



Although the HBF considers that the plan has been improved in a number of ways it still has a number of concerns and objections as set out below.

General comments:

The HBF considers that the emphasis is still too focused on affordable housing, underplaying the wider economic and social benefit of private housing and the fact it helps deliver a significant element of affordable housing and will continue to do so.

The HBF supports the 5year review of the plan.

Concentration of growth in cities - The HBF questions should this still be required with WG looking for 1/3 of work force to work from home and covid19 making people realise that access to countryside and fresh air are important. Other changes which are being reported as happening because of covid-19 including house buyers wanted a larger garden and to live closer to the countryside.

Comments on Policies/supporting text

Policy 2 - Requires a spatial framework within LDPs to guide the growth of town and cities - would this not be better provided in an SDP. The supporting text is confusing as it states, 'supported by Strategic and Local Development Plan spatial strategies,' surely spatial; strategies are only needed in one of the plans not all three.

Strategic Placemaking Principles - There are some requirements which are contradictory for instance it states that 'urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations' yet within these areas there is also a requirement for a mix of housing types including family housing, green space, biodiversity, SuDS etc. Other than building higher it will be very difficult to meet all of these requirements.

Policy 3 - States '*Planning authorities must take a proactive role and work in collaboration with the Welsh Government and other public sector bodies to identify the best locations for growth and regeneration*' The private sector should be included in the list of organisations who the LPA should work with.

Policy 6 - Residential should be included in the mix of uses which should be provided in town centres as required by Policy 2 of the document.

Policy 7 - The title of the policy should remove the word 'affordable' and include text which supports all housing tenures. This change has been made in the supporting text and is supported by the HBF but should also be mirrored in the Policies title.

Policy 7 supporting text - The HBF does not consider that the document makes it clear enough that the housing need figures should be the starting point for the housing requirements set out in either Strategies or Local Plans. This is particularly important as both Strategic and Local Development plans are required to be in conformity with the NDF which is stating the housing need requirements. The text should also include further explanation of some of the other factors which should be considered when setting the housing requirement of an SDP or LDP, such as economic growth aspirations in part driven by the City/Growth Deals and the need to influence demographic patterns [both mentioned elsewhere in the document].

The text should also recognise the role market housing has had and will continue to have in providing affordable housing.

Policy 8 Flooding - The text should also include a commitment to ensure that WG and the NRW continue to provide up to date advice and evidence for LPA's and the development industry through the TAN and Development Flood maps to help guide development away from the most likely to be affected areas. The plan to be included in the NDF is unlikely to be at a scale which would allow boundaries of the flood areas to be identified.

Policy 15 Masterplanning for District Heat Networks - it would be helpful to set a threshold above which this is required, as it is currently not clear what is meant by 'largescale'?

Chapter 5 The Regions

Policy 19 - HBF supports the added importance given to Strategic Plans but the policy/ supporting text should go further setting a time scale in which they should be produced. This is particularly important as several policies within the NDF require the detail to be provided by Strategic Plans. The concern is that it may be difficult to bring forward LDP's in conformity with the NDF without this detail, the green belt is probably the best example of this.

In setting this time scale for delivery of SDP's the WG should also commit to providing the resources necessary to ensure delivery as quickly as possible.

Policy 21 Supporting text - states *'The Strategic Development Plan should be informed by and facilitate the delivery of the North Wales Growth Deal and ensure support for a smart, resilient and connected region.'* The HBF questions whether this is right, surely the SDP should be the lead document.

Policy 22 - States *'decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic development Plan'*. The difficulty with this statement is that the plans provided in the NDF are not at a scale or detail which allows it to be clear what is the proposed extent of the green belt. Further it appears from the background evidence supporting the NDF that no assessment has been made of what area should be green belt, in fact this is stated as a requirement for the SDP. The adoption of an SDP is a number of years away and both Flintshire and Wrexham are struggling to put an adopted LDP in place, this means that the delivery of housing in these areas is likely to be severely limited by the lack of a detailed green belt plan.

Green Belts - Supporting text should be added to emphasise the importance of not drawing them too closely to urban boundaries this could limit the potential for future growth of the identified main areas of growth. Green belts are a very permanent policy decision and far more difficult to amend should future



growth be required. This is also vital as the document elsewhere rules out the option of new settlements the potential location of which could be limited by green belt allocation.

Policy 33 - The extent of 'The valleys area' needs to be clarified, there are large areas of the geographical valleys area not suitable or viable for development. For development to be sustainable and meet placemaking requirements it is likely to have to be concentrated around a limited number of key valleys towns. If this is the case these should be identified rather than the whole area.

The HBF supports the reduced role of Newport in the SE growth area and the recognition that flooding could be a major constraint on development in the SE region.

Supporting text - states 'The Strategic Development Plan should be informed by the Cardiff City Region Deal and should ensure that key locational decisions on housing and employment sites,' The wording should be strengthened to recognise the importance of these two documents aligning and complimenting each other.

Policy 34 states 'decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic development Plan' The difficulty with this statement is that the plans provide in the NDF are not at as scale or detail which allows it to be clear what is the proposed

extent of the green belt, further it appears from the background evidence supporting the NDF that no assessment has been made of what area should be green belt, in fact this is stated as a requirement for the SDP. The adoption of an SDP is a number of years away and a number of LDP's in the SE region are currently at early stages in their plans review, this means that the delivery of housing in these areas is likely to be severely limited by the lack of a detailed green belt plan.

Chapter 4. Strategic and Spatial choices: Future Wales' spatial strategy - The HBF considers that the statement 'Choosing to develop new towns or 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.' is disappointing and contrary to PPW10. Further, in terms of the Placemaking agenda it is considered that the ability to consider a new town option should be kept particularly considering the time scale of the plan, as there is only so much new development which can be added to existing towns, many of which already suffer with inadequate infrastructure.

