

## CONSULTATION RESPONSE FORM

### National Development Framework: Issues, Options and Preferred Option

This consultation seeks your views on the emerging National Development Framework (NDF). The NDF will not be published in draft form until 2019 but the issues it should address, the Vision, the objectives and the Preferred Option for achieving these are set out in this consultation. These will shape how the NDF is prepared.

If you have any queries on this consultation, please email: [ndf@gov.wales](mailto:ndf@gov.wales) or telephone 0300 025 3261.

#### Data Protection

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing. .

Names or addresses we redact might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Your data will be kept for no more than three years.

Under the data protection legislation, you have the right:

- to access the personal data the Welsh Government holds on you;
- to require us to rectify inaccuracies in that data

- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

The contact details for the Information Commissioner's Office are:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 01625 545 745 or 0303 123 1113

Website: [www.ico.gov.uk](http://www.ico.gov.uk)

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer:  
Welsh Government  
Cathays Park  
CARDIFF  
CF10 3NQ

Email: [Data.ProtectionOfficer@gov.wales](mailto:Data.ProtectionOfficer@gov.wales)

## CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option		
Date:		
<b>Name</b>	Angela Loftus, Strategic Planning & Housing Manager	
<b>Organisation</b>	Denbighshire County Council	
<b>Preferred contact details</b> <b>(Email address, phone number or address)</b>	PO Box 62 Ruthin LL15 9AZ 01824 706916 planningpolicy@denbighshire.gov.uk	
<b>Type</b> <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other groups not listed above	<input type="checkbox"/>
	Responding in a private capacity	<input type="checkbox"/>

**We would like give stakeholders every opportunity to contribute to the preparation of the National Development Framework. To assist us with arranging engagement events, publicising consultations and keeping you up to date with progress on the NDF through our newsletter, we would like to include your contact details on our database.**

**Your details will not be used by us for any other purpose, and they will not be shared with any other organisation.**

**Tick the box, right, to OPT IN and be included on our engagement database, receive details of future engagement events and consultations, and receive the NDF newsletter by email**

<b>Q1a</b>	Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		
Support the methodology and the conclusions.		

<b>Q1b</b>	Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		

<b>Q2a</b>	Do you agree the NDF Vision is clear and, ambitious, yet realistic?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
The NDF Vision 2020 – 2040 is to help to deliver sustainable places and we welcome the specific reference to prosperous, distinctive and diversified regions.		

<b>Q2b</b>	Do you believe any changes to the NDF Vision are required? If so, what are they?	<b>X</b>
	<b>Yes</b>	<b>X</b>

<b>No</b>	
<b>Comments</b>	
Disagree with the word 'right' in the sentence " <i>directing development to the right places.....</i> " The sentence could be better worded as follows: " <i>...directing development to the <del>right</del> places which make the best use of resources, create and sustain accessibility, promote healthy communities, protect our environment now and for the future and support prosperity for all</i> "	

<b>Q3a</b>	Do you agree with the NDF Objectives?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Comments</b>		
The objectives provide clear strategic direction for the NDF.		

<b>Q3b</b>	Do you consider any additional objectives are required? If so, what are they?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		

<b>Q3c</b>	Do you consider any of the NDF Objectives should be amended or removed?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>

**Comments**

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**Q3d**

Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?

**X****Yes****No****X****Comments**

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**Q4a**

Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the Preferred Option?

**X****Agree****X****Neither Agree nor Disagree****Disagree****Comments**

The 'do nothing' approach (Option 5) suggest a *key assumption* that "*Housing would be viewed in isolation and not linked to wider objectives*" if the NDF did not proceed (page 82 - ISA). Agree that due to viability issues, the focus of development would continue to be on the urban areas, exacerbating current deprivation if a 'do nothing' approach is adopted, with regards to housing.

<b>Q4b</b>	Do you have any comments on the assessment of the options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		
Sufficiently thorough to proceed.		

<b>Q4c</b>	Are there further alternatives/options that should be considered for the strategic direction of the NDF?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		

<b>Q5a</b>	Do you agree with the NDF Preferred Option?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>X</b>
	<b>Disagree</b>	
<b>Comments</b>		
The Preferred Option themes are set out to match draft Planning Policy Wales themes, however we would question whether this is premature prior to the publication of the final version of the new Planning Policy Wales. Whilst we understand that the emerging NDF is at an early stage of development, it is also disappointing that there is not further detail provided, such as proposed levels and		

areas of growth. The spatial issues and proposed strategic policy directions are very broad and generic and it would be difficult to disagree with any of them.

<b>Q5b</b>	Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?	<b>X</b>
	<b>Yes</b>	
	<b>No</b>	<b>X</b>
<b>Comments</b>		

<b>Q5c</b>	Do you agree all the NDF Objectives are adequately addressed in the NDF Preferred Option?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>X</b>
	<b>Disagree</b>	
<b>Comments</b>		
<p>Overall, agree that the NDF Objectives are adequately addressed in the NDF Preferred Option strategic policy direction.</p> <p>However, we consider reliance on <u>new</u> development proposals to build resilience to environmental risks (Spatial Issue DN2) a potential weakness with regard to Objectives 1.2 (To enable management of and adaption to the consequences of climate change) and Objective 6.4 (To provide strategic direction to manage and adapt to the potential threat of flooding). There should also be acknowledgement of the wider environmental risks facing existing infrastructure, homes and services of Wales.</p>		



<b>Q5d</b>	Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Comments</b>		

<b>Q5e</b>	Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Comments</b>		
Agree that it is appropriate for the NDF and Planning Policy Wales to adopt similar structures and that these themes would most likely follow through to the strategic and local plans too.		

<b>Q5f</b>	The NDF Option is developed around 5 themes, reflecting the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; Wales' Regions. Do you agree with this approach?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>X</b>
	<b>Disagree</b>	
<b>Comments</b>		

Agree that it is appropriate for the NDF Preferred Option to reflect the 4 themes of Sustainable Places in draft Planning Policy Wales (Edition 10). The 5th theme, Wales' Regions, is not a theme in draft PPW. We consider the 5<sup>th</sup> theme relevant to the NDF as a national spatial document and welcome the recognition of the importance of supporting the delivery of strong, resilient and distinctive regions. However, we have concerns regarding the proposed regional apportionment of housing numbers as noted in Strategic Policy Direction AS2, AS3 and R2.

<b>Q5g</b>	Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>X</b>

**Comments**

We have concerns regarding the proposed regional apportionment of housing numbers as it will be impossible to reflect true local engagement at the Local Development Plan stage. There is a clear risk that housing numbers will be imposed on local authorities and will not reflect local circumstances. The document refers to 'policy based' projections but there is no explanation as to what this means.

There is no clarity on the mechanisms for local authorities to engage with Welsh Government to discuss and influence these figures, outside the formal consultation on the draft NDF in July – September 2019 or how regional projections would be apportioned between authorities.

Also, the timetable for the delivery of the NDF is out of sync with the Delivery Agreement for the Denbighshire Replacement Local Development Plan. Pre-Deposit consultation on the Local Development Plan document is expected in April 2019 – May 2019, two months before the consultation on the draft final NDF. Housing projections are fundamental to the development of the LDP Strategy and the level and location of allocations for new development. There is a significant risk that the late imposition of projections during the development of Denbighshire's Replacement LDP through the NDF will delay work on the LDP.

<b>Q5h</b>	Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in <i>Prosperity for All: the national strategy</i> ?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	

#### Comments

The priority areas in the '*Prosperity for all*' document are; Early Childhood Years; Housing; Social Care; Mental Health; Skills and Employability. We consider that the NDF Preferred Strategy offers a basis for co-ordinated delivery by Welsh Government and partners.

<b>Q5i</b>	Do you agree the NDF Preferred Option could be formulated or changed so as to have 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?	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	

#### Comments

Care needs to be expressed that the increase in housing numbers beyond local demand could have a negative impact on language and services.

<b>Q6a</b>	Do you agree with the proposed changes to the Statement of Public Participation?	<b>X</b>
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	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Comments</b>		
It is not obvious what the changes are, but we have no objection to the Statement of Public Participation.		

<b>Q6b</b>	Are there any other changes we should make to the Statement of Public Participation?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>X</b>
	<b>Disagree</b>	
<b>Comments</b>		
No changes proposed.		

### How to respond

Please submit your comments by **23 July 2018**, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to:  <a href="mailto:ndf@gov.wales">ndf@gov.wales</a></p> <p>[Please include <b>Preferred Option consultation</b> in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>National Development Framework Team          Planning Policy Branch          Planning Directorate          Welsh Government          Cathays Park          Cardiff          CF10 3NQ</p>

Additional information
<p>If you have any queries about this consultation, please:</p> <p>Email: <a href="mailto:ndf@gov.wales">ndf@gov.wales</a></p> <p>Telephone: 0300 025 3261</p>