

Senedd Cymru
Y Pwyllgor Newid Hinsawdd, Amgylchedd a
Materion Gwledig
Craffu ar Fframwaith Datblygu Cenedlaethol Cymru
CCERA(5) NDF(v2) 22
Ymateb gan Savills ar ran St Modwen Developments
Limited

Welsh Parliament
Climate Change, Environment and Rural Affairs
Committee
National Development Framework for Wales
CCERA(5) NDF(v2) 22
Evidence from Savills on behalf of St Modwens
Developments Limited



RE: FUTURE WALES, THE NATIONAL PLAN 2040
REPRESENTATIONS SUBMITTED ON BEHALF OF ST MODWEN DEVELOPMENTS LIMITED

On behalf of our client, St. Modwen Developments Limited (St. Modwen), Savills has been instructed to respond to The National Plan 2040 (Future Wales). This response follows formal representations made on behalf of St. Modwen on the consultation of the draft National Development Framework (NDF) which took place between August and November 2019.

It is recognised that the changes made are substantial and we would be grateful if you would accept this letter and consider the comments made as 'Future Wales' progresses to adoption stage.

In our previous response we set out three main points on the draft NDF. These were as follows:

- Having highlighted the scale of the projects currently being progressed by St. Modwen, we considered it appropriate for these projects to be specifically named in the NDF as recognition of their significance and meaning.
- While we support the focus for strategic growth through the defined National Growth Areas in the NDF, we highlighted the need for the document to be more explicit about its policy for economic growth and development and urban regeneration.
- Housing was raised in terms of the NDF's general treatment of it. There were very few references to housing, and we noted that, where it does appear, the focus is mainly (if not solely) given to current definition compliant affordable housing.

In light of the above we wish to make the following key observations following the publication of Future Wales to the Senedd as part of a 60-day period of scrutiny.

- The most fundamental change noted is the four-region approach proposing to split the south and mid-Wales region (as defined in the draft NDF) into separate south west Wales and mid Wales regions. This change is welcomed and has resulted in a greater level of detail with regard to specific settlements.
- It is noted that additional growth areas have been identified and growth areas previously designated have also been extended. Furthermore, Future Wales provides greater level of detail with regard to naming specific settlements within the defined growth areas. While this detail is welcomed and means growth areas are easier to define and are larger, it is noted that St Modwen's projects (as identified in our previous consultation response) remain excluded. We maintain the view that given the scale of the projects at a national level, specific reference should be made to each in the relevant region.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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- There remains limited consideration of economic development throughout the entire Future Wales publication. While there are two policies which explicitly address economic growth in terms of the rural economy and the mid-Wales region, we consider there to be a need for a general policy on economic growth and development.
- In terms of housing, it is noted that the policy focus in Future Wales remains on delivering new affordable homes and this specific reference is made to the responsibility lying with local authorities to set overall housing requirements – a key function of the new Strategic Development Plans (SDPs). We remain of the view that there is a fundamental lack of reference to other forms of housing, aside from affordable housing.

I trust the above is clear – the points made reiterate those provided during the previous consultation stage and remain relevant to these latest comments. We trust this feedback is helpful and we hope it will be taken into consideration as the Wales National Plan progresses to adoption stage.