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**REPORT TO THE NORTH WALES ECONOMIC AMBITION BOARD**  
**15<sup>th</sup> NOVEMBER, 2019**

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**TITLE:** *Consultation on the National Development Framework*

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**1. PURPOSE OF THE REPORT**

- 1.1. To consider the draft National Development Framework (NDF) which has been produced by Welsh Government (WG) and to agree the content of a response on behalf of the NWEAB to the consultation which ends on 15th November, 2019.

**2. DECISION SOUGHT**

- 2.1. To amend/endorse the response to the consultation on the NDF as set out in **Appendix 2**, to include any matters arising during this meeting of the NWEAB and submit them to WG by 18<sup>th</sup> November, 2019.

**3. REASONS FOR THE DECISION**

- 3.1. The NDF will be critical to shaping where development is to take place within the region. It is therefore vital that the NDF accurately reflects the aims of the North Wales Economic Ambition Board, the Adopted Regional Economic Ambition Strategy and the emerging Growth Deal.

**4. BACKGROUND AND RELEVANT CONSIDERATIONS**

**4.1. Introduction**

- 4.1.1 The NDF will be a new national development plan which will set the high level, strategic direction for development in Wales from 2020 to 2040 and will replace the existing Wales Spatial Plan. The purpose of the NDF will be to drive sustainable growth and combat climate change by guiding strategic development over the next twenty years. It will do this by setting the strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of communities. It will also identify broad geographic areas where we should be investing in new infrastructure and encouraging economic development for the greater good of Wales.
- 4.1.2 The NDF will be the highest tier of development plan in Wales, therefore it is focused on issues and challenges at a national scale. Because of its strategic nature it does not allocate specific areas of land for development or include detailed land use policies. It is a framework that should be used to inform Strategic Development Plans (SDPs) at the regional level and Local Development Plans (LDPs) at the Local Authority level (i.e. WG's objective is to have 3 tiers of development plan; National – NDF; Regional – SDP; Local – LDP). It is the role of LDPs to interpret the NDF and SDPs, formulating relevant land use policies and allocating sites for development in response to the

overarching strategic direction of the higher tier development plans. The NDF clearly states that decisions regarding the scale and location of growth in individual settlements should be made within LDPs.

4.1.3 The NDF consultation period ends on 15<sup>th</sup> November and any comments will be considered by the WG scrutiny arrangements in May to June 2020. WG then propose to adopt the NDF in the autumn of 2020. By responding to this consultation the NWEAB reserves the option of contributing to WGs scrutiny arrangements.

4.1.4 There are eleven outcomes that the NDF aims to achieve over the next twenty years.

A Wales where people live....

1. and work in connected, inclusive and healthy places
2. in vibrant rural places with access to homes, jobs and services
3. in distinctive regions that tackle health and socio-economic inequality through sustainable growth
4. in places with a thriving Welsh Language
5. and work in towns and cities which are a focus and springboard for sustainable growth
6. in places where prosperity, innovation and culture are promoted
7. in places where travel is sustainable
8. in places with world-class digital infrastructure
9. in places that sustainably manage their natural resources and reduce pollution
10. in places with biodiverse, resilient and connected ecosystems
11. in places which are decarbonised

4.1.5 These eleven outcomes are overarching ambitions based upon the national planning policy principles and sustainable placemaking outcomes set out within Planning Policy Wales.

## 4.2. NDF Strategic and Spatial Choices

4.2.1 The NDF broadly identifies where large scale change and nationally important developments should be focused over the next twenty years. The Spatial Strategy has three components and sets out:

- Where in Wales growth should be focused;
- How growth should be planned and managed; and
- How we should power and heat places using renewable energy and district heat networks;
- There are three main urban clusters in Wales which have historically attracted people to live and work due to the industries located there, which include:
  - Cardiff, Newport and the Valleys
  - Swansea Bay and Llanelli
  - **Wrexham and Deeside**

4.2.2 The NDF recognises these as economically distinctive areas that support a range of businesses and enterprises. They are important to the economy in Wales, therefore, the NDF seeks to promote their continued growth and regeneration by focusing large scale employment opportunities and housing growth **predominantly** within these areas. Outside these areas, several important regional centres have been identified which should seek to retain and enhance their commercial and public service base through their relevant SDPs and LDPs, these regional areas are:

- Carmarthen

- Pembrokeshire Haven towns
- Aberystwyth
- Llandrindod Wells
- Newtown
- **Caernarfon**
- **Bangor**
- **Coastal towns from Llandudno to Prestatyn**

4.2.3 The NDF also sets out 33 policies to guide the preparation of SDPs and LDPs across Wales. Not all policies within the NDF will apply to North Wales as some relate to the Southern regions.

#### **4.3. General comments on the NDF**

4.3.1 The NDF has been produced in a succinct style and reflects the speed by which WG intend to take the document through to adoption (i.e. 12 months from now). Whilst the principle of an NDF which has more of a planning and development focus is welcomed, as a replacement for the Wales Spatial Plan, the draft NDF currently represents a series of high level positive Welsh Government policy intentions, some of which are portrayed in a spatial manner.

4.3.2 Given the lack of development of SDPs in Wales to date, the NDF is an opportunity for WG to require regions to produce SDPs whilst providing clear guidance as to what is expected of such plans, as well as how and what relationship there should be between the NDF, SDPs, and LDPs as material considerations in guiding how much development takes place and where.

4.3.3 Given the brevity of the draft NDF, it is not clear where the evidence is to support the policy ambitions laid out within it. In particular, it is uncertain where the evidence is on viability and deliverability for the policy proposals which would provide their soundness – a test upon which LDPs are examined.

4.3.4 For example, the use of housing need figures in the NDF is confusing given that these figures bear no relationship to the housing requirement figures in LDPs. They appear to be mere predications of housing growth based on modelling undertaken elsewhere and now applied to Wales. Initially, these overall figures appear potentially low and unambitious, contradicting several other policy areas of the draft NDF which promote growth areas and economic prosperity.

4.3.5 The NDF should also set the context for decisions taken on Developments of National Significance (DNS) yet it is silent on this relationship. There also seems to be a lack of reference to the provision of sufficient infrastructure to accommodate growth in key areas, as well as the mechanisms and interactions with key stakeholders and providers necessary to co-ordinate growth. By sufficient infrastructure to accommodate growth the NDF needs to be clearer in terms of issues such as roads, water, electric gas, digital, electric charging infrastructure, schools of a sufficient size and standard, hospitals, doctor surgeries, dental practices etc. all things needed to meet the needs of a growing population and a developing economy over the next 20 years and beyond.

#### **4.4. Comments relating to the NDF Spatial Strategy**

4.4.1 The draft NDF fails to take the opportunity not only provide guidance to the development plan levels below the NDF (i.e. SDP and LDP) but also misses the chance to connect with clear regional growth visions and agendas, such as the strong economic ambition vision we have here in North Wales. Recognition of such linkages would have then provided a meaningful framework to define the scope and context of an SDP at the next level down.

4.4.2 In a North Wales context, there also appears to be some conflict between recognition of the work that has been underway for some time in defining the collective Growth Vision through the Economic Ambition Board, the infrastructure investment elements of which are already supported by Government funding, and the designation in the NDF of 'Deeside' and Wrexham as a priority growth area. There is also a lack of recognition of importance of the cross border economic relationships that exist with the Mersey-Dee Alliance, for example. Whilst reference is made to a role for coastal towns between Caernarfon and Prestatyn, there is a lack of clarity as to what the NDF is trying to say about priorities for the region and which parts of the region will contribute in what ways? For example:

- What is actually meant by 'Deeside' as the Spatial Strategy map identifies most of Flintshire? Does the NDF actually mean North East Flintshire?
- In contrast, the whole of Wrexham is referred to despite the dominance of Wrexham Town and adjacent satellite towns and industrial areas, and where there is a large rural area with limited growth potential?
- With low levels of housing need identified for North Wales in the draft NDF, where is this housing to be provided and how does this relate to a focus for growth set out in the NDF, or planned growth in LDPs and the provision of housing to support the economic ambition of the area, and what happens in the other Local Authorities in North Wales which are not in the North East Wales proposed growth area?
- Given the identification of North East Wales as a priority growth area, would the definition of an extensive Green Belt on the border with England be counter-intuitive to this long term growth ambition?
- The need to recognize the diversity of North Wales, which on the one hand is predominantly rural much of which needs protecting, whilst on the other hand ensuring a spread of economic development across the region including within and serving our rural communities i.e. sustainable development that recognizes the need to maintain, and support our rural communities.

#### **4.5. Comments on the specific NDF policies and their impact on the North Wales region**

##### **4.5.1 Policies 1, 2 and 3 – Sustainable Urban Growth; Supporting Urban Centres and Public Investment, Public Buildings and Publicly Owned Land**

This trio of policies reinforces WGs recent "Town Centre First" ambition of directing appropriate development initially towards urban centres and encouraging the public sector to intervene in bring such sites forward. This should be done in a rational manner, thereby acknowledging that urban sites are not without constraints and that development should only be undertaken in areas here the infrastructure can absorb it.

##### **4.5.2 Policy 4 – Supporting Rural Communities**

Whilst this NDF policy is well intentioned, it lacks a precise definition of what 'rural' means, leaving this instead to lower level plans to do so. It is not clear, therefore, as to what scale of rural town or community the NDF feels is sustainable to accommodate growth, of what type, and at what scale. There is a lack of recognition that in many rural contexts the loss of facilities that have already taken place over time (village shops, schools, pubs, banks/post offices etc.) has already made many rural villages and communities unsustainable in terms of locating growth, and the proposition that enabling growth will result in these facilities returning needs testing and may need government support. There does not appear to be sufficient linkages drawn out across policies 2-4 in the NDF that explain in any hierarchical sense either the spatial relationship between

‘urban’ and ‘rural’ or the varying levels of sustainability to accommodate growth and development.

#### **4.5.3 Policy 5 – Delivering Affordable Homes**

Whilst the principle of providing more affordable homes via the planning system is supported, WG seem to fail to recognise that planning is only one of many ways to secure affordable housing. It should be clearer in what role the planning system plays relative to other sources such as the work of RSLs, Local Authority management of its own housing stock, as well as proactive schemes such as the Council’s building their own homes. When the NDF refers to the need for ‘a shift in the delivery model’ to deliver more homes, it then fails to explain what this means or how and when this will be implemented. Equally, while the NDF policy talks about “ensuring that funding for affordable homes is effectively allocated and used” it does not say what money. Is it new WG funding, if so what, how and when this will be provided, or is there an expectation that the private developers “pay”. This latter approach does cause viability issues particularly outside of the cities and larger towns. This is far from a strategic approach to the increase in delivery of affordable homes in North Wales or Wales as a whole. In contrast to the a Council’s LDP, which has had to carry out a detailed viability assessment to determine the levels of viable and deliverable affordable housing within the plan, there seems a lack of similar empirical evidence to support the affordable need levels set out in the NDF. A number of North Wales Council’s viability studies show, for example, that if a policy requiring even up to 20% affordable housing (let alone the 50% suggested in the NDF) on its LDP allocations, would not be viable on most, if not all of the allocations.

#### **4.5.4 Policy 6 – Planning in Mobile Action Zones**

It is not clear as to how or when the Mobile Action Zones will be identified and incorporated into the NDF and what option for scrutiny they will be given particularly where they may pose conflicts for sensitive areas such as the National Parks or AONBs.

#### **4.5.5 Policy 7 – Ultra Low Emission Vehicles**

Discussions with Scottish Power Energy Networks about infrastructure capacity in relation to accommodating LDP growth and other policies such as the encouragement of charging points via policy PC5, has highlighted that there is a fundamental issue of upgrading the grid infrastructure, both domestic and commercial, before the roll out of charging points can be seriously considered. However, there is no timeframe for this nor an understanding of how this is to be funded. What joint working has there been between the NDF and the power providers to determine the national strategic approach to the provision of this infrastructure?

#### **4.5.6 Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience**

Whilst well intentioned and supported in principle, the policy relies on things that have yet to be put in place e.g. Area Statements. There needs to be greater clarity and collaborative working from NRW’s perspective to ensure that the necessary framework is provided to future SDPs and LDPs to address the intentions behind this and other similar NDF policy intentions.

#### **4.5.7 Renewable Energy Policies 10-13**

Welsh Government have set ambitious targets for 70% of electricity consumption to be generated from renewable energy sources by 2030. Policies 10-13 of the NDF relate to the development of renewable energy technologies. The spatial priority is for large scale wind and solar development to be directed towards priority areas as shown on the ‘Wales Energy Priority Areas’ map (see

below). A review of landscape and visual impact identified the priority areas as the most appropriate locations to accommodate landscape change. The NDF states that large scale on shore wind and solar energy development is not acceptable within National Parks or Areas of Outstanding Natural Beauty (AONB).

The priority areas identified for wind and solar are generalised and it is difficult to interpret their precise extents from the NDF map. It is also difficult to understand the process used to identify these areas or whether they have followed the Toolkit approach advocated for Renewable Energy Assessments in PPW, to support LDP policies on renewable energy. It is a concern that no account is taken of the potential negative impact that renewable development can have adjacent to, or within, the setting of sensitive areas such as the AONBs or Snowdonia National Park. The level of detail included within policies 10 and 11 seem at odds with the strategic nature of the NDF and are more akin to detailed development management criteria based policies found in LDPs. Given the level of assessment that is required by the various criteria to demonstrate suitability or compliance, and whilst are understandable requirements to determine sustainability, these requirements seem at odds with the general statement that within the priority areas there is “a presumption in favour of development for these schemes and an associated acceptance of landscape change”. When such detailed assessments are required by the criteria that follow there is an implication that they have not been carried out to a sufficient level when defining the priority areas.

#### **4.6. The Regions**

4.6.1 The NDF identifies three regions in Wales:

- North Wales
- Mid & South West Wales
- South East Wales

#### **4.7. The following policies specifically refer to the North Wales region**

##### **4.7.1 Policy 17 – Wrexham and Deeside**

From earlier comments relating to the spatial strategy, there is uncertainty as to what is meant by ‘Deeside’ as in a Flintshire context this diminishes the wider contribution that many areas within Flintshire make towards the economic prosperity of the County and sub region. This is in contrast to the reference to Wrexham as a whole where its contribution is potentially more focused in terms of the main town and satellite settlements and industrial areas.

What is also unclear is that the NDF places so much weight on ‘Deeside and Wrexham’ being a focus for growth, but does not clarify what the role of the remaining areas of the North Wales regions will be. This does not help to set any context or guidance for the development of a SDP and is a missed opportunity to recognise the contribution of the wider region, as well as identifying the regional issues that could be addressed via an SDP. This would also appear at odds with the plans of the NWEAB via the adopted Economic Ambition Strategy and emerging Growth Deal to share growth across the region via sustainable development reflecting the predominantly rural nature of our environment and communities.

Whilst the NDF talks about priorities for growth, its approach to identifying unmet housing need and yet not quantifying the sorts of growth levels required to be ambitious and support economic development is inconsistent. The NDF is not prescriptive in relation to economic growth which would assist in the development of a regional SDP, instead just focussing on one specific aspect of meeting housing need, and specifically affordable need. There should be a much more

comprehensive and strategic focus for a NDF than just affordable housing, which, whilst acknowledged as a key priority, is also not properly explained in terms of either the change required to deliver more, or how this will be supported and funded by the Welsh Government (see comments relating to Policy 5 – para 4.5.3). It would also have been more strategic to have considered economic growth as the key driver where housing is an important part of the supporting infrastructure to help support economic change and delivery of growth and jobs.

The NDF is also silent on any form of Rural Development Strategy approach to the large rural areas of the region that can also in a balanced and sustainable way, make important contributions to growth, development, economic prosperity and well-being.

#### **4.7.2 Policy 18 – Managed growth of North Wales Coastal Settlements**

One obvious issue with such a focus on coastal urban areas for ‘managed growth’ is the issue of flood risk and how this has been taken into account in putting this policy approach forward. Also how are “coastal towns” defined? e.g. Llandudno is clearly a coastal town, is Abergele or Bodelwyddan classed as “coastal towns”? Issues relating to development and flood risk will be further constrained if the focus of the review of TAN15 is to further restrict development in flood risk areas. There is also the unclear consideration as to the sustainability of this approach in terms of areas such as connectivity and transport infrastructure to support this strategy, as well as the role that key inland settlements currently play in respective LDPs, but where the NDF is silent on the role they should continue to play.

#### **4.7.3 Policy 19 – Green Belts in North Wales**

It is unclear why the WG has now made such a clear statement in support of Green Belts in the North Wales region, particularly in prescribing that the area north east of Wrexham “must” have a green belt. Most if not all LDPs in the regional have followed PPW and used a form of green wedge or green barrier approach to manage urban form, and the obvious consequence of shifting to a preference for green belts is the degree of permanence their designation then confirms. The principle also seems at odds with identifying ‘Deeside and Wrexham’ as a regional focus for strategic growth.

#### **4.7.4 Policy 20 – Port of Holyhead**

The Welsh Government fails to fully acknowledge the international role that the Port of Holyhead plays. The NDF needs to be amended to reflect the importance of the port in that context. This is clearly relevant to the emerging Growth Deal.

#### **4.7.5 Policy 21 – Transport Links to North West England**

There is a lack of reference to the need to invest in and improve inter and intra-regional transport infrastructure and also, whilst the focus seems to be on improving cross border connectivity with England, it is not clear what priority is given to improving north-south links with Wales. Emphasising the need to improve linkages from North Wales to Cardiff, Swansea and the main towns in South Wales is a missed opportunity in the draft NDF.

#### **4.7.6 Policy 22 – North West Wales and Energy**

Whilst the NDF acknowledges the region’s potential for an active nuclear industry, it underplays the role which nuclear can play as a low carbon energy source, particularly at a time when the Welsh Government have recently declared a climate emergency.

## 5. FINANCIAL IMPLICATIONS

5.1. None.

## 6. LEGAL IMPLICATIONS

6.1. None.

## 7. STAFFING IMPLICATIONS

7.1. None.

## 8. IMPACT ON EQUALITIES

8.1. The NDF seeks to increase prosperity and reduce inequalities in Wales. The NDF seeks to contribute to the WG ambition to increase the percentage of people who speak Welsh daily by 10% by 2050 by ensuring that the Welsh speaking communities within North West Wales continue to thrive.

## 9. CONSULTATIONS UNDERTAKEN

9.1. Undertaken with all NWEAB partners through the work of the Executive Group.

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### APPENDICES:

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| <b>Appendix 1</b> | Link to the National Development Framework:<br><a href="https://gov.wales/sites/default/files/consultations/2019-08/Draft%20National%20Development%20Framework.pdf">https://gov.wales/sites/default/files/consultations/2019-08/Draft%20National%20Development%20Framework.pdf</a> |
| <b>Appendix 2</b> | Proposed response of the NWEAB to the consultation on the draft National Development Framework   |

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### STATUTORY OFFICERS RESPONSE:

i. **Monitoring Officer – Host Authority:**

“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 and of particular regional relevance. Given its role as a lead body for the development of the region it is appropriate that the Economic Ambition Board is able to provide a response to the consultation.”

ii. **Statutory Finance Officer (the Host Authority’s Section 151 Officer):**

“I note that section 4.1.2 of the report refers to Strategic Development Plans, but the Welsh Government's consultation on the National Development Framework does not reveal whether additional resources will be available for local authorities to prepare those Strategic Development Plans.”



**Draft Response to be sent on behalf on the NWEAB:**

The North Wales Economic Ambition Board thanks Welsh Government for providing the opportunity to comment on the draft National Development Framework. The following matters have been raised by the NWEAB in relation to the NDF:

The NWEAB is concerned that the NDF does not accurately reflect the Board's spatial vision for growth in the region. In particular, the NDF places undue onus on the extent of economic growth which should be planned for in North East Wales, whilst making little provision for growth in the remainder of the region. This is contrary to the NWEAB adopted Economic Ambition Strategy and the emerging Growth Deal with UK Government and Welsh Government, which seeks a more even distribution of growth across the region, recognising the diversity of the region and the significant rural area, which requires sustainable growth for its communities.

The NDF should be more explicit in where the evidence to support its policies and strategy can be found.

1. Clarity needs to be provided in relation to the derivation of the housing projection figures for North Wales and how these are intended to be used in Strategic and Local Development Plans in the future. In addition, WG should clarify how it expects that the ambition of providing 51% of all homes as affordable within the next five years will be achieved. We believe such a figure is not viable if it is to be achieved via the planning process i.e. such a requirement will stifle/prevent much development throughout the region.
2. WG should provide immediate clarity on what weight should be placed on the emerging NDF prior to its adoption for Local Planning Authorities in their development management decisions and policy making.
3. The NDF should acknowledge and reflect the influence of the emerging Regional Economic Strategies and ensure that both documents are complimentary and consistent with each other. Of particular concern is a lack of recognition of our own Economic Ambition Strategy and emerging Growth Deal.
4. WG should provide greater clarity on the role that the extensive rural areas and the communities that serve those rural areas (e.g. the towns and villages) of North Wales, including AONBs and the Snowdonia National Park, should play in meeting the objectives of the NDF.
5. The NDF should make specific reference to the role that Holyhead should play as a Regional Growth Centre since it is the gateway which connects North Wales with Ireland and is of key importance to servicing the region and UK as a whole.
6. WG should clarify within the NDF the role that the nuclear industry should play in meeting the future energy demands of Wales and the extent to which facilities within North Wales will supply the nation. With WG having declared a climate emergency, the need for more low carbon energy has increased and the role that nuclear may play in meeting that need should be re-visited and made clear.
7. The NDF should provide greater clarity on how the Welsh language will be protected, strengthened and developed within the North Wales region.

8. Whilst the NDF's support for the managed growth of the region's coastal towns is noted, the NDF should acknowledge and address the constraints to development which already exist in those settlements e.g. the risk of coastal/alluvial flooding, or the lack of essential infrastructure both physical and digital. Clearer definition of what is a "coastal town" is required as some of our potential growth areas in the region are not "on" the coast but are close to it.
9. The NWEAB acknowledges the role that renewable technologies can play in meeting the nation's energy needs, but the approach of the NDF on this matter and the promotion of Wind and Solar Priority Areas should be further refined. The NDF should reflect and acknowledge the impact that renewable energy development can have on sensitive landscapes (e.g. National parks and AONBs) even when it is located outside those areas. Greater clarity and further refinement of the Priority Areas should be undertaken prior to the NDF being adopted as it is felt that, in North Wales, the Areas are too extensive.
10. The NDF should clarify what new or reinforced grid infrastructure is needed to bring forward renewable developments within the Priority Areas identified.
11. Whilst the NDF acknowledges that strategic North - South transport links are a constraint on growth, it does not make proposals in relation to how and when these should be improved. This should be addressed in the final version of the NDF.
12. Similarly, the NDF should make reference to strategic transport projects (e.g. the 3<sup>rd</sup> Menai crossing and the North Wales Metro) and how they can ensure that transport along the North Wales corridor (from Wrexham to Holyhead) is effective and provides access to jobs, services and facilities whilst promoting better connections throughout and along that region.
13. The NDF should make a clear statement on how general infrastructure requirements will be provided/funded over the next 20 years and beyond in order to support growth e.g. how will sufficient infrastructure such as roads, water, electric gas, digital, electric charging infrastructure, schools of a sufficient size and standard, hospitals, doctor surgeries, dental practices etc. be funded.

WG should consider the above comments from the NWEAB and reflect them in the final version of the National Development Framework. The NWEAB would be happy to clarify any of the above comments with WG, if necessary.