

Consultation Response Form

Your name	Lead Member for Planning, Public Protection and Safer Communities at Denbighshire County Council
Your address	PO Box 62 Ruthin LL15 9AZ
Preferred contact details (email/phone/post)	Planning & Public Protection Services Phone: 01824 706916 Email: planningpolicy@denbighshire.gov.uk
<u>Organisation (if applicable)</u>	Denbighshire County Council

1. NDF Outcomes (chapter 3)

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The 11 Outcomes reflect Welsh Government (WG) policy set out in many strategies and plans. There is however no information on how WG intends to monitor progress towards achieving any of them; i.e. the NDF Monitoring Framework is missing.

2. 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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

National policy on supporting urban centres and town centre regeneration is generally welcomed but could also be included in Planning Policy Wales.

Considering the fact that SDPs and LDPs are produced by Local Planning Authorities (LPAs) and not Welsh Government, policy wording suggest greater freedom for LPAs in planning for rural areas. Nevertheless, the NDF sets policy on Energy Priority Areas, Nature Conservation, National Parks and AONBs etc., which are all outside any urban centres or highly populated agglomerations.

3. 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>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The delivery of Affordable Homes is generally welcomed to address identified need. It must however be kept in mind that local (planning) authorities heavily rely on Welsh Government support to fund the delivery.

Clarification is necessary with regard to the statistical information, which is used in the supportive text. Do the figures refer to the identified housing need and are they to be understood as a policy requirement? Moreover, should the housing need figures to be included in the document at all because they neither encompass the entire Plan period 2020 – 2040 nor will they be up-to-date when the NDF gets published?

4. 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>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Comment

Whilst the thrust of policy is acceptable, Welsh Government has not provided any

details on location / boundaries / extend of individual Mobile Action Zones. Having none in place at the date of publication renders the policy superfluous. Policy delivery strongly depends on private mobile infrastructure providers to deliver necessary infrastructure.

Potential grid infrastructure improvements should be mapped in conjunction with mobile action zones and implementation of both should be streamlined to mitigate incompatibility, restrictions and constraints.

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5. 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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?

Changing the Building Regulations or introducing legislation to impose a statutory requirement on developers to:-

- Liaise with the national grid providers so that any new development incorporates sufficient electricity infrastructure including a sufficient level of voltage.
- The level of infrastructure and voltage can be defined for specific developments but should be considered at the outset rather than as an afterthought.
- If there is an insufficient level of voltage supply to new developments i.e. 80 kV, electric charging points cannot be utilised even if they are provided as they require 100 kV.
- Install electric vehicle charging points on new developments.
- The scale, number and accessibility of such charging points could be defined for specific developments.

Design guidance is insufficient to force developers to take this step. The imposition of conditions by local planning authorities cannot overcome the hurdle of sufficient voltage being provided to sites.

6. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. 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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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?

Policy 8 – Is policy limited to Green Barriers as identified for individual regions? Otherwise it would be beneficial to share information on identified sites with local planning authorities that are currently in the process of reviewing their LDPs.

Statutory intervention through amending the Building Regulations or introducing new legislation is the only means of ensuring that non-renewable energy developers comply with incorporating low carbon initiatives and renewable energy. The requirement of a 20% profit margin for development results in viability arguments being introduced where there is no imposed duty. This limits the abilities of planning authorities to deliver policy 14 and 15.

Comments on Policies 10 – 15

- Priority Area maps should be displayed on an OS base map with the local authority areas shown so that the locations and jurisdictions can be identified. At least with the maps used for the strategic search areas (SSAs) in TAN 8 this was possible.
- Please clarify within the NDF that the Priority Areas will replace the SSAs and the SSAs will no longer be utilised.
- AONBs are not shown on Map 2 – Environmental Designations – it is believed it would be wise to demonstrate the location of AONBs for clarity.
- Policy 10, in reference to applications demonstrating “localbenefits have been maximised” – can this definition be refined or can it be clarified that applications will be required to comply with the definitions or policies on “local” and “local benefits” set out in Local Development Plans or SPGs.
- Policy 11 – “no unacceptable adverse effects” – is this being defined or again can reference be made to Local Development Plans, SPGs in order to

seek clarity?

- vi. Policy 12 – Can LPAs define buffer areas around AONBs or National Parks or is “close to” being defined?
- vii. Policies 10, 11 and 13 should include significant deforestation as an unacceptable adverse effect particularly given Policy 9 in respect of the National Forest.
- viii. Policy 15 – district heat network in mixed use developments – does this exclude single use developments? There is potential in large residential sites and these appear to have been excluded.

8. 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

9. North Wales (policies 17-22)

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>
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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10. Mid and South West Wales (policies 23-26)

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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11. South East Wales (policies 27-33)

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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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.

Welsh Government charged Cardiff University with conducting research into the potential number of Welsh regions: 'Identification of Regional Areas for the National Development Framework - Final Report to Welsh Government'.

The recommendation was 'Four regions are ultimately proposed (Figure 20)' (Paragraph 9.4) and 'Based on this research, it is difficult to justify such a large Central Wales region as identified in the WSP, particularly to the North and South. As previously noted, the connection between Ceredigion and Powys is not consistently strong. Pembrokeshire as a separate region would also be difficult to justify, as no regional maps produced for this research and only one sub-regional map suggest Pembrokeshire as a separate region.' (Paragraph 10.3) Neither of these research recommendations has been carried forward into the draft NDF. This suggest that political considerations outweigh (scientific) research / credible evidence.

The principle of regional development in Wales, including the introduction of Strategic Development Plans (SDPs), is welcomed and supported. There is however a strong objection to making the production of SDPs mandatory for every Local Planning Authority. It should be for Denbighshire County Council and its neighbouring local authorities to decide whether, how, and what matters are part of the regional plan. Will Welsh Government provide additional funding to support the production of SDPs?

The introduction makes reference to the Welsh National Marine Plan and further reference should be noted in respect of the policies where competing priorities or

interests arise, particularly Policies 17, 18, 20 and 22.

Policy 22 - Denbighshire is noted as having an important role in providing limestone in the NDF. It should be noted that the only active limestone quarry situated outside of the AONB is in Denbigh. All other active quarries are within the AONB, adjacent to SSSIs and confined to an area to the south of Mold at Eryrys, Llanarmon yn Ial and Maeshafn. A significant amount of the limestone resource within Denbighshire is within the AONB and therefore increased extraction without impact on the AONB is not possible.

Policy 18 identifies the coastal arc from Caernafon to Deeside as the focus for managed growth; including Rhyl and Prestatyn. How does this approach align with Welsh Government and Natural Resources Wales policy on directing development away from areas of flood risk?

12. Integrated Sustainability Appraisal

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.

n/a

13. Habitats Regulations Assessment

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?

n/a

14. Welsh Language

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 favorably than English.

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

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.

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?

Welsh Government is committed to review the NDF every 5 years. The draft NDF does however does not contain any information on Monitoring – Indicators, Triggers, Review actions.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>
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