

## **Response to Welsh Governments National Development Framework (NDF)**

Conwy County Borough Council (CCBC) welcomes the opportunity to comment on the Welsh Government's (WG) consultation on the draft National Development Framework (NDF) 2020-2040. Please accept this correspondence as the formal representation from CCBC, which was confirmed by the Council's Cabinet on the 12<sup>th</sup> November 2019.

CCBC 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 growth and for infrastructure investment across Wales. At the same time, CCBC recognises that there are clear challenges of having to achieve a sustainable pattern of development for the longer term while taking into account the climate change agenda that requires local planning authorities to look beyond the 20 year horizon and develop policies to achieve a longer term objective.

However, whilst the principle of the NDF is supported, CCBC has reservations around the Spatial Strategy and proposed policies set out in the NDF as responded to below. Of particular concern is the conflict between the NDF, the Conwy Replacement Local Development Plan (RLDP) 2018 – 2033 and the recognition of the work that has been underway for some time in defining a collective Growth Vision through the Economic Ambition Board (EAB), the infrastructure investment elements of which are already supported by Government funding. The Conwy RLDP (Preferred Strategy) for example recognises the potential jobs, housing, infrastructure and associated land requirements that will be required in Conwy as a result of the regional Growth Vision. The Welsh Government's response to the Conwy RLDP (Preferred Strategy), received on 17<sup>th</sup> September 2019, supports the growth and spatial distribution proposed within it.

### **1. Strategic Development Plans / Regional Planning**

As above, CCBC is committed to regional collaboration and is a proactive partner of the North Wales Economic Ambition Board (NWEAB). 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, as does the Conwy RLDP in terms of the proposed growth strategy and supporting evidence set out in Background Paper 1 (BP/1) 'Growth Options' and BP/9 'Employment Land Review' (refer to [www.conwy.gov.uk/rldp](http://www.conwy.gov.uk/rldp) )

CCBC supports the principle of Strategic Development Plans (SDPs). However, whilst we appreciate it is early days in terms of SDP progress, the NDF is particularly vague in addressing SDPs and lacks a clear steer and appropriate links. Given the lack of SDPs in Wales, the NDF is an opportunity for Welsh Government to provide clear guidance as to what is expected of such plans, as well as how and what relationship there should be between the NDF, SDPs and the LDPs as material considerations in guiding how much development takes place and where. Furthermore, CCBC consider that the merits of a three tier planning policy remain unclear. This is especially the case as resources, capacity and expertise is stretched and reducing. WG should further consider the true benefits of introducing a regional level of Development Plan bearing in mind the potential complexities and inconsistencies that will be involved.

Given the brevity of the published NDF, it is not initially clear to CCBC where the evidence is to support the policy ambitions laid out within it. In particular, it is uncertain where the

evidence is on viability and deliverability for the policy proposals which would provide their soundness – a test upon which LDPs are examined.

The following representations are dealt with in order of the questions set out in the official WG response form. Where detailed, each subject area lists the proposed change to the NDF. The responses also assess whether the current Conwy RLDP (Preferred Strategy) 2018 – 2033 is in general conformity with the policies proposed in the NDF and the potential implications if they are not.

## **2. NDF 11 Outcomes**

The Conwy RLDP 'Preferred Strategy' Vision and Objectives embrace the Key Planning Principles, the National Sustainable Placemaking Outcomes in Wales and the concept of placemaking set out in Planning Policy Wales (Edition 10). By taking such action it ensures that the spirit of the Well-being of Future Generations Act and its 7 wellbeing goals are fully embedded within the Strategy. The Conwy RLDP is committed to creating sustainable places in Conwy, which will be delivered around 15 strategic objectives grouped around 4 key themes (as detailed in Figure 1 at Appendix A). The Objectives proposed are in general conformity with the NDF. However, the outcomes seem to be at odds with WG's Key Planning Principle 'Creating and Sustaining Communities' and the need to plan for resilient and cohesive communities, especially in areas with high constraints, such as flood risk. The NDF doesn't fully tackle flood risk and coastal change given there will be a significant impact on some settlements from future rising sea levels. As such, consideration should be given to including an outcome that seeks to create resilient and cohesive communities.

Whilst the NDF focuses on avoiding flood risk areas to accommodate growth, it is silent to a degree on improving/regenerating key areas at significant risk of flood risk/high level constraints. Creating resilient communities in these areas will require regeneration/improvement to ensure that the needs of the community can be accommodated over the NDF period and inform SDPs and LDPs. To this point, there is significant concern that flooding funding is being linked to growth areas (i.e. that is Wrexham and Deeside in the case of North Wales). This means that priority projects for community resilience may not get funded and lower priority flooding projects will because they are in growth areas. The Conwy LDP (Preferred Strategy) promotes resilient and sustained communities and as such proposes an Eastern Regeneration and Improvement Area (ERIA) to encourage resilient communities and overcome the impacts associated with flooding constraints to meet community's needs (**refer to Appendix B for the ERIA**). There is real concern that the approach in the NDF will impact on the sustainability of these communities without a clear outcome, necessary funding and recognition of the ERIA in Conwy.

**CCBC Rep 1:** The spatial strategy is also silent on the development of resilient communities in areas of high constraint, such as flood risk to the East of the County Borough.

New outcome to cover creating/sustaining resilient and cohesive communities

**CCBC Rep 2:** To widen flooding funding beyond growth areas to areas in need of urgent regeneration/improvements as a result of high level flood risk

**CCBC Rep 3:** To recognise the Eastern Regeneration and Improvement Area (ERIA) as proposed in the Conwy RLDP 'Preferred Strategy 2018 – 2033 (refer to Appendix B)

### **3. NDF Spatial Strategy (NDF Policies 1 – 4)**

The draft NDF does not seem to be fully spatial around some topics. It is for growth areas, onshore wind and solar, district heat networks etc. Yet other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) appear to have been set aside for a later date, stating the WG “will identify” areas/sites. This may have implications on SDPs and LDPs currently being prepared/reviewed. It is the intention of Conwy to consult on the RLDP Deposit in early 2020 with submission planned for September 2020.

#### **NDF Policy 1 ‘Sustainable Urban Growth’ and Policy 2 ‘Supporting Urban Centres’**

The designation in the NDF to concentrate growth in the North East (Deeside and Wrexham) is of concern, especially having regard to where future flood funding will be allocated and without understanding the implications on other local authority areas to deliver their own growth and priority issues. It is unclear if the impacts of centralising development to the growth area will be a positive and complementary enabler for the North Wales Coastal Settlements and the rural hinterlands. Having said this, it is noted that the Welsh Government do not object to the Council’s spatial strategy set out in the Conwy RLDP ‘Preferred Strategy’ 2018 – 2033, however greater clarity is required overall as to what the NDF is trying to say about priorities for the region and which parts of the region will contribute.

As summarised above, in a North Wales context, there is a conflict between recognition of the Growth Vision and the infrastructure investment elements which are already supported by Government funding. The Conwy RLDP (Preferred Strategy) clearly recognises the regional Growth Vision and its needs associated with jobs, affordable housing and infrastructure. To ensure there is consistency across the proposed planning tiers, the NDF should fully recognise the Growth Vision and its links to the SDPs and the Conwy RLDP.

The strategic map at page 25 focuses primarily on what already exists across Wales and misses an opportunity to be more ambitious and forward looking over the NDF period. The NDF recognises connectivity issues (road and rail) in Wales but does not suggest any deliverable proposals for improvements. This map and text could go further to highlight where, for example, infrastructure/transport/regeneration development could emerge between regions and across Wales. As above, consideration should be given to those urban areas that are in need of improvement/regeneration due to high level constraints and inability to accommodate growth (e.g. Eastern Regeneration and Improvement Area)

Whilst the towns along the coastal corridor within Conwy are welcomed as being the most appropriate in sustainable terms to accommodate growth, the lack of recognition of the highly constrained settlements to the east of the County Borough should be fully captured in the NDF as a means to link to a future SDP and the Conwy RLDP. Furthermore, Conwy is further constrained outside of the eastern area from a flood risk, topography and natural/historic perspective, which poses additional challenges in accommodating growth, the necessary infrastructure to support it and creating liveable, successful places. The NDF should consider putting more focus on the strategic coastal transport corridor along the A55/Rail Route as a sustainable means to ensure flexibility in accommodating growth as opposed to the specific towns of Llandudno and Colwyn Bay. This approach would provide greater opportunity to accommodate growth, but also provide a means to encourage active travel, decarbonisation and meet more locally based housing, employment and community/utility infrastructure in sustainable and accessible locations.

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033.** The Conwy RLDP proposes sustainable growth that is needed by 2033 and the spatial distribution of the growth through the identification of key sustainable places, strategic sites and vital infrastructure requirements. It reflects the Growth Vision, LHMA and the Employment Review in setting a deliverable growth strategy. The spatial strategy within Conwy's LDP sustainably distributes this growth across the settlement hierarchy, focusing 90% across the accessible and sustainable coastal corridor. The new growth proposed in the Conwy Preferred Strategy is the result of evidencing and balancing a number of key factors. It is the outcome of understanding how the population and households will change up to 2033, together with planning for the new employment, housing and related infrastructure that is required as a result of local and regional economic drivers and affordable housing need. It also reflects the capacity of the development industry and other strategic objectives that the RLDP needs to tackle. In balancing these key growth factors the Conwy Preferred Strategy proposes to accommodate up to 1,800 new jobs and 4,300 homes by 2033. It also sets out an ambitious plan to deliver the needs of 1,800 affordable homes over the Plan Period comprising approximately 1000 new affordable homes from new build and a further 800 from policy mechanisms and Council initiatives. As such, the Conwy RLDP Preferred Strategy is in general conformity with the NDF Policy 1 & 2. However, the NDF should recognise the constrained areas and need for regeneration/improvement in order to create resilient communities (e.g. Eastern Regeneration and Improvement Area).

The CCBC Representations covered below under the Spatial Strategy section also overlap with similar issues raised for the proposed North Wales Region.

**CCBC Rep 4:** To ensure there is consistency across the proposed planning tiers, the NDF should fully recognise the North Wales Growth Vision and its links to the SDPs and the Conwy RLDP. The Conwy RLDP fully takes on-board the Growth Vision in terms of growth levels, jobs, housing and infrastructure.

**CCBC Rep 5:** The draft NDF does not seem to be fully spatial around some topics and leaves a number of designations/areas for a later date. This may have implications on the preparation of SDPs and LDPs. It is spatial for growth areas, onshore wind and solar, district heat networks etc. but not for other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc).

**CCBC Rep 6:** Consider the impact of concentrating growth in Wrexham and Deeside on local authority growth strategies and priorities.

**CCBC Rep 7:** Greater clarity is required overall as to what the NDF is trying to say about priorities for the region and which parts of the region will contribute.

**CCBC Rep 8:** Concern regarding growth focus being largely around North East, which may have impacts on local authority growth options to achieve jobs, affordable housing etc.

**CCBC Rep 9:** Significant concern that flooding funding is being linked to growth areas. This means that priority projects for community resilience may not get funded and lower priority flooding projects will because they are in growth areas.

**CCBC Rep 10:** Does not recognise areas in need of regeneration/improvement as a result of high level constraints like flood risk e.g. the Conwy RLDP identifies an Eastern Regeneration and Improvement Area (ERIA).

**CCBC Rep 11:** The document refers to a built coastal arc from Caernarfon to Deeside as a focus for managed growth, reflecting the important sub-regional role that this area plays when

supporting the main growth area noted, namely Wrexham and Deeside. No reference to supporting the sub-regional area.

**CCBC Rep 12:** The NDF focuses primarily on what infrastructure already exists across Wales and misses an opportunity to be more forward looking over the NDF period.

**CCBC Rep 13:** There is a lack of reference to the provision of sufficient infrastructure to accommodate growth in key areas as well as the mechanisms and interactions with key stakeholders and providers necessary to co-ordinate growth.

**CCBC Rep 14:** The NDF recognises connectivity issues (road and rail) in Wales but does not suggest any deliverable proposals for improvement.

**CCBC Rep 15:** No reference to the connection between rural areas and the regional growth centres. No reference to towns that have an important role as they serve rural areas such as the Key Service Centre of Llanrwst.

**CCBC Rep 16:** Concerns about the lack of policies relating to the rural areas of Wales, a risk that the focus on cities and large towns and the growth of urban areas will increase the existing spatial differences, and sections of the document give the impression that rural areas will be voids, except for agriculture and visitors.

### **NDF Policy 3 – Public Investment, Public Buildings and Publicly Owned Land**

All available Council and Welsh Government owned sites which were proposed as Candidate sites, have been thoroughly assessed as part of the LDP site selection process. As such, the Conwy RLDP Preferred Strategy is in general conformity with the NDF Policy 3. However, as with 'CCBC Rep 24' below, consideration should be given to the fact that some authorities no longer have any land which is appropriate for housing in their ownership. Therefore utilising it to deliver affordable homes will not be possible. In times when public funding is low and budgets are being cut, Local Authorities who do have land in their ownership may be looking to maximise the land value on these sites. When considering small and medium sized construction and building enterprises they will be focussed on the viability of projects.

### **NDF Policy 4 'Supporting Rural Communities'**

The NDF 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 a greater threat that rural places in Wales are left behind and the gap between urban and rural areas widens. This would be to the detriment of large parts of Wales which is rural in character and where 40% of the population live.

Given the rural nature of Conwy, supporting rural communities and their development is a key priority. CCBC 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 CCBC 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. In particular, the NDF is silent on the importance of Key Service Centres to support the wider rural settlements.

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033.** Conwy's countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The RLDP Preferred Strategy therefore focuses limited growth to those rural settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. As such the majority of rural growth is focused in the Key Service Centre of Llanrwst, which is a settlement that supports the wider rural communities in terms of employment, retailing and education. To ensure that the wider rural communities have the opportunities to sustain themselves, a more flexible approach to development is promoted in the Conwy RLDP where it safeguards community identity and meets local needs. Due to lack of policy guidance set out in the NDF it is difficult to determine whether the Conwy RLDP complies at this stage.

**CCBC Rep 17:** The NDF should contain more rural 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.

**CCBC Rep 18:** The NDF should recognise the importance of Key Service Centres (e.g. Llanrwst) to accommodate growth and in delivering wider rural community needs.

### **Other Spatial Strategy considerations.**

#### **Developments of National Significance**

The NDF should also set the context for decisions taken on Developments of National Significance (DNS) yet it is silent on this relationship. There also seems to be a lack of reference to the provision of sufficient infrastructure to accommodate growth in key areas as well as the mechanisms and interactions with key stakeholders and providers necessary to co-ordinate growth. This does not just mean the physical or digital or electric charging infrastructure to accommodate growth, but also relates to the key social infrastructure needed at the local level to help deliver growth e.g. property resources e.g. schools of a sufficient size and standard and health care facilities to meet the needs of a growing population. To this point the NDF should also recognise the potential for a tidal lagoon along the North Wales Coast as proposed in the Conwy Economic Growth Strategy and supported in the Conwy RLDP (covered in more detail below).

**CCBC Rep 19:** The NDF should also set the context for decisions taken on Developments of National Significance (DNS)

### **Tourism and the Visitor Economy**

Greater recognition and guidance on the growth and development of tourism and the visitor economy in the final NDF is also required. Tourism is one of the largest economic sectors in the County Borough supporting a high level of jobs and supporting sectors. Visitors come to Conwy to experience its unique natural and historic character and the RLDP seeks to protect and enhance this through proposed policies and designations. The designation of large areas of the rural area for solar and wind could potentially have a significant detrimental effect on Conwy's tourism industry as the landscape and visual element could be significantly affected.

**CCBC Rep 20:** Greater recognition and guidance on the growth and development of tourism and the visitor economy in the final NDF is also required.

**CCBC Rep 21:** A balance needs to be made between impacts on important local economic sectors, natural and historic impact and the need for delivering low carbon energy.

#### **4. NDF Policy 5 'Affordable Housing'**

Whilst we are fully supportive of the principle of delivering increased levels of affordable housing, the target of 47% of new homes to be affordable over the next 5 years is unrealistic under current delivery models. 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 (51% in North Wales). 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. Further detail is required on key factors that are critical to delivering these high levels of affordable housing, such as:

**CCBC Rep 22: Funding** - There is a need to clarify WG funding streams to support the delivery of these ambitious targets for AH.

**CCBC Rep 23: Affordable Housing Delivery** - with overstretched and under-funded LAs, most of whom no longer own or build housing, what assistance would WG provide to enable LAs to build these houses? When reading the supporting text it is unclear how the policy will be achieved. For example, reference to the shift in delivery model - how will this be pursued and achieved? Whilst CCBC 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.

**CCBC Rep 24:** The delivery of affordable housing is an objective for most, if not all, LDPs in Wales in accordance with National Guidance. Whilst we do not disagree with Policy 5 on delivering affordable housing, some authorities no longer have any land which is appropriate for housing in their ownership. Therefore utilising it to deliver affordable homes will not be possible. In times when public funding is low and budgets are being cut, Local Authorities who do have land in their ownership may be looking to maximise the land value on these sites. When considering small and medium sized construction and building enterprises they will be focussed on the viability of projects.

**CCBC Rep 25: Affordable Housing and Viability** – Consideration of viability, especially with regards to market development, is not fully considered in delivering higher levels of affordable housing. 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.

**CCBC Rep 26: Affordable Housing and the Private Sector** - 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.

## **Housing Numbers**

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.

**CCBC Rep 27:** 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.

## **5. Policy 6: Planning in Mobile Action Zones**

We note that the Mobile Action Zones (MAZ) are not set out in the draft NDF, with the text stating that these will be “identified”. This raises questions around how and when the zones will be identified and the implications for SDPs and LDPs. It is unclear whether MAZs would form part of the NDF or a separate document and/or this means that it is the expectation for SDPs and LDPs to deal with the Mobile Action Zones in policy terms?

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033** - The RLDP (Strategic Policy 31) recognises telecommunications including broadband and mobile phone networks as an essential service that should to be planned alongside developments from the outset, taking into account the requirements and priorities identified in the North Wales Digital Connectivity Strategy. The installation of superfast broadband is a key issue of importance in the rural areas, which rely on such services for both business and social needs. Provision of telecommunications infrastructure such as broadband and mobile phone apparatus is therefore supported in suitable locations. Conwy’s LDP recognises the importance of investment in high quality telecommunication systems to ensure economic, social and environmental sustainability. The plan includes strategic policies which support the widespread provision of high speed broadband and telecommunications infrastructure.

**CCBC Rep 28:** Greater clarity is required on MAZs and their impact on SDPs and LDPs. It is unclear how MAZs will be delivered.

**CCBC Rep 29:** Policy 6 needs to be extended beyond mobile phones - reference needed to broadband and internet infrastructure also.

## **Policy 7: Ultra Low Emission Vehicles**

While there is support for this policy and approach, we raise concerns regarding the 'action' stage and how/when the network of rapid charging points will be created. Much more detailed information is required.

We understand that to enable the effective roll out of EV charging points one of the key elements to support the charging infrastructure is data connectivity and the lack of connectivity in parts of Wales is already causing issues with authorising payments and extracting charging data from the hardware. It is essential that the planning and delivery of these two elements is effectively co-ordinated to facilitate the smooth roll-out of charging



infrastructure. In the longer term, this communication is also going to be essential for managing future functionality such as vehicle to grid charging. Would the detail on charging points be better included in PPW?

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033** – The Conwy RLDP (page 156) encourages provision of Ultra Low Emission Vehicles (ULEVs) and charging points will be encouraged and supported through the RLDP as part of new development. Where car parking is provided for new non-residential development, the RLDP will seek a minimum of 10% of car parking spaces to have ULEV charging points. The Council will also prepare a ULEV Strategy which will complement the aspirations of ULEV ambitions in the RLDP.

**CCBC Rep 30:** The policy is supported, although further clarity required around data connectivity.

### **Polices 7 & 8 Green Infrastructure**

**Policy 7 ‘Biodiversity Enhancement and Ecosystem Resilience’** areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development.

**CCBC Rep 31:** The enhancement of biodiversity and the resilience of ecosystems is welcomed. However, as it stands this policy is extremely open ended and further detail is required. Will these areas be subject to public consultation before being finalised and what resource implications would there be for Local Authorities to administrate / manage these networks?

**Policy 8 – ‘National Forests’** - An increase in woodland cover is welcomed to help build the resilience of our ecosystems, to secure the delivery of our change and decarbonisation aspirations, and to ensure that productive potential of Welsh woodlands is maintained.

**CCBC Rep 32:** CCBC welcome the increase in woodland cover, however it is again unclear how the 2000 hectares a year of new national forests will be prepared/administrated/financed.

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033** – Conwy has a significant number of wildlife habitats and species which are important internationally, nationally and locally, therefore protecting biodiversity and increasing the green infrastructure network are key principles within the RLDP. A Conwy Green Infrastructure Assessment is underway to inform the Deposit Conwy RLDP.

### **Policies 10 & 11 - Powering and heating places with renewable energy and District Heat Networks**

**CCBC Rep 33:** Policy 10 ‘Wind and Solar Energy in Priority Areas’ – The priority areas identified for wind and solar are generalised and it is difficult to interpret their precise extents from the NDF map.

**CCBC Rep 34:** Whilst the NDF makes reference to Marine Development Plans, there is a lack of reference to tidal as an energy opportunity.

**CCBC Rep 35:** It is also unclear how the areas in Conwy have been evidenced e.g. landscape assessment, grid connection and viability.

**CCBC Rep 36:** Policy 10 also notes that there is an acceptance of landscape change in these areas, this appears to contradict other elements of the NDF which outlines that the North West has an area of high landscape quality.

**Compliance with Conwy RLDP Preferred Strategy 2018 – 2033 –** The Conwy RLDP seeks a proactive approach to Renewable Energy and DHN. A Renewable Energy Assessment (REA) has been completed in line with WGs REA Toolkit Guidance, including landscape and grid connection assessments. As such no strategic search areas are identified in the RLDP, but consideration will now be given to the priority areas in drawing up the Deposit.

### **The North Wales Region**

Whilst CCBC agree in part to the emphasis on the North Wales region, there is concern that growth is focused in Wrexham and Deeside and doesn't reflect the spatial strategies and priorities proposed in the other growth centres across the coastal arc and furthermore their relationships to the rural area.

**CCBC Rep 37:** The North Wales Region proposed in the NDF seems to omit the North Wales Growth Deal proposals and its links to the SDPs and the Conwy RLDP. Whilst the NDF states that SDPs are shaped by the Welsh Government's regional Economic Development Plans and City and Growth deals, it is unclear whether the NDF takes these on board. For example, the Conwy RLDP fully takes on-board the Growth Vision in terms of growth levels, jobs, housing and infrastructure and proposes strategic sites in support of the Growth Vision

**CCBC Rep 38:** Support the principle of ensuring that Wrexham and Deeside are supported, but do not support the concept that this should be the focus for economic growth, the provision of services and facilities, transport and digital infrastructure - this is important for the entire region. The North Wales Growth Deal includes strategic sites being brought forward through the RLDP e.g. Abergele South East.

**CCBC Rep 39:** Whilst not covered in the Growth Vision, the NDF should consider recognising the potential for tidal energy, the benefits of the Tourism and Visitor Economy and areas in need of regeneration/improvement in Conwy to support the Region e.g. Eastern Regeneration and Improvement Area.

**CCBC Rep 40:** There is no reference to how the rest of the North Wales can be supported to benefit from the growth of Wrexham and Deeside.

**CCBC Rep 41:** Given that vast areas of the North Wales region (and Wales as whole) can be considered as rural, a policy which relates to rural areas is appropriate, outlining how these areas can be supported to ensure that they thrive and can provide for the needs of these areas in terms of housing, employment, access to services, sustainable transport and digital infrastructure.

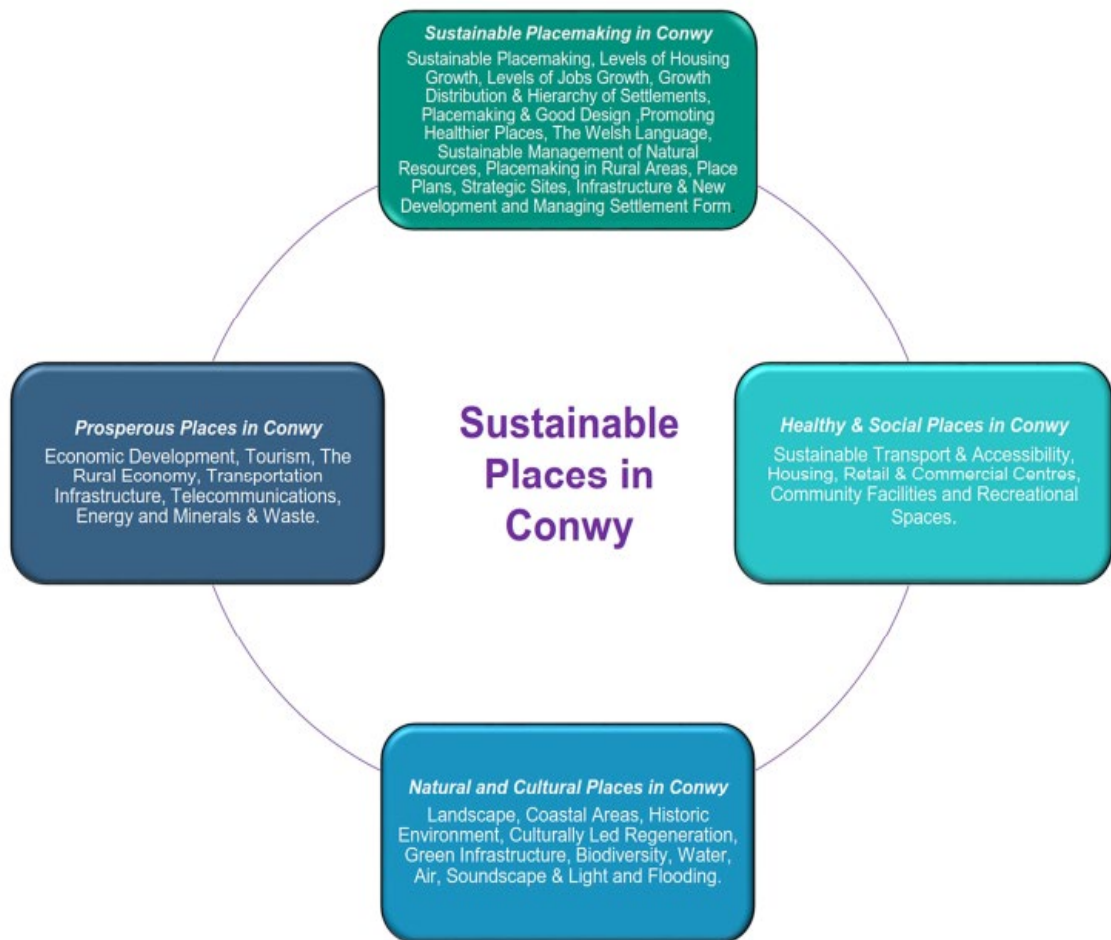
**CCBC Rep 42:** It is stated that the central estimate for the North Wales Region stands at 19,400 additional homes up to 2038 with 51% of these being for affordable dwellings over the next 5 years. It is stated that these estimates provide part of the evidence and context on which Housing Requirements for SDPs can be based. Planning Policy Wales (PPW) in paragraph 4.2.6 states that the Household Projections together with the LHMA and Well-being plan for a plan area will form a fundamental part of the evidence base for development plans; in addition it is stated that these should be considered with other key evidence in relation to issues such as what is the Plan seeking to achieve. The NDF should fully consider these matters in setting affordable housing targets for the Region.

## **Welsh Language**

**CCBC Rep 43:** Considering that economic development and community regeneration is integral to linguistic prosperity, consideration should be given on a national level to the impact on the Welsh language or on the opportunities to increase the use of the Welsh language in the NDF.

## Appendix A: Conwy RLDP Preferred Strategy Structure

Figure 1 RLDP Structure



## Appendix B: RLDP Key Diagram (2019 – 2033) showing Eastern Regeneration and Improvement Area (ERIA)

Map 1: RLDP Key Diagram

