

Consultation Response Form

Your name	Emyr Davies & Jane Carpenter
Your address	Redrow Homes (South Wales) Ltd Redrow House Copse Walk Cardiff Gate Business Park Cardiff CF23 8RH
Preferred contact details (email/phone/post)	<div></div> <div></div>
<u>Organisation (if applicable)</u>	Redrow Homes (South Wales) Ltd

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 outcomes are considered to be high level political statements rather than planning based. They are not presented in a robust manner that would be expected within a national planning framework document. The outcomes relate to matters beyond the planning system.

For an outcome in the NDF (the highest level of the Development Plan hierarchy) to be appropriate it must be demonstrated to be realistically achievable, and not just an aspiration. There is no evidence base to the Draft NDF to support the outcomes set and so they are not demonstrated to be 'viable and deliverable'. This being something that the Welsh Government has been advising is essential, and Redrow agrees with, but does not appear to be the case with the NDF. The development plan which the lower tiers being the SDPs, and LDPs will have to adhere to. If the National level planning framework is not sound then how would the SDPs and LDPs meet the tests of soundness which they are bound to do.

A significant issue with the outcomes is that some support growth and others seek protection and enhancement of the natural resources and environment. The planning system must maintain to be a process of weighing up all matters and reaching a balanced judgement on a site by site, location by location, region by region basis. The SDPs and LDPs will ultimately consider the detail but they must both conform with the NDF which will have development plan status.

The 11 outcomes have avoided addressing two planning topics that have direct impacts on the future Welsh economy and should not be ignored by the NDF. These being what outcomes are required to address the severe congestion on the M4 around Newport and the housing crisis across the nation.

A decision not to progress the M4 relief road has been made. The congestion, which is worsening, around Newport is already having a significant impact on business investment in SE Wales. The area east of Newport to the Severn crossings and within the middle of the Great Western Powerhouse (Cardiff, Newport and Bristol) that could reap reward from strategic position with good existing infrastructure is suggested to be sterilised from development for 50 plus years by indication of a green belt designation in the Draft NDF.

There is a recognised housing crisis in Wales. The Welsh Government supports (Cabinet Secretary for Environment and Rural Affairs Letter to Heads of Planning (February 2017) the building of more homes, the delivery of 20,000 affordable homes over the Assembly term and delivery new homes (private and affordable) is one of the highest priorities to Government.

With the delivery of homes in Wales only back to two thirds of that prior to the recession it is surprising that the role of private housing building is not mentioned in the Draft NDF. The value of providing much needed new homes, affordable housing through cross subsidy, the associated infrastructure such as schools and leisure provision is something that the draft NDF should be giving considerable weight to. This is something being delivered at no cost to the public purse that should be supported further and not be limited.

The private house builders have delivered the majority of new homes in recent years despite raising for many years the lack of viable and deliverable housing land being provided through LDPs.

The Draft NDF it not considered to aspire to the growth and investment opportunities that Wales has to offer. It may actually limit the ambitions already set out such as City Deal.

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

No evidence has been provided with the draft NDF to show how these policies would be achieved (e.g. urban capacity studies). This cannot be left to the SDP as there is real risk that when the evidence base is obtained that the NDF policies, as drafted, would not be deliverable.

The NDF must adhere to Planning Policy Wales. PPW allows consideration of suitable and sustainable greenfield sites within or on the edge of settlements, alongside new settlements in the open countryside in exceptional circumstances (emphasis added). There is a requirement for a range and choice of sites to ensure that there is a deliverable supply of land. Indeed, there is a requirement for a range and choice of homes to be provided to meet the needs of all.

Notwithstanding that there is an inadequate supply of deliverable urban land in the identified growth areas higher density developments are not what people want or aspire to want. Whilst it is recognised that probably greater higher density development is required it is still important to recognise a range and choice of housing for different needs.

The Cardiff Capital Region Strategic Business Plan endorsed by the 10 LPAs in the region supported the principle of new settlements which would combine housing,

employment, education, community and leisure elements in a planned, sustainable development of significant scale. The NDF should acknowledge that such development and development on the periphery of settlements can also deliver sustainable development.

The introduction of the SAB regulations with cost not being a factor to not comply in the sequential approach to drainage solutions will likely cause greater difficulties for site delivery on higher density sites and more so for brownfield sites.

If compliance is achievable on a brownfield site on the sequential approach then it is likely to create significantly greater cost for drainage solutions than would have been the case prior to January 2019. The greater cost being likely to be the loss of developable land as more would be required to deal with the surface water drainage due to below ground constraints (e.g. capping following remediation). If brownfield viability is to be pushed further than before where sites haven't come forward for development, and with limited S106 packages and lower affordable housing provisions, how will development on brownfield land be grant funded to provide the requirements suggested in the Draft NDF.

In relation to Policy 2 it is suggested that there is not a blanket approach to public service facilities being located within town and city centre locations. This isn't defined but some of these facilities are regional facilities and so placing them in good transit locations out of the defined centres could be more appropriate and still be very sustainable. It could arguably create a more sustainable facility for those using it on a regional basis. It could also benefit from transport movement to in opposite directions at peak travelling times. This assisting in road traffic but also potentially making the rail service improved. This in the sense of freeing up space at commuter times but also supporting rail travel outside of purely commuting basis.

Policy 3 relates to bringing forward public land and is a clear political statement that should not be included in a planning framework. Land ownership is not a material planning consideration. All land must be considered on the same basis and the very essence of the planning system. This to guide development and bring land forward in the most sustainable way. Public land that does not rate as sustainably as a private land promotion cannot be favoured over the private land.

Notwithstanding comments above public land is often slow in coming forward for development due to land assembly and funding. How would the Welsh Government ensure that public land came forward the pace needed to deliver new homes? Even with public land being made available there is not enough sustainable and deliverable land to meet the requirements even over the early period of the NDF. Moreover with Council's already struggling with budgets to lose capital receipts from the land sales would be detrimental to the operational side of Council's. For example, it is known that some authorities use money from Council land sales to fund their school improvements. If the land is sold (or gifted) to allow for higher affordable housing provision where will the Council's gain money to offset this loss. A double blow in such scenario would be that the Council cannot generate money towards education and leisure provision from affordable housing under the CIL Regulations. The consequences of a significant lack of funding for school investment would be extremely difficult for a Council to manage and difficult to see how they

could.

Policy 4 relates to supporting rural communities and sets out that “appropriate proportionate growth” is acceptable. This is welcomed but it is not clear what “appropriate proportionate growth” is.

Chapter 2 of the draft NDF recognises that Wales is an ageing population and there will be one third more people aged 65 and over by 2038. This means that rural homes are being lived in longer and without new homes being provided younger families cannot live in those areas and are being forced out. Seemingly to the higher density urban areas as advocated by the draft NDF. The consequences being seen and likely to be exacerbated based on the thrust of the draft NDF and recent Raglan decision are that house prices in rural areas will significantly rise, local schools will be forced to shut due to inadequate numbers and local services (e.g. shops, buses) will fade away due to reduced population. Over 65s get a free bus pass so how would a dwindling bus provision stand chance of remaining operational. Failing to provide “appropriate proportionate growth” (which has to be meaningful housing release such as that proposed in Raglan) will make rural communities less sustainable. How is effectively not allowing rural communities the ability to maintain their way of life complying with the Well-Being of Future Generations Act? Greater housing release and new job opportunities are required quickly to serve rural areas to address the recognised issue of there being third more people aged 65 and over by 2038.

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 statistical release of the Estimates of Housing Need confirm that they “should not be used as housing targets”. PPW requires “appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area” when setting housing requirements. Producing figures in the NDF either needs to be based on robust needs assessment or the NDF must clarify that any figures are indicative and it is for the lower tier of development plans to produce figures based on the evidence gained at those times. It should be stipulated that any figures are not to be construed as targets.

Notwithstanding the comments above the draft NDF states that 114,000 new homes are required up to 2038 and stating that 8,300 are required for the initial 5 years (2018/19 – 2022/23). The table on p.30 of the draft NDF shows that circa 6000 new homes have been provided per annum for the last 5 years (2014-2018). Of these new homes it appears that over 80% have been delivered as “private enterprise new dwellings”. On this basis the majority of affordable housing that has been delivered over the past 5 years has been via private developers and through section 106. It is agreed though that the delivery of homes over the past 5 years (still a third short of pre-recession) has not been enough and greater ‘deliverable’ land needs to be made available in a timely fashion. The measures to increase affordable housing delivery as advocated by the draft NDF should therefore be implemented in addition to the backing and increased contribution from private house building.

To see a graphical growth in housing delivery the land available to build the housing must be identified at least 2 years in advance due to the lead in times (land assembly, planning process, site preparation, infrastructure delivery and then into construction). There is already a significant lack of land available and hence the decline in housing delivery in Wales compared to the rest of the UK.

The draft NDF in Policy 5 states that the Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. It is not clear how this would be achieved.

The contribution of volume house builders is significant already, has the capacity to deliver more, and cannot be ignored. The house building industry set out during the first preparations of the LDPs of the importance for making sure sites are viable, deliverable and making sure a solid continuous supply of land is available across LAs for housing delivery. The impact of this having not happened is now evident by the graph shown on p.30 of the draft NDF. At a point in time when housing delivery needed to increase to meet identified need (i.e. the past 5 years) Wales has suffered in contrary to the rest of the UK despite the private sector and even RSLs asking for the planning system to be improved to allow improved delivery.

To increase housing delivery and meet the housing need for Wales the graph on p.30 of the draft NDF clearly shows that the volume house builders need to continue what they have had done and increase this further. The approach set out in the draft NDF with local authorities, RSLs and SMEs contributing more is required in addition to increased delivery by volume house builders to get to the appropriate growth levels required for Wales. Policy 5 should be revised and be relevant to all sectors of housing.

The draft NDF looks to project forward past trends to 2038. However, the immediate past trends (10 years) are not appropriate where the UK suffered an economic recession. This is apparent as shown in the table on p.30 of the draft NDF. The delivery levels of the 80s/90s/00s are wholly more appropriate. The draft NDF is considered to be lacking any aspiration for economic growth and/or increased prosperity.

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

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

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 checked="" type="checkbox"/>

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

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

Improved biodiversity and GI should be encouraged through all developments. It is questioned whether this is a matter for the NDF and is already covered appropriately within planning policy and then accordingly in site specific details (via SDPs, LDPs).

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 checked="" type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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?

Does WG have evidence to set out how a District Heat Network would be viable and at what scales. It is unlikely to be viable to consider a District Heat Network on most development proposals. It would clearly be at a significantly higher level than creation of 100 dwellings.

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

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

The draft NDF sets out that the focus of growth is to be Cardiff, Newport and the Valleys. It goes on to say that Cardiff will remain the primary settlement with its future strategic growth shaped around strong housing and employment markets. The draft NDF recognises the Metro as generating opportunities for development in settlements outside the city. This is essential for the metro. The metro needs to encourage development (employment and homes) at all lengths of its routes to encourage multi directional movement and/or less commuting movements (e.g. new settlement approach). Having all housing and/or all employment directly to a few areas will exacerbate existing pressures in relation to commuting movements being the same direction at the peak times. It will not be feasible to run a system like this. This is the very issue with the current system and many railway lines finishing in Cardiff. Destinations need to be provided throughout a Metro network to ensure that it can operate efficiently. New developments of scale would be an obvious way to bring through Metro ambitions via private development and funding.

Creating new opportunities for housing and employment between Newport and Bristol would appear prudent. The M4 tolls having been removed make this area attractive to buyers/investors from the higher values seen in the Bristol market. This attractiveness will remain regardless of whether new homes are provided in this area. Without new development the impact for local communities will be greater with locals being priced out further by existing housing stock being bought by those further afield and property prices increasing as they would still remain lower than the Bristol area. Developing this area would also be favoured over encouraging further traffic levels along the M4 and via the pinch point of the Brynglas Tunnels. South East Wales should be taking advantages of this opportunity to strengthen the SE Wales economy.

The draft NDF states that Newport has significant brownfield development opportunities and is keen to enhance Newport's status. It is not clear where this land is to meet the additional homes required. Is this evidenced anywhere? Newport has historically successfully delivered a brownfield strategy for its last two development plans but Newport is constrained by flood zones, the Gwent Levels, topography and an existing green belt (NB. This established green belt should be referenced in the draft NDF but was not) to the west. To have any chance of meeting the growth aspirations there would need to be significant greenfield release, especially more so than brownfield land that isn't apparent in any case, in Newport. Something that Newport itself recognises in its response to the Draft NDF.

Policy 30 requires the identification of green belts...particularly around Newport and the eastern part of the region (emphasis added). This is not appropriate and contrary to requirements in PPW for green belts only be considered when soundly based. Green Belts have a permanence of over 50 years. No evidence has been presented to indicate any justification for a green belt. In fact, the inspectors reviewing the LDPs in Cardiff and Monmouthshire found that the evidence that was presented for green belt proposals was not soundly based and in any event there were other suitable measures (e.g. settlement boundaries) to control development pressures. The NDF cannot pre-empt the evidence obtained as part of the SDP. The draft NDF even suggests that a green belt should be considered in relation to the green belt around Bristol. The emerging plans there are seeking to re-consider the green belt designation because of the constraint it has caused.

An indication for a green belt requirement as set out in the draft NDF would restrict the real opportunity for creating sustainable economic growth (new housing and employment) in the area between Newport and Bristol. The draft NDF should be recognising the loss of M4 tolls and close proximity of Bristol with higher prices to take advantage of and capitalise on the economic links between Cardiff, Newport and Bristol (The Great Western Cities). New development is required in this area so that local people are not priced out of the market.

The final paragraph on p.10 of the draft NDF sets out the role of each development plan. The NDF on a national scale, SDPs on a regional scale and LDPs on a local scale. Further to points raised in this response the matter of green belt designation would appear to be at most a regional matter for designation. And again, this would be appropriate as at LDP and SDP any proposal for a green belt designation would be evidenced.

It is considered that any reference to a green belt, except the one already established between Cardiff and Newport, within the NDF should be removed. The evidence base to be established with the SDPs can determine appropriately whether green belt protection is required. Should reference of green belts remain then the wording should be amended so that the SE Wales reference is amended to reflect that in North Wales and the green belt boundaries on the schematics should be removed.

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.

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?

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 favourably 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?

Having viewed the published representations to be submitted by the public sector for the draft NDF it is clear that both experienced public and private sector planning professionals are concerned with the proposed planning framework set out in the Draft NDF.

Redrow prides itself on developing new homes and communities to the highest standards. As a Welsh company Redrow would very much like to continue this and increase the delivery of new homes in Wales. It is important that all levels of the Welsh Planning System allow sufficient deliverable land and sites in sustainable locations to come forward in a timely fashion to enable much needed new homes (private and affordable) to be provided to cater for the needs of people living and

wanting to live in Wales. This is truly important for the prosperity and Wales and in the interests of the future generations in Wales.

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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