

Consultation Response

Climate Change, Environment and Rural Affairs Committee

Scrutiny of the draft National Development Framework 2020 -2040.

The Home Builders Federation is supportive of a plan-led system and of an additional tier of planning control linked to the regional agenda but would like to raise a number of concerns regarding the draft document currently under consideration.

Fundamentally, the document fails to acknowledge the role of the private sector in delivering the housing the country needs to support growth, particularly in respect to the cross subsidy that delivers a significant level of affordable housing in Wales. Further, it does not support the growth aspirations for Wales and in particular the City and Growth Deals in the South and North of Wales.

We would also ask the Committee to consider the following issues:

- The document lacks guidance on the role of private home builders in delivering the range of new homes Wales needs. New housing is only referenced under the heading of 'Affordable housing', where it states: *'We are committed to ensuring that new housing meets the needs of all members of society.'* before the going on to emphasise *'those unable to afford to buy on the open market.'*
- The document cites the recent Welsh Government housing need statistics but does not clarify that these are not housing supply targets. This important distinction was made by the Minister when the figures were released, and we would welcome confirmation and clarification in the NDF.
- The role of new housing in supporting economic growth is not adequately acknowledged in the draft document. This economic growth could play an integral part of the drive to create new employment opportunities linked to City and Growth Deals. The demographic likely to be employed in the modern high-tech industries that the Welsh Government aims to attract will require appropriate volumes and types of new housing.
- There appears to be a lack of ambition in the NDF in stating Welsh Government's obvious ambitions to enable growth. This is a missed opportunity, and an area where a pro-development commitment would be welcomed as a key factor in achieving these aspirations.
- The concentration of new development in existing urban areas and, in particular, Newport, is not supported by a robust evidence base, nor do capacity assessments point to this as a suitable proposition. Newport is heavily constrained by because of flood risk and the capacity of nearby road infrastructure, including the M4.
- Whilst PPW10 supports the potential for the development of new settlements in Wales, the NDF contradicts these ambitions by suggesting 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 and colleges, public transport infrastructure and a good range of public services.'

- A large number of the proposed policies require both the detail and the evidence base to be provided by the next tier of planning below, which is the Strategic Development Plan (SDP). Currently no SDPs have commenced in Wales following the Planning Wales Act in 2015 leaving an evidence void. There is also currently no guarantee or requirement for SDPs to be commenced or adopted. The most advanced SDP is the SE Wales proposal which recently issued a draft timeline suggesting adoption in 2025. This raises the question of what happens in the period between the NDF being adopted in 2020 and an SDP which at earliest would be 2025.
- The required increase in use of public sector land for new housing development raises concerns regarding deliverability across Wales, particularly when considering the Housing Minister's recent letter to LPAs requiring them to bring forward schemes of at minimum 50% affordable housing on public sector land. Such a high level of affordability raises questions over viability and therefore deliverability of new housing.
- The concept of a green belt has been included without any evidence to support its need or location. The policy also states that it 'must be' provided rather than considered. Green belts also differ slightly to many planning policies in that they are permanently protecting an area for 50 years and are very infrequently reviewed. Green belts were established to limit urban growth, yet the two green belts identified in the NDF are both within the areas identified for growth.

In summary, HBF believe that the critical issue with the draft NDF is the lack of support for the private house builder. Therefore, because that the plan does not provide any level of certainty for the private house building industry, the NDF is likely to result in a decline in the industry's future investment in Wales and a continued decrease in the level of new housing delivery overall.

Having reviewed the written evidence submitted to the Committee on the 24 October 2019 we note that a number of the issues we have raised above are supported by both Local Authorities and academics including:

- NDF should be more ambitious.
- Too focuses on setting the scene and outlining the expectations for Strategic Development Plans.
- Lack of urban capacity study to support push for urban growth.
- NDF should support potential for new settlements.
- Housing need figure needs to be clearly the starting point not a target.
- Constraints on development in Newport.
- Lack of evidence for green belt requirement.

