

From: [Tony Hughes](#)
To: [NDE](#)
Cc: [REDACTED]
Subject: Response to NDF Consultation
Date: 30 October 2019 12:43:35
Attachments: [WG Draft NDF 2020-2040 Consultation 311019.docx](#)

Hi,
Please see the attached response from the Clwydian Range and Dee Valley AONB.
Regards

Tony Hughes

Tony Hughes
Swyddog Cynllunio AHNE Bryniau Clwyd a Dyffryn Dyfrdwy
Clwydian Range and Dee Valley AONB Planning Officer
Loggerheads Country Park, Near Mold, Denbighshire, CH7 5LH

[REDACTED]

Dilyn ni ar Twitter: <http://twitter.com/cyngorsDd> - Follow us on Twitter:
<http://twitter.com/DenbighshireCC>
Ymwelwch a ni ar-lein ar <http://www.sirddinbych.gov.uk> - Visit us online at
<http://www.denbighshire.gov.uk>

Mae'r wybodaeth a gynhwysir yn yr e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag o wedi eu bwriadu yn unig ar gyfer pwy bynnag y cyfeirir ef ato neu atynt. Os ydych wedi derbyn yr e-bost hwn drwy gamgymeriad, hysbyswch yr anfonwr ar unwaith os gwelwch yn dda. Mae cynnwys yr e-bost yn cynrychioli barn yr unigolyn(ion) a enwir uchod ac nid yw o angenrheidrwydd yn cynrychioli barn Cyngor Sir Ddinbych. Serch hynny, fel Corff Cyhoeddus, efallai y bydd angen i Gyngor Sir Ddinbych ddatgelu'r e-bost hwn [neu unrhyw ymateb iddo] dan ddarpariaethau deddfwriaethol.

The information contained in this e-mail message and any files transmitted with it is intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error please notify the sender immediately. The contents of this e-mail represents the views of the individual(s) named above and do not necessarily represent the views of Denbighshire County Council. However, as a Public Body, Denbighshire County Council may be required to disclose this e-mail [or any response to it] under legislative provisions.



**Bryniau Clwyd a
Dyffryn Dyfrdwy**
Clwydian Range
and Dee Valley

Ardal o Harddwch Naturiol Eithriadol
Area of Outstanding Natural Beauty

Bryniau Clwyd a Dyffryn Dyfrdwy AHNE
Park Gwledig Loggerheads, Yr Wyddgrug, Sir Ddinbych CH7 5LH

Clwydian Range and Dee Valley AONB
Loggerheads Country Park, Nr. Mold, Denbighshire CH7 5LH

Ffon | Tel: 01352 810614 | Ffacs | Fax: 01352 810644
E-bost | E-mail: clwydianrangeanddeevalley@denbighshire.gov.uk
Gwefan: www.ahnebryniauclwydadyffryndyfrdwy.org.uk/
Web: www.clwydianrangeanddeevalleyaonb.org.uk/

 [www.facebook.com/Clwydian Range & Dee Valley AONB](https://www.facebook.com/ClwydianRange&DeeValleyAONB)

 @Clwyd_De_AONB

Cyf | Ref:

Dyddiad | Date: 31 October 2019

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

Dear Sir/Madam

**WELSH GOVERNMENT CONSULTATION - DRAFT NATIONAL DEVELOPMENT FRAMEWORK
2020-2040**

Thank you for consulting the AONB on the draft NDF. The following comments are submitted on behalf of the Joint Committee following consultation with the AONB Partnership Landscape Character and Built Environment Working Group and the Chair of the committee:

1. General:

- **The Joint Committee is concerned that the document does not consistently give AONB's the status and recognition they deserve as part of Wales' suite of most cherished protected/designated landscapes. For example, the contextual plan on the inside front cover indicates National Parks but not AONB's. Given that this plan helps set the national context for the NDF, this is an omission that should be corrected.**
- **The relationship between the NDF and PPW (10) should be made more explicit, including the reference to 'National Parks and AONB's are of equal significance ... and must be afforded the highest level of protection from inappropriate development' (PPW para 6.38), and recognition that development outside but affecting the setting of such landscapes is equally important (PPW para 6.35).**
- **For the avoidance of doubt, it should be made clear that the spatial strategy and regional spatial maps are diagrammatic only and should not be taken as indicative of any specific land allocations. For example, the Deeside/Wrexham national growth area appears to extend up to the boundary of the AONB, which if followed literally would have a harmful impact on the setting of the protected landscape.**

2. Overview: Challenges and Opportunities:

- **Welcome recognition that Wales' landscapes are 'amongst the best in the world' coupled with a specific reference to National Parks and AONB's.**
- **The important work of and opportunities presented by protected landscapes as exemplars in relation to issues such as tackling climate change through, for example, carbon**

sequestration, and in maintaining and enhancing biodiversity should be recognised in this section. Their role in providing opportunities for outdoor recreation and their contribution to meeting health and well-being objectives should also be referenced.

- The discussions on Climate Change and Aggregates should make it clear that the development of associated new infrastructure and quarries must be balanced against other environmental constraints, such as the need to conserve and enhance protected landscapes and their setting.

3. NDF Outcomes:

- Outcome 9 recognises that Wales' natural resources, including its landscape, are 'assets of great value ... which must be managed, maintained and enhanced', and is supported by the Joint Committee.

4. Spatial Strategy:

- Given that a significant area of Wales is covered by protected/designated landscapes, it is a surprising omission that the NDF contains no overall strategic policy about the national role and expectations for such areas which also would help inform strategic and local development plans. The committee believes that such a policy must form part of the NDF in the same way that topics such as biodiversity and the National Forest are treated, and would strongly urge WG to engage with the Welsh National Parks and AONB's to consider how such a policy could be framed.
 - The broad thrust of the strategy which focuses large scale growth in existing urban centres whilst allowing some growth in smaller towns and rural villages to help sustain local communities and services is supported. Recognition that this will help channel development pressures away from the countryside and the statement that 'in areas designated for their landscape or ecological importance, protection against inappropriate development remains in place' are also supported. However, whilst this protection from inappropriate development within the AONB is welcome, the committee would also emphasise the need to explicitly protect the setting of such landscapes from inappropriate development in line with PPW.
 - The Wrexham-Deeside national growth area and part of the North Wales Coast regional growth area lie just outside the AONB. Excessive and inappropriate growth of these areas has the potential to adversely impact on the setting of the AONB if not carefully controlled. It is noted and welcomed that this is acknowledged in the supporting text to North Wales Regional Policies 17 -Wrexham and Deeside and 18 - North Wales Coastal Settlements.
 - The aspiration to support sustainable rural communities set out in Policy 4 is supported, but the requirement to plan positively for such development should be caveated with a statement along the lines of 'whilst conserving and enhancing designated areas and key environmental assets.'
 - The emphasis on increasing digital connectivity in rural areas contained in Policy 6 is supported, together with recognition that this should not be at the expense of adverse landscape impacts.
 - Policy 8 relating to biodiversity enhancement has the full support of the committee. Recognition of the important role played by AONB's and National Parks in delivering this alongside the local authorities and NRW should be referenced.
 - It is noted that the National Forest (Policy 9) has yet to be identified but the committee would comment that in the spirit of 'The right tree in the right place', tree planting is not always compatible with the landscape character and qualities which protected
- 

landscapes seek to conserve and enhance. In this context, Wales' protected landscapes should be involved in developing this initiative from the outset.

- The protections for National Parks and AONB's set out in Policies 11 and 12 in relation to large scale on-shore wind and solar energy development are supported. However, the Joint Committee is extremely concerned about Policy 10, particularly the designation of Wind Energy Priority Areas 3 and 15, where large scale development will be encouraged and associated landscape change accepted. One of the recognised special qualities of the Clwydian Range and Dee Valley AONB is its tranquillity and the opportunity to experience uninterrupted and extensive views, particularly towards the higher ground of Snowdonia to the west. These views have already been impacted by extensive wind farm development within the TAN 8 Strategic Search Area A (which is subsumed within the extended proposed Priority Area 15) and various offshore developments. Despite Priority Areas 3 and 15 being 10-15km outside the AONB it is clear that with the increasing size and scale of modern turbines (as already witnessed in SSA-A), views to the west and north from much of the higher ground of the AONB will be enclosed and characterised by turbine dominated skylines with a consequential harmful effect on one the AONB's most important special qualities. The committee does not accept that this level of landscape change is acceptable and objects to this policy.
- There is a strong emphasis in the NDF on generating renewable energy from wind and solar sources but little mention of the opportunities for marine energy or strategic policy to lend support to such development. Given Wales' acknowledged tidal and marine renewable energy potential this appears to be an omission in a national strategy such as the NDF.

5. The Regions – North Wales:

- The regional profile diagram makes reference to 'The west being of high landscape and environmental quality', which devalues the Clwydian Range and Dee Valley AONB in NE Wales and is an error that should be corrected.
- Given the national and strategic significance of Wales' protected landscapes, the National Park and 3 AONB's in the region should be indicated on the regional strategy diagram.
- See comments on Regional Policies 17 and 18 above.

I would be grateful if you could take account of the Committee's views in taking forward the NDF.

Yours sincerely

Tony Hughes

For the Clwydian Range and Dee Valley AONB Joint Committee

