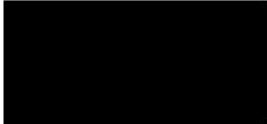


Consultation Response Form

Your name	Michael Davies
Your address	
Preferred contact details (email/phone/post)	mpdavies@savills.com
<u>Organisation (if applicable)</u>	Savills UK C/O Mrs E M Charlton's 1995 Settlement Trust

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:

Outcome 7 should be amended to state "in places where travel is sustainable and safe".

The safety aspect we are seeking relates to the provision of appropriate roadside services along key road infrastructure corridors.

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

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?

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?

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 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 enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

We agree with the proposal to increase the use of ultra-low emission vehicles and the implementation of electric vehicle charging infrastructure. As well as providing this infrastructure in new residential and employment developments, safe stopping points should be provided along strategic road corridors at roadside services / hotels to enable residents, goods vehicles and visitors alike to travel longer distances throughout Wales using electric 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"/>

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 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?

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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?

[illegible]

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

Policy 19: Green Belts in North Wales

We understand that Policy 19 aims to support the role of Strategic Development Plans by identifying and establishing Green Belts to manage urban form and growth in North Wales, particularly in the Wrexham and Deeside area. Whilst we support the careful management of urban form in North Wales, we **object** to this Policy on the basis that it fails to adequately distinguish the differences between 'Green Barrier' and 'Green Belt' designations and fails to provide clear guidance for dealing with both.

Our client owns land on the edge of Connah's Quay (**Appendix 1**), a settlement which is included within the Wrexham and Deeside National Growth Area and is located between the A548 and the A55. Given that proposals for the new A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement (**Appendix 3**) are expected to fundamentally change the surrounding land, much of it currently designated as Green Barrier, we consider that the National Development Framework should provide clear guidance on the application of Green Barriers and how they differ from Green Belt.

Due to the National Development Framework failing to provide clarity on the differences between Green Belt and Green Barrier, Flintshire County Council are likely to treat them as the same. Due to this, we consider that the function of Green Barrier land is being over emphasised and that appropriate developments within the region, which require land to be released from the Green Barrier, are being overlooked or restricted. Page 24 of the National Development Framework clearly states that the Wrexham and Deeside urban area is economically distinctive and that the National Development Framework intends to '*promote their continued growth and regeneration*'. Around Connah's Quay, where a significant new

strategic highway investment is planned, the designation of land as Green Barrier places a local level development restriction for the area when growth is being planned for the same area at a national level, creating an inconsistency (**see Appendix 2**). Furthermore, the National Development Framework document states that '*new, large scale employment opportunities and housing growth will occur predominantly, though not exclusively, in these urban areas*'. We support the aim of the National Development Framework to promote the Wrexham and Deeside region as a National Growth Area but are opposed to the lack of clarity that surrounds the importance of the Green Barrier designations within it.

It is our view that the distinction between Green Belt and Green Barrier designations should be clearer and allowances be made for appropriate development to come forward supporting economic growth where new infrastructure is being invested in. Clear guidance on the different roles to be played by Green Belt and Green Barriers should be provided. Currently there is no reference to Green Barriers in the National Development Framework and we consider it essential for this to change as presently the large swathes of Green Barrier land surrounding Connah's Quay restricts rather than promotes growth in the surrounding area, creating a conflict between national and local policy. Our proposal for clear guidance on the differences between Green Belt and Green Barrier land would help to remedy this conflict and help ensure that Strategic and Local Development Plans are in agreement with the National Development Framework.

Policy 20: Port of Holyhead

We understand that **Policy 20** (Port of Holyhead) outlines that the Welsh Government will work with port operators, local authorities and investors to support the development of the port and facilitate new investment in order to ensure that its strategic gateway role is maintained and enhanced. Furthermore, it states that investment to the port's capacity to accommodate cruise ships is supported. We **support** this policy as it recognises the importance of Holyhead Port within the region and its potential for future expansion. We encourage the Welsh Government's continued support of investment in the Port and the benefits this will bring to the North Wales region.

Policy 21: Transport Links to North West England

We understand Policy 21 (Transport Links to North West England) outlines that the Welsh Government will work with local and regional authorities in North Wales and North West England to ensure transport investments strengthen cross-border transport links. The A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement is one such example of how this strengthening of cross-border links will occur and is relevant to the Mrs EM Charlton's 1995 Settlement site due to the proposed 'red route' cutting through the north western edge of the site. We therefore **support** this policy and its objective to improve transport connections in North Wales.

(please see attached Appendices 1-3)

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.

No response

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?

No response

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?

N/A

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.

N/A

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?

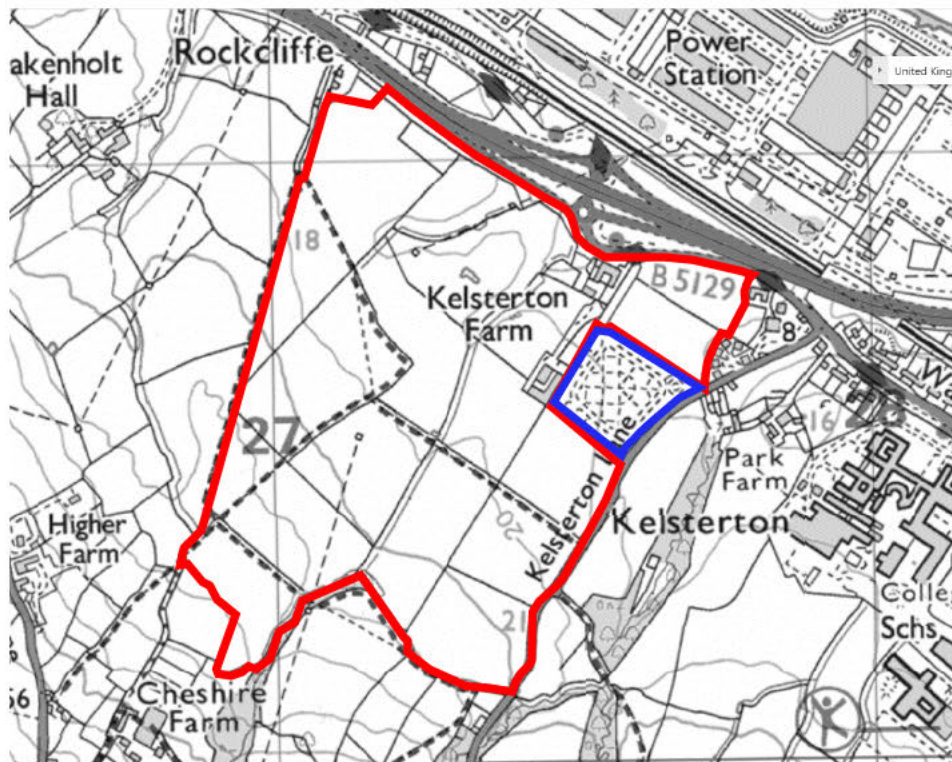
(please see attached Appendices 1-3)

16. Are you...?

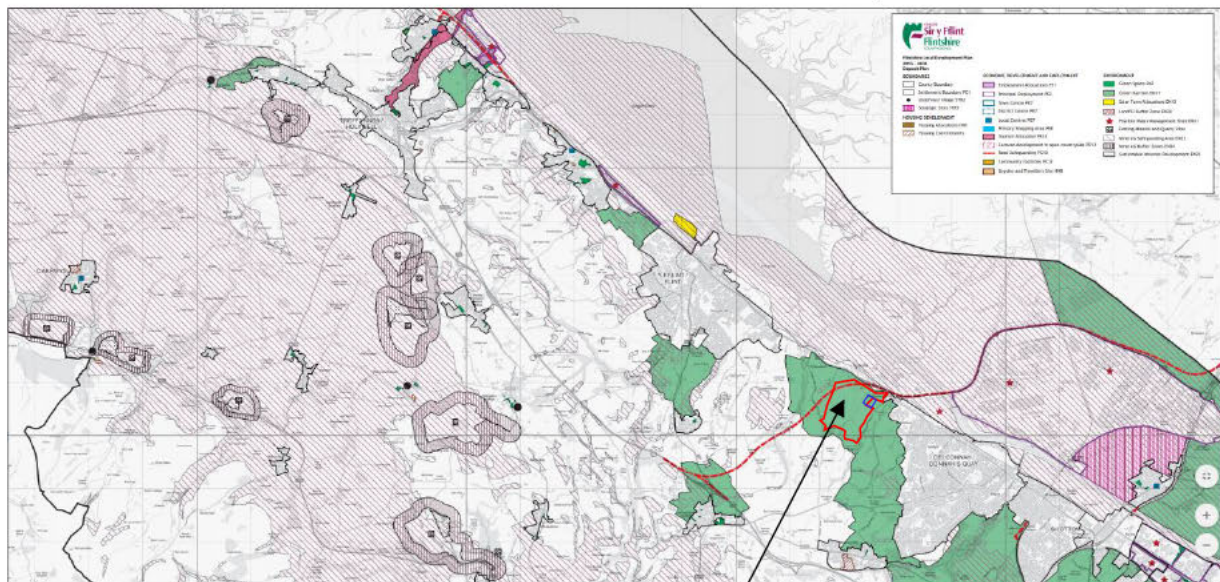
Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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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Appendix 1: Site Plan

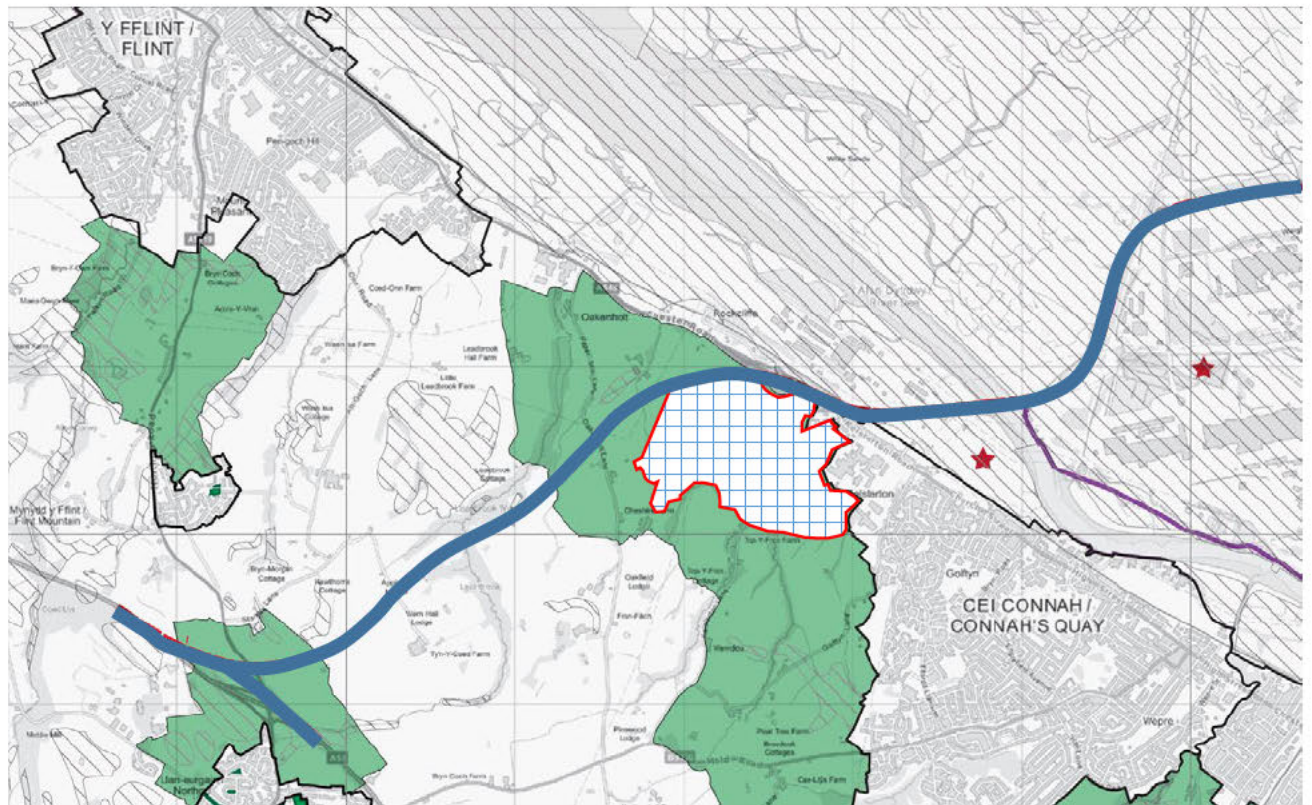


Appendix 2: Connah's Quay Proposals Map from Flintshire Deposit Plan



Mrs EM Charlton's 1995 Settlement

Appendix 3: Land sought to be removed from green barrier



Proposed land to be removed from green barrier



A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement