely is a need to significantly elevate the overall level of housing provision. As we have set out in our response to Question 2, the NDF must be more explicit in recognising the importance of this issue and present a positive, policy-led approach to support a boosting of the supply of new homes. Failure to do so will not only exacerbate the issues in households being able to afford access to new homes, but will also inadvertently undermine investment and growth across Wales.

Whilst we have indicated a point of disagreement with the approach set out within the NDF, this is not to say that we do not think that local authorities, social landlords and small and medium-sized developers should have an important and valuable role in providing much needed affordable homes. Importantly the experience of development in recent years confirms (both in Wales and other parts of the UK) that relying on such approaches **in isolation** will not provide the quantum of affordable homes needed in the areas they are needed most.

The above points are demonstrated by the housing completions chart presented on p.30 of the Draft NDF. The chart shows that the strongest annual rates of delivery have been achieved where contributions to supply have been made from the private

sector and RSLs/local authorities. It is important to note that the private sector has consistently made the greatest contribution. This is not acknowledged in the Draft NDF. Its omission represents a critical gap in recognising the role of private enterprises in meeting the outcomes sought and ensuring the priority of providing *“housing in Wales which meets our needs”* is met (p.30 of the Draft NDF).

In this context, it is important to recognise (again by reference to the chart on p.30), that while the housing estimates produced by Welsh Government suggest that on average 47% of additional homes should be affordable housing, such a proportionate level of provision has not been met since the 1980s. The Welsh Government has not produced any evidence as to how it suggests that such a proportionate target will be met without assuming a fundamental lowering of the overall levels of provision, even below those recorded in recent years. This would evidently contradict achieving the above priority.

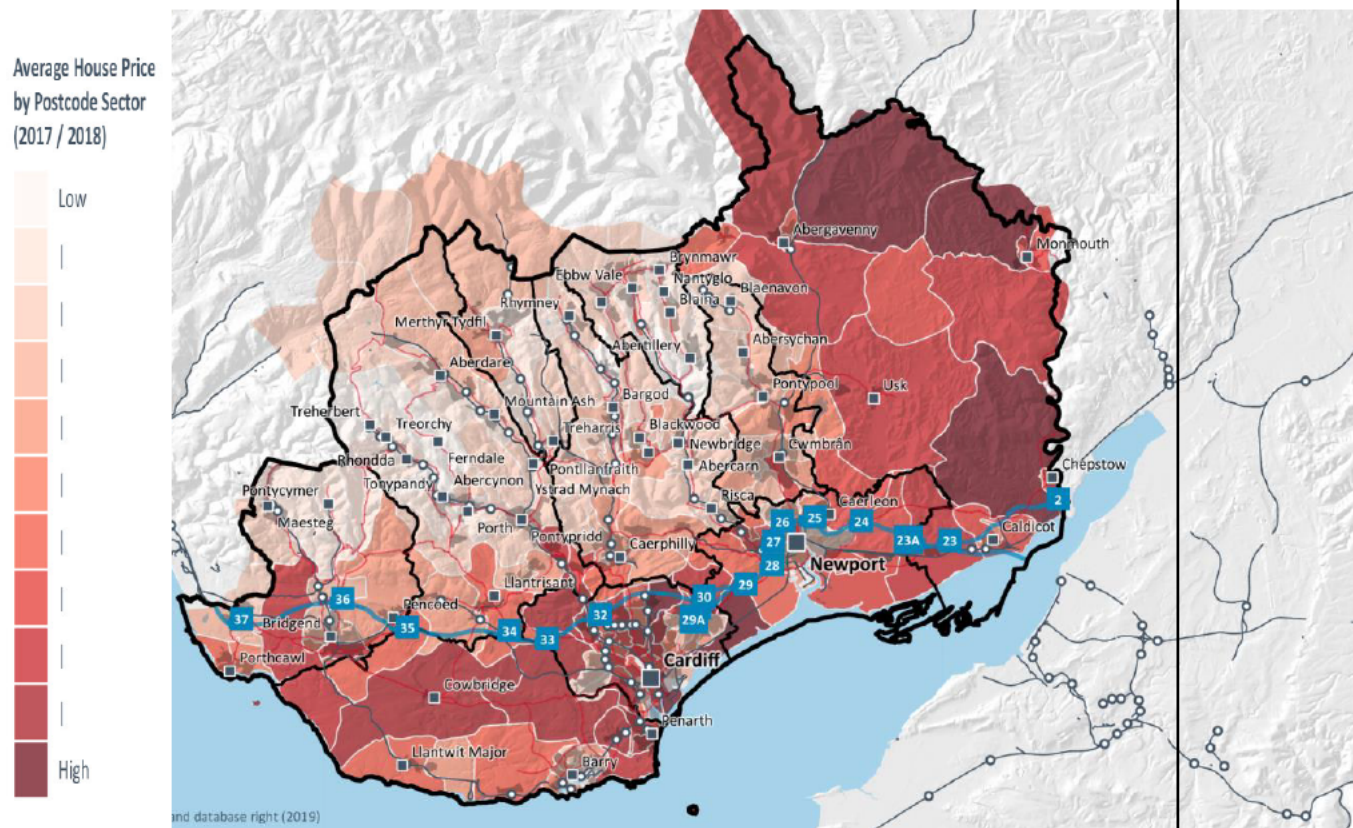
In the context of seeking to elevate provision, it is important to recognise that the contribution of new affordable homes provided through Section 106 agreements has been comparatively substantial for a number of years. The table below, which is sourced from the Welsh Government's Affordable Housing Provision data collection, shows that the proportion has consistently been around 30% over the last four years. This represents a step-up from the years preceding.

Planning obligation	Number delivered	Percentage of all additional housing delivered through planning obligations
2011/12	624	25.7
2012/13	432	21.2
2013/14	384	15.9
2014/15	796	35.9
2015/16	705	29.4
2016/17	932	36.6
2017/18	773	33.4

Where the NDF seeks to elevate the proportion of affordable housing to be delivered, this must be grounded on the basis of transparent and robust evidence which confirms how this level of provision will be supported/delivered. This will need to consider the comparative deliverability of land in different parts of the growth areas, alongside the availability of public sector funding.

From a perspective of deliverability, it is reasonable to highlight that higher proportions of affordable housing can be supported through the provision of market housing where house prices are stronger. Looking specifically at the Cardiff City Region, the following map illustrates that across this sub-regional geography there is a considerable disparity in house prices and therefore land values which must be acknowledged through any such assessment.

Average House Price 2017/18 by Postcode Sector (Source: Turley, Land Registry data)



In considering the geographic distribution of house prices in this example geography, it is readily apparent that many of the higher value areas are located in the hinterlands to the urban areas. This provides an important context in considering the need for the NDF to provide sufficient flexibility in its spatial strategy (as referenced in response to Question 2).

The NDF must also place greater emphasis on the importance of providing not only the right tenure mix of housing, but also the mix of types and sizes of homes. Providing homes which will attract a new workforce will be critical in supporting the Welsh Government's economic ambitions. The NDF should include a clear policy steer on the need for different sizes and types of new homes, which in turn recognises current deficiencies in the existing housing stock. This should be directly linked to a spatial strategy that recognises that urban, edge of urban and rural sites are required to provide different mixes and types of housing.

In the context of the above the NDF should be amended to:

- Be explicit in requiring a new policy based approach to housing delivery nationally, which seeks to provide for a level of new homes in excess of the housing estimates. This is the only means of ensuring an ambitious approach to elevating delivery from its current low level to one which is capable of overcoming evident housing challenges.

- Take account of the full scale of affordable housing need in establishing the principle that housing requirements will need to be elevated above the 'estimates' to enable need to be met.
- Clarify that SDPs and LDPs must recognise deliverability as a key contributing factor to setting the spatial strategy and the identified provision of land where the priority of ensuring those in need of affordable housing are provided with a home in the plan period
- Clarify that the 47% 'need' figure is not a target, with emphasis required to be placed on the *absolute* need figure calculated for affordable housing.
- Include a clear policy steer on the mix of housing which will be needed at a national level to form a framework for SDPs and LDPs.

In the context of the above, Policy 5 should be amended to recognise the role of market housing in addressing the 'housing challenges' referred to. Only by recognising the need for a holistic approach to the challenge, embracing delivery from a range of sources, will the NDF set the positive framework required to help address the significant issues faced across Wales.

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

5. Low Emission Vehicles (policy 7)

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

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

Whilst not commenting specifically on the wording of Policy 7, the NDF should note the role ultra low emission vehicles can play in bringing forward sustainable development. This should be seen in the context of the sustainable transport hierarchy set out in PPW. The future role of ULEVs, alongside other forms of sustainable transport, should be reflected elsewhere in the NDF (e.g. Policy 31).

6. Green Infrastructure (policies 8 & 9)

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

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

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

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

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

Policy 14 requires Local Planning Authorities to identify opportunities for District Heating Networks and 'ensure they are integrated within new and existing development'. Policy 14 should be amended to allow greater flexibility. The policy must recognise that District Heat Networks will not be feasible, or the most effective approach to supply, in all new and existing developments.

Policy 15 rightly recognises that there must be flexibility when considering whether a District Heat Network should be incorporated within large scale mixed use development. This includes whether such provision is feasible and the most effective approach to supply. Sufficient flexibility should be provided to allow this to be reviewed on a case by case basis.

Policy 15 refers specifically to 'large scale mixed use development'. This is not defined in the policy, but the supporting text refers to large scale, mixed use developments of more than 100 dwellings. Reference is also made to the potential for a lower threshold to be applied. No reference is made to scale in terms of other, non-residential, elements of any scheme.

We would question what evidence has been used to support this threshold, given the range of factors (including location, density and heat demand) which affects the feasibility of the use of district heating. The bar currently set in the Draft NDF is likely to be too low in many instances, which emphasises the need for flexibility in the wording of any policy.

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

Our client supports the general principle of developing Strategic Development Plans (SDP) at a regional level. The Draft NDF (p.46) rightly acknowledges that *“many policy areas are best considered at the regional scale”*.

The Draft NDF acknowledges that SDPs should be shaped by other regional strategies, including the Welsh Government’s Regional Economic Development Plans and City and Growth Deals (p.46). It continues by noting that if key outcomes are not aligned, or do not support one another, the region’s ability to deliver will be undermined.

This applies equally to the framework and spatial direction set by the NDF. As set out in our response to Question 2, the Draft NDF is not sufficiently ambitious or clear in terms of economic growth. Taking the South East Wales Region, the Draft NDF contains overly restrictive policies that will impede the alignment of key policies, undermining the ability of any future SDP to deliver appropriate levels of sustainable growth. The Draft NDF also restricts the ability of future Strategic and Local Development Plans to determine the appropriate location for such growth.

This will exacerbate existing socio-demographic issues and the ability to deliver economic growth across the South East Wales Region. This is addressed in more detail below.

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

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

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

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

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

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

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

11. South East Wales (policies 27-33)

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

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

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

South East Wales Region

Holistic Approach

Our client supports the identification of the South East Wales region as a focus for growth. The Draft NDF recognises that it is the most populous region of Wales, despite being the smallest geographically (p.62). It is also acknowledged as being a major city region on a UK scale. This should be fundamental to the framework and strategy set for the region, viewed in the context of the work already being undertaken by the Cardiff Capital Region.

The recognition in the Draft NDF (p.62) that there must be a collaborative, holistic approach to housing, economic growth and connectivity infrastructure coordinated is welcomed. It is important that such issues are coordinated and planned on the basis of the region as a whole. The emerging Strategic Development Plan will play a key role in ensuring this is delivered. We are, however, concerned that the Draft NDF seriously undermines the ability of any future SDP to deliver this aim.

Focus for Growth

The Draft NDF states that growth should be focused primarily in Cardiff, Newport and the Valleys. Whilst the principle of further growth in these locations is supported, we have significant concerns with the failure of the Draft NDF to make any reference to other parts of the region, such as the Vale of Glamorgan and Monmouthshire. Both areas are fundamental to the wider region and delivery of the aspirations and ambitions of the Cardiff Capital City Region. This should be explicitly recognised in the NDF.

The current approach to growth is not supported by any form of robust evidence. Critically, the Draft NDF makes no assessment of the implications of putting in place a strategy focusing entirely on Cardiff, Newport and the Valleys. In doing so, the Draft NDF fails to recognise the growth potential of other parts of the region, together with the negative implications this will have for economic growth and addressing existing socio-demographic issues across the region as a whole.

Any future Strategic or Local Development Plan is required to conform to the NDF. In this context, the strategic approach set out for the South East Region will impede the ability for meaningful decisions about growth and spatial strategy to be made at

the regional and local level. The NDF sets a framework for the national growth area that restricts opportunities for growth in key areas (in particular Monmouthshire). This is both premature and unsubstantiated. It is critical that the strategy for South East Wales is planned on a more holistic basis, enabling decisions to be made with the support of a comprehensive and coordinated evidence base. This will be delivered through regional and local plan making.

As raised in relation to Question 2, our client supports the general principle of further growth within urban areas, particularly those associated with the main conurbations in the region. We would, however, question whether it is realistic, or appropriate, to rely so heavily on delivery within Newport and the Valleys. The NDF must acknowledge that there are opportunities for sustainable development throughout the region, not just in Cardiff, Newport and the Valleys.

If the strategic policies set out in the Draft NDF are to be delivered, the housing, economic and infrastructure needs of the region as a whole must be planned for. As worded, the Draft NDF risks predetermining the direction of future local and regional plans, requiring stagnation rather than allowing authorities to plan for growth.

The Draft NDF is also inconsistent in how it approaches the links to the English regions in North Wales and South East Wales. Policy 17 makes direct recognition, and encouragement, to the cross-border links between North Wales and the Cheshire/Liverpool City Region. In contrast, there is no acknowledgement of the links with the south west of England and the South East Wales Region. This fails to reflect the aspirations of the Cardiff Capital Region City Deal and associated future opportunities, or the economic strengths associated with the Western Powerhouse or the emerging Great Western Cities concept.

Housing Estimates

Whilst not referenced in the specific policies relating to the region, the supporting text states that *“under the Welsh Government central estimates 71,200 additional homes are needed in the region until 2038”* (p.66). As set out in relation to Question 2, our client is concerned that the Draft NDF is not sufficiently clear that the housing estimates should not be taken as targets. This is not helped by the current drafting of the NDF, for example, reference to 71,200 additional homes being *“needed in the region”*. It should be made explicit that the estimates should be seen as no more than a starting point for future Strategic and Local Development Plans.

It is also noted that the 71,200 figure derived from the central estimates is not very aspirational. It falls considerably short of the requirements set out in the adopted LDPs, let alone taking account of the ambitions for future growth in the region. Applying such a figure as a basis for future Strategic and Local Development Plans would fail to provide anywhere near the level of growth needed. This would undermine economic growth, and the ability to address significant challenges such as affordability and wider demographic issues.

Green Belts in South East Wales

Our client strongly objects to Policy 30: Green Belts in South East Wales. It is overly

prescriptive on the basis that it 'requires' the identification of Green Belts through a future Strategic Development Plan. Despite the prescriptive nature of the policy, it is clear that there is an absence of any detailed evidence or analysis to support this requirement. There is also a complete failure to properly assess the significant implications of adopting such a prescriptive policy on the South East Wales Region.

Despite this lack of evidence base, the policy itself specifically refers to the requirement for a Green Belt to be identified, particularly around Newport and the eastern region. The supporting text is even more prescriptive, stating that 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"*. This approach is wholly unjustified and unduly prescriptive.

Given the intended permanence of Green Belt designations, it is critical that the evidence assembled to underpin such a restrictive policy is robust and transparent. This evidence must take full account not only of environmental considerations, but also the economic impact of Green Belt designations at the sub-regional and indeed national level.

The evidence base should reflect on the proven long-term impact of Green Belt designations in England, for example. There is evidence of their '*substantial welfare costs*', having '*made accommodation more expensive and smaller, increased costs for businesses (especially relative to other European cities), and...contributed to the volatility of house prices*'¹. The failure to undertake a national review of the Green Belt since its inception has also contributed to acute local manifestations of the national housing crisis in cities throughout England².

To date there is no evidence that sufficient (if any) consideration has been given to the economic consequences of the proposed requirements for new Green Belt designations in South East Wales. This is a fundamental shortcoming of the NDF's approach to providing indicative Green Belt areas for future designation. Evidence must be provided, which assesses not only the perceived environmental and other benefits of such designations, but also the potential socio-economic consequences.

If carried forward to the final NDF, Policy 30 will severely restrict the ability of Strategic and Local Development Plans to respond to, and address, existing pressing socio-economic issues. Monmouthshire in particular would be significantly affected. The identification of a Green Belt over a large section of Monmouthshire would severely constrain future growth in a number of existing settlements. In doing so, the future vitality of such settlements would be threatened.

Many of the settlements across the rural parts of Monmouthshire are characterised by an ageing population, something that is common across many areas of Wales. The absence of new housing in such locations over recent years has limited their ability to retain and attract younger households, which has had consequences for local services and facilities. In many of the rural parts of Monmouthshire the imbalance between supply and demand has created worsening affordability issues,

¹ Tom Papworth, Adam Smith Institute (2015) The Green Noose: an analysis of Green Belts and proposals for reform

² Institute of Economic Affairs (2012) Abundance of land, shortage of housing: IEA Discussion Paper No.38

thereby limiting the ability of younger generations to remain in close proximity to family. Imposing a Green Belt on a large part of Monmouthshire, thereby severely restricting future development, will only serve to exacerbate these issues.

The Draft NDF indicates that the proposed Green Belt designation in South East Wales will cover some of the areas where demand for development is likely to be highest. A number of the areas identified are clearly sustainable locations for future growth (in terms of access to existing services/facilities, active travel and public transport opportunities etc). Given the intended permanence of Green Belt designations, this risks sterilising land for a wide range of uses in a number of sustainable settlements.

Restricting growth in this way will undermine the aspirations of the Cardiff Capital Region City Deal, which includes a growth strategy for the region as a whole. It would restrict economic growth in an area of significant demand and potential. This will undermine the role of future Strategic and Local Development Plans, by predetermining (and severely constraining) the growth strategy.

As asserted in response to earlier questions, our client recognises the importance of enabling urban development, but over many years the urban areas (including the key urban centres in South East Wales) have seen new development focus on those sites which are deliverable. Plans to date have ensured that the physical spread of urban areas has been carefully managed and the outward expansion of these urban areas has been modest. The success of this approach means that the amount and quality of brownfield land that is available is constantly reducing. As a result, the deliverability of remaining land is often very challenging, because many of the most deliverable sites in stronger market areas have already been redeveloped. In addition, land that is available is not always in the right locations, or of the right type to meet local housing needs. An over-reliance on inner-urban development, to the exclusion of sustainable urban growth:

- Does not provide sufficient land to cater for the full range of housing needs, and particularly fails to provide the family homes with outdoor space that young families with children need; and
- Often leads to very low levels of affordable homes being facilitated through private sector development, due to the commercial viability challenges of remediating and re-developing brownfield land.

The failure to recognise these consequences risks exacerbating affordability issues and stifling investment which will be critical to the South East Wales Region achieving its ambitions and potential. In the context of the above, requiring the identification of a Green Belt (without any form of evidence) across a large part of the region is entirely unjustified.

It is also noted that the approach taken between the identification of Green Belts in North Wales and South East Wales is inconsistent. For North Wales, Policy 19 of the Draft NDF states that the Welsh Government 'supports' the role of SDPs identifying and establishing Green Belts. This clearly does not go as far as 'requiring' the identification of a Green Belt, allowing any future SDP to consider

whether there is actually evidence to support the identification of such a designation.

The Draft NDF, and its supporting evidence base, provides no justification for the requirement to identify a Green Belt in South East Wales. Policy 30 is entirely unsubstantiated and far too prescriptive. It should be deleted from the NDF.

Whilst we see no justification for the identification of a Green Belt, should the Welsh Government be minded to retain reference to such a designation, the NDF should be amended to allow for consideration to be given through a future SDP. This would provide the opportunity to consider at a regional level whether there is an evidence base to support the identification of a Green Belt. This should take account of PPW, which states that designation of a Green Belt must be soundly based and only be employed where there is a demonstrable need to protect the urban form. In the case of South East Wales, we do not consider that such a designation is either required or soundly based.

Policy 31: Growth in sustainable transit orientated settlements

We do not object to the general principle of focusing growth in places with good active travel and public transport connectivity. We also support the role of Strategic and Local Development Plans in planning for growth to maximise the potential opportunities arising from better regional connectivity.

The policy, however, places too much reliance on focusing development on *“land in close proximity to existing and committed new mainline railway and Metro stations”*. Whilst not objecting to development in such areas, the NDF must be realistic as to how much growth they can realistically accommodate. There is no indication that any consideration has been given to the capacity of land within close proximity to such stations through the NDF.

The policy should also recognise the role other sources of active travel and public transport connectivity can play in delivering growth. It is far too restrictive to focus development solely on areas close to mainline railway and Metro stations. In doing so, it ignores the importance of good access to bus, cycle or pedestrian infrastructure/connectivity. The NDF would set a far too narrow framework if active travel was only achieved through access to rail and future Metro stations. Whilst an important part of the future sustainable transport hierarchy, the NDF should also allow Strategic and Local Development Plans to take account of other factors, such as access to cycle and pedestrian infrastructure, bus services, the provision of Ultra Low Emission Vehicles. Other locational factors should also be taken into account, including the ability to work at home and access to existing services and facilities or provision.

New development in existing settlements already served by public transport can provide significant opportunities to help secure, and improve existing services. It also provides the opportunity to support and enhance the level of services and facilities available to existing and new residents.

Policy 31 should be amended to allow greater flexibility for Strategic and Local Development Plans to consider sustainable locations for growth on a wider, more

holistic basis. The policy should be reworded to ensure it is clear that growth can still be sustainable outside of those areas close to existing committed/mainline railway and Metro stations. If applied too prescriptively, this policy could severely restrict the ability to bring forward sustainable growth across the South East Wales Region – potentially undermining the ambitions and goals of the Cardiff Capital Region.

Clarity of Plans

The illustrative map on p.63 of the Draft NDF is inconsistent with the plan included on p.25. This is confusing and should be addressed in future iterations of the NDF.

The identification of the Green Belt in South East Wales is strongly objected to. Whilst being indicative and imprecise given the scale of plan, it risks predetermining the location of any Green Belt. It should be removed from the plan.

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.

No comment

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?

No comment

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?

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 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.

No comment.

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?

No comment

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	X
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