

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Agree

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with most of them

If you disagree with any of the 11 Outcomes, please tell us why:
We suggest there should be some mention of affordability within the outcomes.

2. Spatial Strategy (policies 1 - 4)

Q3. 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)		X					
Rural areas (Policy 4)		X					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

No Response

3. Affordable Housing (policy 5)

Q5. 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?

Neither agree nor disagree

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

We firmly support the ambitious affordable housing targets set out in the draft National Development Framework (NDF), however we have concerns regarding the mechanisms for the delivery of this number of units. We welcome the proposals but think they may need to go further so that the targets can be delivered.

The framework suggests that from 2018-2023 an additional 8,300 homes will be required annually to meet housing need, and on average 47% of these should be affordable housing (social housing or intermediate rent). As an RSL who manage and deliver existing and new homes across the majority of the Local Authorities in Wales we believe that additional funding and investment will be required to help meet this target. Meeting this is achievable if WG are able to make the necessary resources available and support LA's with delivery. LA's are stretched for resources and we believe WG have a critical role to play in supporting them, particularly in developing a standard viability assessment model for adoption across Wales to create a consistent approach, and standardising S.106 agreements to prevent developers unreasonably avoiding or reducing obligations. .

We believe that some clarity and consideration is needed around intermediate tenures to support increased supply and so that a consistent approach is taken across all LA areas. WWH is bringing a product to market that allows eligible purchasers (eligibility includes local connection criteria, maximum incomes etc.) to buy a new home for 70% of market value without a deposit. Our model is designed to help to increase overall housing supply by allowing the first purchaser to sell on the open market, at which point WWH's investment can be recycled to build more homes. This product will meet an affordable housing need for those on modest incomes whilst boosting housing supply.

We welcome the drive to start building affordable housing at scale and pace, and are enthused to become a partner in achieving this. We agree with the importance of boosting supply through Local Authorities and SME's as larger housebuilders are not incentivised to increase supply at the pace that is required. However, we believe that the larger housebuilders do have an important role to play in helping to meet the affordable housing needs of Wales. It is understood that 1/3 of all affordable units in Wales are currently delivered by housebuilders, it is considered that this should be acknowledged as a key delivery mechanism and will need to be relied upon as a basis upon which to raise the scale and rate of delivery in line with the aspirations of the NDF.

The release of public land for the delivery of affordable housing is welcomed and a working partnership with WG's new Land Division is considered positive. It is vital that an open and transparent mechanism for release is identified so that it doesn't become a bidding war and competition for land between RSL's LA's and other affordable housing providers.

The option to identify specific land within LDP's for affordable housing is considered positive and will help to provide affordable housing in a strategic manner rather than relying on windfall sites and exception sites as key delivery mechanism through the planning process. This will help to provide a joined up holistic approach to the delivery of affordable housing. We believe that more land needs to be identified for housing, not just for affordable housing, therefore consideration needs to be given to the blockages that are preventing sites from coming forward. For example, WG should consider the specific challenges to the viability of building in Wales and their impacts. RSL's and LA's have a key role to play in delivering affordable housing but need a level playing field in terms of standards – everyone deserves a safe, healthy, efficient and high quality home, regardless of tenure.

While we appreciate the need to concentrate housing delivery on brownfield sites, it is important that this doesn't diminish the importance of greenfield sites also being released. The concentration on brownfield sites which often require land remediation, more costly SUDS solutions etc can often significantly affect viabilities, this in turn often results in a shortfall in the delivery of affordable units and further hampers the ability to meet the targets in the NDF.

It is considered that innovative housing tenures should be explored to help supplement the delivery of affordable housing meeting a low cost home ownership market where there is secure mechanisms for reinvestment in future affordable housing schemes. Further clarity should be provided to define what is meant by affordable housing and what different types of housing tenures are products are envisaged to help meet the identified targets.

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Neither agree nor disagree

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No opinion

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Neither agree nor disagree

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

Q12. To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments			X				
District heat networks			X				

Q13. 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?

We fully support the drive towards decarbonisation and are fully committed to doing our part to deliver the change needed. There are challenges around the cost and practical implications of retrofit of existing properties and we think there will need to be practical and financial support across the sector to ensure that all RSL's are able to deliver the changes successfully.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?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.

Agree

9. North Wales (policies 17-22)

Q15. 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?

Neither agree nor disagree

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

Q16. 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?

Neither agree nor disagree

11. South East Wales (policies 27-33)

Q17. 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?

Neither agree nor disagree

Q18. 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.

We agree with the principle of preparing SDP's, however we have concerns with regards to resourcing and the ability of Local Authorities to deliver these in a robust and timely fashion. In a context where LA resource is over-stretched, it would be helpful if WG could offer additional support, skills and/or resource to ensure that regional and local plans are robust, well considered, compliant and effective.

12. Integrated Sustainability Appraisal

Q19. 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 Response

13. Habitats Regulations Assessment

Q20. 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 Response

14. Welsh Language

Q21. 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 Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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 Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

we support the key principles and outcomes sought by the NDF but as a whole have concerns about the over reliance on the SDP's and Local Authorities to take this forward. It feels like further information and focus could have been provided at this stage to give more comfort and direction for Local Authorities to work together to take forward and deliver on a realistic plan for growth.

It feels as though there is some conflict with other emerging policies such as the current consultation on TAN 15, in particular around the growth strategies set out for North Wales and in the South East, as well as the reliance on brownfield land as the focus for growth.

Particularly in relation to affordable housing, we welcome the focus on scale and delivery however we feel more guidance could have been provided in terms of how these adventurous targets can be delivered.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Joanna Davoile
Organisation (if applicable)	Wales & West Housing
Preferred contact details (email/phone/post)	[REDACTED]

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response