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**Craffu ar Fframwaith Datblygu Cenedlaethol**  
**Cymru**  
**CCERA(5) NDF(v2) 15**  
**Ymateb gan RPS Consulting Services Ltd ar ran**  
**Barratt David Wilson Homes**

**Welsh Parliament**  
**Climate Change, Environment and Rural Affairs**  
**Committee**  
**National Development Framework for Wales**  
**CCERA(5) NDF(v2) 15**  
**Evidence from RPS Consulting Ltd on behalf of**  
**Barratt David Wilson Homes (BDW)**

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## **Response to the Welsh Parliament Climate Change, Environment and Rural Affairs Committee**

**FUTURE WALES The National Plan 2040 Working Draft National Development Framework Document: September 2020 Version**

**October 2020**

### **Introduction**

This response has been prepared by RPS Consulting Services Ltd on behalf of Barratt David Wilson Homes. The RPS office in Cardiff has been working within the planning system in Wales for over 30 years. The office has been involved in some of the largest residential, retail, commercial and energy projects that have taken place since 1988.

Barratt David Wilson Homes (BDW) is one of the UKs largest providers of new homes. BDW has delivered circa 600 homes per annum in South Wales for many years many of which have been completed in collaboration with the registered social landlord sector. The business is capable of delivering a substantial proportion of the number of new homes required in Wales on an annual basis.

### **General Comments**

A national development framework is very much welcomed. The absolute clarity that it sits at the top of the development plan hierarchy and its relationship with Planning Policy Wales is positive too. The document is ambitious but practical in many ways. Further integration with the National Infrastructure Plan and Regional Economic Frameworks will be beneficial. Securing private sector investment to provide homes achieve the is about achieving a coincidence of interest between investor policy and deliverable development opportunities.

A plan led system needs plans and this simple necessity needs to be the absolute priority. Driving sustainable growth and combating climate change will be compromised without Strategic Development Plans and replacement Local Development Plans being in place as soon as possible.

**Recommendation** – The plan making process should be refined significantly to enable the plan led system to be in place as soon as possible.

Despite stating it doesn't intend to do so Future Wales does seek to take decisions that are most appropriately taken at the regional or local level. It should only provide strategic direction for all scales of planning and sets out policies and key issues to be taken forward at the regional scale. By identifying an area as green belt it does seek to determine the broad location for new development. The regional and local tiers are the most appropriate level at which to take these decisions, involving communities as they do so.

**Recommendation** - A review of Future Wales every five years is welcomed but should be undertaken sooner if needs be to ensure integration with other strategies and policies.

### **Energy**

New homes are highly energy efficient. When the target to generate 70% of consumed electricity by renewable means by 2030 is reached new homes in Wales will be one of the most sustainable forms of development.

Requiring district heating networks 'where possible' at the specified locations is a realistic approach. Ensuring

the energy efficiency of the development and the source of energy is renewable is an effective means to combat climate change. Similarly installing electric car charging points 'where appropriate' is pragmatic. Access to electric cars is still variable.

## Delivering Homes

A more measured approach to the growth potential at Newport is welcomed. As is a greater recognition of the contribution that open market home building can make towards the overall housing requirement. Greater collaboration amongst all parties that can fulfil the number of homes sought would enhance the prospect of achieving the required number.

The continued recognition that population projections are the starting point to determine the homes required is welcomed. Resolving issues associated with demographics and affordability can be achieved via a positive approach to sustainable growth. Growth has to be recognised as a tool to achieve sustainability.

The Covid-19 pandemic has reinforced the quality and accessibility of our local areas is hugely important for people's health and their well-being during the toughest stages of the pandemic. There is a collective appreciation of the value of parks and green spaces, walking and cycling routes. To incorporate these assets into a development of homes for families results in a density typically of 35 homes per hectare. A target of new developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), is unrealistic.

**Recommendation** – Only in town and city centres the aim should be to achieve 50+ dwellings per hectare.

A density of 50+ dwellings per hectare can only be achieved via the development of flats or a drastic reduction in green spaces. Neither is appropriate in more suburban locations. Having a home with its own green space and a space within which to work is the new norm that the pandemic has stimulated. Ultimately it will affect density but equally reduce journeys for work.

Plot based development is an option but not one that will deliver a significant number of homes in a short period of time.

## Green Belts

PPW and LDPs, that have as necessary been extended until an update is adopted, already ensure decisions on the location of development, key services and infrastructure should support existing built-up areas ensuring development is located in the most accessible and sustainable locations.

*Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form. (PPW para 3.60.)*

The green belt as per policy 34 covers a vast area, from Chepstow to west of Cardiff, of predominately open countryside divorced from the existing urban form. The necessity for the green belt has not been justified or publicly scrutinised. *Green Belt and green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. (PPW para 3.66.)* Until the green belt has been carefully chosen it cannot be a factor in development management decisions.

The process to determine the need for green belts and their boundaries is to be established by an adopted Strategic Development Plan (SDP). The timescale for adoption of a SDP isn't defined. It could take 4 or 5 years. Provisions in the Local Government and Elections (Wales) Bill give the Welsh Ministers powers to make regulations to establish corporate joint committees for a strategic development plan. This Bill won't be enacted until next year. Policy 34 is entirely speculative.

**Recommendation A** – The area identified for a green belt should be removed from the regional strategic diagrams. The NDF should state green belt designation is a matter for consideration during the process to determine the broad location for new development taken at the regional or local level.

**Or** if the schematic boundary for a green belt is retained the policy, for example, should be reworded as below:

**Recommendation B** - The Strategic Development Plan must consider the relationship of the green belts with the green belt in the West of England. Local Development Plans and development management decisions

should take into account PPW until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.

Until such time that the boundary for the green belts has been established on the basis of a robust assessment the weight attributed in decision making to the area shown for consideration for a green belt should be minimal.