

From: [Emyr Davies](#)
To: [NDE](#)
Subject: Draft NDF representation
Date: 15 November 2019 09:46:22
Attachments: [draft-national-development-framework-response-form_ED Nov "19".pdf](#)

Hello,

Please find attached my personal individual response to the Draft NDF consultation.

Regards,

Emyr

Emyr Davies

Senior Planning Manager

Redrow Homes Limited

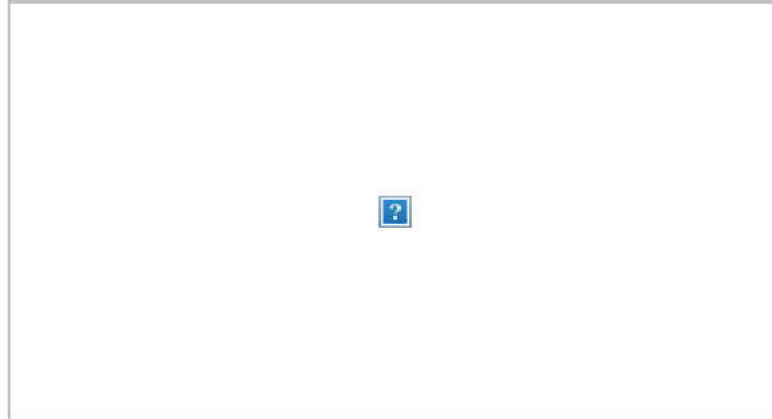
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Consultation Response Form

Your name	Emyr Davies
Your address	██████████ ██████████ ██████████
Preferred contact details (email/phone/post)	████████████████████
<u>Organisation (if applicable)</u>	

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

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

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

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

The **draft NDF does not include any kind of monitoring** as required with other lower tier levels of the development plans. This is likely to be deliberate as the draft NDF as set out would fail in achieving the 11 outcomes. They do not create a realistic vision and it would naïve to think otherwise.

The **outcomes are clearly idealistic** with only some influenced by the planning system (emphasis added). If they are left in the current form they can only be considered as aspirational and knowingly unachievable. The outcomes are not informed by a robust evidence base to demonstrate how they would be viable and deliverable. This must be the process otherwise it could place the lower tier development plans of the SDPs and LDPs in impossible situations of being able to conform with unrealistic outcomes put forward in the NDF.

A significant issue is that some of outcomes support growth and others seek protection and enhancement of the natural resources and environment. The planning system must maintain to be a process of weighing up all matters and reaching a balanced judgement on a site by site, location by location, region by region basis. The SDPs and LDPs will ultimately consider the detail (and what is reality!) but they must both confirm with the NDF which will have development plan status. It is therefore concerning that the draft NDF has even been presented in its current form. It is not sound (noting that it does not need to meet the tests of soundness as with all other development plans), is unrealistic and even with this arguably still remains unambitious in pushing Wales, and particularly South East Wales, to grow, compete and prosper for the benefit of future generations.

Notwithstanding that the 11 outcomes are not considered realistic they fail to address the highly motivated political topics that have direct impacts on the future Welsh economy and should not be ignored by the NDF.

1. The decision to **not progress the M4 relief road** means that access to the indicated (non-aspirational) growth areas by road is significantly impacted. This is already having a significant impact on business investment west of Newport. The area east of Newport to the Severn crossings and within the middle of the Great Western Powerhouse that could reap reward from this is seemingly sterilised from development for 50 plus years by indication of a green belt designation.

2. Despite **a housing crisis** with the delivery of homes in South Wales only back to two thirds of that prior to the recession the role of private housing building is not mentioned. The value of providing much needed new homes (including affordable housing), the associated infrastructure such as schools and leisure provision is something that the draft NDF should be giving considerable weight to. Beyond the physical outcome of private house building it is a significant employer in Wales that also teaches key trades to in-house apprentice schemes. The value of the private house building industry in Wales, and particularly South East Wales, is significant. The levels of volume house delivery that has been seen in Wales can only be achieved with significant investment upfront. This is not always apparent and the costs never fully recognised but infrastructure diversions are made, new pipework, cabling, roads etc are laid. These significant costs are there regardless of whether greenfield or brownfield land. In the case of brownfield land there are often greater costs because the existing infrastructure is no longer fit for purpose or was designed for a different use and therefore needs removing before being replaced.

The draft NDF has considered matters in a very simplistic way. Direct growth to brownfield land in more urban areas and protect all green spaces. Everyone will live happily, sustainably and everything to hand. This is not how people want to live which I'll come back to later and it is simply not viable or realistic to achieve. The planning system needs to be able to retain the ability to weigh up and make balanced judgements over brownfield v greenfield, growth v protection etc and not simply be instructed to protect all green spaces and only build on brownfield land. The overall need requirements must continue to be understood based on a solid evidence base and then development plans produced to pass the tests of soundness. I.e. they will be able to deliver what they set out!

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The introductory text to Chapter 4 states that growth will be focused on growing urban areas. It then says that urban growth focus enables more people to walk and cycle for everyday journeys. Prior to this in the same Chapter it states that "Choosing to develop new towns and enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities...."

At first glance this might appear somewhat sensible. However, it fails to give regard to the current situation and fails to give any indication of how it could be delivered. Of greatest concern when considering basic economic principles is that the draft NDF cannot deliver on what it sets out.

The current situation involves the M4 in South East Wales that is a major national issue. The level of congestion is increasing month by month in terms of queue length and amount of time each day there is significant congestion. This is essentially the only route connecting England to the whole of the southern half of Wales (Newport through to west Wales). Unless imminent measures are brought forward to address this issue the Welsh economy will suffer. The draft NDF fails to mention it let alone set out how the draft NDF outcomes would be achieved with this major issue.

No evidence has been provided with the draft NDF to show how these policies would be achieved. This cannot be left to the SDP as there is real risk that when the evidence base is obtained that the NDF policies, as drafted, would not be deliverable.

The NDF must adhere to Planning Policy Wales. PPW allows consideration of suitable and sustainable greenfield sites within or on the edge of settlements, alongside new settlements in the open countryside in exceptional circumstances (emphasis added). There is a requirement for a range and choice of sites to ensure that there is a deliverable supply of land. Indeed, there is a requirement for a range and choice of homes to be provided to meet the needs of all.

Notwithstanding that there is an inadequate supply of urban deliverable land in the identified growth areas higher density developments are not what all people want or aspire to want. If the Welsh Ministers honestly thought about where they now live and what they want / aspire to have from a home they would probably be saying the same as most people. This being something along the lines of a house with more bedrooms than required, a private garden space, a quiet environment with enjoyment of green space and play/leisure provision. Whilst it is recognised that probably higher density development is required it is still important to recognise a range and choice of housing for different needs. This is something that new settlements can successfully deliver.

The **Cardiff Capital Region Strategic Business Plan** endorsed by the 10 LPAs in the region **supported the principle of new settlements** which would combine housing, employment, education and leisure elements in a planned, sustainable development of significant scale.

In relation to the **SAB regulations** concern has already been expressed in the industry about the additional difficulties of complying with the legislation on brownfield land. This being the inherit contamination issues that are often associated with such sites and not fully restored but dealt with appropriately via capping for example. When asking whether brownfield sites are deliverable in all historic aspects the development industry has been dealing with there is now the added difficulty of the SAB process. If compliance is achievable on the sequential approach then it is likely to create significantly greater cost for drainage solutions on brownfield sites than would have been the case prior to January 2019.

Also in relation to the SAB regulations, the higher density a scheme will become then the more space that would be required for sustainable drainage. Yes, there could be some innovative ways to deal with it but this would add significant additional cost to a scheme's viability and likely to be comparative to just using additional land.

What percentage of affordable housing has been delivered on brownfield land recently (without grant funding)? If the Welsh Government are estimating that 47% of new homes need to be affordable and that within the growth areas they should be directed to brownfield land it would be interesting to see past build data to show what percentage of affordable homes have been viably (without grant funding) delivered in urban areas in Wales? NB. This would also be schemes being prior to additional

development costs added in recent years relating to sprinklers and SAB compliance.

In relation to Policy 2 I somewhat disagree by a blanket approach to public service facilities being located within town and city centre locations. This isn't defined but some of these facilities are regional facilities and so placing them in good transit locations out of the defined centres could be more appropriate and still be very sustainable. It could arguably create a more sustainable facility for those using it on a regional basis. It could also benefit from transport movement to in opposite directions at peak travelling times. This assisting in road traffic but also potentially making the rail service improved. This in the sense of freeing up space at commuter times but also supporting rail travel outside of purely commuting basis.

Policy 3 is a very political statement and not appropriate within a development plan. Bringing forward public land can be supported but the private landowners cannot be ignored. **Land ownership is not a material planning consideration.** All land must be considered on the same basis and is the very essence of the planning system. This to guide development and bring land forward in the most sustainable way. Public land that does not rate as sustainably as a private land promotion cannot be favoured over the private land.

Public land is often slow in coming forward for development due to land assembly and funding. How would the Welsh Government ensure that public land came forward at the pace needed to deliver new homes? However, even with public land being made available there is not enough to meet the requirements unless WG have evidence to show otherwise. Moreover with Council's already struggling with budgets to lose capital receipts from the land sales would be detrimental to the operational side of Council's. For example, it is known that some authorities use money from Council land sales to fund their school improvements. If the land is sold (or gifted) to allow for higher affordable housing provision where will the Council's gain money to offset this loss. A double blow in such scenario would be that the Council cannot generate money towards education and leisure provision from affordable housing under the CIL Regulations. The consequences of a significant lack of funding for school investment would be extremely difficult for a Council to manage and difficult to see how they could. Would WG make money available to compensate the local authorities?

Policy 4 relates to supporting rural communities and sets out that "appropriate proportionate growth" is acceptable. This is welcomed but it is not clear what "appropriate proportionate growth" is and should be clarified further. A small development in Raglan was recently refused by the Minister essentially on sustainability grounds. I would have argued that this was appropriate proportionate growth for that community and indeed the local planning authority did.

Chapter 2 of the draft NDF recognises that Wales is an ageing population and there will be one third more people aged 65 and over by 2038. This means that rural homes are being lived in longer and without new homes being provided younger families cannot live in those areas and are being forced out. Seemingly to the higher density urban areas as advocated by the draft NDF. The consequences being seen and likely to be exacerbated based on the thrust of the draft NDF and recent Raglan decision are that house prices in rural areas will significantly rise, local schools will

be forced to shut due to inadequate numbers and local services (e.g. shops, buses) will fade away due to reduced population. I.e. what is currently being witnessed will be compounded. Over 65s get a free bus pass so how would a dwindling bus provision stand chance of remaining operational without increasing the population. Failing to provide “appropriate proportionate growth” (which has to be meaningful housing release such as that proposed in Raglan) will make rural communities less sustainable. How is effectively not allowing rural communities the ability to maintain their way of life complying with the Well-Being of Future Generations Act? Greater housing release and new job opportunities are required quickly to serve rural areas to address the recognised issue of there being third more people aged 65 and over by 2038.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

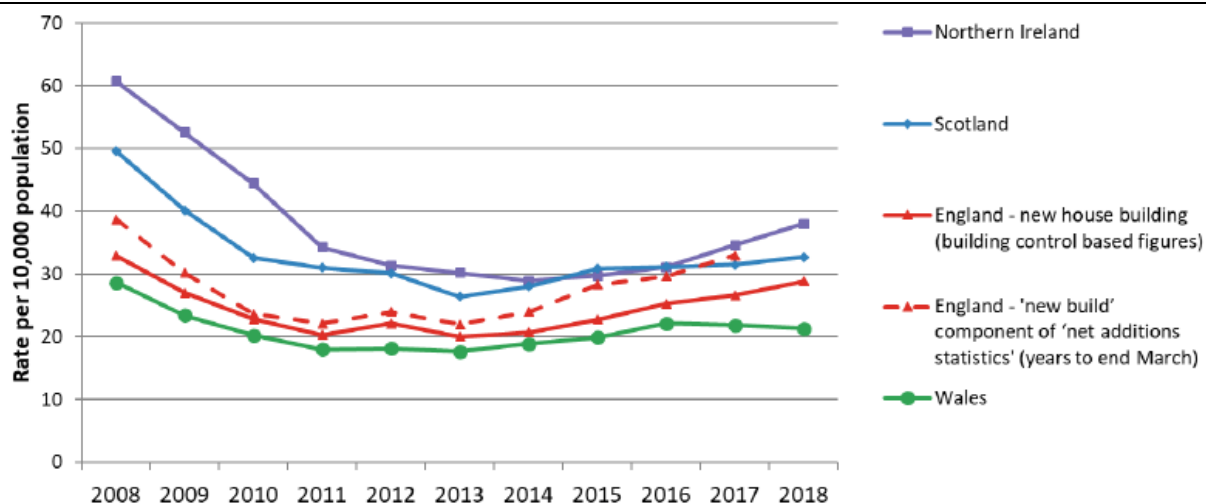
Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

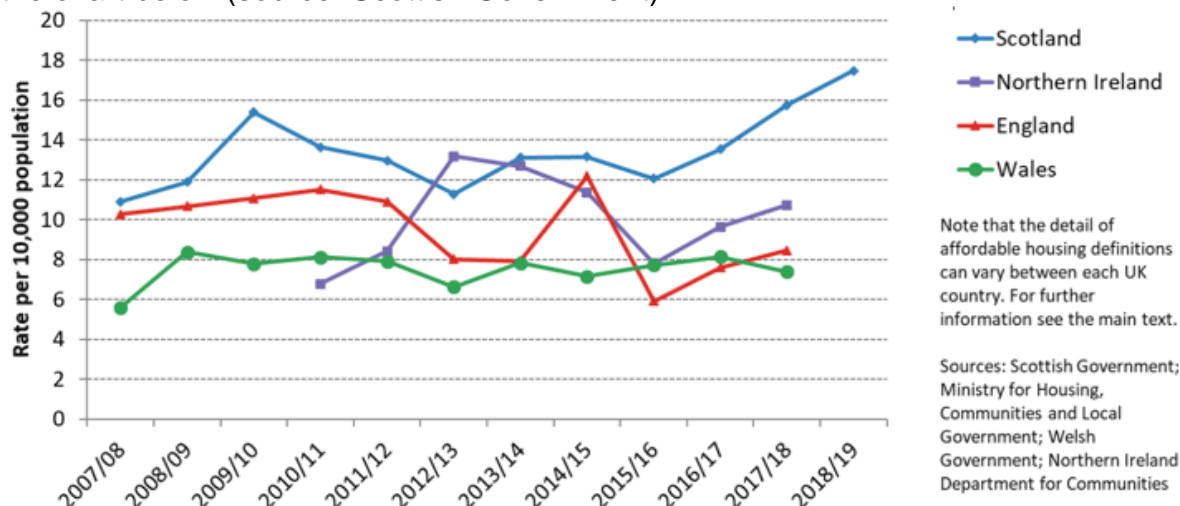
The statistical release of the Estimates of Housing Need confirm that they “should not be used as housing targets”. Producing figures in the NDF is considered dangerous as they could be construed as targets when the figures are not evidenced based on housing need. **It is not for the NDF to indicate a housing target.** PPW requires “appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area” when setting housing requirements. No evidence base has been prepared to support the draft NDF.

Notwithstanding the **inappropriate use of suggesting 114,000 new homes** are required up to 2038 and stating that 8,300 are required for the initial 5 years (2018/19 – 2022/23). The table on p.30 of the draft NDF shows that circa 6000 new homes have been provided per annum for the last 5 years (2014-2018). Of these new homes it appears that over 80% have been delivered as “private enterprise new dwellings”. On this basis the majority of affordable housing that has been delivered over the past 5 years has been via private developers and through section 106 and with significant cross subsidy. It is agreed though that the delivery of homes over the past 5 years (still a third short of pre-recession) has not been enough and greater ‘deliverable’ land needs to be made available in a timely fashion (NB. Remembering at least a 2 year lead-in time!)

To see a graphical growth in housing delivery the land available to build the housing must be identified at least 2 years in advance due to the lead in times (land assembly, business investment, planning process, site preparation, infrastructure delivery and then into construction). There is already a significant lack of land available and hence the decline in housing delivery in Wales. See evidence provided by Scottish Government in the chart below.



Un-surprisingly the level of affordable housing delivery has also fallen as shown in the chart below (source: Scottish Government).



The draft NDF in Policy 5 states that the Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. It is not clear how this would be achieved.

The contribution of volume house builders is significant as set out. The house building industry set out during the first preparations of the LDPs of the importance for making sure sites are viable, deliverable and making sure a solid continuous supply of land is available across LAs for housing delivery. The impact of this having not happened is now evident by the graph shown on p.30 of the draft NDF. At a point in time when housing delivery needed to increase to meet identified need (i.e. the past 5 years) Wales has suffered in contrary to the rest of the UK. This highlighted above with data from the Scottish Government.

To increase housing delivery and meet the housing need for Wales the graph on p.30 of the draft NDF clearly shows that the volume house builders need to continue what they have had done and increase this further. The approach set out in the draft NDF with local authorities, RSLs and SMEs contributing more is required in addition to increased delivery by volume house builders to get to the appropriate growth levels required for Wales.

Levels of growth

The draft NDF looks to project forward past trends to 2038. However, the immediate past trends (10 years) are not appropriate where the UK suffered an economic recession. This is apparent as shown in the table on p.30 of the draft NDF. The delivery levels of the 80s/90s/00s are wholly more appropriate. The draft NDF is clearly lacking any aspiration for economic growth and/or increased prosperity. As a national document with development plan status this is significantly disappointing to see.

As a comparable Gloucestershire County set a 20 year housing need at 115,200 units and the West of England Joint Spatial plan set a 20 year housing need at 116,500. The draft NDF for the whole of Wales for 20 years implies 114,000 units is appropriate.

Failing to allocate sufficient land for housing and promoting economic growth will cause Wales, and especially SE Wales, to lag even further behind the Great Western powerhouse. If SE Wales does manage to continue in investing modern high tech business then it needs to deliver on the appropriate mix and volume of housing to cater for this.

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?

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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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

Does WG have evidence to set out how a District Heat Network would be viable and at what scales. It is unlikely to be viable to consider a District Heat Network on most development proposals. It would clearly be at a significantly higher level than creation of 100 dwellings.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

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

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

9. North Wales (policies 17-22)

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

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

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

The draft NDF sets out that the **focus of growth** is to be Cardiff, Newport and the Valleys. It goes on to say that Cardiff will remain the primary settlement with its future strategic growth shaped around strong housing and employment markets. The draft NDF recognises the Metro as generating opportunities for development in settlements outside the city. This is essential for the metro. The metro needs to encourage development (employment and homes) at all lengths of its routes to encourage multi directional movement and/or less commuting movements (e.g. new settlement approach). Having all housing and/or all employment directly to a few areas will exacerbate existing pressures in relation to commuting movements being the same direction at the peak times. It will not be feasible to run a system like this. This is the very issue with the current system and many railway lines finishing in Cardiff. Destinations need to be provided throughout a Metro network to ensure that it can operate efficiently.

Creating new opportunities for housing and employment between Newport and Bristol would appear prudent. The M4 tolls having been removed has made this area attractive to buyers/investors from the higher values seen in the Bristol market. This will remain attractive regardless so failing to provide new housing in this area will result in existing housing stock being lost to outsiders and property prices rising quickly due to lack of supply and prices still be favoured to the Bristol area. Developing in this area would also be favoured over encouraging further traffic levels along the M4 and via the pinch point of the Brynglas Tunnels. South East Wales should be taking advantages of this opportunity to strengthen the SE Wales economy. Why is it not?

In relation to Newport the draft NDF says that the **Metro** will improve the city's public

transport system and it benefits from road and rail links with Cardiff, Bristol and London. However, the road links in the form of the M4 are becoming more congested each month. Now that the M4 relief road has been shelved the NDF should set out how the road congestion will be improved as without this the continued pressures would adversely impact the SE Wales economy.

In relation to the rail times at a time when this should be improving Great Western Railways (GWR) have recently announced their new timetables from January 2020. On the whole across their operating area GWR are improving the frequency and rail speed but for Cardiff and Newport to Bristol and vice versa the service actually gets worse.

The draft NDF states that **Newport has significant brownfield development opportunities**. It is not clear where this land is to meet the additional homes required. Is this evidenced anywhere? Newport is constrained by flood zones, the Gwent Levels, topography and a green belt (NB. This established green belt should be referenced in the draft NDF but was not) to the west. To have any chance of meeting the growth aspirations there would need to be significant greenfield release, especially more so than brownfield that isn't apparent in any case, in Newport.

Policy 30 requires the **identification of green belts**...particularly around Newport and the eastern part of the region (emphasis added). This is not appropriate and contrary to requirements in PPW for green belts only be considered when soundly based. Green Belts have a permanence of over 50 years. No evidence has been presented to indicate any justification for a green belt. In fact, the inspectors reviewing the LDPs in Cardiff and Monmouthshire found that the evidence that was presented for green belt proposals was not soundly based and in any event there were other suitable measures (e.g. settlement boundaries) to control development pressures. The NDF cannot pre-empt the evidence obtained as part of the SDP. The draft NDF even suggests that a green belt should be considered in relation to the green belt around Bristol. The emerging plans there are seeking to re-consider the green belt designation because of the constraint it has caused. This English region as aforementioned have greater growth aspirations than for the whole of Wales suggested in the draft NDF. It must be clear that this is not appropriate.

An indication for a green belt requirement as set out in the draft NDF would restrict the real opportunity for creating sustainable economic growth (new housing and employment) in the area between Newport and Bristol. The draft NDF should be recognising the loss of M4 tolls and close proximity of Bristol with higher prices to take advantage of and capitalise on the economic links between Cardiff, Newport and Bristol (The Great Western Cities).

The final paragraph on p.10 of the draft NDF sets out the role of each development plan. The NDF on a national scale, SDPs on a regional scale and LDPs on a local scale. Further to points raised in this response the matter of green belt designation would appear to be at most a regional matter for designation. And again, this would be appropriate as at LDP and SDP any proposal for a green belt designation would be evidenced.

It is considered that any reference to a green belt, except the one already

established between Cardiff and Newport, within the NDF should be removed. The evidence base to be established with the SDPs can determine appropriately whether green belt protection is required. Should reference of green belts remain then the wording should be amended so that the SE Wales reference is amended to reflect that in North Wales and the **green belt boundaries on the schematics should be removed.**

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

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

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

In the final paragraph on p. 9 the text states that “The NDF complements PPW”. This is presumed to be an error as the NDF must comply with PPW?

Conclusions

- 11 Outcomes do not reflect reality – not evidenced!
- The draft NDF has many political statements – not for policy!
- Inappropriate to refer to housing Numbers – not evidenced!
- Limiting growth to urban brownfield sites focused on Newport and the Valleys not appropriate – not evidenced!
- Suggesting a brownfield strategy to meet need – not evidenced!

- No apparent ability to deliver the affordable housing aspirations set out – not evidenced!
- Suggesting that green belts are required – not evidenced!
- Draft NDF being contrary to what PPW requires.
- Failure to recognise the significant economic benefits of private house builders.

Having spoken with colleagues in the industry and especially the local planning authorities there is significant concern with the direction the draft NDF sets out. Overall the draft NDF lacks any ambition, it would be a missed opportunity for Wales to prosper and it would likely be very damaging to the Welsh economy, failing to adhere to the Well-Being of Future Generation Act.

16. Are you...?

Providing your own personal response	<input checked="" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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