

GWYNEDD COUNCIL CABINET



Report to a meeting of Gwynedd Council Cabinet

Date of meeting:	05/11/19
Cabinet Member:	Councillor Gareth Griffith
Contact Officer:	Gareth Jones Assistant Head of Department Environment Department
Contact Telephone Number:	34092
Title of Item:	National Development Framework Consultation

THE DECISION SOUGHT

That the Cabinet:

Approves the draft response to the consultation on the National Development Framework (Appendix 1).

Authorises the Assistant Head in consultation with the Cabinet Member to undertake any amendments arising from the Cabinet's discussions, including editorial and administrative changes.

Authorises the Assistant Head in consultation with the Cabinet Member to create a cover letter highlighting the Cabinet's main points and for this to be submitted with the response in Appendix 1 to Welsh Government by 15 November 2019.

THE REASON FOR THE NEED FOR A DECISION

Welsh Government has prepared a National Development Framework, the document is currently the subject of a public consultation and a response needs to be submitted by 15 November 2019.

INTRODUCTION AND RELEVANT CONSIDERATIONS

BACKGROUND

- 1.1 Welsh Government is required to prepare a NDF under the Planning (Wales) Act 2015. Following its adoption, the NDF will replace the Wales Spatial Plan - a document that is considered ineffective to a great degree. Essentially, and contrary to the Wales Spatial Plan, the NDF will have development plan status. This means that its subordinate plans, namely Strategic Development Plans and Local Development Plans, must be consistent with it.

WHAT IS THE NATIONAL DEVELOPMENT FRAMEWORK?

- 1.2 The NDF is a 20 year plan and once adopted, it will apply to the period between 2020 - 2040. The draft document sets out Welsh Government policies on developing and using land in the spatial context.
- 1.3 Welsh Government describes how a NDF will address national priorities through the planning system, including:
- Maintaining and developing a thriving economy
 - Decarbonisation
 - Developing resilient ecosystems
 - Improving the health and well-being of our communities
- 1.4 The NDF is divided into five parts.

1 Introduction - This section explains the purpose of the document, its status when it is a final document, how the document is in keeping with the broader policies of Welsh Government

2 Wales: Overview - Challenges and Opportunities - This section sets out the main challenges and opportunities facing Wales over the next 20 years. Including, e.g. Climate Change, Transport, A Changing Population, A Wales where the Welsh language is alive and thriving, A Vibrant Landscape, A Changing Economy, Various Regions

3 NDF Outcomes - Through the NDF, the Government hopes to create a Wales where people live...

- and work in connected, inclusive and healthy places
- in rural, vibrant places where they can live, work and receive services
- in distinctive regions that address health inequalities and socio-economic inequalities through sustainable growth
- in places where the Welsh language is thriving
- and work in towns and cities that are a focus and trigger to sustainable growth
- in places where prosperity, innovation and culture are promoted
- in places where travel is sustainable
- in places with the highest quality digital infrastructure
- in places that manage their natural resources sustainably and reduce pollution
- in places with biodiverse, resilient and connected ecosystems
- in de-carbonised places.

- 1.5 The NDF proposes 11 'outcomes'. These Outcomes are general ambitions based on national Planning principles and the national creating sustainable places outcomes noted in Planning Policy Wales.

4 Spatial Strategy and Options: NDF Spatial Strategy - This section sets out a spatial strategy that notes the type and location of development across Wales. The spatial strategy is a lead framework for those places that will change on a large scale and developments of national importance. In the north Wales region, the spatial strategy shows that Wrexham and Deeside will be areas of national growth (mainly employment

opportunity areas and a large-scale increase in new housing), with Bangor and Caernarfon as regional growth areas. This section also introduces 11 Policies relating to Sustainable Urban Growth, Supporting Rural Communities, Delivering Affordable Housing, Strategic Framework to Improve Biodiversity, National Forest, Wind Energy and Solar Energy in priority areas (outside these areas). A Map displaying the NDF's Spatial Strategy is included as appendix 2 to this report.

5 The Regions - This section sets out policies for the regions. The Government states that it is important for Strategic Development Plans to be drawn up and Policy 16 outlines what should be included in SDPs. The other Policies in this section of the document relating to the north Wales region (including Gwynedd, Anglesey, Conwy, Denbighshire, Flint and Wrexham, map included of the North Region as appendix 3 to this report), includes Policy 18 - Coastal Settlements in North Wales. The policy supports this area as the focus for managed growth. The area extends from Caernarfon to Deeside. There are also policies on Holyhead Port (Policy 20) and Policy 22 North-west Wales and Energy (Policy 22).

- 1.6 The documents that are the subject of the public consultation can be viewed here: https://gov.wales/draft-national-development-framework?_ga=2.124342346.1791518843.1571923704-1057805724.1499345243

MATTERS TO CONSIDER AND AN OUTLINE OF THE RESPONSE TO SUBMIT TO WELSH GOVERNMENT

- 1.7 The consultation document includes 15 questions in order to give a structured response. It is suggested that a response is given to the individual questions noted in appendix 1, accompanied by some general points.
- 1.8 Summary of the observations:
- Support the principle of establishing a NDF.
 - Questions regarding whom will prepare Strategic Development Plans, will Councils receive additional resources in order to prepare them?
 - Concerns about the lack of policies relating to the rural areas of Wales, a risk that the focus on cities and large towns and the growth of urban areas will increase the existing spatial differences, and sections of the document gives the impression that rural areas will be voids, except for agriculture and visitors.
 - Concerns about how the Welsh language is portrayed in the document, with references to the weakness of the Welsh language and the risk for the Welsh language to be portrayed as something historical to protect, rather than as a means of communication that should be professed and developed.
 - Questions over the evidence base supporting the NDF, e.g. housing and affordable housing figures, renewable energy priority areas,
 - The document refers to a built coastal arch from Caernarfon to Deeside as a focus for managed growth, reflecting the important sub-regional role that this area plays

when supporting the main growth area noted, namely Wrexham and Deeside. No reference to supporting the sub-regional area.

- No reference whatsoever to the Welsh Government designated Enterprise Zones in the document.
- No reference to the connection between rural areas and the regional growth centres. No reference to towns that have an important role as they serve rural areas such as Porthmadog, Pwllheli, Blaenau Ffestiniog, Dolgellau.
- Unclear from the document whether the Government supports Low Carbon Energy or favours renewable energy. How does this affect plans for Wylfa Newydd and the LDP and plans for the Small Modular Reactors (nuclear)?

NEXT STEPS AND TIMETABLE

A response to the consultation needs to be sent to the Welsh Government by 15th November 2019.

ANY CONSULTATIONS UNDERTAKEN PRIOR TO RECOMMENDING THE DECISION

The Joint Planning Policy Unit has consulted with the Housing Department, Gwynedd Consultancy, Economy and Community Department and the Language Advisor. The draft response to the questions are based on input from the Environment Department and the input received from the other Departments. Also note that a discussion has been held at a recent Joint Planning Policy Panel and consideration given to the matters raised.

Opinion of the statutory officers

Chief Finance Officer:

I note that the report, in the second bullet point under 1.8, asks if any additional resources will be available for local authorities to prepare Strategic Development Plans.

Monitoring Officer:

The National Development Framework forms part of the framework of development plans under the Planning (Wales) Act 2015. As a consequence it is a document of high and long term significance. It is appropriate that the Cabinet determines the Councils response to the consultation.

Appendices

Appendix 1 – Draft Response to the National Development Framework Consultation

Appendix 2 – Spatial Strategy Map

Appendix 3 – North Wales Region Map

Background Documents

Consultation Documents – National Development Framework – Welsh Government August 2019

Appendix 1

NDF Outcomes (chapter 3)

4.1 The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
			<input checked="" type="checkbox"/>			

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
		<input checked="" type="checkbox"/>			

- If you disagree with any of the 11 Outcomes, please tell us why:

Outcome 1 – Is this excluding rural areas? It is important that rural areas are digitally well connected so that the same opportunities for working from home and self-employment are available as there are in larger cities, towns and villages. It is also important the rural areas have the same offer of a good quality of life for their residents. As this outcome is worded, and with outcome 2 below it is felt that this excludes rural areas. Should this first outcome be for the whole of Wales?

Outcome 2 – As outlined above rural areas should be as well connected digitally as the larger towns and cities, residents of Wales should not be penalised for living in rural areas.

Outcome 4 - There is a need to be cautious that the wording in Outcome 4 does not allow some authorities to consider education alone as a way of promoting and developing the language. The Welsh language needs to be a key consideration throughout any plans relating to the economy and a number of authorities could use the wording, "Where Welsh is the everyday language of the community," as a way out of obligations as it is a very difficult statement to define and measure.

Also how is "Where Welsh is the everyday language of the community," defined? What is the community? How much of the population must speak Welsh for it to be an 'everyday language'? Why is it only in communities where the Welsh language is the 'everyday language of the community' that development work will need to be managed in order to ensure that jobs and homes are available so that the language can be central to the identity of those communities? If the aim of having a million Welsh speakers is going to be achieved, the Welsh language will need to be promoted beyond the heartlands.

What about the visibility of the Welsh language? Signs, etc.? It is believed that this should be promoted nationally.

The Welsh language must be a responsibility for all, and not just the education authorities, across the whole of Wales.

Also, the linguistic connection should be highlighted in the other outcomes that relate to work opportunities and community services (Outcome 2), economic opportunities in cities and towns (Outcome 5) and economic development, investment and innovation (Outcome 6) for example.

The language should filter through each of the objectives and outcomes.

Outcome 6 - This outcome should refer to reducing difference - within society and between places.

1. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)				x			
Rural areas (Policy 4)				x			

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

General Points on the Spatial Strategy

- A substantial risk that the Plan will be considered as one for cities / towns only, due to the focus on cities and large towns and growing urban areas increasing the existing spatial differences and that these areas continue to be poor and lose their young population.

- Elements on the right track, but give the impression that rural areas will be voids, except for agriculture and visitors.
- The nuances of the references to rural suggest that they are relatively close to larger centres - there is a lack of appreciation about how far some areas are. There is a need to appreciate marginalisation as a substantial challenge for many communities.
- The list of economic activities that should be prioritised in the rural areas is too narrow...a range of economic activity and a selection of jobs (and well-paid jobs) is needed in the countryside - reference should be made to encouraging higher value economic activity that is not as dependent on location (e.g. digital).
- Para. 4 on page 29 needs to refer to West Wales as well as Mid Wales.

Page 24 the text goes from describing the urban areas to then refer to smaller towns & villages and then important regional centres. It would flow better going from urban areas to regional centres and then referring to smaller towns and villages.

Map - page 25

There are links between South Gwynedd and Aberystwyth and South Gwynedd and Wrexham and these should be identified on the Spatial Strategy Map. Welsh Government designated Enterprise zones should be identified on the Spatial Strategy Map areas for economic development/growth. There are also links between Dwyfor and the Bangor Regional Growth area and these links should be recognised.

P2 - the language should be a consideration and an important factor when considering the location of services and facilities. There are linguistic implications to any decision to centralise services and facilities in urban areas and this could have a positive impact on individuals' use of Welsh-medium services. This should be highlighted.

P3 –The promotion of the use of publicly owned land is welcomed. The review of publicly owned land is currently undertaken as part of the evidence gathering when preparing LDPs therefore this is not a new policy here. Mae angen amlygu bod y Gymraeg yn ffactor ac ystyriaeth berthnasol mewn trefi a dinasoedd hefyd, ac nid yn perthyn i ardaloedd gwledig yn unig.

There is a need to highlight that the Welsh language is a factor and a material consideration in towns and villages also, and that it does not apply to rural areas alone.

P4 - It is considered that Policy 4 could be more ambitious, that is, not only relying on the more 'traditional' economic activities related to the rural areas. There should be reference to the other economic activities which are prevalent and growing in the rural area such as science and technology. On the whole it is considered that the rural and more marginal areas of Wales do not receive sufficient representation in the NDF. These areas are sub regionally very important, as areas where people live and work. It is vitally important that these areas provide opportunities to access housing, high quality (well paid) employment, access to services, transport and digital infrastructure and how this will be delivered should be outlined in the NDF.

Reference should be made to the Welsh Government designated Enterprise Zones in the rural areas and the aims for these. There is little mention of the Enterprise Zones anywhere within the NDF. It is welcomed that the NDF recognises that rural areas can be quite different to one another depending on their proximity to major urban centres. It will be important, therefore that the definition of what is rural for Development Management purposes is made in the Local Development Plans not the Strategic Development Plans due to the difference in rural locations across these regional areas.

2. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
			x			

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The delivery of affordable housing is an objective for most, if not all LDPs in Wales in accordance with National Guidance. Whilst we do not disagree with Policy 5 on delivering affordable housing, some authorities no longer have any land which is appropriate for housing in their ownership. Therefore utilising it to deliver affordable homes will not be possible. In times when public funding is low and budgets are being cut, Local Authorities who do have land in their ownership may be looking to maximise the land value on these sites. When considering small and medium sized construction and building enterprises they will be focussed on the viability of projects. Viability is an important consideration when considering the delivery of affordable housing and may have implications for local authorities when trying to identify sites for affordable housing led developments, as well as for construction businesses in bringing schemes forward. Those Local Authorities who do not have land within their portfolios for the delivery of affordable housing should not be penalised and funding should still be allocated for the delivery of affordable housing in their areas through other means, such as in partnership with RSLs.

What does this mean? - 'To address this we will support **a more balanced approach** with local authorities, registered social landlords and Small and Medium sized construction and building enterprises encouraged to build more homes' ?

Page 30 Delivering Affordable homes

Reference to the need of on average 47% of additional homes to be affordable housing for the 5 year period 2018/19 to 2022/23. However it does not have regard to the impact of viability on market sites and that on average it is unlikely that a level of 47% affordable provision will be achieved in the majority of sites in rural locations throughout Wales.

3. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
			x			

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

This policy is supported. Ensuring that all parts of Wales, including rural areas, are supported by the telecommunications infrastructure, is welcomed. When will the Mobile Action Zones be identified by Welsh Government?

However, Policy 6 needs to be extended beyond mobile phones - reference needed to broadband and internet infrastructure also. Mobile Action Zones will be a long / middle term intervention; therefore, should the policy be more long-term?

4. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
	<input checked="" type="checkbox"/>					

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The objectives of this policy is supported.

5. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
			<input checked="" type="checkbox"/>			

P8 - The enhancement of biodiversity and the resilience of ecosystems is welcomed. However, who are the key partners that will identify the areas which could be safeguarded as ecological networks? Will these be identified in partnership with the Local Authorities? Will these areas be subject to public consultation before being finalised and what resource implications would the be for Local Authorities to administrate / manage these networks? As it stands this policy is extremely open ended and due the areas not having been identified yet, it is difficult to comment in full. Does reference need to be made to Ash die back (and other such issues of national importance) in the NDF which is a national issue which will have implications for the whole of Wales.

P 9 - As with Policy 8 above, given the lack of detail on the areas under consideration it is difficult to provide detailed comments on this policy. Will the delivery sites be identified in consultation with local authorities and other relevant key partners? When will they be identified and will they be subject to public consultation before being finalised?

6. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments					x		
District heat networks			x				

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

General Points

From a linguistic perspective there is a large number of renewable energy schemes, in particular community-run hydro schemes, which therefore make a direct contribution to creating prosperous communities and to the well-being of the community - and very often to the Welsh language.

No reference is made in this section to linguistic benefits, and the table on page 70 does not show that any relationship is seen between energy policy and the Welsh language.

Consideration should be given to obtaining a national policy for nuclear energy as well as renewable energy.

Page 36 Renewable Energy (locally owned) - Reference is made to one gigawatt of renewable energy consumption to be generated from renewable energy locally owned and for renewable energy projects to have at least an element of local ownership by 2020. While local ownership is welcomed, it is felt that further clarification should be included within the NDF over what is defined as local ownership of a scheme to ensure that it complies with this target or a link to a specific document if this is available elsewhere.

Page 36 Renewable Energy (grid infrastructure) - Reference is made to the priority areas providing a critical mass of new renewable developments together to build the case for new or reinforced grid infrastructure.

It is unclear whether the NDF has undertaken any analysis of the current capacity serving the priority areas identified. This could have an impact over the level of additional infrastructure required and this additional infrastructure could impact upon high value environmental designations outside the priority area e.g. new grid connections on Anglesey.

Page 38 - States that further guidance will be produced to assist in the development process. It is unclear the scope, timescale and who will produce this guidance.

P 10 - No specific reference is made within the policy over an element of local ownership with such proposals. Whilst they state that applications must demonstrate how local social, economic and environmental benefits have been maximised it is felt that this is not explicit enough that local ownership is sought with such proposals. This needs to be more clear to reflect the local ownership statement on page 36 (see above comments).

Due to the potential scale of wind turbines the policies should also include reference to the appropriateness of the highway network to accommodate the proposed development and not simply refer to suitable access to the site.

Policy 10 also notes that there is an acceptance of landscape change in these areas, this appears to contradict page 48 which outlines that the North West has an area of high landscape quality, how then has the NDF come to the conclusion that landscape change is acceptable here on such a scale. In addition Policy 10 outlines that Planning applications must demonstrate how 'the following adverse impacts have been minimised'...this includes 'landscape and visual impacts, cumulative impacts and the setting of National Parks and Areas of outstanding Natural beauty'. There is an area of outstanding natural beauty surrounding the Isle of Anglesey, has an assessment of the impacts the developments proposed through the NDF could impact this AONB.

Page 42 Wales Energy Priority Areas

The National Grid as part of the Wylfa Newydd project undertook work to identify a preferred route for a new overhead line grid connection. Their identified preferred route was the orange route which passes through a large part of the identified Solar and Wind Energy priority area identified on Anglesey. The National Grid withdrew their application in light of Horizon delaying the Wylfa Newydd project although the decision in relation to the Development Consent order will be announced in October. This could result in the site having permission for development in the near future. Has any consideration been given towards the proposed priority area on Anglesey sterilising the previously identified preferred route for the grid connection to the Wylfa Newydd project?

The supporting evidence which outlines the Stage 1 and Stage 2 work to identify the Priority Areas states that this was a high level desktop review. The Development Plan Policies in recently adopted LDPs (or Joint LDP) provides justification over the size of wind turbines / solar farms that can be accommodated having regard to a Landscape Sensitivity and Capacity Study. It is understood that NRW are undertaking work to produce National Guidance in relation to this matter.

The work undertaken by ARUP has identified broad areas considered to be of greatest opportunity and that wider matters at site-specific level will need to be considered in the context of more detailed planning as sites come forward. It is felt however that the current wording of the policy does not reflect that these are areas of greatest opportunity with site-specific issues to be satisfied for proposals to be supported.

It seems that one of the Special Landscape Areas identified within the Anglesey & Gwynedd Joint LDP falls within the Anglesey Priority Area. Such areas are supported by a Statement of Value and Significance which clearly set out how each area meets the criteria for designation, and include a set of 'special qualities' that underpin the designation. Any development proposals within the SLA will need to take account of its special qualities. It is felt that this should also be reflected within the NDF. Given the robust evidence on which the recently adopted Gwynedd and Anglesey LDP – it is difficult to see how the proposed designations in the NDF, which appear to undermine the LDP, are justified and what evidence there is to support this.

Consideration needs to be given towards the impact of development on the setting of the National Park and the AONB. Part of Priority Area 1 is in close proximity to the AONB in the North of Anglesey.

P12 - Welcome the sentence which outlines that proposals close to the boundaries of the AONB must demonstrate that the development will not undermine the objectives that underpin the purposes of the designation, how does this fit with Policy 10?

P13 - If the criterion in Policy 11 are to be followed is there any need for a separate policy. When will the energy atlas be produced and who will prepare this? Will be subject to public consultation before being finalised?

7. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
			<input checked="" type="checkbox"/>			

4.4 The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

8. North Wales (policies 17-22)

4.5 We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
				<input type="checkbox"/>		

9. Mid and South West Wales (policies 23-26)

4.6 Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
		<input type="checkbox"/>				

11. South East Wales (policies 27-33)

4.7 In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
		<input type="checkbox"/>				

4.8 If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

The North Wales Region – General Points:

The Regions

Given that vast areas of the North Wales (and Wales as whole) region can be considered as rural, a policy which relates to rural areas is appropriate, outlining how these areas can be

supported to ensure that they thrive and can provide for the needs of these areas in terms of Housing, Employment, access to services, sustainable transport and digital infrastructure.

Page 48 - The facts included on the diagram are useful but some kind of context is needed for these figures, for example, what is the significance of the fact that there are 200,000 Welsh speakers in the area? It is noted on the map that West Wales is an area of high landscape and environmental quality, it is assumed that the area of the whole region includes areas of high landscape quality, including the Clwydian Hills and Dee Valley AONB. More of a rural nature than a hinterland - the Welsh description is better, hinterland again suggests that they are on the outskirts of urban areas.

No reference to Anglesey Enterprise Zone or Snowdonia Enterprise Zone which are Welsh Government designations and how the Government objectives about the Enterprise Zones will be delivered. In that respect, it is important to ensure that there is a specific reference to Snowdonia Aerospace Centre (Llanbedr Airfield) as a National asset.

There is no reference to how the rest of the North Wales can be supported to benefit from the growth of Wrexham and Deeside (the majority of the attention is focused over the border...)

Priorities should ensure that the most peripheral areas are treated fairly, e.g. in the provision of digital infrastructure, access to jobs, housing, etc.

Page 50 - What does the square symbol on Holyhead represent? It is not included in the key - port? Anglesey Airport is shown on the map but there is no reference in the text. As it is an important link between north and south Wales, this needs to be reflected in the document.

Why is Holyhead not a 'Regional Growth Centre'? Holyhead's connections by road, train, port and air (within a reasonably close distance) means that there are opportunities for Holyhead to be a 'Regional Growth Centre'. Similar settlements in other parts of Wales, such as Milford Haven and Pembroke are identified as Regional Growth Centres. It is considered that Holyhead merits the same status.

Para 6 on page 52 refers specifically to the 'Advance Manufacturing Research Centre', it is unclear why there is only reference to this but not to other schemes which are as significant.

P 16 – There is some concern that certain more rural areas which do not have national growth could be overlooked within Strategic Development Plans. When developing Strategic Development Plans will further funding be available for Local Authorities? What happens in regions where some Local Authorities don't currently have an adopted Local Development Plan, or in areas where the timetable of plan revisions are significantly out of sync? It is recognised that the NDF states that SDPs are shaped by the Welsh Government's regional Economic Development Plans and City and Growth deals has the NDF been informed by these? The document states that the WG requires SDP to come forward in each of the three regions to deliver the requirements of this policy. However the third paragraph under the Policy states that LPAs should determine the geographical footprints of the SDP. The last paragraph on page 10 states that the SDP should cover regional or sub-regional scales. In addition the foreword by Julie James AM states that LPAs are encouraged to move ahead with developing SDPs. It is unclear therefore whether an SDP has to cover the whole region or whether they should rather be focussed on a sub-regional basis e.g. areas identified as being National Growth Area? This needs to be made clearer within the Framework. A Joint Local Development Plan has been prepared for the Gwynedd and Anglesey LPAs and this plan is currently the only example of a joint plan in Wales. The plan is a strategic one for the sub-region which has considered issues for both counties and wider impacts / planning issues.

P17 - Support the principle of ensuring that Wrexham and Deeside are supported, but do not support the concept that this should be the focus for economic growth, the provision of services and facilities, transport and digital infrastructure - this is important for the entire region .

P18 - When developing this policy have the aims and objectives of the North Wales Growth bid been taken into consideration? The fact that settlements on the Isle of Anglesey have been omitted from the growth arc suggests that it has not. Large schemes have been outlined in the North Wales Growth Bid (Morlais for instance) for the Island and therefore it is considered that housing and key services will need to be provided as outlined in Policy 18 on the Island too.

It is stated that the central estimate for the North Wales Region stands at 19,400 additional homes up to 2038 with 51% of these being for affordable dwellings over the next 5 years. It is stated that these estimates provide part of the evidence and context on which Housing Requirements for SDP can be based. Planning Policy Wales (PPW) in paragraph 4.2.6 states that the Household Projections together with the LHMA and Well-being plan for a plan area will form a fundamental part of the evidence base for development plans; in addition it is stated that these should be considered with other key evidence in relation to issues such as what is the Plan seeking to achieve.

The reference to 114,000 additional homes up to 2038 in the central estimate for the whole of Wales on page 30 is not as explicit in that this will be part of the growth level expected over the NDF period. A review of the past build rate seen within the 7 North Wales Planning Authority reveals an annual build rate of approximately 1,700 units per annum (see Appendix 1). This would equate to a growth level of approximately 34,000 over the next 20 years. The latest figures within adopted development plans for the 7 North Wales Planning Authority indicate a build rate of approximately 2,340 units per annum (see appendix 2). This would equate to a growth level of approximately 46,800 over the next 20 years. The Framework needs to be clearer what is the meaning of the figure 19,400 within the NDF for the North Wales region. If this is a starting point then this needs to be stated throughout the document otherwise objector's seeking a lower growth level could well use this figure to object to alternative figures within SDP / LDPs. It is unclear what the evidence base is for the number of additional homes referred to and it is suggested that no figure is provided unless it is based on robust evidence. If a housing need "target" is required on a regional basis – should this evolve through the SDP process?

P20 and P21

The fact there is a policy for the port of Holyhead which outlines its importance as a strategic gateway further supports the argument that Holyhead should be included as a regionally important Centre and should also be included in Policy 18 as an area for managed growth.

What about the third bridge over the Menai Straits? There is no reference to this in the document at all, it has been the subject of a public consultation and a statement on the Government's website suggests a start date of 2020/2021 and a completion date of 2022/2023. The statement also highlights that the A55 has local, national and international importance. This is the main economic route for North Wales and it is a part of the Euro 22 route on the European roads network - as it is a development of national significance it is considered important for it to be referenced in the document. It is important to have better connections between north and south Wales, in order to maximise opportunities and ensure better access to the south-east, and not just focus on connections to north-west England.

P22 Through this policy, is the NDF promoting/favouring renewable energy over non-renewable energy? If so how does this effect the proposals for Wylfa Newydd? There are policies in the Gwynedd and Ynys Môn Joint Local Development Plan which relate

specifically to development at Wylfa Newydd. Is Policy 22 specifically related to Nuclear/low carbon energy generation? If so should this be explicit here, rather than using the terminology non-renewable energy generation in order to provide clarity.

Trawsfynydd is recognised nationally as a site for small nuclear reactors and the text in paragraph 4 of page 54 should be amended to reflect this.

Attention to the Welsh language:

It is disappointing that so little attention is given to the language in these sections, and only one repeated sentence appears under the sub-heading, "The Welsh Language".

The Government should be setting a clear vision throughout this document of what local authorities and regional plans should act upon in terms of planning and economic development in order to strengthen the situation of the Welsh language and contribute to the million speakers they have set as a target with Cymraeg 2050.

The fact that a number of the regional policies are being noted as ones with an intention to realise the outcome of creating "places where the Welsh language is thriving" on the table on page 70 is very contentious.

The Welsh language should be a consideration in any plans relating to creating jobs and community prosperity.

There is also a need to be cautious that the language does not appear in connection with rural areas only.

In terms of the regional plans of North Wales, great emphasis is placed on developments in the Wrexham and North West area, and there is a need to be careful of the impact this has on the Welsh language as there is a very different context to the language in the community and socially across North Wales.

12. Integrated Sustainability Appraisal

- 4.9 As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.
- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

Note that the assessment of the NDF's impact on the Welsh language has been included within the Integrated Sustainability Appraisal. Due to the importance of the Welsh language and the target of increasing the number of speakers to a million by 2050, the NDF should be supported by the Impact Assessment on the Welsh Language outside the Integrated Sustainability Appraisal.

13. Habitats Regulations Assessment

- 4.10 As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and

address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

No comments

14. Welsh Language

4.11 We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

This is addressed in some of the previous questions.

Considering that economic development and community regeneration is integral to linguistic prosperity, we are very disappointed to see the insufficient consideration given on a national level to the impact on the Welsh language or on the opportunities to increase the use of the Welsh language in the NDF.

The NDF is a very important planning document and the Welsh language is a matter of national importance. A document on such a strategic level by Government should show guidance and set ambitious aims and push the authorities and regions to do more. It is not at all clear from this document what the Government wishes to see.

4.12 Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The impact on the Welsh language and the need to consider how the plans work in favour of the Welsh language must be highlighted through the entire document in order to ensure that there is a relationship between each change and policy in the NDF and a positive impact on the language and community well-being. It does not make sense, for example, that policy 20 on the chart on page 70-17 notes a relationship with the Welsh language, but not policy 21. Any plans that look at mobility and economic advantages is likely to have a linguistic impact.

Much more than 13 out of 33 policies should aim to obtain outcomes that lead to the prosperity of the Welsh language.

It is completely unacceptable that the Government is considering that it should not be aimed to realise the outcome with the policies relating to Newport and the Heads of the Valleys. This does not set an expectation for the regions for those areas where there is a genuine need to give strategic consideration to the Welsh language. How can you talk about regeneration activity and improving well-being without also talking about the Welsh

language? Perhaps the majority of the population in these areas are not Welsh speakers, but this does not mean that no well-being needs associated with the Welsh language exist.

There is a risk of discriminating against the Welsh speakers (i.e. affect their right to use the Welsh language) and treating the Welsh language less favourably than English unless the Welsh language is a core consideration of any regeneration, well-being and economic plans.

The Government should carefully consider its role in setting the correct vision and ambition, and make changes to the Framework that challenge and push everyone to go further than what they currently do. Referring to the Welsh language in one brief sentence in every region, rather than having it permeate through the economic plans, gives regions and authorities too much room to neglect their responsibility to work in favour of the Welsh language.

It must be ensured that the Welsh language is not just a priority in those areas "where Welsh is the everyday language of the community".

The wording of Outcome 4 on page 20 is weak and there is a risk for the Welsh language to be portrayed as something historical (see wording of page 12) to protect, rather than as a means of communication that should be used and developed. The wording is too vague, and there is a risk that the various definitions of "everyday language" will lead to a lack of action, instead of triggering development.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

See below the Council's General Points

Part 2 Page 12

Page 12: The final sentence refers to the fact that people in north-west and west Wales continue to live their everyday lives through the medium of Welsh. There are communities in all parts of Wales where Welsh is a living language and where the population live their lives in Welsh. Believe that this paragraph can be re-worded.

- Welcome the concept of establishing the NDF as a method of aligning efforts to increase prosperity and reduce differences across, and within regions - but they need to be reinforced. Suggest the need for further emphasis on the role of the NDF as a proactive tool to enable the distribution of growth (and prosperity) and the importance of ensuring that this is the priority for public spending
- Welcome the concept of establishing the NDF, SDPs and LDPs, but note that it is unclear how the development of the SDPs is being led and who / how / when it must be prepared
- Welcome the direction to working alongside the Regional Economic Development Plans but note that the regions and local areas have had input into the documents to date and that there is a need to be clear how these will sit alongside the strategies that the regions are preparing (i.e. NWEAB in our case)
- Note uncertainty regarding how the three Welsh Government regions tie-in with the four economic regions established by Local Government through the City & Growth Deals (suggest that Welsh Government should adopt the same system)
- Note the importance of ensuring that settlements (large and small) are sustainable and pleasant places to live and work

- Suggest the need to refer to low carbon energy, not renewable, in the general sections of the document
- Is there a need for further emphasis on ensuring economic prosperity in the language's strongholds (bearing in mind that these areas are outside the locations suggested as a priority)
- When referring to digital connectivity, reference should be made to broadband, mobile and internet in all cases
- Page 14 - reference should be made to quarries as well as coal mines
- Not much reference to rural in the context of North Wales - this has been restricted to Mid Wales...

16. Are you...?

Providing your own personal response	
Submitting a response on behalf of an organisation	

<p>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</p>	<input type="checkbox"/>
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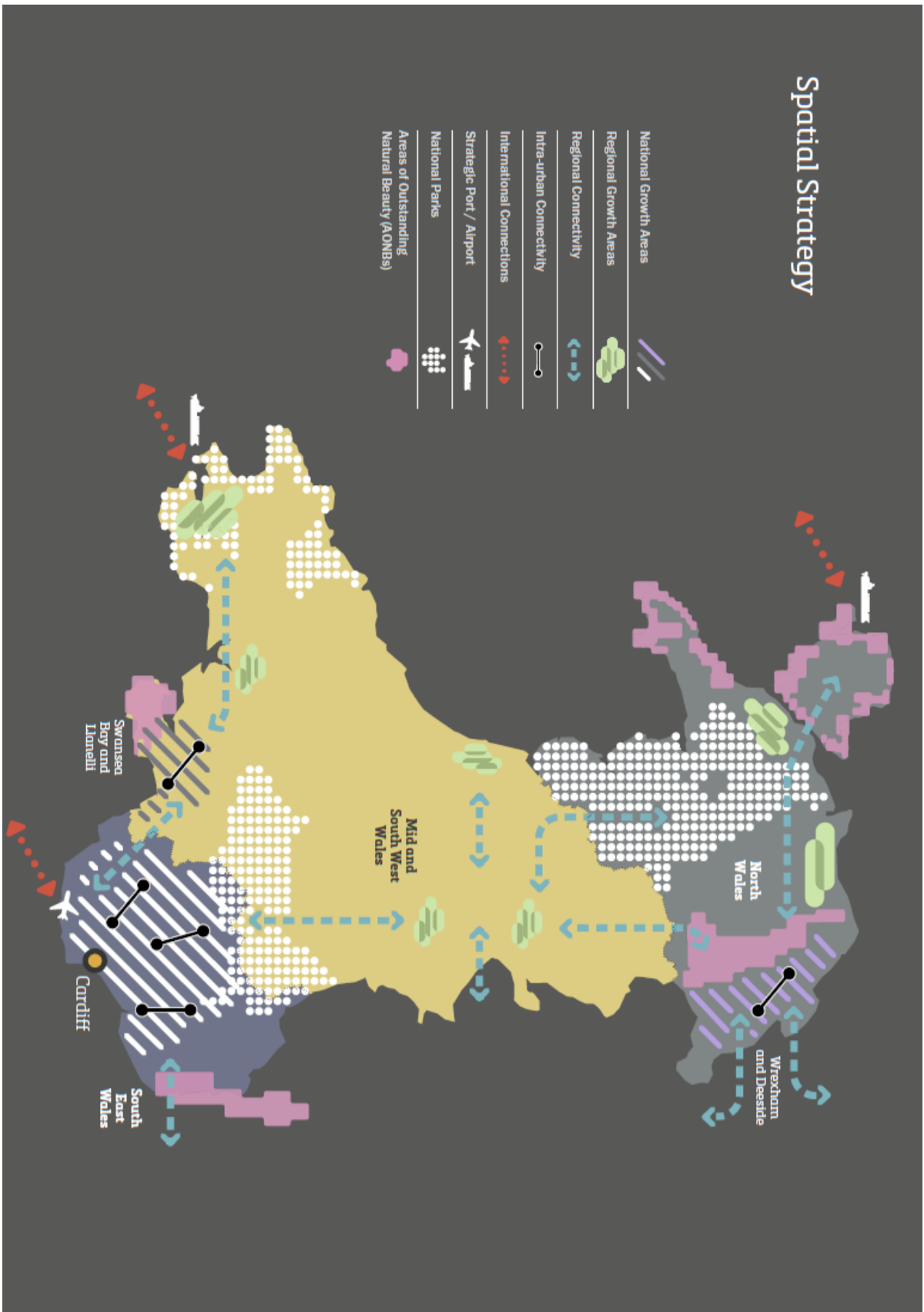
Appendix 1 – Past Build Rate for North Wales Planning Authority

Planning Authority	Published JHLAS Used	Total Completions	Annual Average Completions
Anglesey & Gwynedd Planning Area	2015 to 2019	2,140	428
Snowdonia National Park	2014 to 2018	152	30.4
Conwy	2014 to 2018	1,293	258.6
Denbighshire	2015 to 2019	804	160.8
Flintshire	2014 to 2018	2,866	573.2
Wrexham	2014 to 2017	977	244.25
TOTALS	-	8,232	1,695.25

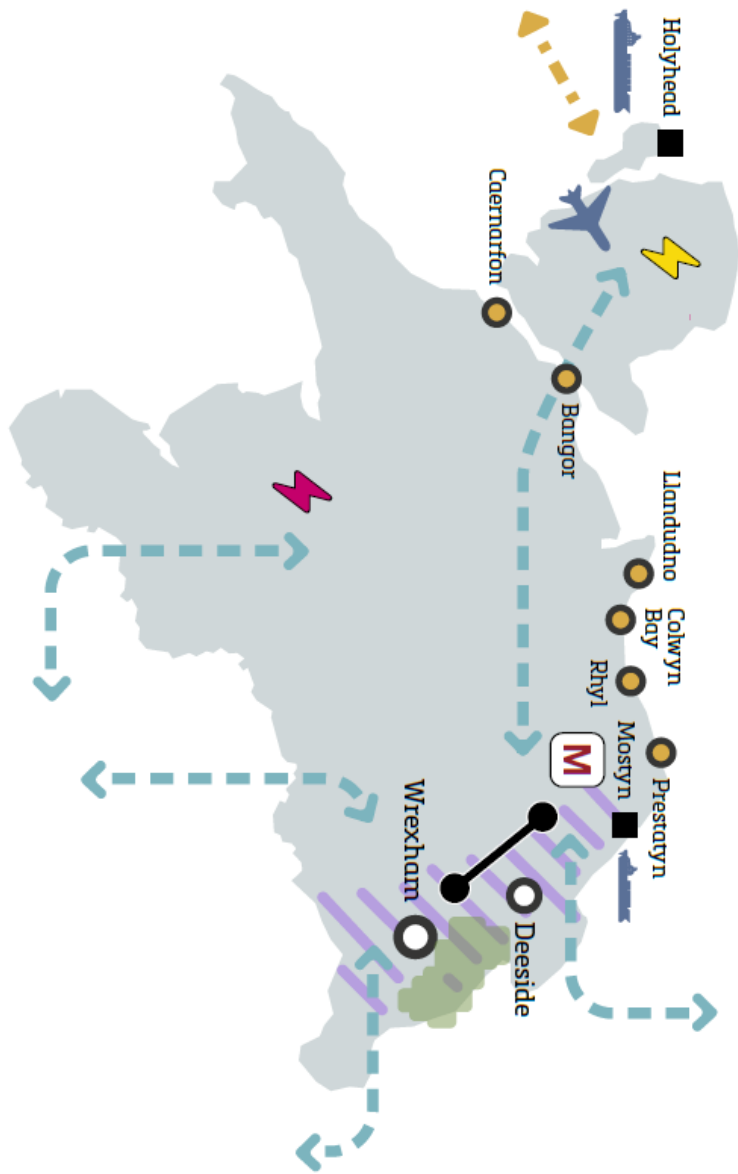
Appendix 2 – Build Rate within Adopted LDP / UDPs in North Wales

Planning Authority	Plan & Period	Overall Growth Level	Level Per Annum
Anglesey & Gwynedd Planning Area	Joint LDP 2011 to 2026	7,184	479
Conwy	LDP 2007 to 2022	6,520	434.6
Denbighshire	LDP 2006 to 2021	7,500	500
Snowdonia National Park	LDP 2016 to 2031	770	51.3
Flintshire	UDP 2000 to 2015	7,400	493.3
Wrexham	UDP 1996 to 2011	5,775	385
TOTALS	-	35,149	2,343.2

Appendix 2 – Spatial Strategy Map



Appendix 3 – North Wales Regional Map



- National Growth Area
- Regional Connectivity
- Intra-urban Connectivity
- International Connections
- Ports
- Green Belt
- Anglesey Airport
- Centres of National Growth
- Centres of Regional Growth
- Anglesey Energy Island
- Trawsfynydd
- North Wales Metro

