

# Consultation Response

## Submission of Evidence Form – National Development Framework

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Date

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Title of evidence

HBF Response to NDF Call for Evidence and Projects Consultation

Summary of evidence

The HBF believe that the provision of sufficient housing in the right locations is critical to the future wellbeing of Wales and is something that contributes to meeting all of the Wellbeing Goals either directly or indirectly. Linked to this is the provision of a range of associated infrastructure requirements and the need for the provision of these to be aligned with the delivery of housing. This concept has recently been supported by the first recommendation of the Economy, Infrastructure and Skills Committee - National Infrastructure

Commission for Wales Report Jan 2017 which included the following recommendation:

*'The remit of the Commission should be extended to include the supply of land for strategically significant housing developments and related supporting infrastructure alongside the economic and environmental infrastructure.'*

In considering how these issues are dealt with in policy terms the HBF suggest that the following should be taken into account when drafting the NDF:

**Housing Need** – 'The Future Need and Demand for Housing in Wales September 2015' prepared by Alan E. Holmans Cambridge Centre for Housing and Planning Research gives the most up to date figures for Wales and should be used as the starting point. The report looks at the period 2011- 2031 and concludes that we need to provide between 8,700 – 12,000 homes annually.

Based on build rates between 2011 and 2016 we have already undelivered by 13,500 dwellings based on the lower of the two annual need figures.

**Calculating Housing Requirement** - The NDF offers the opportunity to make a clear statement about how the housing requirement should be calculated taking account of the latest statistical information available as the starting point, while also considering the need to support economic growth and ambitious, again a point identified in the Cardiff Capital Region City Deal Growth & Competitiveness Commission Report and Recommendations.

**Economic Benefit of Housing** – The Economic Footprint of House Building in Wales May 2015 Litchfields (NLP) report provides a good starting point in understanding the wider economic benefits of house building. The Affordable Housing sector also produce a similar report annually. The NDF again is an opportunity to make this relationship clearer providing a policy framework to support it.

**National Housing Figure** – Although the HBF do not support a national housing figure being set by the NDF, if WG are minded to do so then it should be set based on the identified need (Holmans Report). We consider that an Strategic Development Plan (SDP) would be the better plan level at which to set housing numbers on a sub-regional level.

**Infrastructure** – Following the recommendation of the report on the proposed Wales Infrastructure Commission. The HBF would stress the need to provide a clear statement on the need to link the provision of a wide range of infrastructure to housing delivery. This could include infrastructure associated with travel and transport, water and sewerage and energy all critical to the provision of new housing.

**New Settlements** – The HBF request that the document includes a policy supporting the principle of new settlements in Wales (not currently supported by PPW). Some guidance on what Welsh Government would consider to constitute a ‘new settlement’ in terms of size and range of facilities would also be helpful to support this policy.

**Metro** – The HBF request a policy which links the new metro routes and stations to the potential for large scale new development in locations outside of existing settlements. Such locations may currently be within a short commute of one of the large cities/towns or areas of economic activity but may currently be considered to be unsustainable in terms of their transport links. The provision of new metro links could also be important in the potential delivery of new settlements.

**Cross Boundary Issues** – These exist all the way along the Welsh and English border but in terms of housing are strongest in the North and South. The HBF acknowledge that there are now very different planning systems in operation and it may be difficult to influence these directly, however policy guidance on how to deal with such issues is critical particularly with the growth of the city regions and the potential reduction in Severn Bridge Tolls.

#### Summary of key issues/conclusions

The HBF request that the NDF includes policies which;

- deal with now to provide a level of housing which meets the identified need across Wales
- deal with the way housing figures are calculated to ensure economic ambition
- ensure housing is provided in the right/ sustainable locations to meet market demand
- provide a clear recognition of the economic benefit of house building
- support the consideration of new settlements within Wales
- provide the link between the metro and areas of future housing growth
- deal with cross boundary issues

Why have you submitted this evidence?

The evidence has been submitted on behalf of HBF members in Wales who represent house builders and planning consultants involved in the delivery of homes. It has been submitted to emphasise the importance of new house building on the well-being of Wales but also the critical link to the provision of infrastructure to support this new housing.

How should this evidence inform the development of the NDF?

The evidence should be used to support the inclusion of policies and supporting text which deal with the issues identified.

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

The HBF consider that the delivery of the homes Wales needs and the associated infrastructure to support them meets with a number of the well-being goals directly and all of them indirectly.

Why is the evidence of national significance?

The comments submitted relate to strategic planning issues which affect the delivery of homes across all of Wales and are issues that cannot be dealt with consistently across Wales in SDP's or LDP's.

Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)

Yes