

ISLE OF ANGLESEY COUNTY COUNCIL

Scrutiny Report Template

Committee:	Partnership and Regeneration Scrutiny Committee
Date:	24 th October, 2019
Subject:	Isle of Anglesey County Council (IACC) Draft Response to Welsh Government's (WG) National Development Framework Consultation
Purpose of Report:	<p>The National Development Framework (NDF) will be the highest tier of planning policy in Wales and will be in place for the next twenty years (2020-2040).</p> <p>The IACC draft response considers the NDF against the Anglesey context to assess what the proposals would mean for the Island and its residents.</p>
Scrutiny Chair:	Cllr Gwilym Owen Jones
Portfolio Holder(s):	Cllr Richard Dew, Portfolio Member for Planning and Public Protection
Head of Service:	Dylan Williams
Report Author: Tel: Email:	Project Management Office (Dylan Ll. Jones) 01248 752497 DylanLlewelynJones@anglesey.gov.uk
Local Members:	All Members

1 - Recommendation/s

The Partnership and Regeneration Scrutiny Committee is requested to:

1. Submit comments to the Executive on the IACC's draft response to the Welsh Government's National Development Framework Consultation.
2. Recommend to the Executive Committee that the IACC's draft response to the Welsh Government's National Development Framework is approved.

2 – Link to Council Plan / Other Corporate Priorities

By responding to the Welsh Government National Development Framework consultation, it will provide the IACC with greater opportunity to meet the County Council's key ambition namely "working towards an Anglesey that is healthy, thriving and prosperous". The IACC will hope to influence the NDF to ensure that developments over the next 20 years are appropriate to the Island and that the infrastructure is in place for the benefit of its residents.

The response will endeavour to ensure that the people of Anglesey can thrive and realise their long-term potential by providing the basis for employment

opportunities through promoting the Island to attract major investment and development for economic growth and by working in collaboration across the North Wales region to improve connectivity to make Anglesey more accessible.

The IACC response will also promote the importance of the Welsh Language and culture, as Anglesey remains one of the strongholds of the Welsh language. This means there is a need to sustain Welsh communities and that it is critical to prevent out migration of young people through providing affordable housing, jobs and opportunities for these rural areas to flourish from Welsh speaking communities.

The IACC response has taken into consideration the Anglesey and Gwynedd Joint Local Development Plan to ensure there is consistency in the IACC's approach. In addition, the IACC's response will be requesting the Welsh Government to ensure that there is alignment from the highest tier of planning policy down to the local level that will promote consistency and effective decision-making.

3 – Guiding Principles for Scrutiny Members

To assist Members when scrutinising the topic:-

3.1 Impact the matter has on individuals and communities **[focus on customer/citizen]**

3.2 A look at the efficiency & effectiveness of any proposed change – both financially and in terms of quality **[focus on value]**

3.3 A look at any risks **[focus on risk]**

3.4 Scrutiny taking a performance monitoring or quality assurance role **[focus on performance & quality]**

3.5 Looking at plans and proposals from a perspective of:

- Long term
- Prevention
- Integration
- Collaboration
- Involvement

[focus on wellbeing]

4 - Key Scrutiny Questions

- 1. What are the key areas of local concern in the proposed National Development Framework?**
- 2. What long-term implications are there for future strategic plans and developments on the Island?**
- 3. How will the proposed Framework impact on the Council's strategic work programme and community wellbeing?**
- 4. Is the IACC's draft response robust and fit for purpose?**

5 – Background / Context

Introduction

The National Development Framework (NDF) is a new development plan which will set the direction for development in Wales from 2020 to 2040. It sets a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of our communities.

The NDF is a spatial plan, which means it sets a direction for where investment in infrastructure and development should be located for the greater good of Wales and its people.

The NDF is the highest tier of development plan and is focused on issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses.

Isle of Anglesey County Council (IACC) Draft Response

Responding to the NDF is critically important to ensure that planning policy at the highest tier is fit for purpose and that there is clear alignment between the IACC's aspirations from the local level through to the national level that will provide the direction of travel for future investment in infrastructure and development. This is an opportunity for the IACC to influence the contents of the NDF which will shape nation's development for the next 20 years.

IACC Strategic Points

1. General

The IACC welcomes the opportunity to comment on Welsh Government's National Development Framework (NDF). The IACC supports the principle of creating a NDF for Wales, however, the IACC does have serious concerns and reservations in relation to a number of themes and policies in the draft NDF.

2. Approach to Strategic Development Plans / Regional Planning

The IACC is committed to regional collaboration and accepts the principle of Strategic Development Plans. However, being part of the first and only Joint Planning Policy Unit (JPPU) and Joint Local Development Plan (JLDP) in Wales the merits of three layers of planning policy remain unclear. This is especially the case as resources, capacity and expertise are stretched and reducing.

3. Recognition of existing NSIPs

Recognition of Nationally Significant Infrastructure Projects (Wylfa Newydd & National Grid) should be included as part of the NDF. The Easy Read version of the NDF consultation does not promote nuclear in a positive light and there is only a passing reference to these developments under Policy 22. This is disappointing and unacceptable and we strongly urge the Welsh Government to review and update.

It is widely recognised that nuclear new build will be critical, together with key, all other forms of low carbon energy generation, to enable the UK to meet its Net Zero carbon emissions target by 2050. The final NDF should fully and accurately reflect this.

The importance of these projects, and nuclear new build in particular, to the future economic growth of Anglesey and North West Wales, cannot be underestimated.

Without having a full appreciation of these, and other similar developments in Wales, the framework is unlikely to be inclusive, comprehensive, and fit for purpose. If or when these developments progress will determine the appropriateness of the NDF locally.

4. Approach to Low Carbon Energy

The IACC is committed to delivery of the Anglesey Energy Island Programme. The support for new energy infrastructure on Anglesey is grounded upon securing long-term employment and supply chain opportunities, and creating transformational economic growth, whilst ensuring adverse impacts are effectively mitigated.

The IACC believes the draft NDF's approach to low carbon energy is too narrow and should incorporate all forms of low carbon energy production. The draft NDF does not do this and instead focusses on wind and solar developments only.

The IACC has reviewed the background documents supporting the proposed Priority Areas for wind and solar. There is a lot of information in relation to the criteria applied. The justification for selection of the majority of the Island as a Priority Area for wind and solar energy is unclear. This is not acceptable and is of significant concern, the IACC objects to this designation.

In being designated a Priority Area, the proposed new policy (Policy 10) gives a presumption in favour of development and an acceptance of landscape change, with significant weight being given to the proposal's contribution to greenhouse gas reduction and meeting decarbonisation and renewable energy targets. IACC understands that planning applications will need to be dealt with on a case by case basis, but this approach creates a strong expectation that such developments will be acceptable, notwithstanding landscape and other impacts. Whilst Anglesey is an Energy Island, that does not mean the majority of the Island should be considered as available to host additional new energy developments no matter what the environmental, economic and community impacts might be, which IACC consider will be the result of the NDF as currently drafted.

The IACC is already potentially hosting two NSIP and the additional wind and solar developments would impose further burden on the host communities. In addition, there are electrical grid infrastructure connection issues that need to be considered as the proposed National Grid development only serves Wylfa Newydd and it is unclear what additional infrastructure would be needed to connect to the central area of the Island.

5. Regional Growth Area - Holyhead

The IACC is extremely disappointed and surprised that Holyhead has not been recognised or defined as a Regional Growth Area for Wales, especially given that the NDF specifically identifies the importance of the port of Holyhead to serve Wales, the wider UK and Ireland. This is not acceptable.

The IACC is of the view that a clear evidence base exists to justify Holyhead's inclusion as a Regional Growth Area given its potential strategic importance to Wales, and therefore suggests that the NDF is amended accordingly.

6. Vision for Rural Areas

Given the rural nature of Anglesey, supporting rural communities and their development is a key priority. The IACC is of the opinion that the draft NDF does not provide enough direction for rural areas. Without such vision, there is a risk for greater disparity between urban and rural areas creating further challenges to rural areas.

Greater recognition and guidance on the growth and development of tourism and the visitor economy in the final NDF would also be of value. Tourism is the largest economic sector on the Island generating £311M per annum to its economy. The sector supports approximately 4,000 jobs. Visitors come to Anglesey to experience its unique character and very special sense of place, peaceful and tranquil setting, its beaches, seascapes and its dramatic landscapes. The designation of the majority of the Island for solar and wind (with virtually no socio-economic benefits) could potentially have a detrimental effect on the Island's tourism industry and compound issues further in rural Wales in relation to creating employment opportunities, tackling inequalities, cohesive communities etc.

The importance of the NDF in guiding and informing development in rural areas of Wales, and not only urban development, is critical.

7. Welsh Language Policy

The Welsh language is most prevalent in rural Wales and whilst IACC acknowledges the intention in the NDF to meet the objective of reaching one million welsh speakers by 2050, it believes that not having a dedicated policy on the Welsh Language is a fundamental omission. It is critical to meeting this target to prevent nett out migration of young people through providing affordable housing, jobs and opportunities for these rural areas to flourish from Welsh speaking communities as rural towns, villages and communities are critical to the character and fabric of Wales and it is these towns and communities that shape and define Wales.

8. Connectivity and Potential Third Crossing

The IACC are disappointed that no mention is made of the proposed new third crossing between the Island and mainland. This is considered to be short-sighted, unambitious and discouraging. We request that this is recognised and included in the final NDF.

Whilst supportive of the principle for a North Wales Metro in enabling access to jobs, services and facilities, the IACC is of the view that this infrastructure should

expand the entire North Wales region to Holyhead which will facilitate improved connectivity between North West Wales and North East Wales (and into England).

Additionally, the final NDF should consider a range of solutions for a greener future for low carbon travel, including charging points, community transport, bio-fuel vehicles, and solutions to reduce the use of the private vehicle.

9. Air Connectivity

The importance of Cardiff Airport as an international gateway is acknowledged. However, no mention is made of its national role and the importance of connecting North and South Wales, which is referred to in the Wales Transport Strategy and which recognises that the service plays a significant part in the economic development of north-west Wales, providing improved business connectivity, tourism opportunities and reduced journey times. IACC consider that the NDF should reflect this.

10. Affordable Housing

Delay to the delivery of affordable housing is a key issue. The IACC note the reference to the need of on average 47% of additional homes to be affordable housing for the 5 year period 2018/19 to 2022/23. However, this does not have regard to the impact of viability on market sites and that, on average, it is unlikely that a level of circa 50% affordable provision will be achieved in the majority of sites in rural locations across Wales. Whilst it is acknowledged that WG intend to use its funding, land, planning and housing policies to drive delivery, the issue of addressing market failure and infrastructure costs are not explained in the NDF.

11. Continued Engagement with Welsh Government

The issues raised, and further detail provided in Annex A need to be considered and addressed in preparing the final version of the NDF. If this is not the case, then the plan will not work for the residents, communities, economy and environment of the island. The submission takes full regard for the present and the future, in full alignment with the Wellbeing and Future Generations Act.

It is hoped that the Welsh Government finds the IACC response to the NDF to be constructive in order to assist in creating an overarching development plan for the next 20 years that will shape the future growth and development of the country for the greater good of its people and the next generation.

The IACC is committed to working collaboratively locally, across North Wales and with the Welsh Government to ensure that the NDF is fit for purpose and there is clear alignment from the local level to the highest tier of planning.

Procedural Decision Making

The IACC's response to the Welsh Government's consultation on the National Development Framework will need to be submitted by 1st November, and consequently, should the decision be called in by the Partnership and Regeneration Scrutiny Committee, it would not be possible to comply within the given timescales. As a result, the Chair of Council has agreed it is

reasonable under the circumstances to exempt the decision from call-in. The Chair of the Partnership and Regeneration Scrutiny Committee has been informed of the decision.

The reasoning behind this decision is the tight timescales set by Welsh Government and the need to review a large volume of consultation material. Failure to reach the deadline would be prejudicial to the interests of the Council and the Island. As stated in the Recommendations (Section 1), the Partnership and Regeneration Scrutiny Committee is requested to submit comments on the draft response to the Executive Committee.

6 – Equality Impact Assessment [including impacts on the Welsh Language]

The IACC response to the NDF Consultation raises issues in relation to the Welsh Language that requires further consideration by the Welsh Government (See Bullet Point 7 in Section 5 above).

The IACC submission takes full regard for the present and the future generations, in full alignment with the Wellbeing and Future Generations Act (2015).

7 – Financial Implications

Not Applicable

8 – Appendices:

IACC Letter – Draft Response to WG National Development Framework Consultation (which includes Appendix A)

9 - Background papers (please contact the author of the Report for any further information):

Not Applicable