

Introduction

Savills is the UK's leading property and planning consultancy and represents clients in the public and private sectors throughout Wales. We are involved in advising on many of the most significant development projects in Wales and our expertise in all areas of land use allows us to combine sector-leading expertise with detailed local knowledge to identify solutions to the most complex and challenging planning projects.

Savills is grateful for the opportunity to give evidence to the Committee and the following represents a summary of the consideration of the draft National development Framework. The responses align with the questions set out in the Consultation Response Form.

1. NDF Outcomes

Savills considers that the NDF Outcomes included within Section 3 of the draft document are generally achievable, if a little unambitious.

The stated outcomes underline the NDF focus on Wales as a place to live for its current population with little or no reference to its context or external relationships and opportunities. These relationships are significant in terms of the general sustainability of the Wales economy and environment.

There is a notable absence of substantive economic purpose to the Framework as a whole and the Outcomes specifically, to the extent that an opportunity to implement a sustainable Framework and to achieve a sustainable Wales in its overarching context has been missed in the draft document.

Furthermore, and seemingly key to the delivery of an effective long-term national framework, is the absence of a clear infrastructure strategy: what infrastructure projects are considered to be core requirements, where these should be located and how they are to be delivered. It is proposed that these should be identified since they hold the key to unlocking a host of other development opportunities. It is acknowledged that some of the infrastructure projects lie to be determined outside of Wales (i.e. by the UK government) but notwithstanding this the potential within the NDF should surely exist for the Welsh Government to either identify potential major projects over the next 20 years as a minimum, and to support the consideration in principle of such projects.

2. Spatial Strategy

The draft NDF directs significant new development to key locations – an approach that generally reflects how planning for growth has been carried out in Wales. However, the number of locations is limited and the explanation of what this means and how it will be applied is brief.

The discouragement of alternative options, in particular of greenfield development is over prescriptive and is in danger of not facilitating schemes that might benefit from existing services or recognising the potential that the delivery of these services might be enabled by large scale new development.

Further explanation of the national and regional growth areas would be beneficial. There is very little information on what they mean, what or how projects will be prioritised within them and how they will inform the preparation of SDPs.

3. Affordable Housing

The draft NDF expects a much more significant number of affordable homes to come from the public sector almost immediately and there are clear practical difficulties in achieving this. This is accompanied by a lower contribution (than is currently being delivered) of other housing from the private sector. We doubt whether it is the intention of the NDF to suppress current performance but this is a realistic scenario based on proposed expectations.

The NDF relies on referring to percentages of affordable housing. The concern is that the high levels described in the section on housing (and in the regional sections as well) will be used as targets in future development plan documents, including the forthcoming Strategic Development Plans (SDPs). If delivery by new methods or new sources fails then targets will potentially make new housing schemes unviable. The reasons for this are well rehearsed and broadly understood and accepted by planners in the public and private sectors.

4. Green Infrastructure

No information is given even indicatively or on any spatial diagram or plan as to the location or extent of the Forest and caution must be given to the presence of existing resources and available sites in determining its extent and location(s).

6. Renewable Energy & District heat Networks

Fundamental to the delivery of any effective energy network is Grid infrastructure and Grid capacity: these require significant upgrade throughout the country if Wales is to achieve its stated outcome of leading the way in a sustainable, competitive and decarbonised society. The grid issues are relevant not only in respect of the generation of energy on a macro scale, but also to achieve localised distribution to the decarbonised housing developments that will be sought to be achieved over the 20 year period of the Plan.

The omission of substantive reference to the grid issues is an omission to the document, and one for which there must be a commitment through a national planning framework in order

for the realisation of schemes of renewable and low-carbon schemes throughout Wales. The relationship of energy generation and of distribution via the National Grid in a UK context must also be recognised and considered as part of the NDF.

In more general energy terms, the sentiment of target setting is generally supported although there is no information in terms of practical delivery of WG targets. There is no tie in with other WG strategies or plans, or with proposals and policies whether from the public or private sectors. There appears to be a heavily weighted presumption in favour of local-owned generation schemes although there is very little commentary in terms of what locally owned looks like in practice.

The draft NDF therefore needs to be clear that there is an established, and urgent, need in Wales for a significant increase in development of low carbon energy generation projects and associated infrastructure (such as overhead lines and substations) to meet decarbonisation targets and prosperity goals and that there should be a requirement for substantial weight to be attributed by decision-makers to the contribution of projects towards meet this need. This would make a significant contribution to the generational change in energy supply that is required over the duration of the draft NDF.

7. The Regions

The Spatial Strategy is founded on the identification of just three regions within Wales. There is little or no explanation of this approach and compares with the current Wales Spatial Plan (which the NDF will replace) that identifies six spatial areas and also with Welsh Government research for the NDF that was carried out by Cardiff University and which recommends four regions. The definition of the regions is crude and does not necessarily reflect the geography, context, opportunity and challenges that need to be addressed within Wales to inform the Spatial Strategy.

8. North Wales

The housing figures for North Wales are significantly lower than recently planned provision. The NDF allocates 19% of homes throughout the duration of the NDF to North Wales which equates to 19,400 homes over a 20 year period. This figure equates to an annual housing need of just 917 homes per annum compared to the combined figure for the current LDP network across the identified North Wales region (noting that Flintshire and Wrexham are deposit plans and their figures may be subject to change) of 2376. The NDF housing figure for North Wales is therefore 59% lower than that currently anticipated, 47% of which are allocated as affordable housing.

The imposition of a Greenbelt located to the north-east of Wrexham requires further consideration. The use of greenbelt is increasingly considered to be a concept that imposes a restrictive approach to planning policy that has the potential to stagnate the housing market

and too blunt and negative an instrument. It is also noted on the strategic regional diagram that the National Growth Area overlaps the Greenbelt for the north east of Wales and it is difficult to see how the two concepts can be merged.

Rather than a Greenbelt, it is proposed that areas of significant green infrastructure, potentially incorporating areas identified for the National Forest (Policy 9) is likely to be a much more useful and constructive approach to “conserving” countryside by placing it in a functional setting rather than a restrictive context.

The absence of any meaningful infrastructure proposals within the NDF for the North Wales region is also recognised and there are a number of potential schemes that should be referenced, including the Third Menai Crossing and improvements to the A55.

Finally, and consistently across the regions, the absence of substantive economic strategy is of significant concern.

9. Mid & South West Wales

With regards to the Mid & South West Wales region there is recognition within the text that there is significant regional variation within the identified area and that effectively it will be treated in two sub-regions. It is not clear whether there would be a single SDP or more.

The housing figures are significantly lower than recently planned provision. The NDF need of 23,400 homes over the 20 year period gives an annual figure of 1,170 homes. The combined annual figures from just Swansea, Neath Port Talbot and Carmarthenshire’s current adopted LDPs is 2,450. The NDF proposal is less than 50% of this figure with one half of the homes to be provided by affordable housing.

In addition to the absence of substantive economic policies, there are a number of key projects that might be identified as being forthcoming over the NDF period including city and town regeneration projects, road and rail improvements and grid upgrades.

The absence of development opportunities and growth areas throughout mid-Wales effectively from the M4/A48 through to Welshpool is of concern and is not helpful in terms of growth in a sustainable manner of Mid & South West Wales.

10. South East Wales

The proposed strategy for South East Wales is inconsistent – it purports to support string growth but does not demonstrate how this can be delivered across sectors. The strong encouragement for growth across the region is contradicted by:

- A significant reduction (almost 50%) in the quantum of housing. The NDF requirement divided equally gives an annual figure of 3,650 dwellings per

annum. The current round of LDPs proposes an annual target of 6,832 per annum. 48% of this reduced commitment is expected to come from affordable housing;

- The limited number of identified growth locations. The WSP listed 14, the NDF has just six. The Wales Spatial Plan identified and described three strategic growth areas, the NDF has a vague wash-over National Growth Area which is unclear in intention, effect and is undefined;
- The imposition of the greenbelt, the overall thrust of which might be better achieved in identifying areas of significant green infrastructure;
- The virtual silence on economic growth or priority sectors and the absence of any substantive policies on these issues;
- The absence of any infrastructure policies which, in an area, of major infrastructure underinvestment is particularly significant. A number of transport and energy schemes should be identified including the desperate need for enhancements to the M4.

15. Other Comments

There are a number of sectors that are briefly referenced within the Overview and Outcome sections of the NDF and are fundamental to a successful and sustainable Wales but are not reflected within the draft NDF. These include waste infrastructure, the maintenance and development of mineral resources and the education (and associated Research & Development) sector. The NDF offers an excellent opportunity to promote and develop these sectors in alignment with other development opportunities.

31st October 2019.