

From: [Karen Powell](#) on behalf of [Christopher Bithell](#)
To: [NDF](#)
Cc: [Andy Roberts](#)
Subject: WG Consultation to the National Development Framework
Date: 12 November 2019 15:20:32
Attachments: [image001.png](#)
[NDF Comments Letter.pdf](#)
[NDF Flintshire CC Response to NDF consultation.pdf](#)

Please find attached covering letter and Flintshire County Council's response to the consultation.

Regards,

Councillor Chris Bithell

Cabinet Member for Planning and Public Protection | Aelod Cabinet Cynllunio a Gwarchod y Cyhoedd |

Flintshire County Council | Cyngor Sir y Fflint

<http://www.flintshire.gov.uk> | <http://www.siryfflint.gov.uk>



We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.

Opinions advice, conclusions and other information in this

message that do not relate to the official business of

Flintshire County Council shall be understood as neither

given nor endorsed by it or on its behalf, and consequently

Flintshire County Council shall bear no responsibility

whatsoever in respect thereof.

Rydym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn ddi-oed i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.

Deellir na fydd unrhyw safbwyntiau, na chynghorion, na

chasgliadau nac unrhyw wybodaeth arall yn y neges hon,

nad ydynt yn berthnasol i waith swyddogol

Cyngor Sir y Fflint, yn cael eu cynnig na'u cadarnhau ganddo

nac ar ei ran, ac felly ni fydd Cyngor Sir y Fflint yn derbyn

unrhyw gyfrifoldeb am y rhannau hynny o'r neges.

From: Councillor Christopher Bithell

Oddi wrth: Y Cyngorydd Christopher Bithell



NDF Team
Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: ndf@gov.wales

Your Ref/Eich Cyf

Our Ref/Ein Cyf

Date/Dyddiad

Ask for/Gofynner am

Direct Dial/Rhif Union

CB/AR/KP

12 November 2019

Cllr Chris Bithell

[REDACTED]

To whom it concerns

RE: Flintshire County Council's response to the Welsh Government consultation relating to the National Development Framework (NDF)

Please find attached the response of Flintshire County Council to the consultation relating to the NDF. This response has been endorsed by the Council's Planning Strategy Group which I chair, and I hope you find the comments both useful and constructive. I would appreciate it if you would confirm receipt of these comments.

Yours faithfully

[REDACTED]

Cllr Chris Bithell
Cabinet Member for Planning & Public Protection

County Hall, Mold. CH7 6ND
www.flintshire.gov.uk
Neuadd y Sir, Yr Wyddgrug. CH7 6ND
www.sirfflint.gov.uk



The Council welcomes correspondence in Welsh or English
Mae'r Cyngor yn croesawu gohebiaeth yn y Gymraeg neu'r Saesneg

Flintshire County Council's response to the welsh Government consultation on the National Development Framework
Friday 8th November 2019

General comments on the purpose and format of the NDF

At the outset Welsh Government should be congratulated for the speed within which the NDF has been produced, its succinct style and the speed by which they 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.

Given the lack of development of Strategic Development Plans in Wales to date, the NDF is an opportunity for Welsh Government to provide 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.

Given the brevity of the published NDF, it is initially 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.

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 initially in Scotland and now applied to Wales. Initially these figures appear very low and unambitious, contradicting several other policy areas of the NDF promoting growth areas and economic prosperity. This has already caused issues for emerging LDPs and those under review, as the status and difference between these figures and the requirements in LDPs is not explained. Local Authorities are still working under the Ministerial guidance given in 2014 relating to the need to build more homes in Wales and that they should also be more ambitious than the recession trend influenced Welsh Government projections of household growth, the same trends that are still prevalent in the latest Welsh Government projections.

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. This does not just mean the physical or digital or electric charging infrastructure to accommodate growth, but also relates to the key social infrastructure needed at the local level to help deliver growth e.g. properly

resourced schools of a sufficient size and standard, and health care facilities to meet the needs of a growing population.

Comments relating to the NDF Spatial Strategy

The NDF fails to take the opportunity not only provide guidance to the development plan levels below the NDF (SDP and LDP) but also misses the chance to connect with clear regional growth visions and agendas. 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.

In a North Wales context, there also appears to be a conflict between recognition of the work that has been underway for some time in defining a 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? If one takes a strict reference to Deeside, this might be interpreted as large areas of former heavy industry land in the flood plain? 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 such low levels of housing need identified for North Wales in the NDF, is this mainly to be provided in Deeside and Wrexham, 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 - a moratorium on housing development? Are these matters which will have to await for an adopted Strategic Development Plan to be in place.
- 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 vision, given that once defined Green Belts have a long term degree of permanence by definition?

Comments on the specific NDF policies

Policy 1 – Sustainable Urban Growth

“Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density

and mixed use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.”

General Comments/Concerns

Flintshire’s LDP spatial strategy and allocation of growth between strategic sites with good connectivity and smaller sustainable development sites strikes the right balance to achieve the broad aims of Policy 1. The aims of this policy should also be taken into account by Welsh Government in the ongoing review of TAN1 as the previous trend of incrementally allowing speculative sites, often on appeal, has caused harm to communities particularly as Inspectors are charged with just looking at the proposal before them and do not seem to take account of either the sustainability of growth which is the aim of the policy, or the cumulative impact where other development or appeal decisions have already been permitted.

Policy 2 – Supporting urban centres

“Proposals for new public service facilities of a significant scale should be located in town and city centres. A sequential approach must be used to assess development plan allocations and to determine planning applications for developments. Only in exceptional circumstances should public service facilities of a significant scale be approved outside of town and city centres.”

General Comments/Concerns

Given the nature of Flintshire’s settlements it is challenging to identify sites within those settlements for such public investment projects to be located. The LDP has a sufficiently flexible policy approach to identifying and considering such development options as and when they arise.

Policy 3 – Public Investment, Public Buildings and Publicly Owned Land

“Welsh Government investments and land holdings will support the delivery of sustainable places. We will work with all public land owners and investors to ensure that new development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport. Strategic and Local Development Plans should review publicly owned land, both redundant and in current use, to identify potential sites for development and re-development, including for mixed use and affordable housing developments that will support the creation of sustainable places.”

General Comments/Concerns

The Council is also progressing its Strategic Housing and Regeneration Programme (SHARP) whose intention is to deliver 500 affordable homes on Council owned sites across the County. Substantial progress has been made in achieving this target. Whilst the intention to use public land (including Welsh Government) is supported, it must come forward in a timely manner to avoid frustrations in communities.

Policy 4 – Supporting Rural Communities

“The Welsh Government supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. The future for rural areas are best planned at the regional and local level. Strategic and Local Development Plans should plan positively to meet the needs of rural communities with regard to housing, transport, businesses, services and diversification in the agricultural sector.”

General Comments/Concerns

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, and post offices) 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 is a naive expectation. 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.

Policy 5 – Delivering Affordable Homes

“The Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. Strategic and Local Development Plans should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, they should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”

General Comments/Concerns

Whilst the principle of providing more affordable homes via the planning system is supported, Welsh Government fails to recognise that this is not the only source of affordable housing, or in relative terms 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 own SHARP programme. 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; if this is ‘new’ money; or how and when this will be provided. 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 Council’s deposit 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. The Council’s viability study shows, for

example, that if the Council were to have a policy requiring up to 50% affordable housing on its LDP allocations, this would not be viable on any of the allocations.

Policy 6 – Planning in Mobile Action Zones

“In Mobile Action Zones, local planning authorities and telecommunications operators will work together to increase mobile coverage collaboratively by identifying suitable sites and buildings for new equipment and infrastructure. Considerable weight will be given to the need to increase mobile phone coverage, along with its associated economic benefits. Accordingly, there is a presumption in favour for new mobile telecommunications infrastructure, provided that there are no significant adverse landscape impacts.”

General Comments/Concerns

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 AONB.

Policy 7 – Ultra Low Emission Vehicles

“The Welsh Government supports the increasing use of ultra-low emission vehicles. We will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.”

General Comments/Concerns

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 time frame 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?

Policy 8 – strategic framework for biodiversity enhancement and ecosystem resilience

“To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify:

- areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key*

mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.

Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.”

General Comments/concerns

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.

Policy 9 – National Forest

The Welsh Government is committed to developing a national forest, and will identify appropriate delivery sites and mechanisms to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.

General Comments/Concerns

The primary concern with this policy is the uncertainty about the ability of Welsh Government to deliver this, something that is a key test of policies in LDPs. This coupled with the lack of even indicative areas for the national forest, the rationale behind 2,000 hectares, or potential conflicts with areas that may also be suitable for renewable energy technology add to the uncertainty.

NB: Renewable Energy Policies 10-13 are considered together

Policy 10 – Wind and Solar Energy in Priority Areas

The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change.

When determining planning applications for large scale on-shore wind and solar energy development in Priority Areas, significant weight will be given to the proposal's contribution to reducing Wales' greenhouse gas emissions and meeting our decarbonisation and renewable energy targets.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been minimised:

- *landscape and visual impacts;*
- *cumulative impacts;*
- *the setting of National Parks and Areas of Outstanding Natural Beauty;*
- *visual dominance, shadow flicker, reflected light or noise impacts;*
- *electromagnetic disturbance to existing communications systems; and*

- *the following identified protected assets:*
 - *archaeological, architectural or historic assets;*
 - *nature conservation sites and species;*
 - *natural resources or reserves.*

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.

Policy 11 – Wind and Solar Energy Outside of Priority Areas

Outside of the Priority Areas for Solar and Wind, planning applications for large scale wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:

- *landscape and visual impacts;*
- *cumulative impacts;*
- *the setting of National Parks and Areas of Outstanding Natural Beauty;*
- *visual dominance, shadow flicker, reflected light or noise impacts;*
- *electromagnetic disturbance to existing communications systems; and*
- *the following identified protected assets:*
 - *archaeological, architectural or historic assets;*
 - *nature conservation sites and species;*
 - *natural resources or reserves.*

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.

Policy 12 – Wind and Solar energy in National Parks and Areas of Outstanding Natural Beauty

Large scale on-shore wind and solar energy development is not acceptable within National Parks and Areas of Outstanding Natural Beauty.

Policy 13 – Other Renewable Energy Developments

Proposals for other large scale renewable energy generation will be determined in accordance with the criteria of policy P11.

General Comments/concerns

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 AONB. 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.

NB: Policies 14 and 15 on District Heat Networks are considered together.

Policy 14 – Priority Areas for District Heat Networks

Within Priority Areas for District Heat Networks, planning authorities should identify opportunities for District Heat Networks and ensure they are integrated within new and existing development.

Policy 15 Masterplanning for District Heat Networks

Large scale mixed used development should, where feasible, have a District Heat Network. Planning applications for such development should prepare an Energy Masterplan to establish whether a District Heat Network is the most effective energy supply option and, for feasible projects, a plan for its implementation.

General Comments/Concerns

The assumption from the Priority Areas Map is that the opportunity for a heat network in Flintshire relates to the Energy from Waste at Parc Adfer on Deeside Industrial Park currently being commissioned. Whilst the potential to supply the nearby mixed use development site at Northern Gateway with the residual heat that this plant will generate is being explored, it is unclear who and how will be responsible for developing the infrastructure required to develop such a heat network if feasible, or indeed to retro-fit a network to the existing businesses on the nearby Deeside Industrial Park if again feasible.

The Regions

Policy 17 – Wrexham and Deeside

The Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. Wrexham and Deeside’s role within the North region and the wider cross-border areas of Cheshire West and Chester and Liverpool City Region should be maintained and enhanced.

Strategic and Local Development Plans across the region should recognise Wrexham and Deeside as the focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Wrexham and Deeside’s regional role.

The Welsh Government will work with cross border authorities to promote Wrexham and Deeside's strategic role and ensure key investment decisions support Wrexham and Deeside and the wider region.

General Comments/Concerns

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 region will be. This does not help to set any context or guidance for the development of a Strategic Development Plan 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 North Wales Economic Ambition Board to share growth across the region.

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 National Development Framework 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). 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.

There is also little reference to the role or potential for the Port of Mostyn despite its appearance on the regional map, which is in contrast to Holyhead which has a specific policy to identify its potential.

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.

Policy 18 – North Wales Coastal Settlements

The Welsh Government supports the built up coastal arc from Caernarfon to Deeside as the focus for managed growth, reflecting this area's important sub-regional role supporting the primary growth area of Wrexham and Deeside.

Strategic and Local Development Plans across the region should recognise the role of this corridor as a focus for housing, employment and key services.

General Comments/Concerns

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. 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.

Policy 19 – Green Belts in North Wales

The Welsh Government supports the role of Strategic Development Plans identifying and establishing green belts to manage urban form and growth in North Wales, particularly around Wrexham and Deeside.

The Strategic Development Plan should consider the relationship of any new green belts with the green belt in Cheshire West and Chester.

General Comments/Concerns

It is unclear why the Welsh Government 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 region 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.

Policy 21 – Transport Links to North West England

The Welsh Government will work with local and regional authorities in North Wales and North West England to ensure transport investments, including in the North Wales Metro, strengthen cross-border transport links.

Strategic and Local Development Plans should support improved transport links between North Wales, Chester, Liverpool and Manchester and plan growth to maximise the potential opportunities arising from better regional connectivity.

General Comments/Concerns

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, (which is important given Flintshire's location), it is not clear what priority is given to improving north-south links with Wales.