

ISLE OF ANGLESEY COUNTY COUNCIL	
Report to:	Executive Committee
Date:	28 th October, 2019
Subject:	Isle of Anglesey County Council Draft Response to Welsh Government National Development Framework Consultation
Portfolio Holder(s):	Cllr. Richard Dew
Chief Executive:	Annwen Morgan
Corporate Director:	Dylan Williams
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Local Members:	All Members

A – Recommendation/s and reason/s
<p>Introduction</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Isle of Anglesey County Council (IACC) Draft Response</p> <p>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 which 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.</p>

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 is 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. The 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 is 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. The draft response will however be presented to the Partnership and Regeneration Scrutiny Committee on 24 October and Members of the Committee will have the opportunity to comment.

Recommendations

It is requested for Elected Members to approve the attached letter (including Appendix A) as IACC's response to Welsh Government's National Development Framework (2020-2040) Consultation.

Subject to Elected Member endorsement it is also requested that delegated authority is given to the Director of Place & Community Well-being to carry out any minor amendments, variations or corrections which are identified and reasonably necessary prior to formal issue of response.

B – What other options did you consider and why did you reject them?

Not Applicable

C – Why is this decision for the Executive?

The matter warrants endorsement and approval by the Executive as the National Development Framework will be the highest tier of planning policy in Wales and will be in place for the next twenty years (2020-2040). The proposed development plan therefore needs to be considered against the Anglesey context to assess what the proposals would mean for the Island and its residents.

D – Is this decision consistent with policy approved by the full Council?

Not Applicable

E – Is this decision within the budget approved by the Council?

Not Applicable

F – Who did you consult?		What did they say?
1	Chief Executive / Strategic Leadership Team (SLT) (mandatory)	Comments received from Chief Executive incorporated in the report
2	Finance / Section 151 (mandatory)	No comments received following consultation
3	Legal / Monitoring Officer (mandatory)	Comments received and incorporated in the Procedural Decision Making section (Section A above)
4	Human Resources (HR)	No comments received following consultation
5	Property	No comments received following consultation
6	Information Communication Technology (ICT)	No comments received following consultation
7	Scrutiny	The draft response has been shared with the Partnership and Regeneration Scrutiny Committee on 17/10/2019 and will be presented to the Scrutiny

		Committee on 24/10/2019 for Members of the Scrutiny Committee to have an opportunity to comment.
8	Local Members	
9	Any external bodies / other/s	N/A

G – Risks and any mitigation (if applicable)		
1	Economic	
2	Anti-poverty	
3	Crime and Disorder	
4	Environmental	
5	Equalities	
6	Outcome Agreements	
7	Other	

H - Appendices:
IACC Letter – IACC Draft Response to Welsh Government National Development Framework (2020-2040) Consultation

I - Background papers (please contact the author of the Report for any further information):
Not Applicable



DYLAN J. WILLIAMS BA (Hons), MSc, MA, M.R.T.P.I
Cyfarwyddwr Lle a Llesiant Cymunedol
Director of Place and Community Well-Being

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGEFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

ffôn / tel:

Gofynnwch am / Please ask for: XXX
E-bost / Email: XXX
Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: XXX

Dear Sir / Madam,

Response to Welsh Government's National Development Framework (2020-2040) Consultation

The Isle of Anglesey County Council (IACC) welcomes the opportunity to comment on the Welsh Government's (WG) consultation on the draft National Development Framework (NDF) 2020-2040.

The IACC supports the principle of creating a NDF for Wales. It acknowledges that the NDF is a development plan that focuses on national strategic issues and challenges, and recognises its importance as it will set a direction for where investment in infrastructure will take place for the greater good of Wales and its people.

However, the IACC does have serious concerns and reservations in relation to a number of policies in the draft NDF. These build on previous correspondence with WG (IACC letter dated 19th July 2018). The main strategic points are outlined below (and should be read in conjunction with Appendix A which contains additional detail).

1. Approach to Strategic Development Plans / Regional Planning

The IACC is committed to regional collaboration and is a proactive partner of the North Wales Economic Ambition Board (NWEAB) ([LINK](#)). The NWEAB work is driven and informed by the North Wales Growth Vision and Growth Deal in developing a confident, cohesive region with sustainable economic growth, capitalising on the success of high value economic sectors and our connection to the economies of the Northern Powerhouse and Ireland. It is imperative that the final NDF recognises and aligns with these strategies.

The IACC accepts the principle of Strategic Development Plans and Regional Planning. 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 is stretched and reducing. We remain to be convinced that the benefits for all parties of introducing a regional level of Development Plan is worth the additional work to prepare and monitor without creating complexities, inconsistencies and potential loop holes.

2. Recognition of Existing NSIPs

Anglesey could potentially host two Nationally Significant Infrastructure Projects (NSIPs) during the timescales of the NDF – a new nuclear power station at Wylfa and new associated transmission network. 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 would strongly urge the WG to review and update

It is widely recognised that nuclear new build will be critical, together with 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 IACC request that both developments (i.e. nuclear new build at Wylfa and the potential electricity transmission enhancements) are recognised fully in the NDF, notwithstanding that consenting decisions are being made by UK Government. Their scale and significance cannot be underestimated in terms of opportunities and threats (during construction, operation, and decommissioning phases) for existing and future generations.

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.

3. Approach to Low Carbon Energy

The IACC is committed to delivery of the Anglesey Energy Island Programme ([LINK](#)). The EIP's vision is to create a once in a lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects putting Anglesey and the wider region at the forefront of low carbon energy, research and development, production and servicing. This support for new low carbon energy development is grounded upon securing long-term employment and supply chain opportunities, and creating transformational and sustainable economic growth, whilst ensuring adverse impacts are effectively mitigated.

In respect of community energy, reference is made to one gigawatt of renewable energy consumption to be generated from locally owned renewable energy projects. Further clarification should be included in the final NDF over what is defined as local ownership of a project to ensure that the project is to the benefit of the host community.

The IACC believes that the NDF's approach to low carbon energy is too narrow and should incorporate all forms of low carbon energy (including tidal energy to the West of Isle of Anglesey and Off-shore Wind Leasing Round 4 ([LINK](#))). As outlined above,

following both the UK and WG's commitment to achieving the Net Zero by 2050, and the need for a diverse energy mix to deliver this commitment, all forms of low carbon energy production should be given the same weight, prominence and importance within the NDF. 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 and evidence 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. In designating such areas, the NDF creates a spatial envelope expressly supported in policy which has already seen significant on and off shore development, and continues to do so with the proposed new nuclear power station at Wylfa and associated National Grid (NG) infrastructure. 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.

It is noted that wind and solar are the only areas within the NDF where a spatial approach is taken, rather than a criteria based approach. The IACC considers that a criteria based approach would be preferable rather than creating defined Priority Areas. The IACC is already potentially hosting the Wylfa Newydd and NG developments, which will impose a significant burden on the communities, and this does not appear to have been taken into account in relation to the allocation of Anglesey as a Priority Area. There are also concerns in relation to infrastructure. For instance the proposed NG overhead lines were only designed for Wylfa Newydd and it is unclear what additional NG infrastructure would be needed to connect to the centre of the Island. Certainly grid capacity has not been taken into account as part of allocating a Priority Area and this raises significant concerns. There are also likely to be significant transportation concerns arising from this proposal without, for instance, a third crossing which, again, has not been raised in any of the background documents supporting the NDF which the IACC has reviewed. For all these reasons the IACC cannot support the proposed Priority Area designation.

4. 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 a strong 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. Furthermore, this should be given greater prominence due the uncertainty surrounding Brexit. The implications for Anglesey and the wider region should the UK leave the EU on the 31st October (with or without a deal) are not clear, but it can be assumed that there would be a transitional period and this should be factored into the NDF when considering Regional Growth Areas. Whilst not objecting to North East Wales being the focus of strategic economic growth; the IACC seeks clarity as to how the plan will enable and influence growth in North West Wales. The potential of the Energy Island Programme and projects such as Wylfa Newydd in transforming the socio-economic landscape in North West Wales has been overlooked.

5. 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 view that the draft NDF does not provide enough direction for rural areas. The importance of the NDF in guiding and informing development in rural areas of Wales is critical. Without such vision, there is a risk for greater disparity between urban and rural areas creating further challenges to rural areas. As such the IACC considers that the NDF should contain more policy guidance in relation to supporting employment opportunities, protecting and enhancing the Welsh language, tackling inequalities, resilient and cohesive communities, promoting connectivity (both transport and digital infrastructure) and enabling sustainable development. Greater recognition and guidance on the growth and development of tourism and the visitor economy in the final NDF is also required.

Tourism is the largest economic sector on the Island generating £311M (STEAM Report 2018) 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. Approximately 95% of Anglesey's coastline is designated Area of Outstanding Natural Beauty, it has 50km of Heritage Coast (including North Anglesey) as well as a number of other National and European designated sites. The designation of the majority of the Island for solar and wind (with virtually no socio-economic benefits) could potentially have a significant detrimental effect on the Island's tourism industry as the landscape and visual element of rural Anglesey could be significantly affected.

Whilst there is a significant difference between urban and rural development, it is essential that the NDF equally enables appropriate development to drive prosperity and growth in rural areas. The IACC believes that further engagement with the Welsh Local Government Association (WLGA) Rural Forum is required to discuss a shared plan.

6. Welsh Language Policy

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. However, what makes Wales unique is the Welsh language. 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. Including such policy would align with the WG's Cymraeg 2050: Welsh Language Strategy and performance should be measured to sustain these Welsh communities and to meet the WG's target of 1 million Welsh Speakers by 2050. It is critical that this target is met 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.

7. Affordable Housing

Delay to the delivery of affordable housing is a key issue. The IACC note the reference to the need for an average of 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. There is a growing need to raise the standard of existing social housing to modern standards, however, additional resources are required to ensure this happens.

8. Connectivity and Potential Third Crossing

The IACC is 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 especially given the potential developments that could take place on the Island which would result in significant increases in traffic volume cumulatively. This would make entering and leaving the Island a major constraint and a barrier for growth. As a scheme previously promoted by the WG, this crossing should be included in the 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 North West 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 between North and South Wales

Draft Policy 32 relates to Cardiff Airport and supports its growth and development. Its importance as an international gateway is acknowledged connecting Wales to the world, and the IACC supports this. 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 acknowledges 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.

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. This submission takes full regard for the present and the future and is in full alignment with the Wellbeing and Future Generations Act (2015).

It is hoped that the WG 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 WG to ensure that the NDF is fit for purpose and there is clear alignment from the local level to the highest tier of planning which will provide the direction of travel for investment in infrastructure and development. In this regard I would welcome further dialogue with WG in order to ensure the above concerns are addressed appropriately.

Yours sincerely,

DYLAN J. WILLIAMS

Director of Place and Community Well-Being

APPENDIX A

1.0 Governance and Monitoring

- 1.1 The IACC accepts the principle of Strategic Development Plans and Regional Planning. 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. The NDF aims to encourage local authorities to progress the creation of Strategic Development Plans (SDP) and to continue management of Local Development Plans. The governance arrangements, responsibilities and accountabilities are currently unclear in respect of developing the SDP - who is responsible and accountable in terms of co-ordination and delivery. Additionally, there are contradictions in the NDF with regards to the scale of the SDP whether this is for the whole region or at the sub-regional level. This needs to be made clearer within the framework as one would assume that the SDP's would need to be put into place in a very short period.
- 1.2 We question where the capacity and resources are to undertake the above activities. The IACC do not have the capacity, experience or capability to develop a Strategic Development Plan at the Regional level.
- 1.3 Chapter 3 outlines the NDF outcomes based on the national planning principles and national sustainable place-making outcomes set out in Planning Policy Wales (PPW). It notes that every part of the document is concerned with achieving the 11 NDF outcomes. Translating these into actions and outputs to deliver these outcomes is complex and challenging. Understanding who and how delivery will be monitored, aligned, and consistent with Local Development Plans and the Annual Performance Reviews would be beneficial.
- 1.4 The NDF forms part of the new suite of high-level documents (alongside the new Planning Policy Wales, the new Wales Infrastructure Consenting regime and the new Marine Plan for Wales). Collectively they will underpin strategic land-use planning in Wales across the next 20 years. The inter-relationships between these documents will be critical (content, interpretation, application, monitoring etc.). This will be complex, from a public sector, developer, stakeholders, and community/ resident perspective. Consistency will be key, including accessible and effective guidance and support. We would benefit from understanding how this will be progressed. Ensuring that there is consistency across all of these documents is of critical importance to ensure the way forward is clear and that there are no contradictions. This will be critical to maintain the reputation of the land use planning system in Wales, enable effective and efficient decision making, and minimise judicial processes.
- 1.5 The intention to undertake a full review every 5 years is welcomed and supported. In addition, we would propose that an annual monitoring report is collated and published. This would be consistent with the Local Development Plan arrangements.

2.0 Regional Growth Areas – Holyhead (Spatial Strategy)

2.1 We are disappointed and surprised that Holyhead has not been recognised or defined as a Regional Growth Area for Wales, especially given that Policy 20 & 21 of the NDF recognises the importance of the port at Holyhead to serve Wales, the wider UK and Ireland. The significant potential for growth and investment in Holyhead is also recognised. We request that Holyhead is added, recognised and given the status of being a key Regional Growth Areas in the final NDF. We are of the view that a clear evidence base exists to justify Holyhead being a regional growth area in the final NDF:

- Holyhead Port is one of the busiest ports in the UK with over 2 million-foot passengers and 450,000 of freight units passing through on an annual basis.
- It is the major port of embarkation/disembarkation for the North of England, Wales and the Midlands for the Irish Sea and forms a key part of international trade routes.
- Wales' busiest cruise ship port and Holy Island is a busy tourist destination characterised by attractive coastal scenery.
- There are constraints to maximising potential of the port, but significant expansion is recognised and planned as part of the North Wales Growth Deal.
- Post Brexit the Port will become a key international gateway into the UK that would ensure it continues to be a strategic gateway from Ireland through the UK into Europe.
- Significant potential for employment and housing growth which is well connected by road and rail.
- It has a large and expanding retail offer, a large industrial site with business premises, a strategic business park at Parc Cybi.
- Potential Land & Lakes Development which includes a leisure village with up to 500 lodges, cottages and associated facilities.
- Potential large scale mixed-used development at Holyhead Marina.

2.2 A number of references are made to the 'arc' of built up areas in North Wales that runs across the region where population, deprivation, key services, facilities commuting and economic activity are concentrated. The 'arc' stretches along the coast from the Menai Straits to the border with England. It appears that the decision to concentrate the majority of development to the arc from Caernarfon to Deeside is prejudicial against the economic development of Anglesey. Whilst pursuing a policy of this sort may bring economic prosperity to the area in general, it will not for Anglesey. We believe that the 'arc' should be extended further west and start from Holyhead.

3.0 Vision for Rural Areas

3.1 The importance of the NDF in guiding and informing development in rural areas of Wales, and not only urban development, is critical. Rural areas of Wales have vibrant and deprived rural towns and communities which need to be supported as important centres. Further consideration should be given to smaller / rural towns in the final NDF as they are key hubs.

- 3.2 Policy 4 states that the future of rural areas are best planned at the regional and local level – the draft NDF does not provide enough direction for rural areas. With very limited reference to rural development within the draft NDF there is greater threat that rural places in Wales are left behind and the gap between urban and rural area widens. This would be to the detriment of large parts of Wales which is rural in character and where 40% of the population live (settlements of less than 10,000).
- 3.3 If the future of rural Wales is to be limited to development focused on traditional industries (farming/tourism), and low carbon energy (which are not major employers), it is unclear where the necessary and desirable employment opportunities will come from.
- 3.4 The draft NDF does not clearly outline how the North Wales Coastal Settlements in the coastal arc from Caernarfon to Deeside, as an important sub-regional role to support the primary growth area of Wrexham and Deeside, will support viable and sustainable rural communities. It is unclear if the impacts of centralising development will be a positive and complementary enabler for the rural hinterlands. How will the NDF support rural areas to secure quality employment opportunities to stem the flow of outmigration, protect and enhance the Welsh Language, and enable sustainable development?
- 3.5 Linked to Transport and Connectivity how would WG ensure there is connectivity and good transport links from the rural areas to the identified primary growth areas?
- 3.6 Greater recognition and guidance on the further growth and development of tourism and the visitor economy in the final NDF would add value. Tourism is the largest economic sector on the Island generating £311M (STEAM Report 2018) 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. Approximately 95% of Anglesey's coastline is designated Area of Outstanding Natural Beauty, it has 50km of Heritage Coast (including North Anglesey) as well as a number of other National and European designated sites. This is of critical importance to future rural communities, with the opportunities and challenges needing careful consideration and balance.
- 3.7 Ensuring that all parts of Wales, including rural areas, are supported by modern telecoms infrastructure is welcomed. We are eager to better understand how the Mobile Actions Zones will be defined and allocated.

4.0 Welsh Language

- 4.1 We welcome the fact that the NDF recognises that the Welsh language is a key opportunity and challenge facing the nation, and the role of the plan in ensuring the national target of reaching a million Welsh speakers by 2050 is achieved.
- 4.2 For context, the Isle of Anglesey is a very unique and special place where the Welsh language and culture are integral to Anglesey's island identity. The

Welsh language, culture and heritage are of paramount importance. More than three-quarters of Anglesey children and more than half the adults living on the island can speak Welsh. Anglesey remains one of the strongholds of the Welsh language. The Welsh language is a natural element of everyday life, of social cohesion and of well-being on the Island. Safeguarding and enhancing the language is, therefore, of the highest priority in going forward and the IACC are eager to understand how the NDF will contribute towards this priority in Anglesey and North Wales.

- 4.3 We question why there is not a dedicated policy on the Welsh Language and the desired outcome of increasing the number of Welsh Speakers. This should align with the WG Cymraeg 2050: Welsh Language Strategy.
- 4.4 It is unclear why development of the Welsh language is limited only to areas '*where Welsh is the everyday language*'. What is the definition of everyday language? The current approach and wording will limit the relevance and commitment of bilingualism to defined spatial areas.
- 4.5 We question whether the NDF does enough to promote and protect the Welsh Language, and cannot over-emphasise the importance of the Welsh language and culture to Anglesey and North West Wales. This should be reconsidered prior to creating a final NDF.

5.0 Wind and Solar Energy - Renewable Designation

- 5.1 We fully accept the need for low carbon energy production to meet UK's transition following the recent announcement by UK Government of its Net Zero target by 2050. The production of various forms of low carbon energy production will be integral to reach this target and Wales will need to play its role in contributing towards this target.
- 5.2 The draft NDF highlights wind and solar energy as a form of low carbon production, however, tidal, hydro and off-shore developments should also be given the same prominence and importance.
- 5.3 The IACC in partnership with key stakeholders have established the socio-economic Anglesey Energy Island Programme (EIP) ([LINK](#)). Energy Island's vision is to create a once in a lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects on Anglesey and putting Anglesey at the forefront of low carbon energy, research and development, production and servicing. In turn, this will provide a sound base to encourage economic diversification and transition, delivering positive benefits over the longer term.
- 5.4 However, 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.

- 5.5 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 and evidence 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.
- 5.6 The background documents to the NDF confirm that no analysis has been undertaken of the current capacity of the grid infrastructure serving the priority areas identified. This will have an impact over the level of additional infrastructure required and how such infrastructure could impact upon high value environmental designations.
- 5.7 The NDF identifies North and Central Anglesey as a priority area for wind and solar energy (Policy 10). However there is no detail in the NDF to explain how, why and what the criteria was for this location to be selected. We note that background work has taken place through The WG – Assessment of Onshore Wind and Solar Energy potential in Wales (Stage 1 & 2) ([LINK](#)), which provides the methodology, evidence, and justification on selecting the priority areas. The justification for the designations should be articulated far clearer in the final NDF.
- 5.8 The JLDP provides justification over the size of wind turbines / solar farms that can be accommodated having regard to Landscape Sensitivity and Capacity Study. It is understood that NRW are undertaking work to produce National Guidance in relation to this matter. Will the NDF consider such information in order to address site specific constraints and to see whether Priority Areas remain valid locations?
- 5.9 We are concerned about the presumption in favour of development for these schemes (Policy 10) and an associated acceptance of landscape change. The diagram on page 48 identifies the West as an area of high landscape and environmental quality. This contradicts the notion that this is an area that can accept in principle changes to the landscape.
- 5.10 It appears that one of the Special Landscape Areas identified within the Anglesey & Gwynedd Joint LDP falls within the Anglesey Priority Area. Such areas are supported by a Statement of Value and Significance which clearly set out how each area meets the criteria for designation, and includes a set of 'special qualities' that underpin the designation. Any development proposals within the SLA will need to take account of its special qualities. This should also be reflected within the NDF.
- 5.11 Consideration needs to be given to the impact of development on the setting of the National Park and the AONB. Part of Priority Area 1 is in close proximity to the AONB in the North of Anglesey. We note the text to draft Policy 12 which states that proposals close to the boundaries of these designated areas must demonstrate that the development will not undermine the objectives that underpin the purposes of the designation, but it is unclear how this approach dovetails with Policy 10 and the presumption in favour of development within a

Priority Area. Policy 10 simply requires impacts on National Parks and AONBs to be minimised, suggesting that the presumption in favour of development takes precedence. That should not be the case and the NDF should make it clear that Policy 12 takes priority over that presumption.

- 5.12 Pg.11 of the NDF states that it *'does not seek to identify the exact location for new development'* having previously stated that strategic and local development plans (that do identify locations) 'must' conform with the NDF (pg.10). In respect of the wind and solar designation there is, therefore, some contradiction as the Potential Solar Farm Search Areas in the JLDP do not correlate with what is proposed in the NDF. In addition, the Wind and Solar sites lie outside the Strategic Search Areas identified in TAN8 and it would appear, therefore, that the NDF is in conflict with TAN8 and by implication with PPW. This will need to be resolved by the time the final NDF is published.
- 5.13 We welcome the inclusion of Policy 22 – North West Wales and Energy (Page 54) in principle, and request that the following points are considered further to inform and enhance the final NDF:
- a) Direct reference the Isle of Anglesey's Energy Island Programme and its vision / objectives
 - b) Give greater thought and prominence to the need to invest in energy transmission infrastructure
 - c) Give greater recognition of the need to invest in training and skills; work with universities and businesses across the region and North West England
 - d) Welcome recognition of the need to work with the North West Nuclear Arc
 - e) Recognise the need to develop centres of excellence in Universities
 - f) Recognise the supply chain opportunities, especially linked to nuclear energy
- 5.14 Reference is made to one gigawatt of renewable energy consumption to be generated from locally owned renewable energy projects and that at least an element of local ownership by 2020. Further clarification should be included in the NDF over what is defined as local ownership of a project to ensure that it complies with this target and that the project is to the benefit of the community.

6.0 Wylfa Newydd

- 6.1 There is currently insufficient attention and status given to the potential development of a new nuclear build on Anglesey. 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 would strongly urge the WG to review and update. A decision is due to be made by the Secretary of State on the Development Consent Order in October 2019.
- 6.2 The UK Government's commitment for Net Zero carbon emissions by 2050, compared to 1990 levels¹, and WG Ministers duty to ensure the net Welsh

emissions in 2050 are 80% lower than the existing baseline in 2050² means that the Wylfa Newydd Project has the potential to play a significant role in reaching these targets. As a low carbon source of energy, the UK Government has clearly stated that nuclear power generation has an important role to play in the diversification and decarbonisation of electricity demand.

- 6.3 The WG, through its low carbon transition strategy, and the IACC, both recognise the important contribution new nuclear power can make to the UK's energy mix and security of electricity supply and both support the principle of development of a new nuclear power station at Wylfa. They also anticipate that the development of a new nuclear power station at Wylfa will be a fundamental driver for long term, sustainable economic growth on Anglesey and in the wider North Wales region and this should be given more emphasis in the NDF.
- 6.4 In September 2017, the WG published Prosperity for All: The National Strategy; that sets out how WG will deliver the Programme for Government. It takes the commitments in the Programme for Government and sets out how they will be delivered by bringing together the efforts of the whole Welsh public sector. The Strategy specifically mentions the need to harness the opportunities from Wylfa Newydd and the need to link new housing with new major infrastructure developments.. Clarity is required as to how the NDF will interconnect with other high level WG documentation and that they all provide a clear and consistent message on what is to be delivered. The NDF is currently not aligned with the 'Prosperity for All' document when it comes to Wylfa Newydd.
- 6.5 The key strategic importance of the Wylfa Newydd Project is fully recognised in the IACC's Energy Island Programme (EIP) and WG Enterprise Zone ([LINK](#)) which together aim to create a geographical hub of excellence for the development, implementation and servicing of low carbon energy initiatives.
- 6.6 Therefore, the Wylfa Newydd Project will have important implications for the Island's and wider North Wales economy, its communities and environment which needs to be fully recognised in the final NDF.

7.0 Enterprise Zones

- 7.1 There is some reference to Snowdonia, Deeside and Cardiff Airport Enterprise Zones. We request that the Anglesey Enterprise Zone ([LINK](#)) is also referenced, especially when presenting North West Wales and Energy in Policy 22.
- 7.2 Anglesey's Enterprise Zone status alongside its Energy Island Programme is driving the island's growth into a world-renowned centre of excellence in low carbon power generation. There is also the designation of the Marine Demonstration Zone dedicated to marine energy devices to the deep water Port of Holyhead – one of the UK's main gateways to Ireland. These should be included in the NDF to provide relevant context and to outline that Anglesey is home to attracting low carbon energy related developments that will provide transformational job and supply chain opportunities that will contribute towards transforming the local and regional economy.

8.0 Connectivity and Potential Third Crossing

- 8.1 We agree that the regional transport connectivity is primarily West/East (and vice versa) which connects with North West England (rather than North Wales to South Wales). Ensuring that Anglesey is connected to the rest of the North Wales region is of critical importance. One of the key challenges in NWW is to improve transport infrastructure from West to East (and vice versa).
- 8.2 It is disappointing 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 that the final NDF includes the third crossing. This is especially the case when bearing in mind potential developments that could take place on the Island which would add up to significant increase in traffic volume cumulatively, which would subsequently make entering and leaving the Island a major constraint for both residents, commuters and visitors. Additionally, the third crossing is vitally important to connect freight from Ireland to the UK and beyond and to ensure that the Isle of Anglesey is not a barrier for growth, investment and development.
- 8.3 Greater clarity and definition (scope and benefits) of the North Wales Metro (Policy 21) would also be beneficial. This is seen as a vital service to ensure there is improved connectivity between North West Wales, North East Wales, and the North West of England (daily in both directions) to access jobs, services and facilities. The programme of investment being progressed by Transport for Wales, and links to housing, employment etc. should also be enhanced in the final NDF.
- 8.4 Further consideration to Active travel within the NDF would be valuable to explain what activities will be undertaken to improve public transport and walking / cycle paths especially in rural areas. The improvement in active travel can also bring tourism benefits, health and wellbeing benefits and green infrastructure compatibility to the region.

9.0 Air connectivity between North and South Wales

- 9.1 Draft Policy 32 relates to Cardiff Airport and supports its growth and development. Its importance as an international gateway is acknowledged connecting Wales to the world, and the IACC supports this. No contextual information nor how the Airport might be enhanced in terms of routes to connect Anglesey to other strategic locations is provided. There is no mention 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 acknowledges 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.

- 9.2 The IACC considers that Anglesey Airport should be defined as 'Regional Connectivity' in the final NDF to demonstrate the connectivity by air between Anglesey and Cardiff.

10.0 Housing & Affordable Housing

- 10.1 The document refers to the least prosperous/most deprived area of Wales being west Wales and the Valleys, hence its qualification for European grant assisted aid in recent years. Despite this, the strategic direction taken by the NDF is to target economic and housing development on the most prosperous areas of north-east and south-east Wales (including the city of Swansea). This appears to follow a direction that is counter-productive to bringing prosperity to the areas most in need of help, whilst continuing to support the more prosperous areas. This is a cause of great concern.
- 10.2 Housing policy should seek to ensure socially balanced communities, avoid worsening division of Wales into rich and poor areas by supporting more affordable housing in expensive areas, and supporting higher-end market housing in poorer areas to retain / inject wealth & social capital.
- 10.3 The IACC agree that in order to address both the 'delivery gap' and housing need a shift in the delivery model is required. Over reliance on the private sector to deliver affordable housing has meant that fewer affordable homes have been built and this has contributed significantly not only to the widening of the 'delivery gap', but has resulted in more people/families being in affordable housing need. Cost of land, cost of construction, materials etc. has made building affordable housing (particularly at the smaller localised scale) unviable. This is particularly prevalent in rural areas where demand outstrips supply resulting in increased house prices and outward migration of younger people.
- 10.4 Whilst the IACC welcome the recognition that there has been over reliance on the private sector, further detail is required on how the WG intend to encourage / incentivise local authorities, social landlords and small and medium sized builders to build these affordable houses to meet the increasing demand.
- 10.5 Viability is a major issue for house builders, particularly in rural areas. The large number of new build housing in rural areas are self-build plots (infill sites and rural enterprise houses built on family owned land, for example) as this is the only way in which local people can afford to stay in their community. Expecting private developers to increase the provision of affordable housing in rural areas is unrealistic as these developments /sites would become unviable without financial support.
- 10.6 The Anglesey and Gwynedd Joint Local Development Plan (JLDP) was adopted in July 2017 and a Joint Housing Land Availability Study (JHLAS) was completed jointly for both authorities in 2019. The 2019 JHLAS ([LINK](#)) demonstrated a 6.3 years supply of land for housing. The newly adopted JLDP includes a number of housing allocations on the Island and provides for opportunities on windfall sites. Therefore, there is no current shortfall in the supply of land for housing.

- 10.7 There were 83 sites in Anglesey with planning permission for five or more units that were relevant to consider in the 2019 JHLAS study. Six of these sites were completed during the previous year but 70 of these sites did not see a single unit completed during 2017/18. Twenty-Eight sites have an element of the units permitted classified as being within categories 3 and 4 of the JHLAS i.e. not envisaged to be built within 5 years. As we have a newly adopted JLDP there are also numerous allocated housing sites within the JLDP that are not yet subject to planning permission. However, the planning system is reliant on developers to deliver required houses on policy compliant land.
- 10.8 What this demonstrates is that that the planning system provides the opportunities to build affordable housing (i.e. sufficient land and allocations) but more needs to be done to encourage housebuilding. This delivery gap will continue to widen if developers have to deliver 47% affordable housing to meet the demand. This is not a viable option in rural areas and more needs to be done to incentivise private developers as well as funding Local Authorities and Social Landlords to build and let affordable units.
- 10.9 The supporting text to Policy 18 refers to planning and co-ordinating the delivery of new housing to meet identified needs. The WG central estimates 19,400 (Page 51) additional homes are needed in the North Wales region until 2038 and over the initial five years 2018-2023 51% of the additional homes need to be affordable. We are eager to better understand the evidence base, justification and rationale for the number of homes in general, especially affordable housing numbers as, although we have undertaken a broad review of the various background documents, we have not found it easy to ascertain how the various figures have been arrived at. The Framework needs to be clearer on what the status of the figure of 19,400 means within the NDF for the North Wales region so they can provide meaningful evidence and context to SDPs/LDPs.