

Senedd Cymru
Y Pwyllgor Newid Hinsawdd, Amgylchedd a
Materion Gwledig
Craffu ar Fframwaith Datblygu Cenedlaethol
Cymru
CCERA(5) NDF(v2) 04
Ymateb gan Savills ar ran Cancer Research UK a'r
Gymdeithas Frenhinol er Atal Creulondeb i
Anifeiliaid (RSPCA)

Welsh Parliament
Climate Change, Environment and Rural Affairs
Committee
National Development Framework for Wales
CCERA(5) NDF(v2) 04
Evidence from Savills on behalf of Cancer
Research UK and the Royal Society for the
Prevention of Cruelty to Animals (RSPCA)



Savills, is instructed by Cancer Research UK and the Royal Society for the Prevention of Cruelty to Animals (RSPCA), to make representations on the Working Draft version of Future Wales: The National Plan 2040 (WDFW).

Cancer Research UK and the RSPCA has land holdings within Monmouthshire which they are actively promoting for development as part of the preparation of a Replacement Local Development Plan (RLDP) by Monmouthshire County Council. They are close to an agreement with a housebuilder alongside which the site will continue to be promoted.

The Charities have engaged throughout the preparation of the NDF and these comments build on those made by in connection to the previous version of the document, the Draft National Development Framework (DNDF), in November 2019 (which are appended at the rear of this letter).

It is evident that the changes between the DNDF and WDFW are substantial (and many parts of the document have been re-written) but the scope of Cancer Research UK and the RSPCA's comments are narrow, relating to Policy 7 (Affordable Housing), Policy 33 (National Growth Area- Cardiff, Newport and the Valleys) and Policy 34 (Green Belts in the South East).

Policy 7 (Affordable Housing)

This policy relates exclusively to affordable housing, setting the requirement for all opportunities for the delivery of affordable housing to be explored with specific reference to the mechanisms of setting targets for affordable housing delivery and for making affordable housing allocations as part of the development plan.

The Charities do not question or wish to diminish the role that affordable housing schemes play in the total supply of housing but stress the role that the private sector plays in delivering housing. Whilst there are hints of this in the policy subtext, The Charities suggest that either the scope of this policy should be expanded such that it is called "Housing" and also relates to market housing or a separate policy is added relating solely to market housing.

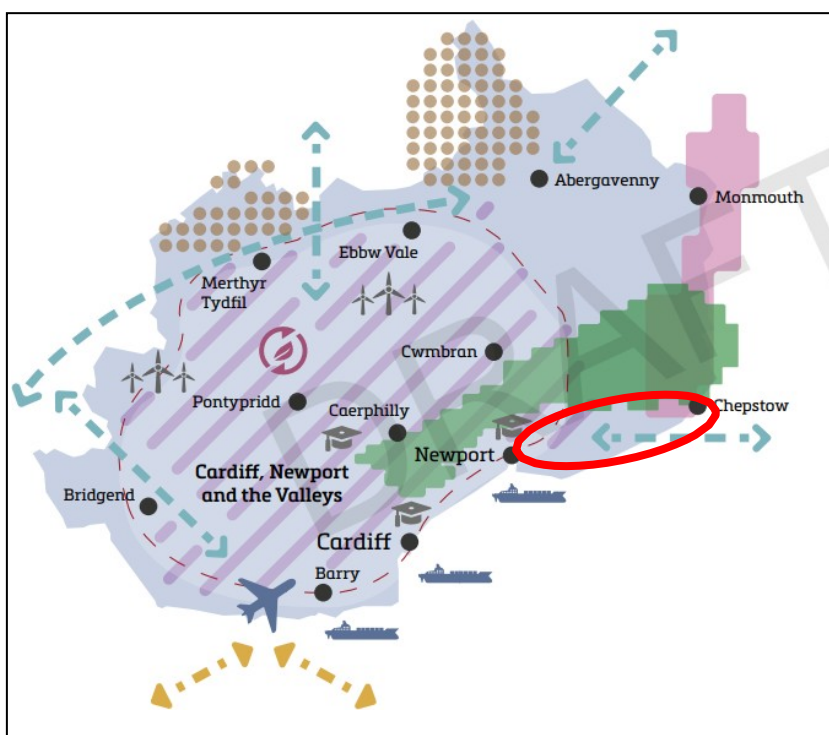
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Policy 33 (National Growth Area- Cardiff, Newport and the Valleys)

The approach taken in the WDFW, as was the approach in the DNDF, is to focus new development in “National Growth Areas”, of which one is identified within each of the North, South West, and South East Wales regions. WDFW does not provide a justification as to how National Growth Areas have been selected but it appears that it is on the basis of (a) the existing location of major populations and concentration of services, (2) a location’s accessibility and connectivity, and (c) a “policy on” approach as to how growth should be directed.

The approach taken in the South East Wales region is that a single National Growth Area should incorporate Cardiff, Newport, and the Valleys. Cancer Research UK and the RSPCA recommend that the National Growth Area should be extended eastwards from Newport so that it covers the Severnside area. The extent of the Severnside area is shown circled red in the South East Wales regional strategic diagram below and includes the settlements (Caldicot, Rogiet, Chepstow, Magor, and Undy) that are listed within Monmouthshire County Council’s LDP:



The justification (and suitability of Severnside's inclusion within the National Growth Area) is as follows:

- The M4 and M48 run through Severnside with their being junctions at Chepstow and Magor. The sub-region is also served by three railway stations (Caldicot, Chepstow, and Severn Tunnel Junction) which provide linkages to other areas within the South East Wales region as well as into England whilst Severnside towns are also shown as being included within the South Wales Metro. Development within this area would therefore constitute transit orientated growth as is reflected by the identification of an arrow indicating “National Connectivity”;
- There is a broad range of existing facilities and services with the sub-region including existing retail centres and established industrial and commercial locations. Linked to this, Severnside is seen as having a key role as part of the Western Gateway;
- Settlements in the Severnside are already a focus for development within Monmouthshire with a series of large strategic residential and employment allocations made within Monmouthshire County Council’s

adopted LDP. These sites have proven to be attractive to the development industry. By including Severnside within the National Growth Area, the South East Wales Strategic Development Plan (SDP) will have a focal point for where growth should be located in the east of the South East Wales Region.

- Monmouthshire County Council is proposing an approach to housing in their Replacement LDP that builds upon a demographic led requirement by planning for additional growth to increase affordability and attract a younger population. This is evidence of Monmouthshire County Council's aspiration for high levels of growth and inclusion of Severnside within a National Growth Area will support this aspiration; and
- The Severnside sub-region is largely free from constraints that would preclude development. It is south of the Wye Valley Area of Outstanding Natural Beauty, predominantly protected by existing flood defenses, and to the south of the Green Belt as proposed on the regional strategic diagram for the South East Wales region.

Notwithstanding Cancer Research UK and the RSPCA's suggestion that Severnside should be included within the National Growth Area, if Welsh Government do not believe that it warrants inclusion (and for the reasons above it is suggested that it does), Severnside should be designated as a "Regional Growth Area" with the maps amended to reflect this, an additional policy relating to Regional Growth Areas added within the South East Wales section, and Caldicot and Rogiet included within the list of towns on Page 63. Whilst Regional Growth Areas are not identified in the South East Wales region, they are designated in the three other regions.

Policy 34 (Green Belts in the South East)

Much like the DNDF, the WDFW sets a requirement for the designation of three Green Belts across Wales, including one in the South East Wales region under Policy 34 (Green Belts in the South East) and much of the policy wording and supporting subtext remains the same.

In their response to the consultation on the DNDF, Cancer Research UK and the RSPCA objected to the principle of the introduction of a Green Belt for the following reasons:

- There was no evidence base to justify the requirement to designate a Green Belt;
- A Green Belt imposes restriction on the development of much of the South East Wales region where in many places there are limited opportunities for redevelopment of previously developed land;
- The degree of permanency of a Green Belt would undermine the ability of development plans within the region to react to changing needs for growth; and
- The proposed location of the Green Belt could lead to unsustainable growth by preventing development in sustainable locations adjacent to existing settlements (and the services that they provide).

Cancer Research UK and the RSPCA were not alone in their objection to the introduction of a Green Belt (in fact there was a large amount of opposition from Local Planning Authorities as well as the development sector). The fundamental objection to the principle of a Green Belt is echoed in these representations (and the original representation is included alongside this response to provide further detail on this matter).

One of the notable additions to Policy 34 is the requirement that Local Planning Authorities do not grant planning permission for major development and LDPs do not make large scale allocations in parts of the Region subject to consideration for inclusion within the Green Belt (as shown in the regional strategic diagram).

Such an approach would effectively impose a moratorium on development across an area where no strategic appraisal has been undertaken as to the need or justification for a green belt. This is likely to restrict development in sustainable locations. Furthermore, the current diagram is difficult to interpret and ambiguous which could lead to sustainable sites for short to medium term growth being unnecessarily stifled.

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It is respectfully suggested that a Green Belt policy is not a justified approach and the green belt polices should be removed or as a minimum that recently added text stating that LDPs should not make large scale allocations in parts of the South East Wales Region subject to consideration for inclusion within the Green Belt should be deleted.

If a Green Belt is to be retained, it should be left to Local Authorities to define its extent through the preparation of the South East Wales SDP with the instruction for its designation contained within the WDFW Removed. An evidence-based approach must be adopted if this approach is taken.

Conclusions

Cancer Research UK and the RSPCA welcome the opportunity to provide further comments on the WDFW prior to its consideration by Members of the Senedd. Whilst the scope of these representations is narrow, the extension of the National Growth Area and the unsustainable nature of the Green Belt polices require further consideration and revision prior the adoption of the document.