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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation – summary of responses

Draft Integrated Sustainability Appraisal Scoping Report for the
National Development Framework

Updated September 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Contents

Page No.

- Introduction 1
- What was the consultation about? 1
- Consultation details 1
- Next Steps 2
- Statistical Breakdown and Overview of the Responses to Each Question 3

- Annex 1
 - Consultation Response Table 22
 - Consultation Response Table -Annexes to Representations 130

Introduction

1. This is an updated version of the consultation summary of response report initially published in January 2018 it consolidates all representations received to the consultation. It was brought to our attention that a small number of representations received were not reviewed at the same time as the original but have since been reviewed and dealt with in the same way as the original representations and are set out in this version of the report.
2. A 12 week consultation exercise for the draft Integrated Sustainability Appraisal (ISA) of the National Development Framework (NDF) took place between April 28 2017 and July 21 2017. This consultation summary report details the representations to the consultation exercise, the Welsh Government response and outlines the next steps.

What was the consultation about?

3. The consultation sought views on the draft ISA Scoping Report for the NDF. The draft Scoping Report is the first step of the ISA for the NDF. This was an important consultation as it will help steer the development of the ISA and the NDF, from its early stages.

Consultation details

4. Stakeholders were contacted from a core consultation list held by the Planning Directorate of Welsh Government and also through the NDF newsletter. These stakeholders included all local planning authorities in Wales, together with relevant public bodies, businesses, special interest groups and professional bodies. The consultation documentation was also made available on the Welsh Government consultation website. A workshop was held on 2 May 2017 as part of the consultation on the draft Scoping report which enabled stakeholders to discuss and help shape the ISA.
5. In total, 35 consultation representations were received from:
 - Caerphilly County Borough Council;
 - Cardiff City Council;
 - Newport City Council;
 - Natural Resources Wales;
 - CADW;
 - Dyfodol i'r Iaith;
 - Mochdre with Penstrowed Community Council;
 - Llandudno Town Council;
 - Pupils2Parliament;
 - Health and Safety Executive;
 - Joint Response Wales Health Impact Assessment Support Unit
Environmental Public Health Service Wales and Public Health Wales;
 - Three National Park Authorities;

- Accessible Retail;
- Clwydian Range and Dee Valley AONB;
- Glandŵr Cymru;
- Home Builders Federation;
- Age Cymru;
- RTPI Cymru;
- Barry Town Council;
- Well-Being of Future Generations Commissioner;
- Valpak Limited;
- Newtown and Llanllwchaiarn Town Council;
- Tidal Lagoon Power;
- Persimmon Homes East Wales;
- Royal Society of Architects in Wales (Royal Institute of British Architects);
- Mineral Products Association;
- Community Housing Cymru;
- Wildlife Trusts Wales;
- Sustrans Cymru;
- Persimmon Homes West Wales;
- Maesteg Town Council;
- Community Council of Carew;
- Historic Houses Association
- Two Individuals

6. All representations have been considered fully. Welsh Government's responses to the representations made, and how they have shaped the ISA, are recorded and presented within this summary consultation report in Annex 1.

Next Steps

7. The ISA Scoping Report, as amended from the consultation, has been published alongside this consultation summary report:
<https://gov.wales/topics/planning/national-development-framework-for-wales/resources/integrated-sustainability-appraisal-scoping-report-for-the-national-development-framework/?lang=en> .
8. The NDF Issues, Options and Preferred Option stage was published for a full public consultation in April 2018.
9. The issues, options and preferred option will be assessed using the ISA Framework within the Scoping Report and an Interim ISA Report will set out the details of this assessment. The ISA interim report will:
 - Demonstrate how the ISA has shaped the development of the NDF;
 - Set out the methodology for the appraisal;
 - Set out the options that were considered, how they were identified and any mitigation measures proposed;

- Set out the social, economic, cultural and environmental effects of the Issues and Options and Preferred Option;
- Describe the proposals for monitoring.

10. This interim ISA Report was consulted upon. Further information about future stages of the ISA process can be found in Section 2.1 of the final Scoping Report.

Statistical Breakdown and Overview of the Representations to Each Question

11. Many respondents did not fill in the consultation form when providing their response to the consultation. As such, a number of representations have been attributed as “no response”. This is because the respondent did not fill out the proforma that was provided but chose to submit a separate response. This is in contrast to some representations being attributed to “did not answer” who simply did not answer the question on the proforma.

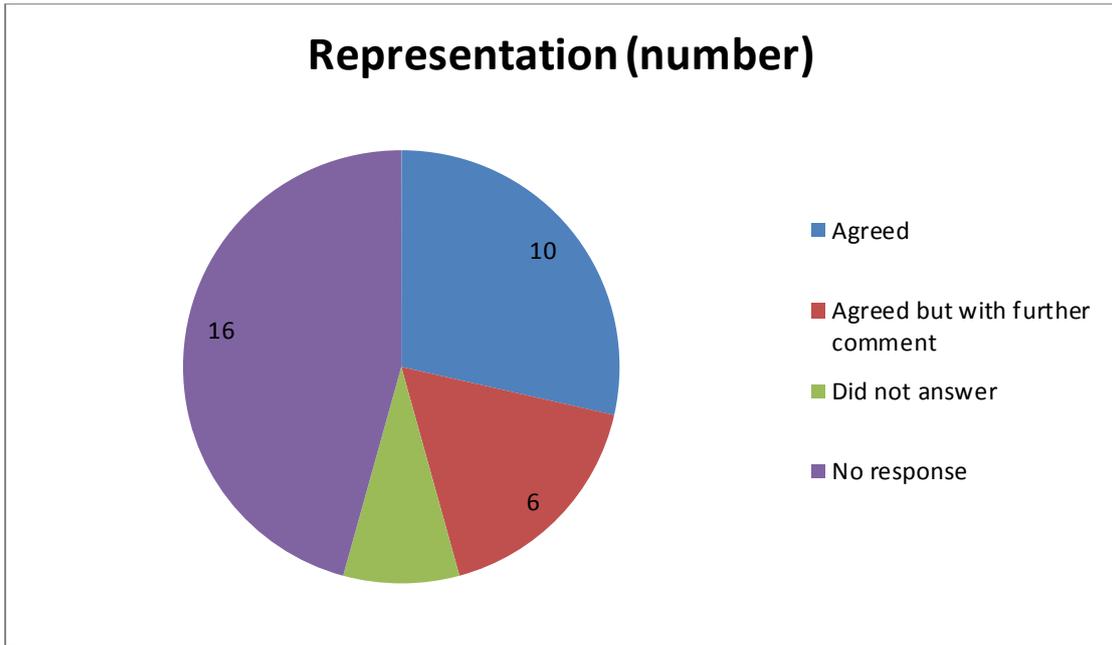
Question 1

Do you support the findings of the review of relevant plans, programmes and environmental protection objectives? Are there any additional plans, programmes or environmental protection objectives you would like to add? Are there any that you would like to remove from the review? (Section 3)

Statistical Review

12. Sixteen respondents support the findings of the review of relevant plans, programmes and environmental protection objectives, six with further comments, while sixteen did not provide a response and three did not answer. No respondents who completed the consultation form disagreed with this question.

Question 1	Yes	Yes but with further comment	No Response	Did not answer
Business	0	1	5	0
LPA	2	1	0	1
Govt. Agency/Other Public Sector	3	0	6	0
Professional Body/Interest Group	0	1	0	0
Voluntary Sector	0	1	3	0
Other	5	2	2	2
Total Representations:	10	6	16	3



Overview

13. Additional plans, strategies and legislation were suggested by respondents to be included as it was felt that these should be considered as part of the review. These were considered and added to the Plans Policies and Programmes Review and Sustainability Themes linked to the ISA where appropriate.
14. A full detailed breakdown of responses to the representations made, the Welsh Government responses and details of the changes made can be found in Annex 1.

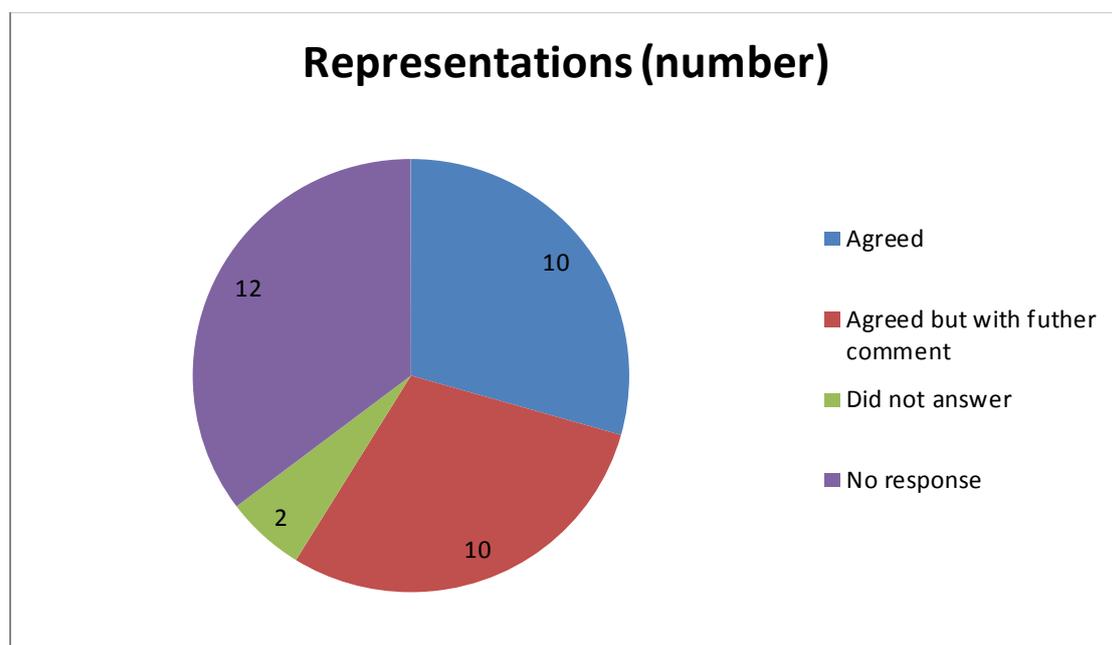
Question 2

Do you agree with the sustainability issues that we have identified? Are there additional issues that the ISA should consider? If so, what are they? (Section 4)

Statistical Review

15. Twenty respondents agreed with the sustainability issues identified in the draft ISA framework ten of whom also made further comments. While no one disagreed with the question, three did not answer and twelve did not provide a response.

Question	Yes	Yes but with further comment	No Response	Did not answer
Business	2	2	3	0
LPA	1	2	0	1
Govt. Agency/Other Public Sector	3	1	3	0
Professional Body/Interest Group	1	2	1	0
Voluntary Sector	0	1	2	0
Other	3	2	3	2
Total Representation	10	10	12	3



Overview

16. Over half of the respondents supported the sustainability issues identified. A number of additional issues were raised including the need to:
 - Consider material assets more fully;
 - Expand on ecosystem resilience and Natural Resources Policy throughout the report;
 - Strengthen climate change throughout the report recognising the wider implications not just flooding;
 - Include more data on National Parks;
 - Give geodiversity more recognition, not just something that underpins biodiversity;
 - Include more on the City Regions;
 - Strengthen how the ways of working have influenced and will continue to influence the work;
 - Clarify interaction between marine and terrestrial planning;
 - Recognise the variations with regards to the use of the Welsh language, including the role of the planning system;
 - More specific reference to the heritage sector and links between tourism and heritage.

17. All representations have been reviewed and changes have been made where appropriate. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

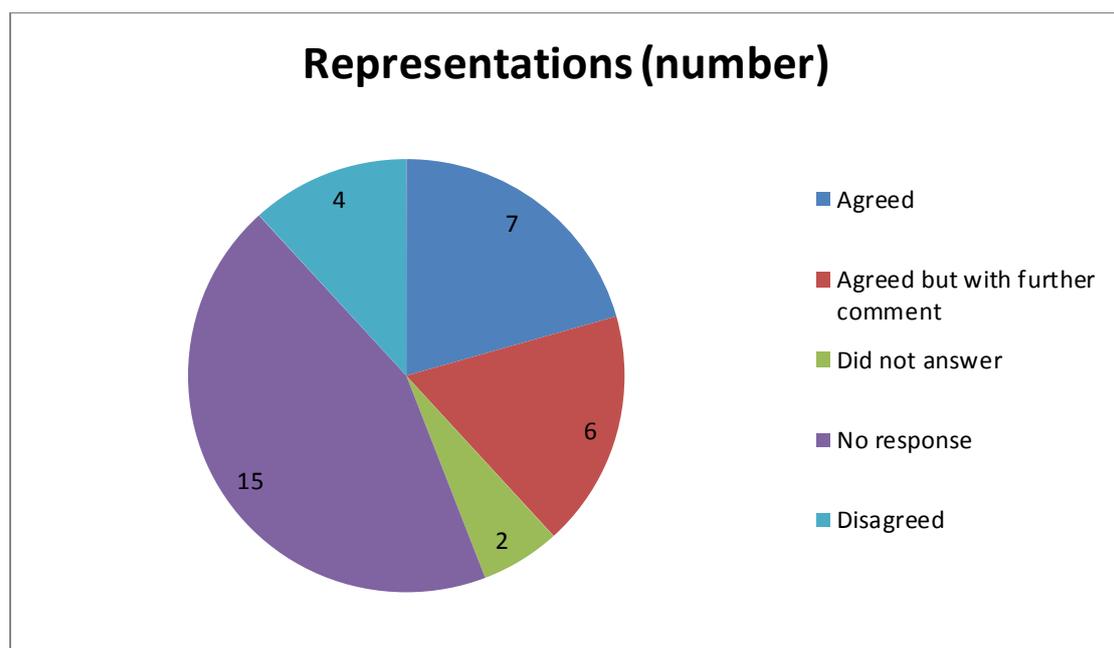
Question 3

Are there any particular topics or geographical areas of specific concern to you or your organisation? (Section 4)

Statistical Review

18. While four respondents disagreed with this question, thirteen agreed six with further comments, three did not answer and fifteen did not provide a response.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	0	2	5	0	0
LPA	2	1	1	0	0
Govt. Agency/Other Public Sector	1	1	3	0	1
Professional Body/Interest Group	2	0	1	0	1
Voluntary Sector	0	2	1	0	0
Other	2	0	4	3	2
Total Representations:	7	6	15	3	4



Overview

19. Representations made included a number of topics and areas to be included such as:
 - Sustainable Management of Natural Resources;
 - Climate Change;
 - Welsh Language;
 - City Regions;
 - Health and Well-Being;
 - Active Travel;
 - Forestry

20. These have been considered and appropriate changes made. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

21. A number of projects were also submitted, these will be considered as part of the call for evidence and projects workstream.

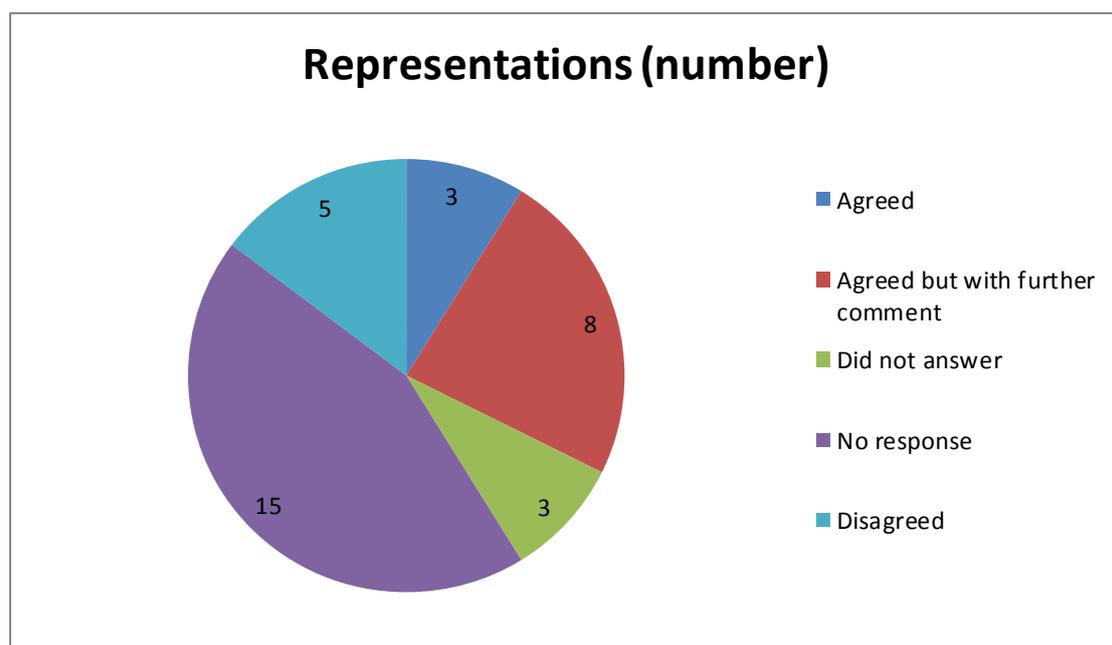
Question 4

Are there any changes you consider should be made to the ISA Objectives or Questions? (Section 5)

Statistical Review

22. Eleven respondents agreed with this question eight with further comments, however six respondents disagreed. Fifteen of the respondents did not provide a response while three did not answer this question.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	0	1	5	0	0
LPA	1	2	0	1	0
Govt. Agency/Other Public Sector	1	0	4	0	2
Professional Body/Interest Group	1	1	1	0	0
Voluntary Sector	0	2	1	0	0
Other	0	2	4	2	4
Total Representations:	3	8	15	3	6



Overview

23. Respondents identified a number of changes which they felt should be made to the ISA Objectives or Questions. These included the need for:
 - Clarity and consistency in the drafting of the questions;
 - Additional questions and amendments to objectives;
 - Links and compatibility between objectives and questions.
24. A number of these were noted and changes were taken forward in the update of the ISA Framework this included providing clarity on the role of the question and changes to reflect the comments and changes within the report following consideration of consultation representations.
25. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

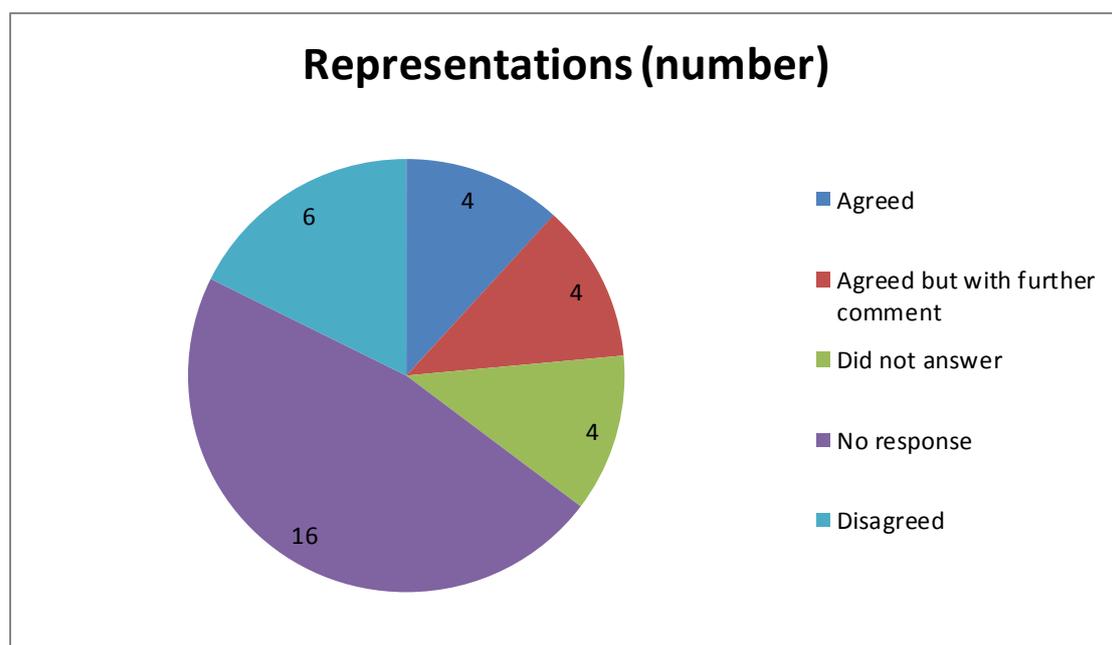
Question 5

Do you have any comments regarding how reasonable alternatives should be developed?

Statistical Review

26. There was a more even distribution of representations for question 5 than for the previous questions with eight agreeing four with further comments and seven disagreeing. Four did not provide an answer and sixteen did not respond.

Question 5	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	0	1	5	0	1
LPA	1	1	1	1	0
Govt. Agency/Other Public Sector	2	0	3	1	1
Professional Body/Interest Group	1	0	1	0	2
Voluntary Sector	0	1	2	0	0
Other	0	1	4	2	3
Total Representations:	4	4	16	4	7



Overview

27. There was commentary regarding how reasonable alternatives should be developed. For instance the need for continued engagement throughout the process. The representations received will inform the next stage of the assessment of the NDF.
28. Questions and comments were raised around Brexit and how the NDF will deal with this. Text has been included in the report recognising the challenges and opportunities provided by Brexit.
29. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

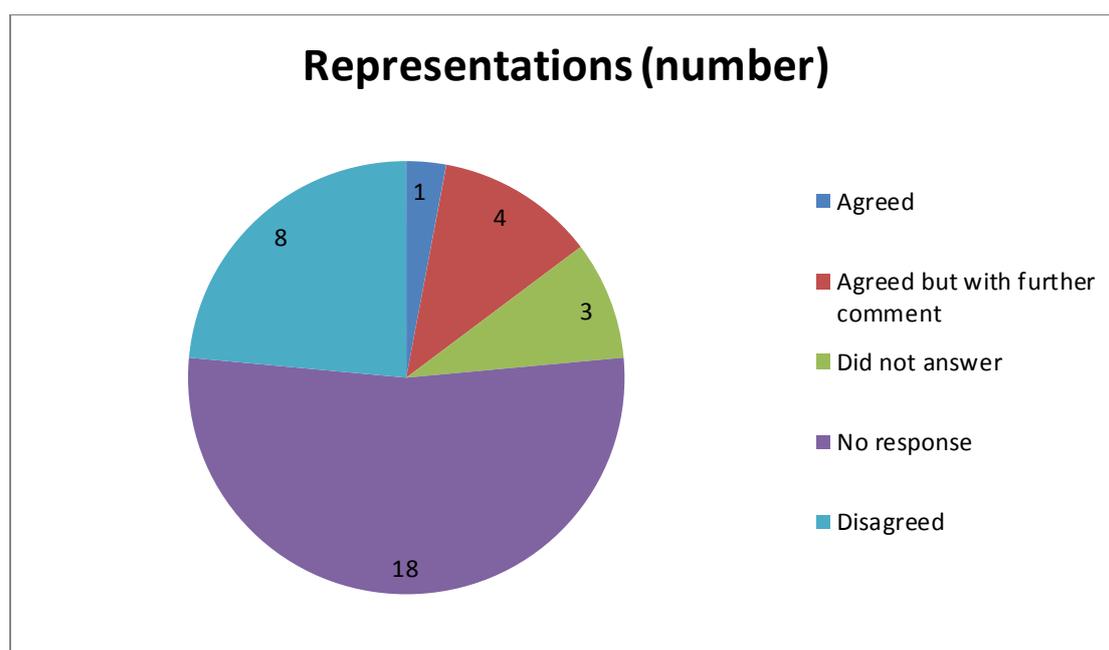
Question 6

Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the NDF?

Statistical Review

30. While five respondents agreed one had further comments, nine disagreed. Eighteen did not respond and three did not answer the question.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	0	1	5	0	1
LPA	0	1	1	1	1
Govt. Agency/Other Public Sector	1	0	4	0	2
Professional Body/Interest Group	0	1	1	0	2
Voluntary Sector	0	0	2	0	1
Other	0	1	5	2	2
Total Representations:	1	4	18	3	9



Overview

31. A number of comments were received regarding the scope of the ISA and its proposed appraisal of the NDF. Many of the comments linked to the earlier questions in the consultation including the need to expand on SMNR principles, health and well-being and minerals assets throughout the report. These representations were fully considered and amendments have been made to the report where appropriate.
32. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

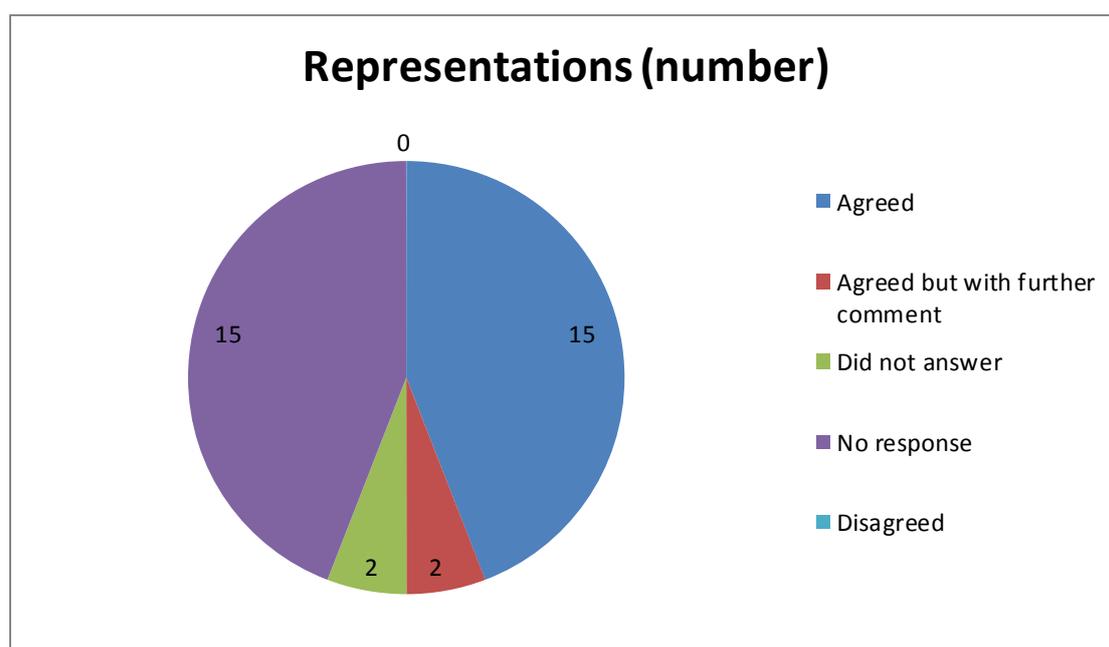
Question 7

Do you support the approach to the integration of the impact assessments?

Statistical Review

33. Seventeen respondents support the approach to the integration of impact assessments two with further comments and no respondents disagreed. Three respondents did not answer while fifteen provided no response.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	1	0	5	0	0
LPA	2	1	0	1	0
Govt. Agency/Other Public Sector	4	0	3	0	0
Professional Body/Interest Group	2	0	1	0	0
Voluntary Sector	2	0	2	0	0
Other	4	1	4	2	0
Total Representations:	15	2	15	3	0



Overview

34. Many of the representations made supported the integrated approach including those from the Well-being of Future Generations Commissioners office and Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and RTPI Cymru.
35. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

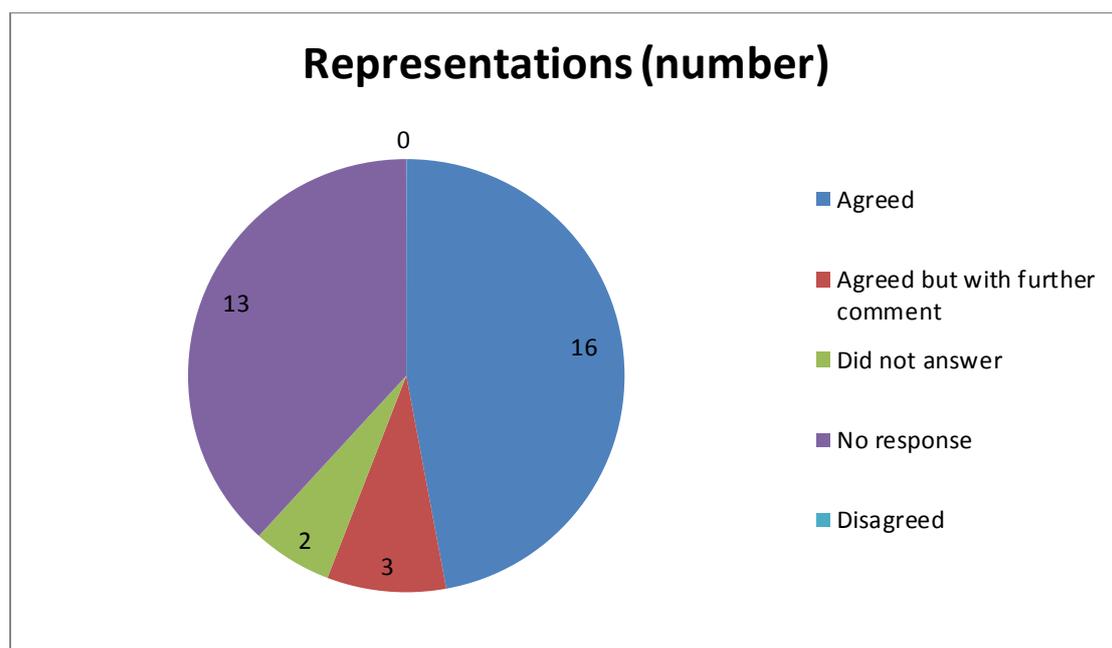
Question 8

Do you support the findings of the initial screening work for the impact assessments in Table 2-1?

Statistical Review

36. Nineteen respondents support the findings of the initial screening work for the impact assessments three with further comments while three did not answer and thirteen provided no response.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	3	0	3	0	0
LPA	2	1	0	1	0
Govt. Agency/Other Public Sector	4	0	3	0	0
Professional Body/Interest Group	1	1	1	0	0
Voluntary Sector	2	0	2	0	0
Other	4	1	4	2	0
Total Representations:	16	3	13	3	0



Overview

37. This question did not generate the same level of comments as other questions. The representations received included the need to strengthen the references to climate change throughout the report and the importance of meaningful engagement. Changes were made to the Scoping Report to address these comments where appropriate.
38. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

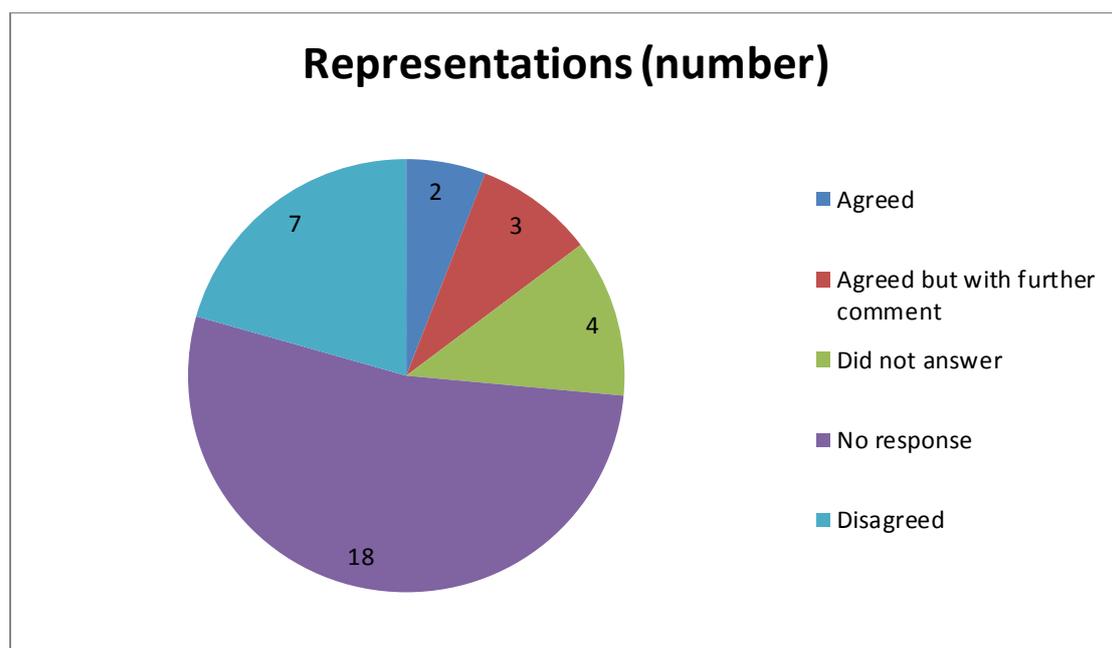
Question 9

Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments in Table 2-1?

Statistical Review

39. Five representations agreed with question 9 three with further comments, while eight disagreed, four did not answer and eighteen did not provide a response.

Question	Yes	Yes but with further comment	No Response	Did not answer	Disagree
Business	0	0	5	0	1
LPA	0	1	0	2	1
Govt. Agency/Other Public Sector	1	0	4	0	2
Professional Body/Interest Group	0	1	2	0	0
Voluntary Sector	0	0	2	0	2
Other	1	1	5	2	2
Total Representations:	2	3	18	4	8



Overview

40. Much like question 8, question 9 did not draw the same volume of representations compared to other questions. All representations were fully considered and additional evidence provided was included in the report where appropriate.
41. A full detailed breakdown of responses to the representations made, the Welsh Government response and details of the changes made can be found in Annex 1.

Question 10

Do you have any other comments?

Overview

42. This question drew a number of detailed comments, statements and questions; these were considered and the Report updated as necessary including changes to the ISA Framework questions, the addition of text on Brexit and providing clarity on the marine and terrestrial planning interface.
43. A full detailed breakdown of responses to the representations made, the Welsh Government responses and details of the changes made can be found in Annex 1.

Question 1

Do you support the findings of the review of relevant plans, programmes and environmental protection objectives (PPP)? Are there any additional plans, programmes or environmental protection objectives you would like to add? Are there any that you would like to remove from the review? (Section 3)

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	The review should also include Minerals Technical Advice Notes 1 and 2	Agreed. Minerals Technical Advice Notes to be added to the review and subsequent stages of the report as appropriate.	Welsh Government Mineral Technical Advice Notes (MTAN) added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
2	Natural Resources Wales	--	It is our view that the principles of the sustainable management of natural resources (SMNR), as set out in the Environment Act (Wales) 2016 should be explicitly referenced and acknowledged. We welcome the prominence given to the State of Natural Resources Report (SoNaRR) both here and in the analysis of baseline information. We also welcome the high profile mention of, and links to, both the emerging Natural Resources Policy (NRP) and Welsh National Marine Plan (WNMP), all of which are likely to have significant influence over the NDP.	Agreed.	Principles of SMNR have been integrated throughout the document.
			We suggest you also include Welsh Government's Wellbeing Statement. In addition, we suggest including the Welsh Government's Nature Recovery Plan.	The Welsh Government's Well-being statement Taking Wales Forward 2016-2021 referenced therefore no change required. Agree to include Nature Recovery Plan.	Nature Recovery Plan added to the PPP review and Sustainability these in Appendix A.
			Appendix A appears to be missing sector development legislation/plans. This may be because it is considered to sit underneath the named policies/plans already mentioned, but this doesn't seem to be the case in all instances, for example: <ul style="list-style-type: none"> • UN Convention on Law of the Sea • Petroleum Act • DECC/BEIS Offshore Energy Plan and subordinate plans for offshore oil and gas licensing • The Crown Estate Minerals Licensing Plan • Shoreline Management Plans 	Agree to include national and international level PPPs. However, it is considered that the other suggested PPP, relating to licencing, are not directly applicable to land use planning.	United Nations Convention on Law of the Sea 1982, Petroleum Act 1998 and the Shoreline Management Plans (SMPs) added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
			In addition, we note that there is no reference to Area Statements. See our comments in relation to Question 5, consideration of alternatives. Regardless of this, given that it is anticipated that these documents will be key in the implementation of the Natural Resources Policy, it is our view that they should be included in the plans reviewed, if they are published in time for consideration. Area Statement production will start once the Natural Resources Policy is approved, with all of them published by the end of 2019. The NDP will need to take them in to account as they are published.	Noted.	Text updated in section 3.1 to acknowledge how future emerging work will be incorporated and the iterative nature of the process.
			The Natural Resources Policy Statement (2015) is incorrectly attributed to NRW (Appendix A, page 4). This is a Welsh Government document.	Agreed.	Correction made.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p><u>Water</u> The review of plans should include the River Basin Management Plans (RBMPs) that are relevant to Wales - Natural Resources Wales produced the RBMPs for the Dee and Western Wales, and the Environment Agency have produced the plan for the Severn. Whilst we recognise that these plans are not produced at a national scale, they contain National Measures, which are set out in the RBMPs separately but that apply to Wales as a whole. It is our view that these National Measures should to be considered as there is a real opportunity for the NDF to help deliver them, for example implementing sustainable urban drainage etc. In addition, we have an all Wales delivery plan which sets out the timetable etc. for delivery, which should also be considered, and which we can forward on to you.</p>	Noted. Agreed.	River Basin Management Plans have been added and the all Wales delivery plan considered. Indicators will be considered, but are not being included explicitly in the assessment framework at this stage. These will be included in the reporting for monitoring purposes at a later stage in the ISA.
			<p>Appendix B, page 32, 3.1.5 Water Environment, Baseline condition and trends – there are a number of errors in this section. This includes the figure referenced (the title is wrong), and, more significantly, the baseline data quoted is incorrect. Currently it states that ‘In 2014 42% of water bodies in Wales were classified as being of ‘good’ ecological status compared to 21% in England. There was a slight decrease to 39% classified as being of ‘good’ ecological status in 2015’. This is incorrect. In 2015 cycle 1 for Wales there were 37% of water bodies achieved good or better ecological status. For Wales in Cycle 2, in 2015 over 38% of water bodies achieved good or better ecological status. 39% relates to the overall figure (combined ecological and chemical) for Wales in Cycle 1 2015. 42% refers to the predicted number of water bodies in 2021.</p>	Noted.	Errors have been corrected, using the SoNaRR report.
			<p><u>Climate change</u> We support the reference to the “Defra (2012) UK Climate Change Risk Assessment: Government Report”, but would expect the corresponding document for the latest UK Climate Change Risk Assessment to be used as well, namely:</p> <ul style="list-style-type: none"> UK Climate Change Risk Assessment 2017: Government Report https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017 <p>Similarly, we support reference to the “Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales”, but would make the point that this is a relatively high-level document, and that the technical chapters of the full UK report would need to be accessed for more detailed information, link below:</p> <ul style="list-style-type: none"> https://www.theccc.org.uk/uk-climate-change-risk-assessment-2017/ <p>Overall, we are satisfied that all relevant plans, programmes etc. in terms of flood risk and coastal erosion have been identified and reviewed. We suggest that the Key theme from the review in terms of flood risk could be expanded to include ‘impacts on people /property’.</p>	Agree that the latest UK Climate Change Risk Assessment report should be added. Further detailed information may be considered at later stages of the report. However, it is noted that the ISA Scoping Report is intended to be high-level. Agree that the key theme could be expanded.	<p>2017 Climate Change Risk Assessment added to PPP review and baseline data.</p> <p>Climate change issues added throughout issues and opportunities in Appendix B and the main report (Table 4-1).</p> <p>Paragraph added referencing the cross-cutting nature of climate change and that objectives will be considered as a whole</p>
			<p><u>Comments on sustainability themes in Appendix A</u> The Sustainability Themes identified in Table 1-2 (in terms of flood risk – page 10) capture the precautionary principle well in terms of new development and climate change adaptation. However, it is stated that the NDF will “use natural features that contribute to flood management to reduce flood risk and coastal erosion”... and that “this should be considered when determining the location and design of new development”? Whilst this sounds good, we are less clear about how this will be delivered in practise. We would welcome greater clarity on exactly how the NDF will link flood defence/mitigation programmes with</p>	Noted. Further clarification on how the NDF may link flood defence/ mitigation programmes with development management will be examined throughout the	No further change required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			development management.	ISA process (Objective 7).	
			<p><u>Comments on sustainability themes in Appendix A</u> The theme related to the protection of water resources/quality (page 13) could be enhanced by including the greater use of Sustainable Urban Drainage Systems (SUDS) as an opportunity. It would also be good to see the sustainable use and disposal of water in all new developments captured (to include sewerage as well as surface water drainage).</p>	Noted.	SUDs considered in the issues and opportunities in Appendix B and Table 4-1
			<p><u>Comments on sustainability themes in Appendix A</u> Theme 'Create safe, sustainable, balanced and cohesive communities' (page 19) should include Wellbeing Goal 7. 'Safe' should include safety from natural hazards such as flood risk and coastal erosion.</p>	Noted.	Reference to well-being goal 7 added.
			<p><u>Landscape</u> Appendix A, Page 17, Protect and enhance the local distinctiveness of our landscapes and the historic environment and its setting – the Historic Landscapes Register is included, and we therefore suggest also including statutory National Park and AONB management plans. In addition, other related UK legislation that should be referred to includes:</p> <ul style="list-style-type: none"> • National Parks and Access to Countryside Act 1949 • Countryside Act 1968 	Noted. It is noted that the legislation is already included in the PPP review, it is considered that the National Park and AONB Management Plans are locally scaled documents which inform LDPs therefore are not included in the ISA at this stage.	Data on National Parks added to Appendix B.
			<p><u>Health and Wellbeing</u> We wish to highlight the importance of the new National Survey for Wales (NSW), an integrated survey by the Welsh Government, Natural Resources Wales, Sport Wales and the Arts Council. This will provide the key data for the population of Wales on a wide range of relevant social and economic aspects, including health and subjective well-being, participation in outdoor recreation and sport, and attitudes towards exposure to flood risk, climate change and biodiversity loss, and will therefore be a key source of data for the ISA and the NDF on the population of Wales. The first results are due to be published on the 28th June 2017, with subsequent annual publication of data until at least 2021.</p>	Noted. The results of this survey will be considered as part of the assessment process, where applicable, when the information becomes available.	Relevant data added to Appendix B.
			<p><u>Economics</u> Additional strategies and plans that should be considered as part of the review are:</p> <ul style="list-style-type: none"> • Green Growth Baseline Study (2014), A report for Welsh Government prepared by Eftec on behalf of the Green Growth Steering Group • http://www.cynnalcyrmru.com/wp-content/uploads/2015/02/Green-Growth-Baseline-Study1.pdf • Growth within: A circular economy: vision for a competitive Europe (2015). McKinsey Center for Business and Environment, jointly sponsored by the Ellen Macarthur Foundation and SUN • http://www.mckinsey.com/business-functions/sustainability-and-resource-productivity/our-insights/europes-circular-economy-opportunity 	Noted and agreed.	Green Growth Baseline Study 2014 and Growth within: A circular economy: vision for competitive Europe 2015 added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
			<p><u>Energy</u> UK Plans and Programmes</p>	Noted and agreed.	The Energy Acts 2013 and 2016 and the 2017

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<ul style="list-style-type: none"> HM (Government) (2013) The Energy Act 2013 HM (Government) (2016) the Energy Act 2016 The Wales Act 2017 		Wales Act added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
			<p>Wales Plans and Programmes</p> <ul style="list-style-type: none"> Welsh Government's 2014 Energy Wales: A Low Carbon Transition Delivery Plan Welsh Government's 2015 Green growth Wales: Investing in the Future Welsh Government's 2015 Green growth Wales: Local Energy Energy Efficiency in Wales: A Strategy for the Next 10 years 2016-2026 <p>Both the Green Growth documents are part of a programme aimed at fostering economic growth, development and social equity, while ensuring that our natural assets can continue to provide the resources and environmental services on which our wellbeing relies. They focus on the sustainable use of natural resources by stimulating investment and innovation, which will help create a new economic model, and deliver economic growth.</p>	Noted and agreed.	Wales Plans and Programmes such as the Welsh Government 2014 Energy Wales: A Low Carbon Transition Delivery Plan, Green Growth: Investing in the Future, Green Growth Wales: Local Energy and Energy Efficiency in Wales: A Strategy for the next 10 years 2016-2026 added to the PPP Review, Sustainability Themes linked to ISA Objectives in Appendix A and table 3-3.
			<p><u>Biodiversity</u></p> <p>Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, Lawton, J. (2010) – whilst this review was produced in relation to English sites, the principles of better, bigger, more joined up, more permeable landscape etc. apply equally to Wales. The map of designated sites has some out of date information: all the marine sites currently described as potential SPAs, should be just SPAs (they were designated by the Minister in January).</p>	Noted. Document only refers to England, no direct influence on the NDF. Note that principles are reflected in other documents that have been reviewed.	Figure 1 to be updated.
			<p><u>Item to add to the review: Health & Well-being</u></p> <p>'Climbing Higher, the Welsh Government's Strategy for Sport and Physical Activity', should be included. This is a 20 year strategy published in 2006 running until 2025, and should inform the NDF. Climbing Higher still contains the target that no one should live more than a six minute walk (300m) from their nearest natural green space.</p>	Noted and agreed.	'Climbing Higher, the Welsh Government's Strategy for Sport and Physical Activity' added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
3	CADW	--	<p>The review has identified most relevant plans and programmes related to the historic environment. However, some of the plans and programmes identified are not active in Wales, and other relevant plans and programmes have not been identified. We question whether the following, included in the list of UK Plans and Programmes, are relevant in Wales;</p> <ul style="list-style-type: none"> Department for Culture, Media & Sport (2007) Heritage Protection for the 21st Century; Department for Culture, Media & Sport (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments; HM Government (2002) The National Heritage Act 2002 	Noted and agreed.	The Department for Culture, Media and Sport documents on Heritage Protection for the 21 st Century and Scheduled Monuments & Nationally Important but Non-Scheduled Monuments and the UK Government's National Heritage Act removed from the PPP

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					Review and Sustainability Themes linked to ISA Objectives in Appendix A.
			In addition, the following should be removed from the list of National (Wales) Plans and Programmes; <ul style="list-style-type: none"> Welsh Government (2013) The Historic Environment Strategy for Wales. 	Noted and agreed.	Welsh Government's Historic Environment Strategy Wales removed from PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A
			The following should be added to the list of UK Plans and Programmes; <ul style="list-style-type: none"> Cultural Property and Armed Conflict Act 2017 The UK marine policy statement (2011) 	Noted. The UK Marine Policy Statement is already included in the review. CADW has since advised that the Cultural Property and Armed Conflict Act need not be included	No further action required.
			The following should be added to the list of National (Wales) Plans and Programmes; <ul style="list-style-type: none"> Welsh Government (2016) Light Springs through the Dark: A Vision for Culture in Wales; and Welsh Government (2017) Technical Advice Note 24: The Historic Environment. Welsh National Marine Plan (forthcoming). 	Agree to add TAN 24 and Light Springs through the dark. The emerging Welsh National Marine Plan is already considered in the report.	TAN 24 and Light Springs through the dark: a vision for Culture in Wales added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
			The following should be added to the list of International Plans and Programmes; <ul style="list-style-type: none"> Convention for the Protection of Cultural Property in the Event of Armed Conflict with Regulations for the Execution of the Convention 1954. 	It is noted that CADW has since advised that this document need not be included.	No further action is required.
			ii) Please see appendix A attached to this letter for our comments about Table 1-2 Sustainability Themes linked to ISA Objectives.	See further comments below under question 10, representation 3.	
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	Yes subject to further comment	Gan fod diogelu a hyrwyddo'r iaith Gymraeg yn elfen bwysig o'r arfarniad, mae'n allweddol bwysig sicrhau bod y broses yn cyd-fynd ag amcanion a champau gweithredu Strategaeth y Gymraeg. Ceir gyfeiriad at y nod o greu miliwn o siaradwyr Cymraeg (sef prif nod Strategaeth y Gymraeg) yn Atodiad A, ond fel y mae'r Strategaeth yn datblygu, yna rhaid i'r gwaith hwn adlewyrchu ac ategu'r camau penodol. Credwn fod peryg mewn canolbwyntio'n llwyr ar y nod uchelgeisiol hwn: os am wireddu'r fath weledigaeth, rhaid sefydlu hinsawdd gadarnhaol a champau gweithredu hirdymor a phendant. Os yw'r arfarniad am wneud gwir wahaniaeth i'r Gymraeg, yna bydd rhaid ystyried sut y gall	Noted. Points to be considered throughout the ISA process.	No further action is required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>gefnogi pob cam o'r daith, yn hytrach nag anelu at darged cyffredinol</p> <p>Byddwn yn nodi'n ogystal pwysigrwydd y Bil Cynllunio (2015) sy'n gofyn am ystyriaeth o'r Gymraeg, pan fo'n berthnasol, wrth benderfynu ar geisiadau cynllunio. Mae'n hanfodol adlewyrchu'r egwyddor yng nghwmpas yr arfarniad hwn, ac yn wir, ar bob lefel o'r gyfundrefn gynllunio.</p> <p>Mae'r ddogfen ymgynghori'n rhoi pwyslais ar ofynion statudol Mesur y Gymraeg (2011), a byddwn yn nodi bwriad y Llywodraeth i adolygu'r Mesur hwn. Byddwn yn ychwanegu na fyddai canolbwyntio'n llwyr ar ofynion y Mesur presennol (i beidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg) yn gallu cyflawni llawer o safbwynt hybu'r Gymraeg. Mesur amddiffynnol yw hwn yn y bôn, ac o'i ddilyn i'r llythyren, mae peryg colli'r cyfle i weithredu'r rhagweithiol o blaid yr iaith.</p>		
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>Because protecting and promoting the Welsh language is an important element of the appraisal, it is vitally important to ensure that the process accords with the objectives and actions of the Welsh Language Strategy. Reference is made to the aim of creating a million Welsh speakers (the main aim of the Welsh Language Strategy) in Appendix A, but as the Strategy develops, this work must reflect and support the specific actions.</p> <p>We believe that focusing entirely on this ambitious aim is risky: if such a vision is to be realised, a positive climate must be established along with long-term and clear actions. If the appraisal is to make a real difference to the Welsh language, consideration must be given to how it can support every step, rather than aim for a general target.</p> <p>We will also note the importance of the Planning Bill (2015), which requires the Welsh language to be taken into consideration, when relevant, when determining planning applications. It is essential to reflect the principle in the scope of this appraisal, and indeed, on all levels of the planning system.</p> <p>The consultation document focuses on the statutory requirements of the Welsh Language Measure (2011) and we will note the Government's intention of reviewing this Measure. We will also add that focusing fully on the requirements of the current Measure (not treating the Welsh language less favourably than the English language) would not achieve much in terms of promoting the Welsh language. This is a defensive measure in essence, and if followed to the letter, there is a risk of missing the opportunity to take proactive action for the language.</p>		
7	Mochdre with Penstrowed Community	Yes	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Council				
8	Llandudno Town Council	Yes	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	Please see comments at Q10		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	--	Yes. We welcome the inclusion of integrating a number of assessments including Health Impact Assessment. We do not wish any identified plans, programme or environmental protection objectives to be removed.	Noted.	No further action required.
			We would like to add the following Strategy: Welsh Government (2012) Together for Mental Health: A Strategy for Mental Health and Wellbeing in Wales.	Noted.	Together for Mental Health: A Strategy for Mental Health and Wellbeing in Wales added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A
			We also want to add the UK Climate Change Risk Assessment (CCRA) 2017 (which includes a Wales section). This document is available at: https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017	Noted.	UK Climate Change Risk Assessment 2017 added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A
12	Three National Park Authorities	Yes	None		
13	Cardiff County Council	Yes subject to further comments	For completeness the following documents should be added to the National (Wales) Plans and Programmes section of Appendix A Plans, Programmes and Environmental Protection Objectives Reviewed: <ul style="list-style-type: none"> Welsh Government (2004) Interim Marine Aggregates Dredging Policy Welsh Government (2004) Minerals Technical Guidance Note (MTAN) 1: Aggregates Welsh Government (2009) Minerals Technical Guidance Note (MTAN) 2: Coal 	Noted.	All three documents have been added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A and Table 3-3
14	Accessible Retail	Yes	N/A		
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	The AONB Joint Committee and Partnership welcome the identification of landscape protection and enhancement as a key theme of the ISA (p.17). Overall, the approach to landscape conservation in the ISA is quite comprehensive and well thought through.	Noted.	No further action required.
			AONB and National Park Management Plans are prepared every 5 years and are important statutory documents relating to nationally recognised landscape assets, many of which cross administrative boundaries. These should be specifically recognised as relevant plans for consideration as part of the ISA. They provide important baseline information for the key theme of protecting and enhancing landscapes and the historic environment and also contribute to other themes. World Heritage Site Management Plans should be given similar recognition.	Noted. It is considered that the National Park and Management Plans are locally scaled documents which inform LDPs therefore are not included in the ISA at this stage.	Data on National Parks added to Appendix B
			In the list of relevant UK legislation in respect of the landscape protection and enhancement theme, the National Parks and Access to the Countryside Act 1949 and the Countryside and Rights of Way Act 2000 are a significant omission.	Noted. This UK legislation is already included in the PPP review,	No further action required,
16	Glandŵr Cymru	--	The Trust has previously provided comments in respect of the NDF Call for Evidence (letter	One of the 'themes' of the	It is noted that the ISA will

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			dated 06 March 2017) in which we, amongst other things, highlighted the need for an overarching approach to tourism across Wales in the NDF. Tourism is of course vital to economic prosperity and job creation in many parts of Wales, but it is a multi-faceted, cross-cutting theme, also important for the maintenance and upkeep of many of the nation's heritage and environmental assets, protection and enhancement of its landscape and promotion of Welsh culture. It is therefore recommended that protection and promotion of tourism in Wales should be considered as a key theme.	PPP review is: 'Establish a strong tourist economy, sensitively capitalising on environmental, heritage, and leisure assets'. Tourism is also considered within the Key Sustainability Issues and Opportunities under '1. A Prosperous Wales'	not be focussing on specific industry types as part of the assessment. This may form part of the NDF therefore no further action required.
17	Home Builders Federation	Yes subject to further comment	There appears to have been no consideration of private sector documents, with mainly only WG documents considered. An example of a private sector document which would appear relevant would be the 'Cardiff Capital Region City Deal Growth and Competiveness Commission Report & Recommendations'. This document also provides a helpful summary of a number of other private sector documents which could be considered.	Noted.	The City Regions Report, Powering the Welsh Economy Cardiff Capital Region City Deal – report and recommendations and Growth Strategy for the Swansea Bay City Region added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
18	Age Cymru	--	Given that 'Population ageing is a permanent feature of our modern society' ¹ we believe that the Welsh Government's Strategy for Older People in Wales 2013-2023 (and future reviews of the Strategy) should be taken into account in the review of relevant plans. Welsh Government (2013) The Strategy for Older People in Wales 2013-2023.	Agreed.	The strategy for Older People in Wales has been added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
19	RTPI Cymru	--	It is unfortunate that recognition of the wider issues appear to be missing from the findings of the review of plans, programmes and environmental protection objectives. Infrastructure in particular does not appear to be recognised and should be mentioned under connectivity/communities.	Noted.	Infrastructure provision considered as a whole, across the issues and opportunities assessments.
			Linked to this, digital infrastructure is also a key theme that should be addressed. Reference to broadband and influences of the digital economy on spatial planning including infrastructure should be included under connectivity/communities or the economy themes. The digital technology sector is among the strongest drivers of growth in large urban areas. The RTPI has recently published The <u>Digital Economy and Town Planning</u> , which provides practical advice to help planners in cities, and city regions respond to the growth of the digital economy and guide its future development.	Noted.	RTPI document added to PPP review in Appendix A. Digital infrastructure considered across the issues and opportunities.
			Cross-border policy and infrastructure linkages must also be addressed. An example of this is set out in our <u>briefing note</u> which states "The NDF should define those linkages across the border with England and the sea border with Northern Ireland and the Republic of Ireland, through sea ports." In relation to this and the maps accompanying the consultation, Figure 4	Noted.	Figure 4 has been updated

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			on transport, would be much more useful if it also showed the transport infrastructure that links parts of Wales through England along with ferry routes to Ireland.		
			Paragraph 3.1, pg 13, refers to international scale documents that the NDF will take into account. These are then listed in Appendix A. However, there is no reference to and the New Urban Agenda adopted at Habitat III (Quito) in 2016, which the UK government has signed up to.	Agreed.	Habitat III (Quito) has been added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A
			The table at figure 3-2, pg 15 is unclear and we question the purpose that it serves. Where and how does it fit in with the review of plans, programme and objectives? Further clarification is required.	Noted.	Table has been removed.
			In relation to the list of plans, programmes and objectives at Appendix A, we are concerned that the value of the NDF in reflecting other policy documents, will be constrained where those documents themselves are out-of-date. For example the Wales Transport Strategy has not been updated since 2008, while several of the Technical Advice Notes (TANs) are older (TAN 2 Affordable Housing 2006, TAN 11 Noise 1997, TAN 13 Tourism 1997, TAN 14 Coastal Planning 1998, TAN 15 Flood Risk 2004, TAN 18 Transport 2007). These along with other documents need to be updated to help ensure that the value obtained from the investment of resources in the NDF is maximised.	Noted.	Text updated in section 3.1 to acknowledge how future emerging work will be incorporated and the iterative nature of the process.
			Cardiff University's Map for Wales project, supported by RTPi Cymru, will help to provide the NDF with the context of many other government policies with spatial implications to ensure there is more read across between policies.	Noted.	No further action required.
20	Barry Town Council	Yes	We would support more discussions around energy production, in particular new untried and untested schemes such as incineration projects such as the one being fought in Barry.	Noted.	ISA Framework updated regarding energy.
			Water quality issues are obviously an issue that we would want more work done around, being a seaside town. There are concerns about the quality of contained tidal water areas, such as the one in Barry where there is a Watersports group located. The quality of the water is poor and the group are limited to the type of Watersports they can undertake because of this. More needs to be done to improve such areas thus improving facilities for young and old alike.	Noted. The ISA Framework addresses water quality and sport.	No further action required
			With Brexit looming what will happen to the list of EU directives found in this document. Barry Town Council would urge the Welsh Government to maintain those levels as outlined later in this document on exiting the EU.	Noted.	Text updated in section 3.1 to acknowledge how future emerging work will be incorporated and the iterative nature of the process. Text in section 4.3.2 has been included on Brexit.
			This Council supports the green and blue flag objectives, and would seek to gain such awards in any parks/open spaces that they gain through the reshaping of services programme. To assist with this they would like the Welsh Government to make grants available to help with gaining these awards.	This comment is not related to the ISA process.	No further action required.
21	Well-Being of Future Generations Commissioner	--	N/A		
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn	Yes	RESTORATION OF THE MONTGOMERY CANAL TO NEWTOWN: The Town Council would like to add restoration of the Montgomery Canal to the	This comment is not related to the ISA Scoping	Details of the project have been passed to the team

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Town Council		<p>considerations being undertaken for the NDF and the Sustainability Appraisal.</p> <p>Council resolved</p> <p>a) July 2017 'Council approves the Canal Restoration Project Initiation Document.'</p> <p>b) Aug 2016 'Committee agrees the circulation of the approved Canal Restoration PID to the identified stakeholders.'</p> <p>The council's project proposal fits well with the Wellbeing of Future Generations (Wales) Act 2015 with particular relevance to the</p> <p>i) Goals: Prosperous Wales, Resilient Wales, Healthy Wales, Cohesive Communities, Vibrant Culture</p> <p>ii) Ways of Working: Long Term, Integration, Collaboration, Involvement</p> <p>In addition to supporting the delivery of the well-being goals, the project fits with a range of Welsh Government economic, social, cultural and environmental policies for, and 4 cross cutting strategies 'Prosperous and Secure', 'Healthy and Active', 'Ambitious and Learning', and 'United and Connected'.</p> <p>Furthermore, the project fits alongside other Welsh Government Impact Assessments for 'Rural Proofing', Economic Development, and Third Sector.</p>	Report.	dealing with the call for evidence and projects to be considered. No further action required.
24	Tidal Lagoon Power	--	<p>Please consider</p> <ul style="list-style-type: none"> • DBEIS industrial strategy work; • UK National Infrastructure Commission's emerging National Infrastructure Assessment; • Committee on Climate Change reports on scenarios for UK carbon budgets and emerging work to inform WG carbon budgets under Environment (Wales) Act; • CCR Growth and Competitiveness Commission's report; • EC energy and transport policy/network strategies (given links to Ireland); • any Irish economic strategies of relevance 	These will be considered by the evidence base team for the NDF.	No further action required.
25	Persimmon Homes East Wales	--	<p>The Wales Spatial Plan (WSP) and Planning Policy Guidance Wales (PPG) should be reviewed under the Plans & Programmes section (Table 3-1). PPPW sets out the Welsh Governments planning policies that LPAs must have regard to in preparing LDPs well as in their consideration of planning applications. The review of these documents may impact on the policy direction of the NDF or vice-versa.</p> <p>The NDF can have an important role in achieving the aims of Section 3.2 (Table 3-3), access to good quality housing, by adopting a strategic approach to the identification of large scale housing development. Persimmon Homes are promoting a number of strategic sites across south Wales including those at Langstone (East Newport). We would be pleased to share further information with you on this 408 acre, 3,000-5,000 home strategic opportunity.</p>	<p>Noted. The PPP review already includes Planning Policy Wales (edition 9) and the Wales Spatial Plan.</p> <p>This is not a comment relating to the ISA Scoping Report.</p>	<p>No further action required</p> <p>No further action required.</p>
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	The RSAW supports the ambitious aspiration of integrating environmental assessment at the national level and recognise that the this is necessarily strategic so the range of plans, programmes and environment objective is appropriate.	Noted.	No further action required.
27	Mineral Products Association	--	The findings are somewhat scant and a little one sided particularly with respect to the minerals industry, where the documents fails to recognise any of the positive contributions made to society by this sector. This lack of balance may be down to inexperience or an unwillingness to look deeper in to the contributions of the sector. No houses, no schools, no hospitals, no roads, no clean water, no paper, no pharmaceuticals, no solar panels, no wind turbines, no mobile phones or PCs. There are no references to Planning Policy Wales or	Noted. Further considered of the minerals industry and 'material assets' to be included in the report, including reference to the Minerals TANs	Minerals TANs added to PPP review. Minerals industry considered throughout review of issues and opportunities.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			National Infrastructure plans.		
28	Community Housing Cymru	Yes subject to further comment	CHC members have fed back that objective 17 should include the assessment of proposed building materials for their sustainability. Materials should be of low embodied energy, from renewable sources or made from recycled materials, preferably from within the UK and sourced close to the site in order to reduce transport miles and therefore adding to the embodied energy content.	Noted.	Information added as an opportunity to be considered for the NDF in table 4-1.
29	Wildlife Trusts Wales	--	We are pleased that the process will involve a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA). However, the consultation document only makes limited references to climate change assessments even though climate change and climate change reductions are a significant part of the Environment (Wales) Act i.e. at least an 80% reduction in greenhouse gases by 2050. For example, in Section 4.3 (Key Sustainability Issues and Opportunities), Table 4-1, A Prosperous Wales does not mention - <ul style="list-style-type: none"> • Climate Change or • Living within environment limits. 	Noted.	Comments regarding 'a prosperous Wales' in Table 4-1 to be included. Changes made to Appendix B 'a Prosperous Wales' under 'opportunities'.
			Also, without appropriate environmental desk surveys ¹⁸ , ecological surveys and reports you cannot confidently predict significant effects. Therefore, the ISA needs to highlight the importance of Local Environmental Record Centres, robust ecological surveys and evidence based reports. ¹⁸ The first piece of preparatory work on any potential development should be a full search at the appropriate Local Environmental Records Centres (LERC). http://www.lrcwales.org.uk/?AspxAutoDetectCookieSupport=1b	It is noted that the ISA of the NDF will be a high-level and national-level assessment. Professional judgement will be used to assess potential effects of the content of the NDF. This will not be a detailed project level type assessment, the type of which may include desktop assessments.	No further action required.
			In addition, we would like to see the following references, <ul style="list-style-type: none"> • Nature Recovery Plan • Sites of Special Scientific Interest, Ancient Woodlands, Section 6 and 7 Habitats and Species • Ecosystem Service Assessment • The produces from the Environment (Wales) Act such as Areas Statements • Wildlife Trusts Living Landscapes Projects - Living Landscape and is a new way of thinking championed by the Wildlife Trusts on how we manage land to do more for wildlife, people and the economy. • RSPB Futurescapes Projects - Working in partnership with many organisations, the RSPB Futurescapes initiative is aiming to make UK landscapes more wildlife-friendly and habitats less fragmented. • River Basin Management Plans¹⁹ • Water Framework Detective – the assessment process should use Water Watch Wales to detriment which waterways are at risk http://waterwatchwales.naturalresourceswales.gov.uk/en/ ¹⁹ https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/river-basin-management-plans-published/?lang=en	Noted.	The Nature Recovery Plan and RBMPs added to the PPP Review and Sustainability Themes linked to ISA Objectives in Appendix A.
• Green Infrastructure audit ²⁰ should be undertaken. A GI Audit is the accurate mapping,	It is agreed that the	No further action required.			

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>description and analysis of all existing green infrastructure (GI) features within a defined study area. It outlines the functional benefits of GI, and identifies opportunities for improving existing GI and for creating new GI. The improvement and increase of GI within an area will provide multi-functional benefits to people, the economy and the environment. A GI Audit provides a focus for organisations such as Business Improvement Districts (BIDs), and can identify partnership opportunities that lead to the targeted implementation of the most relevant and beneficial schemes. It highlights the potential that GI offers to business, through a structured and evidence-based process that initiates action. Indeed, BIDs have reported that a GI Audit has assisted them in the delivery of a range of their business plan objectives that include the improved appearance of the BID area, increased biodiversity and improved air quality²¹. There are many other good guides such as Wildlife Trusts Wales – Green Infrastructure: A Catalyst for the Well-being of Future Generations in Wales, Bridgend²² and Monmouthshire²³ Supplementary Planning Guidance.</p> <ul style="list-style-type: none"> • Biodiversity Benchmark²⁴ - is the only award for business to recognise and reward continual Biodiversity improvement. <p>²⁰ https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/green-infrastructure-audit-best-practice-guide ²¹ ibid ²² https://www.bridgend.gov.uk/media/227718/final-green-infrastructure-spg-for-web.pdf ²³ http://www.monmouthshire.gov.uk/app/uploads/2015/07/GI-April-2015.pdf ²⁴ http://www.wildlifetrusts.org/biodiversitybenchmark</p>	development of Green Infrastructure provides a wide range of significant opportunities for both urban and rural areas across Wales. However, it is not the role of the ISA process to undertake primary data collection. Should this information become available, however, it would be integrated into the report as part of the iterative process.	
30	Sustrans Cymru	--	<p>The NDF review should take in to account the Active Travel Act (Wales) 2013 (ATA). The legislation seeks to make it easier for more people to walk and cycle more often for everyday journeys. The ATA supports several of the Well Being of Future Generations Act's goals, including a healthier Wales and a more prosperous Wales.</p> <p>The planning, design and location of where people live has a significant influence on how people travel. Therefore, the NDF will have a significant influence on whether journeys can be made by foot or bicycle. Welsh Government policy on how provision for walking and cycling is delivered and promoted in Wales should form part of the review.</p> <p>Sustrans Cymru believes that once considered in the review, the key theme around sustainable travel could be strengthened. This could include:</p> <ul style="list-style-type: none"> • Enable increased use of sustainable travel modes (including walking and cycling) and encourage a reduction in dependence on the private car • Encourage the use and viability of public transport services that meet people's needs through land use planning initiatives • Plan for highways infrastructure that meets people's needs, focused on prioritising safe, direct and attractive walking and cycling routes and networks for urban journeys less than 5 miles <p>Overall recommendation: The Integrated SA should ensure the NDF reflects the objectives of the Active Travel Act (Wales) 2013 to ensure land use development and planning across Wales favours sustainable transport.</p>	Noted. The Active Travel Act is already included within the PPP review in Appendix A.	Suggestions considered and key themes from the PPP and issues and opportunities reviewed and updated.
31	Persimmon Homes West Wales	--	With specific reference to housing matters the Wales Spatial Plan and Planning Policy Guidance Wales should have been reviewed under the Wales Plans and Programmes section in Table 3-1. Planning Policy Wales, for example, sets out the Welsh Governments planning policies that Local Planning Authorities must have regard to in preparing their Local	Planning Policy Wales (edition 9) and the Wales Spatial Plan have been considered in the PPP	No further action required.

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			Development Plans as well as in their consideration of planning applications. It may be the case that if these documents were reviewed they would impact on the policy direction that the NDF may take or, the NDF may impact on them in so far as they would need to be reviewed and amended as a result of the policies and proposals contained within the final NDF.	review. Further iterations will be incorporated as necessary.	
			In section 3.2 "Key Themes" reference is made in Table 3-3 to the Key Theme to: " <i>Improve access to good quality affordable housing to ensure that everyone has the opportunity to live in a decent affordable home</i> " The NDF can have an important role in achieving this aim by adopting a strategic approach to the identification of growth areas/ New Settlements/Garden Villages where additional large scale housing development would be supported and promoted. In this respect I enclose a copy of our representations dated 7 th March 2017 in respect of the Call for Evidence and Projects on the NDF which outlines some of the large scale developments that Persimmon Homes are promoting throughout South and West Wales.	This comment does not directly relate to the ISA Scoping Report.	No further action required
32	Individual	Did not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	NA		
34	Community Council of Carew	Yes	Carew Community Councillor have reviewed the draft report and support the methodology and summary of key issues.	Noted.	No further action required.
35	Historic Houses Association	Yes Subject to further comment	<p>The principles of the review are good as is the relevant list, but the tabulated results on pp 15 and 16/17 do not appear consistent. As an example which is of interest to the HHA, one of the Key Themes (on p17) is "Promote and protect the Welsh Language culture and heritage" Against that there are listed five National Well Being Goals viz:- Prosperous, Resilient, Equal, Vibrant, and Globally Responsive. However, the two relevant Well Being Objectives on p15 are numbers 5 (the Language) and 11 (Culture and Heritage). In the grid alongside in neither is the box in the column 'Resilient' shaded but, in contrast, in both cases the box in the column for 'Cohesive Communities' is shaded.</p> <p>The HHA would submit that the built heritage both in private and public ownership provides an excellent focus for communities, especially rural communities, and thus does very much contribute to community cohesion. By contrast the definition of A Resilient Wales in the 2015 Act says "A nation which maintains and enhances a biodiverse natural environment " It is quite hard to see where the language, culture and heritage fit in to that goal. Thus we submit that p15 is correct and p 17 incorrect.</p>	Noted.	Table 3-2 has been removed following other consultation responses received.

Question 2

Do you agree with the sustainability issues that we have identified? Are there additional issues that the ISA should consider? If so, what are they? (Section 4)

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	N/A		
2	Natural Resources Wales	--	<p><u>General</u> To ensure SEA criteria are fully covered in this ISA, please ensure that Material Assets are considered appropriately. As presented, this currently only appears to consider housing and transport. In addition, the inter-relation between the effects on SEA topics also needs to be considered in the assessment process. Scoping Report, page 21, Table 4.1, 2. A resilient Wales – in the opportunities column there is a need to emphasise the opportunity for the NDF to promote and make provision for nature based solutions which deliver multiple benefits for identified key issues. In relation to Geology and soils, note that soil quality has deteriorated across all habitats except woodland. In relation to Minerals and Waste, note that reducing demand is the first step to reducing waste, not recycling.</p>	<p>Noted. The interrelationships will be brought out during the assessments. In relation to minerals and waste, it is noted that the first opportunities paragraph relates to reducing demand.</p>	<p>Material Assets to be considered more fully in light of these comments as well as others. Changes made to Issues and Opportunities in Appendix B and the main report (Table 4-1).</p>
			<p><u>Biodiversity</u> Page 21, Table 4.1, 2. A resilient Wales, Biodiversity, flora and fauna – we are concerned that this section does not provide a clear and comprehensive summary of the issues and opportunities in relation to biodiversity. It is not just designated sites and species which are declining, most non-designated habitats and species are also declining in quality and quantity. Fragmentation is also a key issue, severing meta-populations, leading to local extinctions, and a greater vulnerability to the impacts of climate change. A clear priority and opportunity is the need to protect, create and maintain functioning ecological networks at a landscape scale. We suggest you refer to SoNaRR for a comprehensive view of issues.</p>	<p>Noted. It is considered that the risks to non-designated habitats and species are discussed in Appendix B.</p>	<p>Revisions made to the issues and opportunities in Appendix B and Table 4-1.</p>
			<p><u>Air quality</u> Air quality issues are wider than are described here. While health benefits are identified from reducing air pollution, as are ecosystem benefits, the fact that there are co-benefits needs to be strengthened. The review of baseline data emphasises sulphur dioxide (and ozone) as an issue in Wales. However, it is our view that sulphur dioxide is not a significant issue in Wales, whilst nitrogen oxides (NOx), in particular nitrogen dioxide, are, having been identified as such in all 22 of the Air Quality Management areas (AQMAs) in Wales - this needs reinforcing. In addition, there appears to be no mention of ammonia in this section – this is a significant omission as it is a key increasing pollutant in Wales with many localised hot spots breaching the relevant critical levels. Reductions in ammonia emissions (which include ultra-fine particles PM2.5s) has co-benefits for both ecosystems and human health.</p>	<p>Noted.</p>	<p>Revisions made to the issues and opportunities in Appendix B and Table 4-1. Text relating to ecosystem resilience added to main report.</p>
			<p><u>Water</u> The water section does not adequately reflect the significant water management issues</p>	<p>Noted.</p>	<p>River Basin Management Plans</p>

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>in Wales. A cleaner, healthier water environment is beneficial to many of the 7 wellbeing goals and its importance should be highlighted. The River Basin Management Plans (RBMPs) include a Programme of Measures (local and National), and these should be referred to within the document (as part of duties under Section 3 (4) of the Water Framework Directive (WFD) (England & Wales) 2017 Regulations). Whilst the document makes frequent reference to water features, it is important to consider that the WFD encompasses all water environments.</p>		included in PPP review in Appendix A. Water considered more fully (to include freshwater and marine and coastal) in Appendix B and the main report (Table 4-1).
			The NDF could and should play a bigger part in helping to enhance water bodies and the aquatic environment. For example Sustainable Drainage Schemes; preventing road and highways drainage from going straight to water courses; etc. Development planning needs to take into account WFD at an early stage.	Noted.	Opportunities are noted in the report.
			Page 16, Table 3.3 - the review of plans and programmes identified that 'protect and improve the quality of water resources' is a key theme, and identified national well-being goals where the theme can contribute to. It is our view that this should include 'A prosperous Wales' as improved water quality leads to healthy habitats and species which in turn brings in tourists (in the same way that biodiversity does). 'A Wales of cohesive communities' should also be included as communities that have access to healthy aquatic habitats are more likely to be socially responsible and work together to ensure it stays that way.	Noted.	Goals added to Table 3-3 and also in Appendix A.
			<p>Page 21, Table 4.1, 2. A Resilient Wales – the key issue that 'Terrestrial and marine biodiversity is under threat from development, pollution and climate change' should also include reference to freshwater biodiversity.</p> <p>In relation to the key issue that flood risk 'is exacerbated by an increase in extreme weather events and this means that properties and businesses are increasingly becoming at risk', this should also include reference to land use practices and increased channel modifications leading to increased flow rates and subsequent erosion.</p>	Noted.	Updates made to Appendix B and main report (Table 4-1).
			Page 23, Table 4.1, Key sustainability issues and opportunities, 3. A Healthier Wales – the 2nd bullet point should include reference to Sustainable Urban Drainage Systems (SUDS), and a healthier aquatic environment.	Noted.	SUDs care noted in the report noting the wide-ranging benefits. Text updated in Appendix B and Table 4-1
			Appendix Page 34, 2nd paragraph – it is important to note that Wales isn't all a 'groundwater inner source protection zone'. It is all considered a Drinking Water Protected Area under the WFD, which is where the confusion may have arisen.	Noted.	Text corrected in Appendix B.
			<p><u>Climate change</u></p> <p>There is a presentational issue, and potentially a more fundamental issue, regarding the way that Climate Change is dealt with in Table 4.1. In this table, and in relation to "A resilient Wales" Climate Change is linked to Flood Risk only. Climate Change will impact on many issues, not simply Flood Risk. There needs to be a clear statement within the table that the scoping report acknowledges the full range of risks identified within the "Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales", and that these various potential impacts are addressed within the relevant parts of the scoping report – for example in relation to water availability. Without such a statement we cannot be sure that the scoping report has adopted the comprehensive, systematic approach to climate adaptation that is required. In particular, we cannot be sure that issues regarding gaps in the data have been taken fully on board.</p>	Agreed. It was intended that climate change form an overarching theme for all of the topic areas, however, this will be made clearer and the interrelationships made clearer in the table.	Table 4-1 to be revised. Statement added to main report and climate change issues reviewed throughout the entire document.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p><u>Flood Risk</u> We are pleased to note that 'Climate and flood risk' is captured as a 'Key Issue' in Table 4.1. Although flood risk is noted as a significant issue, ideally it should be made clearer that this is an issue for Wales now, and not just due to climate change. The text does identify that there is an "increasing risk to properties and businesses", however, the increased risk of flooding and the correlating impact on health and wellbeing has not been identified. The impact on the local economy as a result of flooding is also a key issue – not only in terms of direct clean-up/recovery/repair costs, but also from impacts such as disruption to local services, loss of trade to local businesses (including agriculture), working days lost, etc. Under 'opportunities' the NDF also has a role to play in reducing the risk from present day flood risk, not just future risks resulting from climate change. Flood Risk and the management of that risk is an issue for Wales even without the increasing risk from climate change. For example, new development continues to be constructed in areas identified as being at flood risk. There are therefore increasing risks from flooding due to inappropriate development and decision making, not just as a result of climate change. This is not acknowledged in the document or by the relevant ISA objective (Obj.7). Also, we would like to see the NDF provide support to the principle of directing development away from areas of flood risk, as well as providing guidance on location and design. Other partners, such as the Lead Local Flood Authorities, Local Resilience Forums (flood management/flood preparation & emergency planning) and other key stakeholders such as the Wildlife Trusts and National Trust (and others) should also be identified as an opportunity to improve flood risk management, in particular as part of encouraging sustainable land and ecosystem management. We have the following comments on Appendix B (Baseline Data) relating to flood risk.</p>	Agreed. Comments relating to delivery partners (final paragraph) relate to the NDF.	Text in Appendix B and Table 4-1 updated.
			<p><u>Climate & Flood Risk - section 3.1.3</u> page 27. As stated previously, it is not just climate change that will exacerbate flood risk and put people at increasing risk – inappropriate development (building in present day flood risk areas/development of green spaces increasing run-off/poorly thought out drainage, etc.) is also an issue.</p>	Agreed.	Text in Appendix B and Table 4-1 updated.
			<p>Page 28. The impacts of flooding are significantly wider than those identified here. There is the damage to infrastructure and knock-on effects e.g. disruption to everyday lives such as commuting/accessibility, temporary (but possibly long term) loss of facilities and local services, impacts on local business/economy, impacts on health and wellbeing including increased pressure on health service provision, etc, some of which are difficult to quantify.</p>	Agreed.	Text in Appendix B updated.
			<p>Water Environment – section 3.1.5 The NDF could also play a role in guiding decisions through the planning process that ensure new development does not cause or exacerbate flood risks</p>	Agreed.	Text in Appendix B updated.
			<p>Table 3.2. (Key issues) page 35 Climate and flood risk – as before flood risk is an issue currently, not just as a result of Climate Change. There could be links made here to an increasing risk to the health and wellbeing of people in Wales as a result of extreme weather and its impacts (including flood risk), as well as the negative impacts on local the economy/community.</p>	Agreed.	Text in Appendix B updated.
			<p>Page 36 – opportunities (climate and flood risk) The NDF needs to look at opportunities to reduce present day flood risk and promote resilience measures against that too – not just look at future risks.</p>	This is a comment for the NDF team.	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			Also, as highlighted under Q2, other partners/key stakeholders in addition to NRW, should also be identified, especially in terms of encouraging sustainable land and ecosystem management, and for emergency flood planning (which are all part of flood management).		
			<u>Landscape</u> We are pleased that the protection and enhancement of landscape and the historic environment have emerged as a key theme of the review of plans, programmes and environmental objectives (P17). We are also pleased that the opportunities landscape provides in contributing to Welsh Governments four key strategies (1.7), and social, environmental, cultural and economic wellbeing, is clearly recognised.	Noted.	No further action required.
			Figure 2 Landscape Features and Figure 3 Heritage Features – it would be beneficial if these two figures were clear that they illustrate a mix of statutory /non-statutory and national/local designations. Figure 2 should ideally be entitled Statutory Landscape Designations (which are the National Parks and AONBs). Country Parks are non-statutory local authority recreation designations and perhaps would better sit under a recreation or accessible green space map, the production of which we would support.	Noted. It is not intended that a map of local designations will be produced at this stage.	Figure reviewed and Country Park Designation removed.
			Landscape as a resource providing important cultural services for wellbeing also lies beyond designated landscapes and can be considered at different spatial planning scales. The table below sets out the range of Landscape resources which are available as mapped areas. Due to the overlap with habitat and historic environment considerations, it might not be practical to duplicate some of these on Figure 2 Landscape, but as areas of landscape resource, components contributing to landscape distinctiveness, destinations for communities and visitors for wellbeing and components of urban Green Infrastructure, the current discussion within the NDF regarding landscape would benefit from being broader. [separate table attached]	Noted.	Text added to Appendix B and Table 4-1 to widen landscape considerations.
			Page 23, 3. A healthier Wales – this refers to ‘national green spaces’ which is not a term with which we are familiar. This term is also used in Appendix B on page 47. It is unclear whether this is referring to national parks and AONBs, or some other green spaces. Clarity on this would be welcome.	Noted.	Text changed to ‘accessible natural green spaces’.
			Table 4.1 Key sustainability issues and opportunities Page 24, 5. A Wales of cohesive communities - we suggest landscape character and quality needs to be considered as more specific rather than just landscape. This is because being more focused on what a scheme may contribute to would be more helpful down the line. Many of the issues discussed in this section have a connection with the planning and design of the built environment, for example the location and form of housing development, access to safe open spaces, quality of the public realm, and opportunities for social interaction. The NDF should make clear the importance of, and enable, planning for cohesive communities within future areas of growth, across the full range of planning considerations, not simply the delivery of housing. Otherwise planning for social cohesion and healthy communities may be lost in the planning balance, because of economic issues such as developer viability. If this doesn't happen there is a risk that we could continue to repeat the mistakes of the past. We support consideration of the following additional points within the opportunities column: <ul style="list-style-type: none"> • Appropriate guidance could be developed to clarify planning and design approaches that help support cohesive communities e.g. the integration of places and networks for health, habitats and climate resilience within housing and 	Noted.	Additional points added to Appendix B and Table 4-1.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>transport proposals.</p> <ul style="list-style-type: none"> The NDF is focused towards the sustainable planning of new development. It would be helpful also to introduce regeneration and retrofitting as important planning means of addressing the social, health and wellbeing issues faced by existing communities. 		
			<p>Page 24, 6. A Wales of vibrant culture and thriving Welsh language, Landscape and Townscape Character – we welcome the inclusion of landscape in both the issues and opportunities columns, and are pleased that seascape has also been integrated. In addition, we welcome the suggestion of new guidance to assist in the protection and enhancement of this resource as part of the planning system.</p> <p>In the issues column, it is stated that ‘Wales is renowned for its high-quality landscapes with over 50% of the land area being nationally valued for its scenic quality and character’. We would suggest adding ‘including 25% of Wales which is internationally recognised as National Park or AONB’. Similarly in the Key Issues on page 78 of Appendix B.</p> <p>Also in the issues column we support the inclusion of distinctiveness, but would add (underlined) ‘to enable appropriate levels of growth whilst retaining the distinctiveness <u>and quality</u> of places and landscapes’.</p> <p>Cultural Heritage and Assets - it is also important to recognise that assets in isolation, as well as their group value and collective landscape context, are important. We welcome recognition of their contribution to a sense of place and identity.</p>	Noted.	Suggested changes have been incorporated.
			<p>Appendix B, Page 6, 2.1.1, The Economy, Employment and Income in Wales – you may wish to consider adding:</p> <ul style="list-style-type: none"> In 2013 Welsh National Parks accounted for over half a billion pounds of Wales GVA representing 1.2% of the Welsh economy (Valuing Wales’ National Parks, Arup Report 2013). In 2013 more than 12 million people visited Wales’ three National Parks, resulting in some £1 billion pounds’ worth of spend in the Welsh economy (Valuing Wales’ National Parks, Arup Report 2013). 38% of all jobs in Welsh National Parks are linked to the environment (UK Census 2011). <p>Page 8, SMEs and Micro-businesses – you may wish to consider adding:</p> <ul style="list-style-type: none"> It is estimated that over 5,000 small businesses are located in Welsh National Parks, employing more than 29,000 people (Valuing Wales’ National Parks, Arup Report 2013). 	Noted.	Appendix B updated to incorporate suggested changes.
			<p>Page 71, 7.1.2, Relevance to the NDF, 2nd paragraph – landscape is about character and quality, and it is important that this is recognised throughout the assessment process – for example, the text below should ideally have the additions underlined:</p> <ul style="list-style-type: none"> ‘These elements have been strongly shaped by human intervention and land-uses throughout history and the NDF will continue to play an important role in shaping this character <u>and quality</u> through its guidance on land-use planning. Landscape, townscape and seascape character <u>and quality</u> are important in terms of Wales’ strong sense of place and cultural identity with close links to the tourism industry.’ 	Noted.	Appendix B updated to incorporate suggested changes.
			<p>It should also be noted that Protected Landscapes are now more accurately referred to as Designated Landscapes (both Welsh Government and Natural Resources Wales now use this term.)</p>	Noted.	Appendix B updated to incorporate suggested changes.
			<p>In the Protected Landscapes section at the bottom of page 71, two points to consider as</p>	Noted. It is considered that	Appendix B updated to

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>additions are:</p> <ul style="list-style-type: none"> The National Parks and AONBs are national strategic assets contributing to the delivery of social, environmental, cultural and economic well-being goals for a quarter of Wales. More detailed information on these areas is updated on a five-yearly basis through the statutory review of National Park and AONB management plans. 	the National Park and AONB Management Plans are locally scaled documents which inform LDPs therefore are not included in the ISA at this stage.	incorporated suggested changes.
			<p><u>Health and Wellbeing</u> Page 16, Table 3.3 – we are concerned that this table lacks a coherent, comprehensive set of social/health themes. In particular, we recommend the inclusion of the following:</p> <ul style="list-style-type: none"> Increasing informal recreational use of the natural environment by local residents, which provides significant benefits to health, the economy, and community cohesion. Increasing opportunities for people to engage with their local environment, including environmental volunteering, allotments, and community growing schemes, which contribute to health and wellbeing. Improve opportunities for active travel, with a focus on interconnected, safe walking and cycling routes. 	Noted. However, as this table highlights the results of the PPP review, these points will be added to the key issues and opportunities Table 4-1.	Appendix B updated to incorporate suggested changes and Table 4-1. Active Travel theme also updated.
			Page 23, Table 4.1, 3. A Healthier Wales – this should include reference to the role of the NDF in improving infrastructure and opportunities for Active Travel (walking and cycling). The provision of accessible natural green space should be highlighted as an issue and an opportunity.	Noted.	Updates made to Appendix B and Table 4-1.
			<p>Appendix B, page 18, 4.1.1 Health and Wellbeing Relevance to the NDF – this should include reference to the role of the NDF in reducing the cost to the health sector through improving population-level health and wellbeing. This should focus on:</p> <ul style="list-style-type: none"> health improvement (e.g. opportunities for physical activity and mental health benefits through outdoor recreation; health protection (e.g. through improving air quality) 	Noted.	Updates made to Appendix B
			<p>Baseline conditions and trends – there is a lack of data on recreation use of the environment, and on participation in environmental volunteering. Given the numerous references to the recreational use of open greenspaces etc., it is essential that the baseline data includes the following (this will be provided by the new National Survey for Wales, reporting in June 2017):</p> <ul style="list-style-type: none"> percentage of adult population taking part in outdoor recreation in Wales percentage of people meeting the recommended level of physical activity through participation in outdoor recreation in Wales percentage of the population taking part in environmental volunteering <p>For information, with regard to the lack of spatial data on greenspace in Wales, Natural Resources Wales is currently developing a new Green/blue space data set, which we expect to be available by the end of 2017.</p> <p>In addition, Appendix B does not appear to include reference specifically to accessible natural green space. As you are aware there are important co-benefits here for biodiversity, and physical and mental wellbeing.</p>	Noted. This type of data has been identified as a data gap. It is agreed that its inclusion would be useful when available.	Data to be included when available. Some data updated in Appendix A, relating to the first bullet point.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p><u>Energy</u> Issues and opportunities in relation to energy There should be more consideration of smart energy technology as well as low carbon. We consider the NDF has the following opportunities in relation to energy:</p> <ul style="list-style-type: none"> • Greater emphasis on reducing energy demand, to an extent that reflects the ambition implied in the Wales Carbon Budgets that are set by Welsh Government under the Environment (Wales) Act 2016. • Aim to reduce emissions by highlighting the opportunities from natural resources (links to SMNR) and stressing the need to diversify the energy sector (encourage a greater energy mix, for security, affordability and climate factors). This would help realise the potential for energy efficiency, renewable energy and low carbon energy. • NDF could realise the potential of the right technology in the right place (heat networks, wind, marine). • NDF also has the potential to identify the need for, and support development of, energy infrastructure such as electricity transmissions and grid distribution. • NDF has the potential to support decentralised energy networks; reflecting the objective of greater community and local ownership of renewable energy, whilst encouraging demand reduction. • NDF has the potential to identify and support innovation and emerging energy technologies in decarbonising Wales. 	Noted.	Suggested changes to be incorporated.
			<p><u>Economics</u> Page 20, Table 4.1 Sustainability Issues and Opportunities, 1. A prosperous Wales - the document throughout talks in terms of economic growth rather than sustainable economic growth. It is our understanding that Welsh Government envisages economic renewal based upon:</p> <ul style="list-style-type: none"> • Balanced and sustainable growth • Inward investment • Increased employment <p>The Welsh green growth strategy contributes towards the aim of achieving sustainable growth. In view of this it would perhaps be more appropriate to state under "Opportunities for the NDF to address": "The NDF has a role to play in achieving balanced and sustainable growth, encouraging inward investment, increasing employment and promoting a green growth strategy to underpin prosperity and the transition to a low resource use (including low carbon) economy."</p>	Agreed.	Appendix B and Table 4-1 updated.
			<p>Appendix A, Page 8, Table 1.2 - the duty under Section 6 of the Environment Act laid upon public bodies to maintain and enhance biodiversity is recognised, but the document rather tentatively goes on to argue "Plans, programmes and environmental protection objectives (sic) that prioritise economic development without consideration of ecosystem resilience may conflict with this theme." The NDF has a key role to play in ensuring that the planning system helps steer development to the correct places.</p>	It is considered that this is a comment for the NDF specifically.	No further action required.
			<p><u>Benefits of accessible green space</u> Table 4-1, item 3 A Healthier Wales – Opportunities for NDF to address We would like to see the ISA re-worded to recognise the critical importance of accessible natural green space for both health and physical activity, and to state that green spaces within the Welsh Government recommended six-minute walk (300m radius) of home are</p>	Agreed.	Terminology updated and target added to Appendix B and Table 4-1.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>particularly important. TAN 16 (on Sport, Recreation and Open Space) refers to the Natural Resources Wales standards for access to natural green space which propose a hierarchy of provision ranging from large spaces some distance from home, to doorstep green spaces which research¹ shows are likely to be used on a daily basis.</p> <p>¹Coles, R.W. & Bussey, S.C., 2000; Urban Forest Landscapes in the UK – Progressing the Social Agenda. Landscape and Urban Planning 52:181-198, as quoted in: Countryside Council for Wales, 2002: Developing Standards for Accessible Natural Greenspace in Towns and Cities</p>		
			<p><u>Response to Natural Resources Policy priorities</u></p> <p>We would like to see greater emphasis on how the NDF can help further the priorities and opportunities to be outlined in the Natural Resources Policy. Our comments around Green Infrastructure in particular illustrate our approach</p>	Agreed.	Natural Resources Policy added to PPP review. Changes made to Appendix B and Table 4-1.
			<p><u>Ecosystem resilience</u></p> <p>The resilience of ecosystems is a key concept in the Environment (Wales) Act, and yet it is not fully reflected in the NDF, or well-understood by public bodies and the wider public. The development of the NDF is a clear opportunity for Welsh Government to fulfil its new duty in the Environment Act to maintain and enhance biodiversity, and in doing so 'promote the resilience of ecosystems'. Hence it is important that the ISA process can consider the attributes of ecosystem resilience and whether biodiversity is being maintained and enhanced. Please refer to Chapter 4 of the State of Natural Resources Report (SoNaRR) for further detail.</p> <p>In SoNaRR ecosystem resilience is described as: 'the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future'.</p> <p>However, quantifying resilience is very difficult as ecosystems are so complex and dynamic. The pragmatic approach taken by the Environment Act is to concentrate on building resilience by working to enhance the:</p> <ul style="list-style-type: none"> • Diversity, • Extent, • Condition, • Connectivity and • Adaptability of ecosystems <p>Although resilience is not fully understood, by increasing these attributes, which are understood, and can be measured, we can assume that the overall resilience of the ecosystem is also increasing. Since the adaptability increases as the first four attributes increase, then it is sensible to concentrate efforts on these four. Hence the guide questions must enable assessment of whether the NDF will increase the:</p> <ul style="list-style-type: none"> • Diversity between and within ecosystems • Connections between and within ecosystems • Scale of ecosystems and • Condition of ecosystems <p>See our response to Q4 for suggested changes to guide questions.</p>	Agreed.	Text on resilience added to main report. Guide questions updated.
			<p><u>Biodiversity Duty</u></p> <p>We would like to see the consultation document recognise more strongly the duty of other public bodies (particularly local planning authorities) to maintain and enhance</p>	Noted.	Text has been updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>biodiversity, and to promote the resilience of ecosystems. We suggest strengthening the wording in item 2 of Table 4-1 in the opportunities column, from “The NDF <u>can</u> both benefit and enhance biodiversity.....” to “The NDF <u>must</u> both benefit and enhance biodiversity.....”.</p> <p><u>Geodiversity</u> We would like to see greater recognition given to geodiversity. We suggest that geodiversity needs to be explicitly included and has a value in its own right in addition to underpinning biodiversity. For example, we suggest adding the following paragraph to the ‘Geology and Soils’ section of Table 4-1, when discussing the ‘Opportunities for the NDF to address’: “The NDF can both benefit and enhance geodiversity, and has an opportunity to guide the sustainable use of Wales’ geology through guiding the location and manner through which new development occurs. The planning system should protect not only statutory sites but also enhance opportunities to maximise the benefits of all aspects of geodiversity to the ecosystem services, economy and people of Wales. Examples would include considering and enhancing the geodiversity when designing road schemes, quarry restoration, use of indigenous building stones on new developments, etc.” There are suggestions under Q4 for changes to guide questions to ensure geodiversity is considered more fully in the assessment.</p>		
				Noted.	Text to be reviewed and changes made as appropriate.
3	CADW	Yes subject to further comments	<p>We agree with the sustainability issues identified. However, the ISA process is normally used for economic, social and environmental purposes. This is the first time it has been proposed to use the ISA process for cultural purposes and it is important to find ways of integrating cultural issues, especially relating to the historic environment, into the ISA methodology. Whilst the Historic Environment’s primary Well-Being goal is ‘A Wales of vibrant culture and thriving Welsh language’, we are pleased to note that table 5.3 acknowledges its contribution to other Well-Being goals. Please see appendix B attached to this letter for our comments about Table 4-1 Key Sustainability Issues and Opportunities.</p>	Noted.	Changes have been made in line with the suggestions in the CADW consultation Appendix B.
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i’r iaith	Yes Subject to further comments	<p>Rydym yn falch o’r sylw a roddir i’r Gymraeg fel rhan o’r arfarniad hwn, ac yn gwerthfawrogi’r gydnabyddiaeth bod angen trafod yr iaith yn fel rhan o’r darlun cynladwyedd ehangach.</p> <p>O edrych ar Dabl 4.3 yr adroddiad fodd bynnag, byddwn yn dadlau bod materion ieithyddol yn berthnasol i bob un o’r nodau llesiant a nodir dan rif 6 (Cymru â diwylliant bywiog lle mae’r Gymraeg yn ffynnu). Yn hytrach na gosod y Gymraeg fel nod allweddol ar ben ei hun, dylid ei hystyried yn berthnasol i gymeriad tirwedd a threflun, ac i dreftadaeth ac asedau diwylliannol yn ogystal. Ni amlygir y cydberthnasau hyn yn y tabl ar ei ffurf presennol. Byddwn yn dadlau’n ogystal bod y ffyniant y Gymraeg yn berthnasol i rai o’r nodau llesiant eraill, ac yn enwedig y nodau sy’n ymwneud â chymdeithas; 1) Cymru lewyrchus, 3) Cymru iachach, 4) Cymru sy’n fwy cyfartal, a 5) Cymru o</p>	Noted.	Changes to be made in ISA Framework table 5-3 the WCFG goals in objective 5 Text included in section 2.2.2 to recognise the cross cutting nature of the impact assessments including welsh language. Including Maps in Appendix B at the LSOA scale to reflect the local scale to illustrate the range of

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			<p>gymunedau cydlynus. Gobeithiwn felly, bydd y broses yn ddigon hyblyg I ganiatáu lle i'r Gymraeg fel testun llorweddol, ac y caniateir ystyriaeth iddi ar draws yr holl nodau llesiant.</p> <p>Nodir dan grynodedb o faterion allweddol y Gymraeg iddi fod ar "i fyny ers y 1990au, gan nodi amrywiadau rhanbarthol mawr ..." Credwn fod mynd i'r afael â'r amrywiadau hyn yn allweddol, ac yn enwedig felly yng nghyd-destun cynllunio. Dengys dadansoddiad o ddata'r Cyfrifon ers y 90au mai yn ei chadarnleoedd bu'r dirywiad mwyaf o safbwynt siaradwyr Cymraeg. Yn amlwg, mae gwrrachod y Gymraeg yn yr ardaloedd hyn, fel cyfrwng cymunedol naturiol, yn allweddol i gynladwyedd a pharhad yr iaith.</p> <p>O dderbyn yr amrywiadau hyn yn nemograffi'r Gymraeg, gwelwn ei bod yn hanfodol ei hystyried fel rhan o gymeriad tirwedd a threflun yn ogystal ag ased diwylliannol, a bod y ffactorau wnaiff ei diogelu a'i hyrwyddo'n siŵr o amrywio o ardal i ardal. Yn gryno iawn, mae sefyllfa'r iaith yn rhy fregus a chymhleth i ganiatáu yr un ymateb ledled Cymru.</p>		variation at the different scales.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>We are pleased with the focus given to the Welsh language as part of this appraisal, and we appreciate that the need to treat the language as part of the wider sustainability picture is recognised.</p> <p>Looking at Table 4.3 of the report, however, we will argue that language issues are relevant to each one of the well-being goals noted under number 6 (A Wales of vibrant culture and thriving Welsh Language). Rather than placing the Welsh language as a key aim on its own, it should be considered relevant to landscape and townscape character, and cultural heritage and assets as well. These correlations are not evident in the table in its existing form. We will also argue that the prosperity of the Welsh language is relevant to some of the other well-being goals, in particular the goals regarding society; 1) a prosperous Wales, 3) a healthier Wales, 4) a more equal Wales, and 5) a Wales of cohesive communities. Therefore, we hope that the process will be flexible enough to allow the Welsh language to be a horizontal theme, and that consideration is given to it across all well-being goals.</p> <p>The following is noted in the summary of key issues for the Welsh language "there has been an upward trend since the 1990s in the number of people using the Welsh language, noting large regional variations..." We believe that addressing these variations is crucial, in particular in the planning context. Census data analysis since the 90s show that the greatest decline in terms of Welsh speakers have been in its strongholds. Obviously, protecting the Welsh language in these areas, as a natural community medium, is crucial for the sustainability and continuation of the language.</p>		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			If these variations in the demography of the Welsh language are accepted, we notice that it is essential that it is considered as part of the landscape and townscape character as well as a cultural asset, and that the factors which will protect and promote it will certainly vary from one area to the next. Very briefly, the position of the Welsh language is too vulnerable and complex to allow the same response across Wales.		
7	Mochdre with Penstrowed Community Council	Yes	N/A		
8	Llandudno Town Council	Yes	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	Yes	Yes. We note that the Public Health Outcomes Framework for Wales are incorporated, particularly indicators air and housing quality.	Noted.	No further action required.
12	Three National Park Authorities	Yes subject to further comment	On the whole very comprehensive. Page 24, well-being goal 6, under the "Opportunities for the NDF to address" – "The NDF has an opportunity to protect and promote the use of Welsh language through the planning system". Please elaborate, are there particular mechanisms where the NDF can maximise these opportunities? If so we would also recommend that these are highlighted within the decision aiding questions for the SA objectives.	Noted.	The mechanisms by which national planning policies can affect change in relation to the Welsh language are confined by the scope of the town and country planning system. Cultivating a vibrant and thriving Welsh language over the long term is effectively a matter of securing two key objectives – providing people with the ability to speak Welsh and giving them opportunity and reasons to use the language. Planning has little or no influence on the first objective but has a role to play in the second objective, alongside various other

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					areas of public policy. Mechanisms such as providing land for housing, for employment and for community facilities are important levers for any development plan. The NDF will consider these issues alongside other considerations including biodiversity, design, the historic environment, and so forth. The wording of the objective has been amended to help make this clearer
			Page 24 – 25, Well-being goal 6: Protected landscapes make up 25% of Wales. National Parks Wales would expect to see a reference to National Parks and AONBs under the key issues relating to landscape and cultural heritage. National Park Authorities are Local Planning Authorities but operate stricter development policies with respect to the landscape as appropriate to our designation, this should be recognised both in the SA and in the NDF.	Noted.	Updates made to Appendix B and Table 4-1.
13	Cardiff County Council	Yes subject to further comment	<p>The sustainability issues set out in Table 4-1 of the ISA Scoping Report provide a comprehensive list of issues. However it is considered the following issues need also to be considered as part of the ISA:</p> <p>Under Well-Being goal “A Wales of cohesive communities” reference should be included to the current unmet need in Wales for affordable housing. Welsh Government have set a target of providing 20,000 new affordable homes in the current term and the NDF will play a key role in delivering this target. This important issue has been picked up in the Key Themes and ISA Objectives sections and incorporation within the sustainability issues would ensure a consistent approach.</p> <p>Under Well-Being goal “A prosperous Wales” reference should be included to the importance of city regions in providing employment opportunities and tackling disparities in deprivation in the wider region.</p> <p>Under Well-Being goal “A Wales of cohesive communities” need to recognise the role retail centres play in providing important local facilities to local communities. Such centres are particularly vulnerable to out of centre competition and changing shopping habits and this needs to be addressed through the NDF.</p> <p>Under Well-Being goal “A Wales of cohesive communities” there is need to recognise the need for Gypsy and Traveller transit sites across Wales. This is an issue which could be addressed through the NDF.</p> <p>Under WB Goal ‘A Globally Responsible Wales’ the improved standards of energy efficiency in buildings could be expanded out to make reference to reducing fuel poverty.</p>	Noted.	Updates made to Appendix B and Table 4-1.
			Under Well-Being goal “A prosperous Wales” reference should be included to the importance of city regions in providing employment opportunities and tackling disparities in deprivation in the wider region.	Noted.	City Regions reports added to PPP review in Appendix A.
			Under Well-Being goal “A Wales of cohesive communities” need to recognise the role retail centres play in providing important local facilities to local communities. Such centres are particularly vulnerable to out of centre competition and changing shopping habits and this needs to be addressed through the NDF.	Noted.	No further action required. Will be reviewed throughout the ISA process.
			Under Well-Being goal “A Wales of cohesive communities” there is need to recognise the need for Gypsy and Traveller transit sites across Wales. This is an issue which could be addressed through the NDF.	Noted. Provision of sufficient accommodation to meet identified needs is within the ISA Framework.	No further action required. Will be reviewed throughout the ISA process.
			Under WB Goal ‘A Globally Responsible Wales’ the improved standards of energy efficiency in buildings could be expanded out to make reference to reducing fuel poverty .	Noted. Fuel poverty is already considered as an issue under ‘A Healthier	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				Wales'.	
14	Accessible Retail	Yes	N/A		
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	The Joint Committee and Partnership welcome recognition of Landscape Character and Cultural Heritage as key sustainability issues. The summary of issues and opportunities for the NDF to address (p24/25) cover the main areas of concern for the AONB, but the Joint Committee would suggest that specific reference should be made to Wales' protected landscapes (AONB's and National parks) which have special status and make up 25% of the land area.	Noted.	Updates made to Appendix B and Table 4-1.
			In addition, whilst the need to retain the 'distinctiveness' of landscapes is supported, a central issue for protected landscapes in particular is to maintain and enhance their 'special qualities' which are identified in the relevant management plans. This should be recognised in the text.	Noted. It is considered that the National Park and AONB Management Plans are locally scaled documents which inform LDPs therefore are not included in the ISA at this stage.	Updates made to Appendix B and Table 4-1.
			Appendix B – Section 7.1.2 'Landscape and Townscape Character' (p.71) should recognise statutory AONB and National Park Management Plans as a valuable source of baseline data and key issues concerning these nationally valued landscapes. It is noted that no reference is made to 'Data Gaps' for this section.	Noted. Data on AONBs is already included within Appendix B, although agree that National Park data could be strengthened.	Updates made to Appendix B and Table 4-1 with reference to National Parks.
			Inclusion in Appendix B – Section 7.1.3 of the value of 'Dark Skies and Tranquil Areas' (p.74) is supported. Please note that the Clwydian Range and Dee Valley AONB is also currently pursuing Dark Sky designation.	Noted.	Update made to Appendix B to reflect this.
16	Glandŵr Cymru	--	We would ask that recognition is given to the canal network in Wales on the key figures contained in Appendix B. Whilst certain elements of the network are identified such as its World Heritage Site designation at Pontcysyllte Aqueduct and Canal and the SSSI status of the Montgomery Canal, it is considered that the wider value of the network, its use for sustainable and active travel, its heritage, cultural and nature conservation value etc should be recognised. The SEA Regulations require 'material assets' to be considered within the SA/SEA. These refer to the stock of valuable assets within a study area and can include many things from valuable landscapes to schools and hospitals. We consider the canal network in Wales to be such an asset.	Noted.	Reference to the canal network added to Appendix B and Table 4-1.
			It is considered that reference to green infrastructure /spaces, such as in Table 4-1 (Key Sustainability Issues and Opportunities), could usefully be expanded to refer to green and blue infrastructure and spaces to reinforce the fact that this also includes the nations rich wealth of canals and other water bodies.	Agreed.	Updates made to Appendix B and Table 4-1.
17	Home Builders Federation	Yes subject to further comment	Under table 4-1 section 5 summary of key issues the current level of housing need in Wales, both private sector and affordable should be identified. The HBF would suggest that the information contained in the Holmans report would be the best source for this information.	Noted. It is considered that the current baseline provides an adequate level of housing need data.	No further action required.
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	The spatial dimension should be emphasised. Again, we refer to our NDF briefing paper which notes issues such as access to job opportunities, transport, investment decisions and the spatial implications of these. This should be addressed under 'Prosperous Wales' at pg 20.	Agreed.	Appendix B and Table 4-1 updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			The design of the built environment can play an important role in creating a healthier Wales and should be listed on pg 23. This should be included as an issue and opportunity along with the location of development, development patterns, hierarchies etc. The RTPI <u>Promoting Healthy Cities</u> publication examines the vital role that planning can play in delivering improvements to health.	Agreed.	Appendix B and Table 4-1 updated.
20	Barry Town Council	Yes	Again whilst we agree and support the sustainability issues identified this Council would welcome more information and discussion around the dredging of the Channel. Is it an essential requirement to carry out this practice, whilst on the other hand there are other areas which we consider need some sort of dredging programme but are being overlooked. An example of this is the area of beach on Barry Island on the drive onto the island, should this be dredged? Is it at risk of flooding and causing problems in the future? If it is dredged could it then be developed and potential a marina developed in the future?	Noted. The NDF process will consider detailed issues such as this in due course.	No further action required.
			Burial land is a concern not only in Barry but the Vale of Glamorgan as a whole. More discussions is needed around this subject and the possibility of effective reusing burial space. Planning for future burial space.	Noted. It is noted that the NDF is a national level plan, and that local issues such as planning for burial space will be dealt with through LDPs.	No further action required
			Protection of green spaces and making them available to young people and providing services for them in these areas.	Noted.	Appendix B and Table 4-1 updated.
21	Well-Being of Future Generations Commissioner	--	<p>I recognise that the ISA of the NDF needs to fulfil the requirements of regulations and guidance and use a methodology that were drafted before the enactment of the Well-Being of Future Generations Act 2015 and therefore having to use a methodology that does not account for it. I acknowledge that there has been some good progress in framing the appraisal in terms of the Well-Being Goals and Welsh Government's Well-Being Objectives.</p> <p>The Scoping Report clearly acknowledges the importance that the NDF will play in contributing to the achievement of the Well-Being Goals and the Welsh Government's use of the Well-Being Goals to inform the review of evidence, identify issues and structure the assessment should be commended in broad terms.</p> <p>However, the lack of up to date guidance for the development of Sustainability Appraisals and Strategic Environmental Assessments has resulted in a lack of clarity regarding the Well-Being of Future Generations Act's status, as well as some omissions and misinterpretations of critical elements of the Act.</p> <p>For example, the Act clearly places a duty on all the 44 public bodies including Welsh Ministers and local authorities' to 'carry out sustainable development'. In the Well-Being of Future Generations Act "sustainable development" means the process of improving the economic, social, environmental and cultural well-being of Wales by acting, in accordance with the sustainable development principle, aimed at achieving the well-being goals, acting in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. In order to act in this manner, a public body must take account of the "five Ways of Working" which are long term, prevention, integration, collaboration and involvement. It is my view that a full appraisal of whether the NDF will help Welsh Ministers, through their role in the planning system, maximise their contribution to achieving sustainable development is not possible without using the five Ways of Working to frame the appraisal. Ways in which the ISA can consider these could include collaborating with</p>	Noted.	The report will be strengthened to demonstrate how the ways of working have influenced this work and will continue to as the NDF develops. The work of the PSBs is noted and the local scale of the information within these assessments. We will seek to engage with the PSBs on this work as it develops.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>other public bodies in undertaking the Sustainability Appraisal, or meaningfully involving people in Wales in the development of the NDF and fully considered future trends, paying sufficient regard to future issues.</p> <p>Also, the 19 Public Services Boards have been collated a significant amount of data and information in the Well-Being Assessments that they have conducted as part of their well-being planning. These assessments collectively form a body of evidence that would inform the ISA and the NDF understanding of Wales' economic, social, cultural and environmental well-being characteristics. I suggest that the Well-being Assessments are considered alongside my recently published report 'Well-being in Wales: Planning today for a better tomorrow: Learning from Well-being Assessments 2017' as part of the baseline information in the ISA Scoping report.</p>	Noted.	Data to be incorporated when available as part of the iterative ISA process.
22	Valpak Limited	Yes subject to further comment	We are responding specifically in relation to the well-being goal "A resilient Wales" and the issues and opportunities identified under the section "minerals and waste". The proposed Circular Economy Package (CEP) should also be considered in this section and in particular the action plan of the CEP. The CEP aims to increase the length of time that resources are available within the economy and also minimise the amount of waste generated. This includes proposed increases to specific recycling targets which would increase the amount of recycling required, and the amount of recycled material available for use. It may also lead to other recycled material streams, or a move towards designing products for recycling and reuse, which should be considered when assessing infrastructure requirements, along with considerations in line with the Welsh Waste Strategy, Towards Zero Waste.	Noted.	McKinsey Centre for Business and Environment (2015) Growth within: A Circular Economy Vision for a Competitive Europe added to PPP review in Appendix A.
23	Newtown and Llanallwchaiarn Town Council	--	N/A		
24	Tidal Lagoon Power	--	<p>Need better consideration of the interaction between marine and land (NDF/WNMP). e.g. on aggregates, energy, ports, tourism/recreation. Tidal lagoons being a very good example – Swansea Bay pathfinder provides an indication of the regionally significant regeneration potential and the nationally significant jobs and industrial opportunity. The larger scale lagoons that would follow the Swansea Bay pathfinder have land use implications of a transformational nature and of national significance through the potential to provide strategically significant coastal protection, regeneration. There will be significant challenges to overcome to facilitate such opportunities, and much to coordinate (including with other nationally significant infrastructure developments and urban growth) which is why strategic integration with the NDF is important</p> <p>Climate change – very narrow focus which tends to be on flood risk etc. Climate change impacts are far more complex, permeating the economy, impacting people, place and natural resources. We don't really have an all-Wales understanding of this, so how do we plug this gap? Don't think it's ok just to stick to flood risk just because that's where the evidence is. Perhaps this is symptomatic of reviewing the available plans, policies, programmes; and there not being a review of the relevant issues that we don't understand very well because of a lack of plans, policies, programmes (gap analysis). An SA approach (over a SEA-only approach), especially given the WFG Act (Goals and Ways of Working and impetus towards more integrated approach) provides a license to be a bit more creative with the SA in order to have a more meaningful appraisal that truly informs the NDF.</p>	<p>Noted.</p> <p>Noted.</p>	<p>Objective 9 has been redrafted to reflect the interaction between the marine and terrestrial environment.</p> <p>Updates made throughout Appendix B and the main report to address issues relating to climate change.</p>

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
25	Persimmon Homes East Wales	Yes	Yes. It is pleasing to note the reference to the requirement for Local Planning Authorities to provide for a 5 year supply of readily available land for housing (Section 6.1.2) as many Local Planning Authorities are failing to provide for a 5 year supply of housing land. Whilst it would be a matter for individual Local Planning Authorities to allocate sites for housing in their LDPs, it would be beneficial for the NDF to identify areas for large scale strategic land releases.	Noted. This is a comment for the NDF team.	No further action required.
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	We agree that at the headline level the sustainability issues are appropriate. At the more detailed level we believe there should be a clearer recognition of the contribution of the design of the built environment to health and well-being. There are few references to the urban environment in the document although the majority of the Welsh population lives in cities and towns. Features of the built environment that have a positive impact on health and well-being include such matters as: the integration of public transport, location of key services, prioritising of walking and cycling, maintenance of a coherent and continuous public realm, domestic space standards and urban trees to provide shade. While these are matters for local plans and detailed design it is important that the principle of their impact is recognised at the national strategic level.	Agreed.	Updates made to Appendix B and Table 4-1.
27	Mineral Products Association	--	Sadly, there is a far from balanced understanding of the contribution made by the minerals industry to society and to local economies through the sustainable management and development of mineral reserves. A proper baseline assessment and understanding of the industry would be beneficial. Welsh Government has been consulted upon the draft UK Minerals Strategy, however, it is evident that this and industry's discussions with WG have been overlooked.	Noted.	Updates made to main report and Appendix B as part of a wider revision of minerals and waste issues.
28	Community Housing Cymru	Yes subject to further comment	As above (Question 1)		
29	Wildlife Trusts Wales	--	As highlighted above, Table 4-1 which highlights a Prosperous Wales ²⁵ does not address Climate Change or mention living within environment limits . It also states "Overall, the NDF must help to achieve the important balance of economic and social improvement that is also sustainable and respects the country's valuable natural and cultural environment". This has been deal with above. These two areas highlight the lack of understanding there is regarding the Well-being of Future Generations Act. ²⁵ An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	Noted.	Changes to be made based on this and other comments relating to the consideration of climate change more explicitly and holistically throughout all aspects of the reporting (including in Table 4-1).
30	Sustrans Cymru	Yes subject to further comment	With reference to 1. A prosperous Wales – recommend sustainable access to employment and education should be included as an issue as improving it is included as an opportunity for the NDF.	Noted.	Updates made to Appendix B and Table 4-1.
			With reference to 3. A healthier Wales – in terms of opportunities to address challenges created by modern lifestyles and our living environments the NDF needs to do more than consider potential of green spaces. It needs to recognise how patterns of development can create or hinder healthier lifestyles and a healthier population and how access to the	Agreed.	Updates made to Appendix B and Table 4-1.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>outdoors in general (not just green spaces) can be secured. This should also do more to take advantage of the health outcomes that regular physical activity can achieve through incorporating active travel by walking and cycling into everyday journeys, such as commuting.</p> <p>With reference to 4. A more equal Wales – community cohesion is referenced but only in the context of diversity, there is no mention of how people can contribute to a common vision and feel a sense of belonging in their own community. The NDF needs to consider how people are engaged in the planning process and how they articulate and contribute to improving the attractiveness and liveability of the places where they live.</p> <p>With reference to 5. A Wales of cohesive communities – Low levels of active travel have not been highlighted. The Welsh Government Statistical Bulletin, ‘Walking and Cycling in Wales: Active Travel in Wales, 2014-2015’ published October 2015 highlights that only 2% of primary school children cycle to school and only 6% of adults cycled at least once or twice a week for active travel purposes. Given the WG ambition to increase the number of people walking and cycling for everyday journeys then this it is an important issue for the NDF to fully consider.</p> <p>With reference to 7. A globally responsible Wales – agree on issues but given that Wales stills need to meet emissions targets and reduce our global footprint then recommend that there an opportunity for the NDF to enable more journeys to be travelled actively and a reduction in car journeys by creating walkable and cycle friendly neighbourhoods and settlements with safe, direct, and attractive space for walking and cycling, connected by a coherent national walking and cycling network and public transport network.</p>		
				Agreed. This is a comment for the NDF team more specifically.	No further action required
				Agreed.	Updates made to Appendix B and Table 4-1.
				Agreed.	Updates made to Appendix B and Table 4-1.
31	Persimmon Homes West Wales	--	<p>The Baseline Information leading to the Identification of Key Sustainability Issues and Opportunities would seem to be generally robust. Given the reference made in Appendix B – “Baseline Data and Key Issues and Opportunities” it is pleasing to note the reference to the requirement for Local Planning Authorities to provide for a 5 year supply of readily available land for housing (Section 6.1.2 refers). Many Local Planning Authorities are regularly failing to provide for a 5year supply of housing land despite the Welsh Government requirements to do so.</p> <p>Whilst reference if made in Appendix B (Page 52) to the Population Age Structure of Wales, the Baseline Information should include the latest Population Projections and Household Formation Rate Projections. Increases in either (or both) will clearly have a significant impact upon the requirement to provide additional housing along with service provision in a whole range of areas from transportation, education, social services and health.</p> <p>We support the reference made in Table 4-1 (Key Sustainability Issues and Opportunities) within Section 5 (A Wales of Cohesive Communities) and Section 6.2 of Appendix B that: <i>“The NDF should support the provision for a range of housing that meets the needs of the population and promotes safe and sustainable communities. This could be through methods such as identifying strategic housing locations and/or developing national housing targets”</i> Whilst it would be a matter for individual Local Planning Authorities to allocate sites for housing in their Local Development Plans it would be extremely beneficial if the NDF identified areas for large scale strategic land release within it.</p>	<p>Noted. This is a comment for the NDF team more specifically.</p> <p>Noted.</p> <p>This is a comment for the NDF team more specifically.</p>	<p>No further action required</p> <p>Data to be updated where available as part of the iterative ISA process.</p> <p>No further action required.</p>
32	Individual	Did not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the	No further

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				ISA Scoping Report.	action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	Yes	Carew Community Councillors agree with the issues identified.	Noted.	No further action required.
35	Historic Houses Association	Yes Subject to further comment	<p>The HHA would like to have seen a more specific reference to the heritage sector under No 1 A Prosperous Wales. Reference to the heritage is made under No 6 A Wales of vibrant culture and thriving Welsh language but that reference is more relevant to the Cohesive Communities item noted under Q1, i.e. the Opportunities column refers to heritage contributing to cultural identity and sense of place.</p> <p>Tourism is referred to under No 1 but nothing is said of the fact that the prime driver for visitors coming to Wales is the heritage (CADW's recent report on their sites for the 16-17 year emphasises this point.) Therefore HHA would submit that the NDF has a crucial role in guiding the sustainability balance between growth of this critical sector of the Welsh economy and protection of Wales's heritage assets.</p> <p>Whilst reference is made to this issue on p 32 under '4' cont from p31, we submit that it should be specifically stated within Section 4.</p>	<p>It is noted that heritage is captured within the components of Sustainable Development which are referred to within the opportunities section. This would include under opportunities for tourism under 'A Prosperous Wales'. This is made clearer under final ISA Objective 4 (to create opportunities for sustainable economic growth, diversity and business competitiveness), with one of the decision aiding questions asking 'will the NDF 'Create opportunities for and promote sustainable tourism, sensitively capitalising on environmental, cultural, heritage and leisure assets?'</p> <p>Within the key issues, point 6 'A Wales of vibrant culture and thriving Welsh</p>	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				<p>language' highlights the link between heritage and tourism. It is noted that key issues are grouped where it is determined to be most relevant. As the assessment is to be read as a whole, it is not necessary to repeat issues across headings.</p>	

Question 3

Are there any particular topics or geographical areas of specific concern to you or your organisation? (Section 4)

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	South East Wales – Cardiff City Capital Region	Noted.	No further action required.
2	Natural Resources Wales	--	<p><u>General</u> Sustainable Management of Natural Resources – Wales' natural resources provides our basic needs; the air we breathe, the water we drink, and the food we eat. They give us energy, prosperity and security; they protect us and makes us healthier and our lives better. By unlocking the potential that lies within the natural resources of Wales, by managing them and using them in a more joined up way, they can help us face the challenges ahead. The Environment Act includes a requirement for Natural Resources Wales to embed the principles of SMNR throughout the way we work. Through applying these principles we can maximise our contribution to the wellbeing goals and pursue SMNR.</p> <p>It is our view that the SMNR principles are directly relevant to the NDF, and we therefore wish to see a clear embedding of these principles in the NDF. The ISA should include an assessment of how well this has been achieved . See also our comments on SMNR under Question 6. We list the SMNR principles below, as set out in the Environment Act (Wales) 2016:</p> <ul style="list-style-type: none"> a) manage adaptively, by planning, monitoring, reviewing and, where appropriate, changing action; b) consider the appropriate spatial scale for action; c) promote and engage in collaboration and co-operation; d) make appropriate arrangements for public participation in decision making; e) take account of relevant evidence and gather evidence in respect of uncertainties; f) take account of the benefits and intrinsic value of natural resources and ecosystems; g) take account of the short, medium and long term consequences of actions; h) take action to prevent significant damage to ecosystems; i) take account of the resilience of ecosystems, in particular the following aspects: <ul style="list-style-type: none"> i. diversity between and within ecosystems; ii. the connections between and within ecosystems; iii. the scale of ecosystems; iv. the condition of ecosystems (including their structure and functioning) v. the adaptability of ecosystems 	<p>Noted. The principles of the SMNR will be incorporated into the PPP review and, subsequently, into the ISA Framework as appropriate. However, it is noted that many of the themes identified are referred to in the ISA framework currently, although these could be brought out more clearly.</p>	<p>SMNR Principles integrated into ISA Framework.</p>
			<p><u>Climate Change</u> There is a particular issue around the way that Climate Change trends are considered in relation to new developments. Because of the inherent inertia in the way that earth systems respond to the temperature forcing caused by greenhouse gases, there are significant lags in the way that parameters such as global temperature, sea level and weather patterns change. This is important. Developments are generally planned to deal with likely climate conditions (and knock-on effects) over a particular period – say from 2020 to 2050. However, with climate change, we can reasonably project that conditions will change beyond the end date (in this case 2050) in a foreseeable way. Any development should therefore be required to consider how it would provide a suitable base for subsequent adaptation beyond its end date. This is a crucial aspect of thinking</p>	<p>Agreed. The ISA Framework will consider the potential effect of The NDF in the short, medium and long terms. The scale to be used will consider this comment, and will be set out in the next stage of the ISA Report.</p>	<p>Climate change has been considered more thoroughly throughout the report.</p>

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			on behalf of Future Generations. <u>Economics</u> The SMNR principles have economic implications. For example, principles (f) (take account of the benefits and intrinsic value of natural resources and ecosystems) and (g) (take account of the short, medium and long term consequences of actions) together argue for giving priority to welfare analysis using Total Economic Value (TEV) rather than an inevitably short term Economic Impact Analysis approach (EIA). TEV is preferred by TEEB (The Economics of Ecosystems and Biodiversity), which is hosted by the UNEP. Please contact us if you would like to discuss this further.	Noted.	SMNR Principles integrated into ISA Framework.
3	CADW	--	We have nothing to add at this stage.		
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	Yes	Yn arwain o'r ymateb i C2 uchod, manteisiwn ar y cyfle hwn i dynnu sylw at sefyllfa'r Gymraeg yn ei chadarnleoedd, ac i ddadlau'r achos dros ystyriaeth arbennig o gynaliadwyedd yr iaith yn yr ardaloedd hyn. Yn ein Manifesto, <i>Creu Dyfodol i'r Gymraeg</i> , rydym yn pwysu am sefydlu Ardaloedd o Arwyddocâd leithyddol Arbennig. Nodwn y bwriad fel rhan o'r gwaith hwn i roi ystyriaeth i'r ardaloedd a bennir yn Ardaloedd Cadwraeth a Gwarchodaeth Arbennig, a byddwn yn gofyn am sylw cyffelyb i ardaloedd lle mae dros 50% o'r boblogaeth yn siarad Cymraeg. Byddai'n dda o beth pe bai'r arfarniad hwn yn gallu cydnabod ac adlewyrchu'r anghenion ynglŷn â pharhad y Gymraeg fel iaith gymunedol arferol yn ei chadarnleoedd.	Noted.	Maps have been included in Appendix B reflecting the local scale to illustrate the range of variation at the different scales.
			Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh. Following on from the response to Q2 above, we take advantage of this opportunity to draw attention to the position of the Welsh language in its strongholds, and to argue the case for giving special consideration to the sustainability of the language in these areas. In our Manifesto, <i>Creating a Future for the Welsh Language</i> , we call for Special Areas of Linguistic Significance to be established. We note the intention that consideration is given to the areas allocated Conservation Areas and Special Protection Areas as part of this work. We will be calling for similar focus to be given to areas where over 50% of the population speak Welsh. It would be helpful if this appraisal could acknowledge and reflect the needs in relation to the continuation of Welsh as a normal community language in its strongholds.		
7	Mochdre with Penstrowed Community Council	No	N/A		
8	Llandudno Town Council	No	N/A		
9	Pupils2Parliament	--	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	Yes	We are pleased that many areas and topics relating to health and wellbeing are included. We would like to see the following included and strengthened: Mental health and well-being, the ageing population and dementia and climate change.	Noted.	Appendix B and Table 4-1 strengthened, with subsequent changes to ISA Framework.
12	Three National Park Authorities	Yes	Welsh Language: Figure 6-3. Suggest including a choropleth map of Welsh language by community council area as this would show the true complexity of the distribution of Welsh language speakers. In particular this would highlight that even within the local authority areas that show a lower overall proportion of Welsh speakers there are hotspots with higher numbers of speakers. By looking at this in relation to things like WIMD further issues or barriers to increasing the incidence of the use of Welsh language may be discovered that could be within the scope of the NDF to address e.g. access.	Noted. It is not within the remit of the ISA to undertake primary data collection. It is also noted that the NDF is a national level plan, and that local issues will be dealt with through LDPs. However, should more data of national relevance become available, this could be reviewed and incorporated as appropriate.	Additional data to be reviewed and incorporated where available, as part of the iterative ISA process. Maps have been included in Appendix B reflecting the local scale to illustrate the range of variation at the different scales.
13	Cardiff County Council	Yes subject to further comment	Many of the issues listed in section 4 of the ISA report are of specific concern to the Council. These include air quality, flood risk, minerals and waste, health, aging population, equality, retailing and tourism, meeting housing needs, brownfield land regeneration and sustainable transportation amongst others and the recognition in Table 4-1 that the NDF provides an opportunity to address these is welcomed.	Noted.	No further action required.
			As set out in the response to Questions 2 and 4 Table 4-1 and Table 5.3 of the ISA Scoping Report should also recognise that the following issues could be addressed by the NDF and be stated in Table 4-1: <ul style="list-style-type: none"> • Meeting the unmet need for affordable housing across Wales. • Recognition of the role of city regions in Wales and the opportunity to improve connectivity and address geographical disparities within such regions so employment and services are accessible throughout the region with multiplier effects for the region as a whole • Need to protect retail centres • Need to provide a network of Gypsy and Traveller transit sites across Wales Given Cardiff position as the capital of Wales the Council considers it is important that the NDF takes the opportunity to address the need to improve both between south and north Wales.	Noted.	Revisions made to reflect these comments where they are applicable to the NDF as well as other similar comments. City Regions reports added to PPP review in Appendix A. Housing issues strengthened in Appendix B and Table 4-1.
14	Accessible Retail	Yes subject to further comments	The key topics for Accessible Retail are that (a) the need to secure economic growth in Wales and (b) within this context, that the contribution to employment and economic growth made by all the sectors of the retail industry in Wales is properly represented in the evaluation.	It is noted that a key aspect of the ISA is to ensure sustainable economic growth. Whilst specific	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				industries are not being singled out at present, retail has been considered as part of a wider economic base.	
15	Clwydian Range and Dee Valley AONB	Yes subject to further comments	As the body responsible for management of the Clwydian Range and Dee Valley AONB, the Joint Committee and associated Partnership are particularly concerned about conservation and enhancement of this nationally important asset. The AONB straddles three local planning authority areas and requires a strategic response to ensure a consistent approach in the NDF and associated ISA process.	Noted. Landscape considerations, including AONBs, are included in the ISA Framework. The ISA will take a holistic approach to assessment.	No further action required.
16	Glandŵr Cymru	--	The Canal & River Trust (the Trust) is a charity formed in 2012, and entrusted to care for 2,000 miles of waterways and associated infrastructure in England and Wales. Glandwr Cymru (the Canal & River Trust in Wales) is therefore concerned with the multi-functional canal network in Wales and its cross-border connectivity with England.	Noted.	No further action required.
17	Home Builders Federation	Yes subject to further comment	The HBF requests that greater recognition/explanation needs to be given to the way in which the South East and North East of Wales interact with their English Neighbours (currently mentioned briefly in section 5.1.2.) This is important as there are many factors that impact on Planning that in reality are cross boundary.	This is a consideration for the NDF.	No further action required.
18	Age Cymru	--	1. With reference to 'A healthier Wales' (page 23) which cites 'Factors specific to a rural environment compared to those of urban environments...' we believe that it is important that the impact on people living in rural areas is taken into account when creating and implementing planning policy, especially with reference to how they will be able to access services and public and community transport. Loneliness and isolation are a daily reality for many older people. Feeling lonely has many detrimental effects on older people, and there is increasing evidence of the negative impacts on physical and mental health. A vital aspect of creating an age-friendly Wales is to enable older people to play an active role in society. It is important that older people have opportunities to participate in their local community through social activities, learning and volunteering. Efforts must be made to reduce some of the barriers that can lead to isolation such as a lack of local services and amenities, and to increase opportunities for older people to participate in their communities.	Noted. This is also a consideration for the NDF directly.	Updates made to Appendix B and Table 4-1.
			2. With reference to 'A more equal Wales' (page 23), the number of older people in Wales is growing and we are, on average, expected to live longer. This is a cause for celebration and a major achievement for our society. It provides us with opportunities for the future, but also challenges and it will require changes to the way in which we plan and deliver public services. The fact that older people make up an increasing section of the population makes it ever more vital that future planning reflects their needs. We believe that planning decisions should take into account how they will affect people across different stages of the life course of future generations.	Noted. This is also a consideration for the NDF directly.	Updates made to Appendix B and Table 4-1.
			3. With reference to 'A more equal Wales' (page 23) which cites 'Overall, the NDF can help to address issues surrounding the aging population through facilitating the provision of accessible services supported by connective infrastructure...', and 'The NDF could provide an opportunity to reduce isolation and encourage the development of integrated and liveable communities': we would suggest the addition of 'connective accessible infrastructure'.	Noted. This is also a consideration for the NDF directly.	Updates made to Appendix B and Table 4-1.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>It is essential that the built environment in communities is designed and adapted in an age friendly way so that it is suitable for people of all ages. Increasing opportunities for older people to take part locally can do much to boost independence, combat social isolation and loneliness and promote health and wellbeing. All outdoor environments and public spaces across Wales should be accessible and usable for all older people. Safe and accessible streets, places to meet to socialise that are easily accessible by public and community transport, and adequate public seating and public toilets in our communities all help to facilitate this. We believe that the ISA's appraisal of the NDF should look to ensure the design and creation of accessible and inclusive built environments in our communities.</p>		
			<p>4. With reference to 'A Wales of cohesive communities' (page 24): transport is a crucial factor in determining older people's ability to access vital amenities. Without appropriate services and infrastructure older people can become isolated from their community and society, unable to access essential services, participate in activities or visit friends and family. Reliable and accessible local public and community transport networks become increasingly significant as people get older. Community transport schemes provide an essential lifeline for many older people, especially in rural areas. We believe that the ISA's appraisal of the NDF should look to ensure the development of a fully integrated sustainable transport network in Wales, with trains and buses linked to other forms of transport including community transport, pedestrian and cycle routes, and better integration between transport and key services. It should also ensure that improvements are made to transport infrastructure in Wales to improve accessibility to public transport services.</p>	Noted.	Updates made to Appendix B and Table 4-1.
			<p>5. With reference to 'A Wales of cohesive communities' (page 24) '...identifying strategic housing locations', we believe all forms of retirement housing should be built within age friendly communities, to ensure that residents have full access to local services, facilities and public transport to support independence and wellbeing.</p>	Noted. This will be considered as part of wider health and well-being as well as equality considerations.	Changes to be made based on this and earlier comments relating to health and well-being. Updates made to Appendix B and Table 4-1.
19	RTPI Cymru	--	<p>As set out in our briefing note, RTPI Cymru believes that the NDF should spatially map out the following:</p> <ul style="list-style-type: none"> • Transport investment and demand management corridors • Air Quality • Energy infrastructure • Cross-border linkages of policy and infrastructure • A settlement hierarchy for Wales, especially related to the best locations for future growth • National Parks and AONBs • Minerals • Waste 	Noted. This is a comment for the NDF.	No further action required.
			<p>Table 4-1, pg 25, "A globally responsible Wales" would benefit from further development. While it refers to falling greenhouse gas emissions in general, it fails to identify that a key sector of emissions, namely transport is not falling. This should be an issue that is highly pertinent to the NDF. A key concern for RTPI Cymru is that the transport sector is still</p>	Noted	Updates made to Appendix B and Table 4-1.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			routinely failing to achieve the reductions in carbon emissions that legislation now binds our governments to achieve. Indeed, it is evident that transport schemes which will profoundly increase carbon emissions are still finding their way into approved transport programmes. RTPi Cymru's view is that carbon reduction needs to be given greater primacy and weighting as set out in our response on the Welsh Transport Appraisal Guidance 2017. We believe that the NDF has an opportunity to demonstrate that it is possible to achieve economic growth, without generating growth in road traffic and the associated growth in carbon emissions. This should also be reflected in Table 5-3, at section 4, pg 31, in the column "Will the NDF".		
20	Barry Town Council	--	Barry Town Council would like to see Welsh Heritage protected. Currently many of the landmarks, buildings etc. in Wales are not protected, and very few are listed buildings. An alternative method of protection for Welsh Treasures and Heritage should be created to preserve heritage.	Noted.	Details of the project have been passed to the team dealing with the call for evidence and projects to be considered. No further action required.
21	Well-Being of Future Generations Commissioner	--	N/A		
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn Town Council	Yes	<p>RESTORATION OF THE MONTGOMERY CANAL TO NEWTOWN: The Town Council would like to add restoration of the Montgomery Canal to the considerations being undertaken for the NDF and the Sustainability Appraisal. Council resolved</p> <p>c) July 2017 'Council approves the Canal Restoration Project Initiation Document.'</p> <p>d) Aug 2016 'Committee agrees the circulation of the approved Canal Restoration PID to the identified stakeholders.'</p> <p>The council's project proposal fits well with the Wellbeing of Future Generations (Wales) Act 2015 with particular relevance to the</p> <p>iii) Goals: Prosperous Wales, Resilient Wales, Healthy Wales, Cohesive Communities, Vibrant Culture</p> <p>iv) Ways of Working: Long Term, Integration, Collaboration, Involvement</p> <p>In addition to supporting the delivery of the well-being goals, the project fits with a range of Welsh Government economic, social, cultural and environmental policies for, and 4 cross cutting strategies 'Prosperous and Secure', 'Healthy and Active', 'Ambitious and Learning', and 'United and Connected'.</p> <p>Furthermore, the project fits alongside other Welsh Government Impact Assessments for 'Rural Proofing', Economic Development, and Third Sector. A copy of the Project Initiation Document is attached with this consultation response.[separate document]]</p>	Noted. This is not a comment directly for the ISA.	Details of the project have been passed to the team dealing with the call for evidence and projects to be considered. No further action required.
24	Tidal Lagoon Power	--	N/A		
25	Persimmon Homes East Wales	--	Persimmon are concerned to ensure that the NDF takes account of housing related issues both in terms of strategic land identification and speedy delivery through the planning system, given the need to provide, and impact of this to provide affordable	Noted.	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			housing for all.		
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	The importance of the quality of the built environment in new development and the maintenance and improvement of existing places should have more emphasis. For example 'Townscape character' is mentioned in item 6 the table on p24 (A Wales of thriving culture ..) with the suggestion that appropriate guidance on protection and enhancement 'could' be developed. This appears to undervalue the quality of buildings and places to health and well-being and economic prosperity.	Noted.	Text has been updated to reflect the role of buildings can play with regards to health and wellbeing and economic prosperity.
27	Mineral Products Association	--	See the above comments (Questions 1&2). You will appreciate that this lack of balance is of serious concern to the minerals industry. The shortcomings in SoNaRR where highlighted by the MPA to both WG and NRW.	Noted.	Appendix B and Table 4-1 updated.
28	Community Housing Cymru	Yes subject to further comment	Members have noted that in some areas, accessing land affordably is an issue. CHC has set out its views on how this issue might be overcome by revisiting, on a national scale, how public land disposal is managed. Our views on this are set in recommendation 1 of our Planning for 20,000 Homes document, which can be found here: https://chcymru.org.uk/uploads/events_attachments/Briefing_20000-Homes_ENG_Final-2.pdf Accessing public land at affordable prices will enable the achievement of the NDF goal of creating the conditions within which the availability of affordable housing should increase.	It is considered that this is a comment for the NDF team specifically.	No further action required.
29	Wildlife Trusts Wales	--	Particular topics - Biodiversity, Climate Change, Ecosystem Services Geographical areas - All Wales including the Marine	Noted.	No further action required.
30	Sustrans Cymru	Yes	Sustrans has developed a number of policy positions including a position on the role of planning policy. It centres on managing housing growth and the need to work with other agencies to ensure development delivers positive impacts for communities. Below is a summary from our website: <i>Our position on how housing growth and planning policy can increase cycling and walking</i> <i>As the UK population continues to rise, if we are to increase cycling and walking it is critical that planners work in collaboration with transport planners, public health professionals and developers to jointly plan and develop new housing developments and wider urban regeneration.</i> <i>The design and location of where people live has a significant influence on how people travel. New development should wherever possible be located within or adjacent to existing urban areas or commuter hubs. New developments should also be built at higher densities wherever appropriate and be mixed use. Sustainable transport infrastructure should be planned from the outset following principles known to influence active travel choices to realise local health, environmental and economic outcomes, whilst making places more attractive to live.</i> The full text can be accessed on our website by clicking on the following link http://www.sustrans.org.uk/our-position/planning-cycling-walking	Noted.	Updates made to Appendix B and Table 4-1.
31	Persimmon Homes West Wales	--	As one of Britain's largest house building companies with a significant presence within Wales, Persimmon Homes is obviously concerned to ensure that the NDF takes account of housing related issues both in terms of strategic land identification and speedy delivery through the planning system given the identified need to provide affordable housing for all.	Noted. This is an issue for the NDF if relevant.	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes Subject to further comments	Were forestry is being harvested, it should be replanted with insidious species and any wet lands in the higher reaches of the old industrial valleys to be protective.	Noted. A wide variety of issues and topics are covered to ensure the NDF is as sustainable as possible including promoting of the sustainable management of natural resources. Details of forestry policy in relation to land use planning are set out within Planning Policy Wales.	No further action required.
34	Community Council of Carew	No	N/A		
35	Historic Houses Association	No	Covered under other responses	Noted.	No further action required.

Question 4

Are there any changes you consider should be made to the ISA Objectives or Questions? (Section 5)

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes Subject to further comment	ISA Objective 2 - To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across - word missing assume Wales?	Noted. To be corrected.	ISA Framework updated.
			ISA Objective 3 - Create opportunities for an increase in the number of people who are satisfied with their job? The NDF could help create the condition for economic growth and increased employment opportunities, but an increase in the number of people who are satisfied with their job is questionable. (also Appendix B)	Noted. Retained as it is an indicator of the range of jobs not just the number of jobs available	No further action required.
			ISA Objective 8 - Reduce the likelihood of new Air Quality Management Areas being required through land use planning initiatives? This implies that land use planning is the cause of air quality problems. This should be reworded to read: Reduce the likelihood of new Air Quality Management Areas being required.(also Appendix B)	Noted. To be reviewed with consideration of other relevant comments as a whole.	ISA Framework updated.
			As far as is possible through land use planning, ensure that the most vulnerable communities are not disproportionately affected by poor air quality? The NDF is unlikely to be able to influence this in any meaningful way. (also Appendix B)	Noted. Retained as the NDF have the potential to guide development.	No further action required.
			ISA Objective 10 – the questions all need to be reconsidered to reflect what a land use plan can achieve and how SA/SEA can assess its equality impacts.(also Appendix B)	Noted. To be reviewed with consideration of other relevant comments as a whole.	ISA Framework updated.
2	Natural Resources Wales	--	<p><u>General</u> As a legislative requirement, the ISA needs to meet the requirements of the SEA Regulations. This includes adequately assessing the potential impacts of the NDF on the 10 SEA topics, together with the consideration of the inter-relationships between them. The objectives and questions therefore need to clearly and comprehensively cover the 10 SEA topics.</p>	Noted. Table 5-4 demonstrates which of the ISA Objectives are relevant to which SEA topics. This table also demonstrates the interrelationship between the topics, as there are a number of objectives that are relevant to more than on SEA topic area.	No further action required.
			<p>We have some concerns about the wording used in the ISA objectives and associated guide questions:</p> <ul style="list-style-type: none"> Firstly we note that they are framed using a collection of 'support/ encourage/ contribute/ promote'. We would welcome some clarity as to whether there is a hierarchy in the level of 'encouragement' each of these terms applies. Secondly, given the nature of the NDF (a framework that aims to 'provide a spatial context for the delivery of development and national planning policy in Wales over the next 20 years'), it may provide greater certainty and clarity in the assessment if some of these objectives and questions were framed using terms such as 'enable' or 'direct', reflecting the NDF's ability to do just that (rather than just support for example). 	Noted.	ISA Framework updated.
			Scoping Report, page 36, Table 5.3, ISA Objective 17 – we support the addition of a guide question as follows:	Noted.	ISA Framework updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<ul style="list-style-type: none"> 'Improve the provision of nature based solutions to improve air quality, adapt and mitigate climate change, manage flood risk, improve health and wellbeing'. 		
			Scoping Report, page 36, Table 5.3, ISA Objective 17 – it is our view that the wording of this objective should be changed to 'To encourage the sustainable <u>management</u> of natural resources'. In addition, guide questions to both Objective 16 and 17 should make reference to the principles of SMNR.	Noted.	ISA Framework updated.
			Table 5.5 has the wrong column heading – it should be 'Impact assessment theme' (or similar wording), not 'SEA Directive topic'.	Agreed.	Table heading has been corrected.
			<u>Climate change</u> Within Table 5.3 "ISA Objectives and questions", our comments in relation to Question 2 and climate change apply equally here in relation to the ISA Objective 7 "To encourage climate change resilience, including contributing to the reduction and management of flood risk".	Agreed.	ISA Framework updated – climate change integrated into questions within the ISA Framework and separate question removed.
			As a separate point, the questions accompanying ISA Objective 6 "To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design" should be tightened and "scaled" by adding the text "... to an extent that reflects the ambition implied in the Wales Carbon Budgets that are set by Welsh Government under the Environment (Wales) Act 2016".	Noted. However, the ISA Framework will not be including specific targets at this stage of the appraisal process.	ISA Framework updated.
			<u>Flood Risk</u> ISA objective 7 relates to flood risk in terms of climate change resilience only. Flood risk and the impacts on people/property/economy etc. is an issue now and in the future, particularly when the impacts of climate change are considered. To be fit for purpose, the objective should recognise current day risk and seek to influence decisions (nationally, regionally and locally) that direct development away from flood risk areas as well as promote features such as SUDS, flood/climate change resilience. It would be good to see the objective encourage (or direct) the enhanced protection of the floodplain as well as placing greater emphasis on developer responsibility in terms of protection/resilience against future risks as part of new development. This would help people/communities be resilient against (some) flood hazards now and in the longer term.	Agreed.	ISA Framework updated.
			The 2nd question (Will the NDF encourage all new development to be climate change resilient?) should also be expanded to acknowledge current day flood risk. E.g. "direct all new development away from areas of high flood risk and ensure appropriate resilience measures are incorporated to mitigate against present day flood risks (from all sources) and to future climate change impacts..."(?)	Agreed.	ISA Framework updated to include questions relating to present day flood risk.
			It is not clear what is meant by the 3rd question "Will the NDF promote the benefits of flood risk management?". The benefits to what? It is not clear whether this is focussed on climate change resilience, or whether it means some of the wider benefits that can be delivered through flood risk management (including for the environment, local economy, health and wellbeing etc.), or indeed something else entirely. This question needs greater clarification on what it is trying to achieve.	Agreed.	ISA Framework updated and question re-worded to include reference to green infrastructure.
			We suggest that there is a role for the NDF to help contribute/promote greater 'awareness' of flood risk in relation to planning, which is not reflected in the current guide questions.	Noted. It is recognised that the NDF as well as providing guidance and directing development,	ISA Framework updated and question re-worded to include reference to promoting awareness of

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				has the potential to both raise awareness of flooding issues and support work with partners on flood risk and flood protection schemes.	flood risk.
			<u>Landscape</u> Page 35, ISA Objective 13 – in order to promote good design and urban green infrastructure, we would also welcome the inclusion of the following: Amend 3rd guide question <ul style="list-style-type: none"> • ‘Promote sensitive, <u>place responsive</u> design in development’? Add new guide question <ul style="list-style-type: none"> • Encourage places and networks for people and nature within our townscapes? 	Noted.	ISA Framework updated.
			Page 35, ISA Objective 14, 2nd guide question – we suggest amending this to ‘Encourage the conservation and enhancement of the historic landscape character’? Also on page 79 of Appendix B.	Noted.	ISA Framework updated.
			Page 37, Table 5.2.2 Landscape – this should include reference to ISA Objective 14.	Noted.	ISA Framework updated.
			<u>Biodiversity</u> We have some concerns that the current ISA Objectives and questions do not suitably refer to ecosystem resilience, and it is therefore not clear how this will be assessed. As you are aware, Section 6 of the Environment Act places a duty on Welsh Government to maintain and enhance biodiversity and promote ecosystem resilience. Ecosystem resilience should therefore be a key consideration. We will aim to provide you with additional comments in relation to this over the coming weeks (these are included in these comments).	Noted.	ISA Framework updated.
			<u>Health and Wellbeing</u> Scoping report, page 31, Table 5.3, ISA Objective 2 – we support the following additional guide question: <ul style="list-style-type: none"> • Support increase in green infrastructure, especially in urban areas, which can deliver multiple health benefits including reducing urban heat island effects, reducing surface water run-off, improving air quality, and providing mental health benefits. 	Agreed.	ISA Framework updated.
			Scoping Report, page 31, Table 5.3, ISA Objective 2 – with regard to the 5th guide question, we support the reference to open space, but wish to see access to ‘natural green space’ added to this question.	Agreed.	ISA Framework updated.
			Scoping Report, page 36, Table 5.3, ISA Objective 16 – with regard to the 4th guide question, we support the reference to green space, but wish to see access to ‘natural green space’ added to this question.	Agreed.	ISA Framework updated.
			<u>Energy</u> Scoping Report, page 32, Table 5.3, ISA Objective 6 – Currently the Objective states: ‘To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficiency and sustainable design’ We suggest changing this to: To create the conditions within which greenhouse gas emissions can be <u>reduced</u> and limited...	Noted.	ISA Framework updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>In addition, we suggest the following additional guide questions in relation to ISA Objective 6:</p> <ul style="list-style-type: none"> • contribute to reduction in Co2 emission from energy sector – consumption and generation? • encourage reduction in energy demand and support the increase in energy efficiency • support/enable/direct renewable and low carbon energy by identifying right development in right place? • support innovation and encourage emerging technologies within energy system (thinking about battery storage, hydrogen, smart grid, transmission, distribution)? • encourage and support more decentralised energy networks? 	Noted.	ISA Framework updated.
			<p>Scoping Report, page 36, Table 5.3, ISA Objective 17 – we suggest the addition of the following guide question: identify opportunities and promote development of renewable energy where appropriate?</p>	Noted.	ISA Framework updated.
			<p>As a general point, we suggest you consider making the guide questions more quantifiable. We suggest new, more quantifiable wording for Objective 2, Q.5 in the table below. Ideally all the objectives of the NDF would be backed by some form of quantifiable standard by which its success could be measured. For example, the acceptable rate of surface water run-off from developments is specified in the Welsh Government’s Non-Statutory SUDS Standards, acceptable levels of particulate air pollution are specified by both the EU and the WHO, and standards for the acceptable level of urban heat-island induced, dangerously hot nights have been defined by research projects. Please contact us if you would like to discuss this further. We present our specific comments and suggested changes to the wording of guide questions in the following table. (saved separately)</p>	<p>It is noted that, at this stage of the ISA, the use of specific indicators has not been included in the ISA Framework. However, measurable indicators relating to the guide questions are being considered, and will be included as part of a monitoring framework. This will be included once the predicted significant effects of the NDF have been identified.</p>	No further action required.
3	CADW	--	<p>Our suggested amendments to the ISA Objectives 13 and 14 and the questions related to them are attached at appendix C to this letter.</p>	Noted.	ISA Framework updated. Changes have been made to capture the comments and demonstrate the links between townscape and historic townscapes. A glossary has also been include to define Heritage Asset
			<p>I would particularly draw your attention to our suggested questions numbers 4 – 7 for Objective 14, which are based very closely on Cadw’s 6 Conservation Principles for the sustainable management of the historic environment in Wales.</p>	Noted.	ISA Framework updated. Changes have been made to capture the comments.
			<p>We have no comments on Objective 15, as our remit does not cover wider Welsh culture. We suggest that you may wish to consult other cultural organisations about this Objective.</p>	Noted.	No further action required.
4	Newport City Council	Did Not	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
		Answer			
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	Yes subject to further comment	<p>Croesawn yr Amcan i "Annog gwaith i ddiogelu a hybu'r Gymraeg"; fodd bynnag, fel gyda'r ymateb i C2 uchod, nodwn beryglon cyfyngu'r Gymraeg i un amcan yn unig.</p> <p>Wrth dderbyn bod angen i'r arfarniad fod yn un ymarferol, nodwn yn ogystal ei natur integredig; yn unol â hyn, byddwn yn dadlau bod materion sy'n disgyn dan feysydd amcanion eraill yn allweddol bwysig mewn perthynas â diogelu a hybu'r Gymraeg.</p> <p>Nodwn, er enghraifft y cyfle ar gyfer hwyluso mynediad i addysg Gymraeg sy'n cynnig ei hun mewn perthynas ag Amcan1. Yn yr un modd, defnydd o'r Gymraeg yn y gweithle (3, 4), gwarchod y Gymraeg fel iaith gymunedol (12, 13,14), a rôl yr iaith wrth hybu ein hunaniaeth a diwylliant unigryw (13,14, 15).</p> <p>Credwn mai drwy ystyried y Gymraeg fel rhan o wead ehangach y mae gosod sylfaen ymarferol i'w diogelu a'i hybu. Fel gyda'r nodau llesiant (gweler C2 uchod) gobeithiwn bydd y broses yn ddigon hyblyg i ganiatáu lle i'r Gymraeg fel testun llorweddol, ac y caniateir ystyriaeth iddi ar draws yr holl amcanion.</p>	Noted.	Text has been included in section 2.2.2 to reflect the cross cutting nature of the impact assessments including the Welsh language.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>We welcome the Objective "To encourage the protection and promotion of the Welsh Language"; however, as with the response to Q2 above, we note the risks of restricting the Welsh language to only one objective.</p> <p>Whilst accepting that the appraisal needs to be practical, we also note its integrated nature. In keeping with this, we will argue that issues which come under other objective areas are vitally important in relation to protecting and promoting the Welsh language.</p> <p>For example, we note the opportunity to facilitate access to Welsh medium education which presents itself in relation to Objective 1. Similarly, the use of Welsh in the workplace (3, 4), protecting Welsh as a community language (12, 13, 14), and the role of the language in promoting our unique identity and culture (13, 14, 15).</p> <p>We believe that a practical foundation to protect and promote the Welsh language is possible by considering the language as part of a wider structure. As with the well-being objectives (see Q2 above) we hope that the process will be flexible enough to allow the Welsh language to be a horizontal theme, and that consideration will be given to it across all objectives.</p>		
7	Mochdre with Penstrowed	No	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Community Council				
8	Llandudno Town Council	No	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	No	<p>Whilst it is noted at the present stage the precise nature or structure of the NDF has not yet been developed, we are content that the approach is reflective of the requirements of the SEA Regulations. We are content with the majority of the ISA objectives and questions posed. However, we do have a few suggestions and comments:</p> <p>Objective 2 or 11 could be strengthened by questions such as ‘<i>promote positive social relationships and reduce social isolation?</i>’ and ‘<i>promote healthy and active ageing?</i>’.</p> <p>Objective 2 could also contain a question such as ‘<i>reduce stress and promote wellbeing?</i>’.</p> <p>The final question in respect of improving access could also be broadened to read ‘...including opportunities for play, <i>leisure and recreation?</i>’</p> <p>The actual Objective 2 description itself could also be widened to make clearer links and the interaction between physical, mental and social health and wellbeing.</p> <p>Objective 12 focuses on mainly on housing and its quality rather than incorporating a wider focus of the concept of ‘homes’ and the environment/context in which they sit i.e. the importance of gardens and open space and how currently in many developments the sizes of gardens/landscaping may be reduced due to land pressures. We would like to see the concept of ‘homes for life’ or proofing for ageing population incorporated into this objective.</p> <p>Objective 13 could be strengthened in terms of the concept of ageing well environments/dementia friendly environments i.e. if they are well designed and accessible to these groups then they will be suitable for the whole population.</p> <p>It might also be possible to simplify the Objectives and Questions, for example Objectives 6 and 8 overlap considerably and Objective 1 could feature alongside another objective such as 4 or 10. Objective 13/14 could also be combined with 13 being subsumed into Objective 14.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. The ISA Framework covers housing provision for all.</p> <p>Noted.</p> <p>Noted. Objectives have been reviewed and redrafted it was not however felt that any objectives needed to be combined</p>	<p>No further action required.</p> <p>ISA Framework updated.</p> <p>ISA Framework updated.</p> <p>ISA Framework updated.</p> <p>ISA Framework updated.</p> <p>No further action required.</p> <p>ISA Framework updated.</p> <p>No further action required.</p>
12	Three National Park Authorities	Yes	<p>SA Objective 4. “To promote sustainable economic growth, diversity and business competitiveness”</p> <p>The first decision aiding question under this objective asks “Encourage economic growth?”, this is followed by questions regarding diversity etc. Sustainable economic growth is not defined within these questions. What does the objective consider sustainable economic growth to be? Growth in which areas and for how long?</p> <p>Generally this objective could be more comprehensive in its coverage of the Well-being of Future Generations Act goals. National Parks Wales would suggest re-wording this Objective to read:</p> <p><i>“To promote an accessible, diverse and globally competitive, sustainable low</i></p>	Noted.	ISA Framework updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<i>carbon economy</i> "		
13	Cardiff County Council	Yes subject to further comment	<p>The Council generally welcome ISA Objectives and questions but feel the following changes and additions should be made:</p> <p><u>ISA Objective 3: To create opportunities for an increase in employment across the country and promote economic inclusion</u></p> <p>In order to acknowledge the role the NDF can play in promoting city regions add an additional question worded as follows:</p> <ul style="list-style-type: none"> Promote the benefits of city regions in providing job opportunities and tackling disparities in deprivation in the wider region. 	Noted.	ISA Framework updated.
			<p><u>ISA objective 10: To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups</u></p> <p>In order to acknowledge the role the NDF can play in supporting transportation improvements and existing retail facilities add additional questions worded as follows:</p> <ul style="list-style-type: none"> Support the provision of new and improved links between north and south Wales. Support existing retail centres to ensure communities have access to important local facilities 	Noted. ISA framework includes accessibility to services.	No further action required.
			<p><u>ISA Objective 12: To encourage the provision of good quality , safe, affordable housing that meets identified needs</u></p> <p>Given the role the NDF can play in providing market housing needs in addition to affordable housing revise objective to read:</p> <p>To encourage the provision of good quality housing, including affordable housing that meets identified needs.</p> <p>In order to acknowledge the role the NDF can play in supporting the establishment of a network of Gypsy and Traveller sites add additional question worded as:</p> <ul style="list-style-type: none"> Contribute to the establishment of a network of Gypsy and Traveller transit sites 	Noted. ISA framework includes provision of accommodation to meet identified needs	No further action required.
			<p><u>ISA Objective 17: To encourage the sustainable use of natural resources</u></p> <p>In order to acknowledge the role the NDF can play in protecting mineral resources add an additional question worded as follows:</p> <p>Protect existing mineral resources and ensure an adequate supply.</p>	Noted.	ISA Framework updated.
14	Accessible Retail	No	N/A		
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	The Joint Committee supports ISA Objectives 13 and 14 relating to landscape and heritage asset conservation and enhancement together with Objective 16 which recognises the need to encourage conservation and enhancement of biodiversity and geodiversity.	Noted.	No further action required

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			Where there is a potential conflict between these and other objectives (e.g. relating to the promotion of economic development or encouraging renewable energy projects) the Joint Committee would suggest that for Wales' protected landscapes (which were designated for their conservation value) there is a need to give greater weight to conservation and enhancement objectives where there is an irreconcilable conflict. Such an approach is an extension of the well-established 'Sandford' principle which currently applies to National Parks where there is an irreconcilable conflict between conservation and recreation.	Noted.	No further action required.
16	Glandŵr Cymru	--	<p>The approach taken to developing objectives and reference to the seven well-being goals would generally seem to be appropriate. We note the two economic objectives no's 3 and 4, namely to "3. <i>To create opportunities for an increase in employment across the country and promote economic inclusion</i>" and "4. <i>To promote sustainable economic growth, diversity and business competitiveness</i>" and the particular question associated with objective 4 as to whether the NDF will encourage and promote sustainable tourism, sensitively capitalising on environmental, culture, heritage and leisure assets.</p> <p>As previously stated, we consider there to be a need for an overarching approach to tourism across Wales in the NDF and have recommended that this be recognised as a key theme in the ISA. It is therefore also recommended that protection and promotion of tourism in Wales should be considered as a new ISA objective. Associated questions could relate to whether the NDF will encourage the promotion, protection and enhancement of key tourist attractions, support the provision of new and improved sustainable tourism opportunities, promote access to tourism assets and activities etc.</p> <p>With regards to questions linked to ISA Objective 9 (Table 5.3) "<i>To contribute to the protection and enhancement of the quality of water features and resources</i>", it is considered that there should be an additional question relating to the NDFs contribution to the protection and enhancement of all waterways and their settings.</p> <p>With regards to questions linked to ISA Objective 6, "<i>To encourage the conservation and enhancement of biodiversity and geodiversity</i>" it is suggested that they should be expanded to also include reference to the creation of new areas of greenspaces and also widened to refer to both greenspaces and waterways.</p>	Noted. ISA framework includes tourism.	No further action required.
			With regards to questions linked to ISA Objective 9 (Table 5.3) " <i>To contribute to the protection and enhancement of the quality of water features and resources</i> ", it is considered that there should be an additional question relating to the NDFs contribution to the protection and enhancement of all waterways and their settings.	Noted.	ISA Framework updated.
			With regards to questions linked to ISA Objective 6, " <i>To encourage the conservation and enhancement of biodiversity and geodiversity</i> " it is suggested that they should be expanded to also include reference to the creation of new areas of greenspaces and also widened to refer to both greenspaces and waterways.	Noted. Green infrastructure is covered in ISA objective 9.	No further action required.
17	Home Builders Federation	Yes subject to further comment	See answer to Q3 above regarding section 5.1.2.		
18	Age Cymru	--	<p>With reference to questions relating to Objective 10, we deem that there should be a questions relating to:</p> <ul style="list-style-type: none"> • Planning for the provision of an integrated transport system with accessible and inclusive services and infrastructure • Promoting integration between transport and key services • Ensuring that the built environment in communities is fully accessible and inclusive • Planning decisions taking into account how they will affect people across different stages of the life course of future generations. <p>With reference to questions relating to Objective 11, we deem that there should be a question relating to:</p>	Noted.	ISA Framework updated.
			With reference to questions relating to Objective 11, we deem that there should be a question relating to:	Noted.	ISA Framework updated.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<ul style="list-style-type: none"> Creating conditions to provide opportunities for older people to participate in their local community and wider society. 		
			With reference to questions relating to Objective 11, we deem that there should be a question relating to: Planning of retirement housing with full access to local services, public transport and communities.	Noted.	ISA Framework updated.
			With reference to questions relating to Objective 12: 'Create conditions within which all housing should meet acceptable standards', we believe there should be a commitment to the inclusion of the Welsh Housing Quality Standard and Lifetime Home Standards within such standards.	Noted. ISA Framework includes a question on quality of housing.	No further action required.
19	RTPI Cymru	--	There appears to be overlap between ISA Objective 5 (To encourage the protection and promotion of the Welsh language) and Objective 15 (To encourage the protection and promotion of Welsh culture).	It is noted that the separation of these objectives was intentional to differentiate between language and wider cultural aspects including sport, arts, music etc. However the strong links between the two objectives are noted.	No further action required.
			The Question column on Table 5-3 needs to ensure the questions have a spatial dimension.	Noted. The emerging NDF will set the spatial framework which will be assessed against the ISA framework. The objectives and questions in the Framework cover a wide variety of issues and topics to ensure the NDF is as sustainable as possible.	No further action required.
20	Barry Town Council	No	We feel that many of the points we have raised above are contained within the ISA objectives and we welcome these	Noted.	No further action required
21	Well-Being of Future Generations Commissioner	--	The proposed ISA objectives themselves (Table 5-3) cover a broad range of sustainability issues and the cross-refencing against the Well-Being Goals is a useful check but, with the absence of the Ways of Working, does not qualify in any detail how the ISA will assess the NDF's impact on sustainable development and therefore how it will maximise its contribution to the Well-Being Goals. It is critical that the ISA objectives are framed using the definitions as set out, in law, in each of the seven well-being goals. This is important in terms of effectiveness and policy coherence as well as being legally defensible. For example, the ISA refers to 'an increase in employment' the sustainability appraisal should also consider how the NDF will provide the conditions for 'an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work'.	Noted.	Text in section 1.5 has been amended to demonstrate how the ways of working have influenced this process. The legal definitions of the well-being goals are also being included in the main report.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			I believe the ISA objectives that relate to climate change and flood risk (7) and air and water quality (8,9) also have a direct impact on the 'Prosperous Wales' and the 'Wales of Cohesive Communities' Goals as well. This further highlights the need to apply the sustainable development principle, in this case to ensure that interdependencies are understood and addressed through an integrated approach. The term 'encourage' has been used in a number of the ISA objectives where I would have anticipated more assertive language, especially for issues strongly linked to land development such as housing, air quality, climate change and the sustainable use of natural resources.	Noted.	The ISA objectives have been amended to include these proposed changes. The language within the ISA framework has been reviewed and amended to ensure consistency and that it reflects what the NDF can do i.e. direct or indirect influences.
			The Scoping report is unclear as to where it is taking its main frame of reference using both the Well-Being Goals and the Welsh Government's Well-Being Objectives interchangeably. Figure 1-3 suggests a hierarchical approach with the NDF sitting beneath PPW and Welsh Government's Well-being Objectives. However later, in the Scoping Report, the proposed ISA objectives benchmark themselves against the Well-Being Goals. It would be helpful to have relationships between the different policies and the ISA clarified.	Noted.	Figure 1-3 has been updated to sit PPW and the NDF next to each other to reflect their relationship as sister documents. Text has been inserted in section 1.6 to clarify how the well-being goals and objectives have been used.
			Potentially, as the temporal scope of the plan is for much longer than a single session and it will have an impact on a range of different public bodies well-being objectives and it would therefore be useful to see it assess itself against the goals. Importantly also, as the NDF is designed to influence the collective action of many players, including local authorities, businesses etc. the focus should be on using the 5 ways of working to maximize the collective contribution to the well-being goals and to ensure that business as usual does not continue.	Noted.	The approach taken to the ISA and the resulting ISA framework will ensure that the NDF will be assessed against the well-being goals. The scoping report reflects how the goals have helped to shape the objectives and questions against which the NDF will be assessed. In particular Tables 3-3, 4-1, 5-3 And 1-2 in Appendix A. Text has been included to strengthen the demonstration of how the ways of working have shaped this process.
			I am also concerned that some of the Well-being Goals have been narrowly or even misinterpreted. As the Scoping Report states, each Goal is described in detail within the legislation. It would be helpful to have the detail reflected in the document.	Noted.	The legal definitions of the goals have been inserted into the main report.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>The interpretation in Table 4-1 of the Well-Being Goals has omitted critical elements of some of the Goals, skewing the relevant key issues and in turn the opportunities of the NDF, specifically:</p> <ul style="list-style-type: none"> the key issues identified as being relevant to the 'Prosperous Wales' Goal have only focused on economic and skills deficit, with no reference to issues relating to low carbon economy, efficient use of resources and decent jobs. The key issues for 'A more Equal Wales' focus on issues on community cohesion and access to services, especially those for older people, not on issues that relate to people fulfilling their potential no matter what their background or circumstances. For example, Joseph Rowntree Foundation research suggests that poorest people suffer most from a changing climate, are adversely affected by some policy responses to climate change, and are often excluded from decision-making processes¹. <p>¹ https://www.jrf.org.uk/report/climate-justice-how-did-we-get-here</p> <ul style="list-style-type: none"> The role the natural environment plays in contributing to attractive, viable, safe and well-connected communities has been overlooked, as have issues around digital connectivity, albeit this has been identified as an opportunity. 	Noted.	The well-being goals have been used to help structure the document and this has resulted in the separation of topics e.g. the economy falling under 'A Prosperous Wales'. However throughout the report the cross cutting nature of the goals are demonstrated for example table 5-3 demonstrates the interrelationship between the objectives and the goals as there are a number of objectives that are relevant to more than one goal.
			<p>I note that the Welsh Government is currently working on a cross government decarbonisation plan and that the Minister has recently announced a commitment that the public service in Wales will be carbon neutral by 2030. Both actions have major implications for the NDF and so I would expect to see these integrated in to the NDF process.</p> <p>Similarly, the Welsh Government is reviewing the Welsh Transport Strategy and again I would expect interdependencies to be explored and taken in to account.</p>	Noted.	The ISA is an iterative process and as the information is available it will be integrated into the process.
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn Town Council	--	N/A		
24	Tidal Lagoon Power	--	N/A		
25	Persimmon Homes East Wales	--	We suggest that Section 12 be amended to read 'Encourage the provision of sufficient housing to meet identified needs in all areas, <i>including the identification of large scale strategic housing locations</i> '	Noted. This is a comment for the NDF.	No further action required.
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	P 31 item 2 Questions bullet point 3: 'land use planning initiatives' suggests a rather limited conception of planning – there should be reference to design policy and standards (which could for example include space standards and tree planting).	Noted. ISA framework includes design.	No further action required.
			P31 item 3 include: Encourage the use of indigenous businesses in the provision of professional services and construction?	Noted. ISA framework includes the economy and business.	No further action required.
			P31 item 4 include: Encourage of the use of indigenous natural resources (for example timber, mineral resources) in construction – reducing imports, developing the local economy and enhancing local distinctiveness in design?	Noted. ISA framework includes the use of natural resources.	No further action required.
			P32 item 6: Include: Encourage the use of locally sourcing and processing of construction materials.	Noted. ISA framework includes natural resources.	No further action required.
			P 33 item 10: amend bullet point three to read 'Give priority walking and cycling	Noted. ISA framework	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			routes in the development of highway infrastructure that meets the needs of all people? P34 Item 12 include: Encourage the provision of a varied housing stock located to offer convenient access to employment, shopping, educational and recreation facilities? Amend bullet point 2 to replace 'acceptable' with 'the highest achievable'	includes accessibility and active travel.	
			P35 item 13 Bullet point 3 replace 'Promote sensitive design in development' with 'Promote high quality architectural and urban design appropriate to its setting'	Noted. ISA framework includes accessible good quality housing.	No further action required.
			P35 item 14 Bullet point 1 replace '... heritage assets ...' with '... historic buildings and places and other heritage assets ...'	Noted. ISA framework includes design.	No further action required.
				Noted. Heritage Asset is the terminology advise to be used by CADW	No further action required
27	Mineral Products Association	--	Yes we would question how the aspirations and objectives of NDF and WG could be achieved with a policy focussed on the direct reduction of demand for raw material.	Noted.	ISA Framework (Objective 17) updated.
28	Community Housing Cymru	Yes subject to further comment	As mentioned previously, CHC members have noted that Objective 17 needs to look at the sustainability of materials used, not solely the energy efficiency performance of an occupied dwelling.	Noted.	ISA Framework updated.
29	Wildlife Trusts Wales	--	Please look at the following evidence based reports that highlight how nature can help achieve all 7 well-being goals and therefore all of the ISA Objectives <ul style="list-style-type: none"> Wildlife Trusts Wales - Green Infrastructure – A Catalyst for the Well-being of Future Generations Wildlife Trusts Wales - Living Landscapes Vision 2020 Arup – Cities Alive 	Noted.	To be reviewed and data incorporated where necessary.
30	Sustrans Cymru	Yes subject to further comment	There are not any specific changes however Sustrans Cymru would query why the wording in some questions is stronger than others. In some instances 'encourage' is used whilst 'ensure' or 'contribute to' is used for other questions. The wording should depend on the NDF's role in effecting the desired change.	Noted.	ISA Framework updated.
31	Persimmon Homes West Wales	--	The questions in Table 5-3 are generally supported. Section 12 within the table refers to the objective to: <i>"Encourage the provision of good quality, safe, affordable housing that meets identified needs"</i> The first question in the "Will the NDF...?" section. It is suggested that this should be amended to read: <i>"Encourage the provision of sufficient housing to meet identified needs in all areas, including the identification of large scale strategic housing locations"</i>	Noted. This is a comment for the NDF.	No further action required.
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of	No	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Carew				
35	Historic Houses Association	Yes Subject to further comment	<p>With 17 objectives and 80+ questions the HHA will limit its main comments to those most directly relevant to its areas of expertise. These are primarily Objectives 3/4, especially 4 bullet points 4 and 5; 14 and 15. However that does not mean that there is no relevance to other objectives or questions. As examples of the latter there is a clear link between Wales's Culture and Heritage and Education (almost all schools have programmes relating to their local heritage) but there is no question concerning this despite vibrant culture and cohesive communities being included in the Well-being Goal column.</p> <p>Similarly there is a bullet in objective 10 concerning access to cultural and recreational facilities and these, again as exemplified by CADW, are often linked closely to heritage buildings, gardens or landscapes.</p> <p>Looking at the main items we have particularly considered the grid forming Appendix C. Here we feel that there are too many blanks with insufficient recognition of clear pluses and the lack of any minuses represents a failure to acknowledge the realities of life whereby there are so often trade offs between one desirable objective and another.</p> <p>As an example of the latter not specific to just the heritage environment, consider objective 10, bullet 3. This relates to reduction of private car usage and promotion of more sustainable travel. If this is considered in relationship to objectives 4 bullet 4 (promotion of tourism) the two are very largely incompatible. Pembrokeshire alone has over 4 million staying visitors every year. Just a 5% increase thus involves 200,000 extra people who cannot remotely be accommodated by the existing rail and bus/coach service to that county. To raise the sustainable travel facilities to even address anticipated increases in visitors would itself have significant impacts on infrastructure and environment, and any move to discourage cars would clearly damage the chances of increased visitor numbers.</p>	<p>Noted. The interrelationships between the objectives are recognised. The different topic areas have been grouped based on professional judgement and will be considered holistically as part of the assessment.</p> <p>The intention of the compatibility assessment in Appendix C is to generate a high-level overview of the internal compatibility of the ISA objectives, in order to identify any key direct potential conflicts, so that the objectives could be modified as appropriate. It is considered that the ISA Objectives are comprehensive and will be considered as a whole during the assessment. Any potential conflicts in relation to the potential incompatibilities when seeking to achieve sustainable development will be explored in the NDF assessment analysis.</p>	No further action required.

Question 5

Do you have any comments regarding how reasonable alternatives should be developed?

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Did not answer	N/A		
2	Natural Resources Wales	--	<p>At a Wales National level the NDF provides an opportunity to spatially express and integrate the priorities set out in other high level WG Policies, Plans and Programmes including the Natural Resources Policy, the Wales National Marine Plan and the Wales Infrastructure Investment Plan.</p> <p>The State of Natural Resources Report, an assessment of the sustainable management of natural resources provides an evidence base that can help enable integration and synthesis between plans and programmes.</p> <p>Analysis of national alternatives and the effective delivery of NDF policies may be most effectively delivered by applying a regional approach for intervention. If such an approach is considered appropriate by Welsh Government, we recommend that any regional approach set out in the NDF should be coterminous with the areas of Wales for which an 'Area Statements' will be produced.</p> <p>As you are aware, NRW is required under the Environment (Wales) Act 2016 to prepare and publish statements (Area Statements) for the areas of Wales that it considers appropriate, primarily for the purpose of helping to implement the Natural Resources Policy.</p> <p>Each Area Statement must:</p> <ul style="list-style-type: none"> • Explain why a statement has been prepared for the area, by reference to the natural resources in the area, the benefits which natural resources provide, and the priorities, risks and opportunities for SMNR which need to be addressed; • Explain how the principles of SMNR have been applied in preparing the statement; • State how NRW proposes to address the priorities, risks and opportunities, and how it proposes to apply the principles of SMNR in doing so; • Specify the public bodies which NRW considers may assist in addressing the priorities, risks and opportunities. <p>The first Area Statements will include 6 terrestrial Area Statements, and a single marine Area Statement, which together will cover the whole of Wales as:</p> <ul style="list-style-type: none"> • South East • South Central • South West • Mid Wales • North East • North West • Marine <p>An initial spatial representation of the geographic extent of each Area Statement is illustrated in the attached Annex A. However, the priorities, risks and opportunities in the Natural Resources Policy will ultimately help to define the issues/ opportunities we need to address, and evidence we need to capture through Area Statements. It is those issues/ opportunities themselves which determine the scale at which we and others need to take action.</p>	Noted. This is a comment for the NDF team.	No further action required.

			<p>We at NRW are committed to a place-based approach with the organisation moving towards 6 operational areas that are aligned to Area Statements, and based on clusters of local authorities with whom we have an increasing relationship through the Public Service Boards. We will not be constrained by these boundaries – we will consider the appropriate spatial scale for action, and seek to operate accordingly. Throughout this process we will continually review how, where and in what form we need to provide information to support delivery mechanisms (such as land use planning) and help to engage different stakeholders.</p> <p>The spatial boundary of each Area Statement is aligned to the administrative boundaries of local authorities, which should facilitate the delivery and monitoring of interventions. Therefore, applying the same boundaries to any regional approach of the NDF will facilitate the delivery of planning policies from the national through to the local scale.</p> <p>Furthermore, the spatial extent of Area Statements are also broadly similar with other regional strategies/ programmes such as the; Cardiff Capital Region, Swansea Bay City Region, North Wales Economic Board and Growing Mid Wales. The alignment of these boundaries with Area Statements, and any regional approach in the NDF could help ensure the sharing of regional information, and the identification of regional synergies.</p>		
			<p>Whilst the NDF will focus on the deliverables within the land use planning system, we query whether the preparation of the NDF, together with the decision for the UK to leave the European Union, presents an opportunity to assess how the NDF will align with the land management system in Wales to ensure a consistent approach for the sustainable management of natural resources. We are aware of the Scottish Government's intention to ensure alignment between Getting The Best From Our Land: A Land Use Strategy For Scotland 2016 – 2021 and its National Planning Framework 3, and consider there may be benefit of exploring how such alignment can be achieved in Wales.</p> <p>We would welcome the opportunity for further discussion with you on our response to Question 5.</p>	Noted. There will be continued engagement throughout the development of the NDF.	Text on Brexit has been included in section 4.3.2.
3	CADW	--	<p>13. To contribute to the protection and enhancement of the local distinctiveness of our historic landscapes, townscapes and seascapes.</p> <ul style="list-style-type: none"> • Support the protection and enhancement of areas of historic landscape, Registered Parks and Gardens and seascape character, distinctiveness, diversity and quality? • Support the protection and enhancement of historic townscape character and quality? • Promote sensitive design in all development and redevelopment? • Promote heritage-led regeneration? • Encourage a reduction in noise and light pollution? • Encourage the maintenance of areas of tranquillity? • Encourage the conservation and enhancement of the historic landscape? 	Noted.	ISA Framework updated. Changes have been made to incorporate comments and demonstrate the links between townscape and historic townscapes.
			<p>14. To contribute to the protection, conservation and enhancement of the historic environment and historic assets and their settings.</p> <ul style="list-style-type: none"> • Support the protection and enhancement of designated historic assets? • Support the protection and enhancement of non-designated historic assets? • Support the protection and enhancement of marine archaeology? • Allow historic assets to be maintained in order to sustain their values? • Promote the significance of historic assets so that they are understood? 	Noted.	ISA Framework Updated. Changes have been made to capture the comments and a definition of historic assets has been included in the glossary.

			<ul style="list-style-type: none"> Recognise that the historic environment is a shared resource and therefore ensure that there is greater access, understanding and enjoyment of it for all groups in society? Support wider public engagement so that everyone will be able to participate in sustaining the historic environment? Ensure that decisions about change are reasonable, transparent and consistent? <p>Ensure that decisions that impact historic assets are fully documented and that future generations will benefit from the knowledge gained.</p>		
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	--	<p>Mae'n bryder mawr i ni fel mudiad nad oes gan y Gymraeg sefydliad i'w chynrychioli mewn perthynas â materion cynllunio. Yn sgil y diffyg hwn, ni chredwn ei bod yn bosib dadansoddi'r oblygiadau ac effeithiau'n foddhaol heb fewnbwn arbenigwyr cynllunio ieithyddol. Nodwn y bod Cyfoeth Naturiol Cymru a Cadw'n gyrrff ymgynghori statudol ar gyfer y broses hon, ond nad oes corff cyffelyb i gynrychioli buddiannau'r Gymraeg.</p> <p>Wrth ddatblygu'r gwaith (gan gynnwys llunio opsiynau amgen) byddwn yn pwysleisio'r angen i gynnwys mewnbwn arbenigwyr cyffelyb o safbwynt amlinellu anghenion y Gymraeg.</p> <p>Fel rhan o'r Strategaeth laith, rhoddir ystyriaeth i sefydlu Asiantaeth laith er mwyn cyd-lynu'r gwaith o hyrwyddo'r Gymraeg. Credwn y byddai'r arbenigedd a gynrychiolir gan Asiantaeth o'r math yn gallu gwneud cyfraniad allweddol tuag at ddatblygu'r gwaith hwn, gan roi arweiniad ar sut i warchod a hybu buddiannau'r Gymraeg.</p>	Noted. Everyone is a stakeholder in the NDF, given its importance in providing a framework for new development across the whole of Wales. We welcome and encourage representations from everyone and all groups, institutions, businesses and individuals have a contribution to make in developing the national land use plan.	No further action required.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>It is of great concern to us as an organisation that the Welsh language does not have a body to represent it in relation to planning matters. As a result of this shortcoming, we do not believe that it is possible to satisfactorily analyse the implications and impacts without the input of linguistic planning experts. We note that Natural Resources Wales and Cadw are statutory consultation bodies for this process, but that there is no similar body to represent the interests of the Welsh language.</p> <p>When developing the work (including preparing alternative options) we will be emphasising the need to include input from similar experts in relation to outlining the needs of the Welsh language.</p> <p>As part of the Language Strategy, consideration is given to establishing a Language Agency to co-ordinate the work of promoting the Welsh language. We believe that the expertise of such an Agency could make an important contribution towards the development of this work, providing guidance on how to protect and promote the interests of the Welsh language.</p>		
7	Mochdre with	No	N/A		

	Penstrowed Community Council				
8	Llandudno Town Council	No	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	No	No Comment		
12	Three National Park Authorities	Yes	With regard to population, alternatives for the scale of development should be developed with alternative projection scenarios for Wales. Alternative economic paths post Brexit could influence the infrastructure requirements of Wales in the future; it may be worth considering those?	Noted, this is a comment for the NDF team.	Text has been included in section 4.3.2 of the main report on Brexit.
13	Cardiff County Council	Yes subject to further comments	<p>In developing reasonable alternatives it is important to ensure that alternatives are:</p> <ul style="list-style-type: none"> • Realistic - are real alternatives and not just a slight amendment/variance on the original proposal and able to achieve the NDF's objectives; • Reasonable - based on socio-economic and environmental evidence; • Viable - technically and financially feasible; and • Implementable - realisable within the NDF's timeframe and resources. <p>Allied to this it important to consult with stakeholders and adopt a participatory approach to the development and assessment of alternatives.</p> <p>Also it is important to fully document:</p> <ul style="list-style-type: none"> • How the alternatives were developed and any significant constraints to generating alternatives; • Any alternatives that were eliminated early on and why these were excluded from further consideration; • How they were assessed and the assessment outcomes; • Why the preferred alternative was selected; and • Any data gaps and technical limitations/deficiencies affecting the development and assessment of alternatives and a description of the associated uncertainties affecting the assessment outcomes. 	Noted, this is a comment for the NDF team. The development of alternatives will be set out in the consultation on the issues and options for the NDF, noting these considerations.	No further action required.
14	Accessible Retail	No	N/A		
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	See comments on Q4 above relating to potentially conflicting objectives in devising alternatives which impact on the AONB. Greater weight should be afforded to conservation in such nationally protected areas.	Noted, this is a comment for the NDF team.	No further action required.
16	Glandŵr Cymru	--	No		
17	Home Builders Federation	Yes subject to further comment	Table 5-3 ISA Objectives and questions section 12.To encourage the provision of good quality, safe, affordable housing that meets identified needs. The HBF believes that as this is the only question about housing it should not just refer to affordable housing but all forms of housing as there is an identified need for both affordable and private housing in Wales (Holmans Report).	Noted. The ISA Framework incorporates all aspects of housing provision.	No further action required.

			<p>The HBF notes that the first question asks - Encourage the provision of sufficient housing to meet identified needs in all areas? Further questions then identify many different types of housing, however there is no specific question or mention of private housing. The HBF suggests that an additional question is added which asks: <i>'Create the conditions within which the availability of new build private housing should increase.'</i></p> <p>This increase in private housing is not only required to deal with the identified housing need but also to support economic growth and sustainability.</p>		
			<p>The second question asks – 'Create the conditions within which all housing should meet acceptable standards' - The HBF suggest that further clarity is provide in terms of what standards are being asked about in this question as there are a large range of standards which currently apply to housing both new and existing.</p>	Noted.	ISA Framework updated.
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	<p>We agree with considering alternatives such as options for strategic spatial priorities. On this we refer to our briefing note on the scope of NDF and what the NDF should be doing as a high level strategic document – “be evidence based and deliverable, be spatially defined and provide intergradation across different sectors and should spatially integrate national policies.”</p>	Noted, this is a comment for the NDF team.	No further action required.
20	Barry Town Council	No	N/A		
21	Well-Being of Future Generations Commissioner	--	N/A		
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn Town Council	--	N/A		
24	Tidal Lagoon Power	--	<ul style="list-style-type: none"> • Need to consider scenarios (as alternatives) to ensure plan is resilient in this period of uncertainty, and to ensure that the 20yr NDF is facilitating the right pathway for a low carbon economy and meeting 2050 targets and Wales being competitive in the global 2050 scenario. What if population assumptions shift? What if economic performance deviates? What other shocks could happen and necessitate a change in approach? (yes this is about monitoring and review, but better to be proactive in thinking about 2050 and potential alternatives to ensure we remain on track, and potential adjustments in strategy over time because it helps future proof the NDF). 	Noted, this is a comment for the NDF team.	No further action required.
25	Persimmon Homes East Wales	--	No Comments		
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	<p>Commission exploratory studies for areas of potential development or regeneration from a variety of professional teams working in partnership with academic institutions based on clear but open-ended, aspirational briefs involving broadly based public engagement. The results should be widely publicised and followed up with further public consultation using nation and local press, television, radio, social media and bodies such as the National Eisteddfod, amenity societies and professional bodies.</p>	Noted, this is a comment for the NDF team. There have been and will continue to be opportunities to submit evidence and projects as the NDF develops. There will be continuing engagement with stakeholders throughout the development of the	No further action required.

				NDF	
27	Mineral Products Association	--	This is difficult to consider in light of the lack of baseline data and an absence of any balanced consideration of existing issues, let alone alternatives.	Noted.	Changes made throughout including to Appendix A, Appendix B, and the Main Report.
28	Community Housing Cymru	Yes subject to further comment	The Building Research Establishment's "BES 6001 – The Framework Standard for Responsible Sourcing" would enable Local Planning Authorities to assess the sustainability of proposed materials. This would help achieve Objective 17.	Noted, this is a comment for the NDF team.	No further action required.
29	Wildlife Trusts Wales	--	Section 5.1.2 (Geographical Scope of the ISA) states that the geographical scope of the ISA will be driven by the geographical scope of the NDF i.e. the whole of Wales. Therefore, the geographical scope of reasonable alternatives should be at a Wales scale also. For example, if more Port capacity was required in Wales, and Milford Haven couldn't be increased due to environmental constraints, then port capacity at Newport, Neath or Fishguard or Holyhead should be considered. Therefore, an application should be refused due to availability of less damaging alternatives solutions to meet public interest.	Noted, this is a comment for the NDF team.	No further action required.
			<p>We support section 5.1.4 (Assessment of Alternatives) which states that "it is a requirement of the SEA Directive that reasonable alternatives are assessed and, therefore, alternative options will be assessed using the ISA Framework. At this stage, the type and range of reasonable alternative options is not known <i>although it is assumed that they may include, for example, options for strategic spatial priorities of different policy approaches</i>"</p> <p>Development needs to achieve win-win solutions that integrate objectives for people and the natural environment, so contributing to the achievement of sustainable development and living within natural limits (see Climate Change and National and International Biodiversity Loss above).</p> <p>The Future Generations Commission states that, in relation to the M4 Relief Motorway "the Well-being of Future Generations Act arguably requires, the Government to explore other ways to address the problem giving greater consideration to the aspirations contained within the National well-being goals, their own well-being objectives and the five sustainable development principles. Consideration of long-term trends, for instance in technology, car usage and working patterns, are particularly important in ensuring that the solution they develop is fit for current and future generation"²⁶.</p> <p>By this, she may have meant to look at actual alternatives not variations on the same theme, such as the Red, Blue and Black routes as below (from the M4 Corridor around Newport Plan²⁷)</p>  <p>The Welsh Government's case for a new motorway, put forward in its September 2013 consultation paper²⁸ takes no account of the impact of rail electrification or the</p>	Noted, this is a comment for the NDF team.	No further action required.

			<p>Metro. The paper says it does not take account of public transport measures “because the Welsh Government has commissioned a separate study and report on proposals to develop a Metro system for south east Wales”. Yet these separate proposals should not have been considered in isolation. Each will have a significant impact on the other. Indeed, the Welsh Government’s A Cardiff Capital Region Metro Impact Study²⁹, published in October 2013, argues that it will help address congestion on the M4. The Welsh Government also did not realistically investigate the Blue Route either³⁰.</p> <p>Therefore, the alternative solutions stage needs to be applied properly.</p> <p>²⁶ The Future Generations Commissioners evidence to the M4 Public Inquiry – here ²⁷ http://www.m4newport.com/the-draft-plan.html ²⁸ http://www.m4newport.com/the-draft-plan.html ²⁹ http://gov.wales/docs/det/publications/131126-metro-impact-study-main-report-en.pdf ³⁰ http://www.iwa.wales/wp-content/uploads/2013/12/m4-a48-report-mj-v4.pdf</p>		
30	Sustrans Cymru	No	N/A		
31	Persimmon Homes West Wales	--	Save for the comments made under Question B (above) and Question I (below) we have no further comment to make.	Noted.	No further action required.
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	Yes	Carew Community Councillors feel that all reasonable alternatives should be developed and pursued.	Noted.	No further action required.
35	Historic Houses Association	No	See below	Noted.	No further action required.

Question 6

Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the NDF?

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	--	Table 3-2 Objective 4 – would also contribute to A healthier Wales	Noted. This table has been removed from the report.	No further action required.
			Table 3-3 Promote quality employment opportunities and economic activity – would also contribute to A healthier Wales	Noted.	Table updated.
			Table 4-1 A Prosperous Wales The NDF could indicate the level of population and household growth and jobs growth that is desirable to increase the prosperity of the whole of Wales and of the various regions within Wales, e.g, Cardiff Capital City Region.	Noted. This is an issue for the NDF.	No further action required.
			Table 4-1 A Resilient Wales Geology and soils – should this also make reference to minerals development (coal, limestone/sandstone) Minerals and Waste -The NDF has an important role to play with regard to minerals demand (through economic aspirations), planning and management. It can help to guide the sustainable use of such resources through its policy and strategic development proposals. What about its role in terms of supply?	Noted.	Revisions made to Appendix B and Table 4-1.
			Table 4-1 A Healthier Wales The importance of the provision of good housing should be commented on in terms of opportunities to improve health. Good housing can improve health and well being; but poor housing conditions can damage health, particularly in relation to asthma, damp and mould. For children, the effects can last a lifetime. The importance of access to well paid jobs and the potential consequential impact on living standards and thus health should also be commented on here. Access to healthcare - The NDF can help to address issues surrounding access to healthcare through facilitating the provision of accessible services supported by well connected infrastructure to meet identified needs.	Noted.	Revision made to Appendix B and Table 4-1.
			Table 4-1 A more Equal Wales Include reference to the need to make provision for housing that is suitable for older people in order to meet their needs into old age which will in turn free up and make more efficient use of the existing housing stock.	Noted.	Text updated in Appendix B and Table 4-1.
			Table 4-1 A Globally responsible Wales The NDF has an opportunity to help promote low carbon development.	Noted.	Text updated in Appendix B and Table 4-1.
			Table 5.2 – second row, second column – does not make sense.	Noted.	Text updated.
2	Natural Resources Wales	--	We would like to see further linking of the SMNR principles through the NDF, and for the ISA to cover this fully in its assessment of the NDF, as described below. It is an SEA requirement for the Environmental Report to include ‘The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects’.	Noted.	SMNR principles integrated into the ISA Framework.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>Where natural resource receptors (air, soil, water, etc.) are showing impacts, any further development (including permitted development or activity) has to be considered from an accumulative and in combination perspective. Where planning for development is prioritised in known vulnerable catchments or zones (whether highlighted as failing or at risk) the reasons for not achieving or being at risk could be exacerbated. Using the principles of SMNR, additional mitigation needs to be part of the planning prioritisation, assessment and conditions. It may be that there are measures to mitigate existing pressures which could allow further development and this can be taken into consideration for the Development Framework, both from an existing developed land use, or from a proposed development. Such an approach would guard against a new development or innovation being prevented because existing land uses / land managements are exerting a particular set of pressures.</p> <p>For example, in South Wales, the Burry inlet is showing eutrophication. Any development which could add to that impact should include additional mitigation to reduce the impact on the group. Additional poultry units (even under permit levels) would require measures through the planning process to reduce water quality impacts which could exacerbate the existing eutrophication problem.</p> <p>This approach has already been considered in Powys in relation to ammonia and the poultry industry, but a planning development which impacts on ammonia may not always be assessed in the same way. For example, new and additional poultry units are considered under cumulative impact on ammonia emissions but another development (e.g. pig units) which may also add to ammonia levels may not be drawn in to that consideration of cumulative impact. Also, in different authority areas there may not be the same level of understanding of risk and mitigation controls.</p> <p>Hence a key opportunity for the NDF is to provide a framework to help ensure SMNR is applied equally and consistently to sustainably manage the environment and natural resources of Wales, in line with the emerging Natural Resources Policy, and a key role for the ISA is to assess whether this is the case.</p>		
3	CADW	--	see answer to question 2		
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	--	<p>Mae hwn yn gyfnod tyngedfennol i'r Gymraeg. Os yw'r arfarniad am wneud gwir wahaniaeth o safbwynt gwarchod a hwyluso'r Gymraeg, bydd rhaid</p> <ul style="list-style-type: none"> • Cyd-fynd â nodau a chymau gweithredu Strategaeth y Gymraeg • Yn wir, credwn fod dyletswydd i edrych tu hwnt i'r Strategaeth hon, gan ein bod o'r farn nad yw'n rhoi digon o sylw i faterion cynllunio ar ei ffurf bresennol. Byddwn yn pwysleisio'r gofyn a ymgorfforwyd yn y Bil Cynllunio i roi ystyriaeth ddyledus i'r Gymraeg, a photensial yr arfarniad hwn i arwain y ffordd • Manteisio ar arbenigedd cyfredol mewn perthynas â chynllunio iaith er mwyn sefydlu methodoleg wydn ar gyfer asesu effaith o safbwynt gwarchod a hybu'r Gymraeg <p>O gael y broses yn iawn, ac o ddatblygu trefn sy'n ymgorffori methodoleg gadarn, credwn bydd modd i'r arfarniad wneud cyfraniad cadarnhaol at sefydlu ystyriaeth ddigonol i'r</p>	Noted.	The Welsh Language Strategy and Planning (Wales) Act have been incorporated into the development of the ISA assessment framework.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>Gymraeg a gosod patrwm i'w hefelychu ar draws holl haenau'r gyfundrefn cynllunio Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>This is a critical time for the Welsh language. If the appraisal is to make a real difference in terms of protecting and facilitating the Welsh language, it must:</p> <ul style="list-style-type: none"> • Correspond with the aims and actions of the Welsh language Strategy. • Indeed, we believe that there is a duty to look beyond this Strategy, as we believe that it does not focus enough on planning issues in its current form. We will be emphasising the requirement contained in the Planning Bill that due consideration be given to the Welsh language, and the potential of this appraisal of leading the way. • Maximise the existing expertise in relation to linguistic planning in order to establish a resilient methodology to assess the impact in terms of protecting and promoting the Welsh language. <p>If we get the process right, and develop a procedure which incorporates a robust methodology, we believe that the appraisal can make a positive contribution towards giving sufficient consideration of the Welsh language and set a pattern to be emulated across all tiers of the planning system.</p>		
7	Mochdre with Penstrowed Community Council	No	N/A		
8	Llandudno Town Council	No	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	No	No Comment		
12	Three National Park Authorities	No	N/A		
13	Cardiff County Council	Yes subject to further comment	It would be helpful to also show in figure 2-1 how the HRA screening and if required HRA assessment fits into the overall ISA Process.	Noted. As stated in section 1.8 of the Scoping Report, HRA Screening will be undertaken alongside the development of the NDF as it emerges. The assessment of the NDF content will be dependent on the depth of information	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				available at the different stages. The results of the HRA Screening will be integrated into the ISA where appropriate, as part of an iterative process.	
14	Accessible Retail	Yes subject to further comment	Greater emphasis should be given to the need to promote economic growth and other policy aims should be evaluated <i>inter alia</i> against their impact on this overarching aim.	Noted. Economic growth will be considered in the assessment, although no one objective will be given greater weight over another.	No further action required.
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	The scope of the ISA is comprehensive and generally covers all matters of interest to the AONB. However, when considering NDF proposals and alternatives which impact on the AONB, the appraisal should give greater weight to conservation objectives (see response to Q4 and 5 above).	Noted. AONB conservation objectives will be considered in the assessment, although no one objective will be given greater weight over another.	No further action required.
16	Glandŵr Cymru	--	No		
17	Home Builders Federation	No	N/A		
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	We have no further comments.		
20	Barry Town Council	--	N/A		
21	Well-Being of Future Generations Commissioner	--	N/A		
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaearn Town Council	--	N/A		
24	Tidal Lagoon Power	--	<ul style="list-style-type: none"> Is there any appetite for another component of the integrated assessment to be more outward looking? (they're all focus on intra Wales) e.g. how Wales might perform against another states or countries with similar characteristics and/or aspirations? This aligns with Global Wales but more importantly helps us be more resilient by focusing on ensuring we are able to be competitive in the longer term (e.g. can we attract talent, can we stop the brain drain, has our industry been able to upgrade to industry 4.0, are we world leaders in our specialism, are natural resources getting more resilient/healthier, social cohesion/equal society, do we have an identity, health, education/skills, fit for purpose infrastructure, do people want to live in Wales etc etc). Where is comparable? Does this sort of benchmarking help us be more competitive? 	Noted. It is not the role of an ISA to perform this function.	No further action required.
25	Persimmon Homes East Wales	--	No comments		
26	Royal Society or	No	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Architects in Wales (Royal Institute of British Architects)				
27	Mineral Products Association	--	There is a clear need for thorough and sound baseline data from which the scope of the ISA can be developed.	Noted.	Appendix B updated where appropriate.
28	Community Housing Cymru	No	<p>CHC Members have noted that any future Welsh strategy needs to consider the promotion and facilitation of community energy. This would meet;</p> <ul style="list-style-type: none"> • A more resilient Wales – by decentralising power generation and taking away dependence upon the main, often international, suppliers; • A more prosperous Wales – by allowing people to spend less of their incomes on energy bills; • A Wales of cohesive communities – because communities have a stake in their energy production, it can draw them together; • A globally responsible Wales – community energy schemes tend to be renewable, so reducing CO2; • A more equal Wales – people from all backgrounds in the community have to come together and work with each other 	Noted.	Appendix B and Table 4-1 updated.
29	Wildlife Trusts Wales	--	See introduction (this is set out in question 10) – this cannot be a tick-boxing exercise. This must embrace the new way of thinking brought about by the Well-being of Future Generations Act.	Noted.	Section 1.5 has been updated to reflect how the ISA relates to the Well-being of Future Generations Act including the ways of working.
30	Sustrans Cymru	No	N/A		
31	Persimmon Homes West Wales	--	Save for the comments made under Question B (above) and Question I (below) we have no further comment to make.	Noted.	See responses to other comments. In question 2 and 9
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	No	Carew Community Councillors feel that draft report for the National Development Framework is comprehensive enough.	Noted	No further action required.
35	Historic Houses Association	Yes subject to further comment	Long experience with the introduction of initiatives such as the National Development Framework tells us that unintended consequences have a habit of emerging after adoption of the programme.	Noted. A monitoring process will be established for the ISA and NDF which will identify issues and	No further action

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>The HHA would suggest that overall the ISA should be more probing in its approach to these possibilities and in particular explore, and thus try to head off, the likelihood of negative or conflicting consequences.</p> <p>As listed, the objectives and their associated questions are almost entirely framed around questioning whether a particular aspect of the NDF will positively contribute to one or more of the various aims and goals set out in other overarching legislation. However items such as those contained in objective 10 (increased access to recreational facilities, open space, the countryside and coastal areas) may themselves be frustrated if the NDF adopts restrictive policies in pursuit of objective 16 – people having access to anywhere have an impact on the physical space and on its flora and fauna.</p> <p>As this aspect is particularly of interest in connection with the sustaining of the heritage, both built and garden/landscape, the HHA would recommend that the sort of uncertainties detailed at the head of Appendix C in relation to housing should also be explored in relation to access, employment and economic growth as surely one prime purpose of an integrated sustainability appraisal must be to consider the balance to be struck where objectives overlap.</p> <p>Of particular relevance to the HHA this key role is noted in Appendix B at 7.1.4 (p 77) where specific note is made of the aim of the Historic Environment (Wales) Act 2016 to improve the sustainable management of the historic environment. By far the greatest element of that sustainability is economic, and the practical implementation of the NDF will significantly affect whether economic sustainability is achievable for buildings at risk and the built heritage in general.</p>	<p>effects of the plan; this will inform further revisions of the NDF.</p> <p>Further, it is noted, that the ISA Objectives are to be read as a whole. Inherent conflicts will be addressed and explored during the NDF appraisal and analysis, seeking to provide a balanced approach to achieving sustainable development across Wales.</p>	<p>required.</p>

Question 7

Do you support the approach to the integration of the impact assessments?

Rep Number	Name	Support the Question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	N/A		
2	Natural Resources Wales	--	<p>Overall, we welcome the principle for an integrated approach which reflects the Wellbeing of Future Generations Act (WoFG) ways of working, as well as Sustainable Management of Natural Resources (SMNR) principles. Our key concern is that the legal requirements for Strategic Environmental Assessment (SEA) are adequately and sufficiently distinctly addressed as the assessment progresses. We need to be satisfied that the SEA elements of the appraisal do not get buried or diluted in the other assessments also being included. The ISA states it is about the 'integration' of a number of wide-ranging Impact Assessments. Although this is a positive approach, the ISA will need to ensure that:</p> <ul style="list-style-type: none"> the different IA's are properly integrated in decision-making, rather than being a 'bolt-together' of distinct approaches. a 'gaps' analysis should be undertaken to ensure that any key relevant impacts are not missing from the scope of the list of existing IAs 	It is noted that the distinct requirements of the SEA Directive are being met, and will be highlighted throughout the process to demonstrate compliance. Section 2.2.2 and table 5-5 demonstrate how the impact assessments have been integrated into this process. Engagement with stakeholders will continue throughout the development of the NDF.	No further action required.
			<p>Page 11, Table 2.1 - under 'Health' this should include reference to the Public Health Outcomes Framework (PHOF), link below: http://gov.wales/topics/health/publications/health/reports/public-health-framework?lang=en Please note that these PHOF Indicators are currently undergoing a review, including the proposed development of some new indicators on the 'Built and Natural Environment', that will be of direct relevance to the NDF and its ISA.</p>	Noted. To be included once the revisions have been made, as part of the iterative ISA process.	No further action required.
3	CADW	Yes	We support the approach to the integration of the impact assessments.	Noted.	No further action required.
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r iaith	Yes subject to further comment	<p>Fel y nodwyd eisoes, rydym yn falch o'r sylw a roddir i'r iaith yng nghyd-destun allweddol cynaladwyedd. Byddwn yn galw fodd bynnag i'r sylw hwn fod yn addas ac ystyriol; yn seiliedig ar egwyddorion cynllunio iaith gydnabyddedig, ac nid fel ystyriaeth arwynebol i'w llyncu gan ddisgyblaeth ehangach. Rhaid i unrhyw ystyriaeth o'r Gymraeg fod yn seiliedig ar realiti ei sefyllfa, ac ar syniadaeth flaengar ynglŷn â sut i'w hadfer.</p>	Noted.	No further action required.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>As already noted, we are pleased with the focus given to the language in the important context of sustainability. However, we will be calling for this comment to be suitable and considerate; based on recognised linguistic planning principles, and not as a superficial consideration to be swallowed by a wider discipline. Any consideration of the Welsh language must be based on the reality of its position, and any innovative thoughts</p>		

Rep Number	Name	Support the Question?	Representation	Response	Proposed Change
			regarding how to restore it.		
7	Mochdre with Penstrowed Community Council	Yes	N/A		
8	Llandudno Town Council	Yes	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	Yes	No further comment. We welcome this approach and the inclusion of health impact assessment within it.	Noted.	No further action required.
12	Three National Park Authorities	Yes	N/A		
13	Cardiff County Council	Yes subject to further comment	<p>The Council support the approach proposed in the Scoping Report for an integrated assessment incorporating Equalities Impact Assessment (EqIA), Welsh Language, Rural Proofing, Children's Rights, Climate Change, Economic Development, Third Sector, Health Impact Assessment (HIA) and Habitats Regulation Assessment (HRA - if the Screening Report deems it is required).</p> <p>However, it will be important to ensure that impacts are fully considered and not generalised as part of an ISA. This is particularly relevant in relation to EqIA, HIA and HRA which are traditionally done as separate and defined exercises. In order to ensure this it may be advisable to have an appendix to the draft ISA (when at this stage) that demonstrates how the statutory obligations are being met. This follows a similar approach the Council followed when we undertook the Sustainability Appraisal of the Local Development Plan where we included an appendix setting out how we met the Strategic Environmental Assessment (SEA) obligations within the wider assessment.</p>	It is noted that the distinct requirements of the SEA Directive are being met, and will be highlighted throughout the process to demonstrate compliance. Section 2.2.2 and table 5-5 demonstrate how the impact assessments have been integrated into this process. Engagement with stakeholders will continue throughout the development of the NDF.	No further action required.
14	Accessible Retail	Yes	N/A		
15	Clwydian Range and Dee Valley AONB	Yes	N/A		
16	Glandŵr Cymru	--	The approach taken would appear reasonable		
17	Home Builders Federation	Yes	N/A		
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	While we support this approach, clarification is required regarding the Welsh Language Impact Assessment and when this will be undertaken in the process and fed into the ISA.	It is noted that the distinct requirements of the SEA Directive are being met, and will be highlighted throughout the process to	No further action required.

Rep Number	Name	Support the Question?	Representation	Response	Proposed Change
				demonstrate compliance. Section 2.2.2 and table 5-5 demonstrate how the impact assessments have been integrated into this process. Engagement with stakeholders will continue throughout the development of the NDF.	
20	Barry Town Council	--	N/A		
21	Well-Being of Future Generations Commissioner	--	Within my first year in post, I have widely engaged with the public bodies and PSBs. They have reported to me that the lack of integration and the constantly growing body of impact assessments is a real challenge to them. It also increases the risk of a superficial tick box approach being taken that adds administrative burden but little value. I therefore welcome warmly any attempt to integrate and combine impact assessments. This is in line with the 5 ways of working and in particular integration, long-term and prevention.	Noted. Will seek to engage with Public Service Boards as part of the development of the NDF.	No further action required.
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaearn Town Council	--	N/A		
24	Tidal Lagoon Power	--	N/A		
25	Persimmon Homes East Wales	--	The integrated approach is supported, and we note that engagement will include further workshops with specialist stakeholders. Persimmon Homes would welcome the opportunity to become involved in the appraisal process.	Noted.	No further action required.
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	N/A		
27	Mineral Products Association	--	Only if this is based upon sound baseline data and a balance assessment of sustainable development. At present, the document is short-sighted and unbalanced.	Noted.	Appendix B updated where appropriate.
28	Community Housing Cymru	Yes	N/A		
29	Wildlife Trusts Wales	--	Yes – however, it's important to bear in mind the Ministerial Forward in the Nature Recovery Plan ³¹ which states <i>Nature is the planet's life support system. All the plants, animals and micro - organisms and the places where they live, provide direct and indirect economic, social, aesthetic, cultural and spiritual benefits to us as humans. Nature provides our food, water, fibre, building materials as well as benefiting our mental and physical health, inspiring us and shaping our culture.</i> <i>In Wales, we recognise that our well being and the well being of future generations are dependent upon the health of our environment. <u>The state of our natural environment and the nature it supports is a key test of whether we are learning to</u></i>	Noted.	Nature Recovery Plan added to Appendix A and PPP review.

Rep Number	Name	Support the Question?	Representation	Response	Proposed Change
			<p><i>live sustainably.</i> But our nature is under pressures: from over exploitation, habitat loss, pollution, climate change and invasive non-native species.</p> <p>This Nature Recovery Plan is aimed at addressing these underlying causes of loss by putting nature at the heart of our decision-making, by increasing the resilience of our natural systems (ecosystems), and by taking specific action for habitats and species. It sets out how Wales will deliver the commitments of the EU Biodiversity Strategy and the UN Convention on Biological Diversity to halt the decline in our biodiversity by 2020 and then reverse that decline.</p> <p>The plan builds on our ground-breaking new legislative framework. The Well-being of Future Generations (Wales) Act challenges us all to look at the long-term impacts of decisions and to work to meet our seven Well-being Goals, including increasing the resilience of our ecosystems, while the Environment (Wales) Bill enshrines the principles of the UN's Convention on Biological Diversity in law by adopting an ecosystems approach to how we manage our natural resources in future. Conserving and restoring the nature that we have in Wales is an essential investment for everyone's quality of life in Wales. Taking action now, working in partnership, we can achieve real lasting benefits for this and future generations.</p> <p>³¹ http://gov.wales/docs/desh/publications/160225-nature-recovery-plan-part-1-en.pdf</p>		
30	Sustrans Cymru	Yes	N/A		
31	Persimmon Homes West Wales	--	The holistic integrated approach is supported. It is also welcoming to note that engagement on the ISA on the NDF, including a series of workshops, will also be held to enable other specialist stakeholders (alongside the statutory consultees) to contribute to the appraisal. Persimmon Homes would welcome the opportunity to become involved in the appraisal process so far as it relates to housing matters.	Noted.	No further action required.
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	Yes	N/A		
35	Historic Houses Association	Yes	N/A		

Question 8

Do you support the findings of the initial screening work for the impact assessments in Table 2-1?

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	<p><u>Appendix B</u> Page 5 states: "Ultimately, once the ISA is complete and the NDF is adopted, indicators will be produced to help monitor the predicted significant effects of the NDF as it is used." The monitoring targets and indicators should be identified as part of the scoping element of the ISA, and should reflect and build on the Objectives (Q4) identified as part of this work. They should be identified as an integral part of the iterative process of preparing and assessing the NDF, to ensure that the effects of the NDF are monitored appropriately.</p>	<p>It is noted that, although it may be useful, there is no statutory requirement to use indicators and targets and part of the Scoping Stage or the ISA Framework. As the content of the NDF is currently unknown, developing specific targets and indicators for its assessment is not considered to be appropriate at this stage. However, it is noted that this will be considered as part of the iterative ISA process, including seeking to ensure that the 'guide questions' are measurable.</p>	No further action required.
2	Natural Resources Wales	--	<p><u>Climate change</u> Table 5.5 "Integrated impact assessments and main ISA objectives of relevance" states that climate change has been screened into ISA Objectives 3, 4, 6, 7, 8, 9, 10, 16 and 17. When these Objectives are inspected in Table 5.3 "ISA Objectives and questions", it is apparent that only Objectives 6 and 7 make any reference to Climate Change. This further emphasises the points made previously in relation to climate change that, unless the risks identified by the "Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales" are explicitly embedded throughout the ISA Objectives, as appropriate, the scoping report will not address climate adaptation adequately.</p>	Noted.	Updates made throughout the report and appendices.
3	CADW	Yes	Yes		
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	Yes subject to further comment	O dderbyn y sylwadau a nodir yn yr ymateb hwn, byddwn yn hapus gyda'r tabl a'r broses a gynigir yn Nhabl 2-1	Noted.	No further action required.
			Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			Here is a translation of the response received in Welsh. If the comments noted in this response are accepted, we will be happy with the table and process proposed in Table 2-1.		
7	Mochdre with Penstrowed Community Council	Yes	N/A		
8	Llandudno Town Council	Yes	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support Unit, Environmental Public Health Service Wales and Public Health Wales	Yes	Page 11, Table 2.1: in the 'Summary of Screening Results' text the word 'Health' should be expanded to state 'health and wellbeing' within the paragraphs.	Noted. When referring to the impact assessment the terminology 'Health Impact Assessment' is used as this is a recognised process however the supporting text has been amended to reflect well-being.	Text updated.
12	Three National Park Authorities	Yes	N/A		
13	Cardiff County Council	Yes subject to further comment	It would be helpful to outline in the document the timing of the HRA Screening and if required any subsequent HRA assessment as it is not covered in the document.	Noted. As stated in section 1.8 of the Scoping Report, HRA Screening will be undertaken alongside the development of the NDF as it emerges. The assessment of NDF content will be dependent on the depth of information available at the different stages. The results of the HRA Screening will be integrated into the ISA where appropriate, as part of an iterative process.	No further action required.
14	Accessible Retail	Yes	N/A		
15	Clwydian Range and	Yes	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Dee Valley AONB				
16	Glandŵr Cymru	--	We note the findings outlined in table 2.1 and generally welcome the recognition given to the potential impact of the NDF on health, rural proofing, the third sector, climate change and economic development.	Noted.	No further action required.
17	Home Builders Federation	Yes	N/A		
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	While we support the findings, we refer back to our comments on Proposals relating to the <u>Statement of Public Participation for the National Development Framework</u> . As with many high level engagement/ consultation exercises there is a risk of it becoming a procedural exercise partly due to the difficulties of consulting on such high level issues. This makes it all the more important to carry out meaningful engagement and feedback into the process.	Noted. This has been received by the NDF team.	Text has been included to demonstrate the engagement taken as part of this process. This will continue in the following ISA reports as the NDF develops.
20	Barry Town Council	--	This Council would like to see a Welsh Centre – we accept that this would need support and weight from the Welsh Government, but would welcome such a centre in Barry not only to promote the Welsh Language and being Welsh but also to prolong it.	Noted. This is not a comment for the ISA directly.	Details of the project have been passed to the team dealing with the call for evidence and projects to be considered. No further action required.
21	Well-Being of Future Generations Commissioner	--	N/A		
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn Town Council	--	N/A		
24	Tidal Lagoon Power	--	N/A		
25	Persimmon Homes East Wales	Yes	Yes		
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	Yes	N/A		
27	Mineral Products Association	--	Yes, but this will only be of worth if proper baseline data is obtained and a balanced assessment included	Noted.	Changes made throughout including to Appendix A, Appendix B, and the Main Report.
28	Community Housing Cymru	Yes	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
29	Wildlife Trusts Wales	--	N/A		
30	Sustrans Cymru	Yes	N/A		
31	Persimmon Homes West Wales	Yes	Yes		
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	Yes	N/A		
35	Historic Houses Association	Yes Subject to further comment	This question is not applicable to the HHA as Culture and Heritage are not included in the impact assessments	Noted.	No further action required.

Question 9

Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments in Table 2-1?

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Did Not Answer	N/A		
2	Natural Resources Wales	--	<p><u>Climate change</u> The scoping report could usefully refer to the Report Cards produced by NERC under the banner of the "Living With Environmental Change" (LWEC) partnership. In their own words LWEC's climate change impacts report cards "present the latest evidence on how climate change affects different aspects of our environment, economy and society. They are designed for decision-makers at any level, but in particular for use by policy advisors, ministers and local authorities". Report cards have been produced in relation to: Agriculture and Forestry; Biodiversity; Water; Infrastructure; and Health. See: http://www.nerc.ac.uk/research/partnerships/ride/lwec/report-cards/</p>	Noted.	Updates made to Appendix B and Table 4-1 using The UK Climate Change Risk Assessment 2017: Evidence Report.
3	CADW	--	We are not aware of any other evidence that needs to be considered.	Noted.	No further action required.
4	Newport City Council	Did Not Answer	N/A		
5	Individual	Did Not Answer	N/A		
6	Dyfodol i'r laith	--	<p>Byddwn yn ategu'r hyn a nodwyd eisoes o safbwynt gofynion Strategaeth y Gymraeg, Mesur y Gymraeg, a'r Bil Cynllunio.</p> <p>Byddwn yn pwysleisio drachefn bod angen ystyriaeth lawn o amrywiadau demograffi'r Gymraeg, yn hytrach na phriodoli data ac ymateb cyfansawdd i Gymru gyfan</p>	Noted.	Maps to be included in Appendix B reflecting the local scale to illustrate the range of variation at the different scales.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh.</p> <p>We will be upholding what has already been noted in terms of the requirements of the Welsh Language Strategy, the Welsh Language Measure and the Planning Bill.</p> <p>We will be emphasising again that full consideration needs to be given to the variations in the demography of the Welsh language, rather than attributing data and composite responses to the whole of Wales.</p>		
7	Mochdre with Penstrowed Community Council	No	N/A		
8	Llandudno Town Council	No	N/A		
9	Pupils2Parliament	--	N/A		
10	HSE	--	N/A		
11	Joint Response Wales Health Impact Assessment Support	No	Our understanding is that Table 5-3 are intended ISA Objectives which includes the Public Health Outcomes Framework for Wales. We would expect this to be used as a basis of measuring the health and well-being of a nation.	Noted.	Data to be incorporated when available as part of

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Unit, Environmental Public Health Service Wales and Public Health Wales		The National Wellbeing Indicators and Public Health Outcome Framework also have placeholder indicators for adult mental wellbeing and child mental wellbeing. Once available, these should be integrated into the baseline. Rates of suicide should also be added in.		the iterative ISA process.
			The UK Climate Change Risk Assessment 2017 has not been included in Appendix A. Therefore it needs to be added for consideration. This evidence source highlights climate risk change risks, what is or is not being done to address those risks and where further research or action is recommended.	Noted.	Added to Appendix A and the PPP review.
12	Three National Park Authorities	No	N/A		
13	Cardiff County Council	Yes subject to further comment	There is baseline data relating to mineral resources in the following documents produced by BGS which could usefully feed into the ISA: Minerals Resource Map of Wales https://www.bgs.ac.uk/downloads/start.cfm?id=1665 Aggregates Safeguarding Map of Wales https://www.bgs.ac.uk/downloads/start.cfm?id=2654	Noted.	Appendix B updated.
14	Accessible Retail	Yes	An assessment should be made of the contribution made by all sectors of the retail industry including not only total jobs, but the diversity of the jobs provided and their contribution to other objectives (e.g. gender equality, flexible hours, regeneration training etc).	It is noted that it is not the role of the ISA to undertake primary data collection.	No further action required.
15	Clwydian Range and Dee Valley AONB	Yes subject to further comment	AONB and National Park Management Plans are also relevant in relation to a number of the other assessments, notably health, Welsh language, rural proofing and climate change.	Noted. It is considered that the National Park and AONB Management Plans are locally scaled documents which inform LDPs therefore are not included in the ISA at this stage.	No further action required.
16	Glandŵr Cymru	--	No Comment		
17	Home Builders Federation	No	N/A		
18	Age Cymru	--	N/A		
19	RTPI Cymru	--	We refer back to our previous comments on the inclusion of infrastructure plans, programmes and environmental protection objectives at Question a. We question whether all relevant strategies etc have been included?	Noted.	Appendix A updated.
			Table 2-1 provides a useful overview of potential impacts for the NDF, however, it is difficult to trace an audit trail of how its conclusions are influencing the overall appraisal. To take 'rural proofing' as an example, it says that "objectives encompassing aspects of rural life have been incorporated into the ISA Framework", but it is difficult to see any evidence of this throughout these documents.	Noted.	Evidence and audit trail will continue into the Environmental Report.
20	Barry Town Council	--	N/A		
21	Well-Being of Future Generations Commissioner	--	N/A		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
22	Valpak Limited	--	N/A		
23	Newtown and Llanllwchaiarn Town Council	--	N/A		
24	Tidal Lagoon Power	--	N/A		
25	Persimmon Homes East Wales	--	As noted above, it would appear that the Baseline Data does not include Population Forecasts and Household Projection Rate forecasts as this may have a significant impact on the forecasts.	Noted.	Appendix B updated.
26	Royal Society or Architects in Wales (Royal Institute of British Architects)	--	N/A		
27	Mineral Products Association	--	No comments		
28	Community Housing Cymru	No	N/A		
29	Wildlife Trusts Wales	--	Without appropriate environmental desk surveys ³² , ecological surveys and reports you cannot confidently predict significant effects. Therefore, the ISA needs to highlight the importance of Local Environmental Record Centres, robust ecological surveys and evidence based reports. There also needs to be long term investment into monitoring mitigation also – not just two or five years. ³² The first piece of preparatory work on any potential development should be a full search at the appropriate Local Environmental Records Centres (LERC). http://www.lrcwales.org.uk/?AspxAutoDetectCookieSupport=1b	Noted. It is not the role of the ISA to undertake primary data collection.	No further action required.
30	Sustrans Cymru	No	N/A		
31	Persimmon Homes West Wales	--	As outlined in our response to Question B (above), it would appear that the Baseline Data does not include Population Forecasts and Household Projection Rate forecasts? If this is the case, these should form an important part of the baseline data used in the preparation of the NDF. If reference has been made to them, this should be highlighted within the documentation along with any potential consequential effects of changes within either set of forecasts.	Noted.	Data reviewed and updated to include population projections and household projections.
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	No	Carew Community Councillors did not identify any specific additional pieces of baseline data or evidence that require further assessments.	Noted.	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
35	Historic Houses Association	Yes Subject to further comment	The data assembled by CADW under its Heritage Counts programme.	Noted. The baseline reflects the latest data available from Cadw, which is consistent with the data emanating from the Heritage Counts Programme.	No further action required.

Question 10

Do you have any other comments?

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
1	Caerphilly Borough Council	Yes	<p>2 Well-Being Goal: A Prosperous Wales ‘An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.’ Comment : The baseline data relates to:</p> <ul style="list-style-type: none"> • The Economy, Employment and Income in Wales; and • Education in Wales. <p>There is no baseline data in respect of the first part of the well being goal in respect of: “An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change”.</p>	Noted.	Text updated in section 3.1 to acknowledge how future emerging work will be incorporated and the iterative nature of the process.
			<p>4. Well-Being Goal: A Healthier Wales Table 11: the questions all need to be reconsidered to reflect what a land use plan can achieve and how SA/SEA can assess its equality impacts. The importance of the provision of good housing should be commented on in terms of opportunities to improve health. Good housing can improve health and well being; but poor housing conditions can damage health, particularly in relation to asthma, damp and mould. For children, the effects can last a lifetime. The importance of access to well paid jobs and the potential consequential impact on living standards and thus health should also be commented on here.</p>	Noted.	ISA Framework updated to reflect what is deemed to be achievable by the NDF. Appendix B and Table 4-1 updated to reflect comments.
			<p>Access to healthcare - The NDF can help to address issues surrounding access to healthcare through facilitating the provision of accessible services supported by well connected infrastructure to meet identified needs.</p>	Noted.	Appendix B and Table 4-1 updated to reflect comments.
			<p>Table 2 should include questions related to housing and economic activity.</p>	Noted.	Appendix B and Table 4-1 updated to reflect comments.
			<p>5. Well -Being Goal: A more Equal Wales 5.3 Table 11: the questions all need to be reconsidered to reflect what a land use plan can achieve and how SA/SEA can assess its equality impacts.</p>	Noted.	ISA Framework updated to reflect what is deemed to be achievable by the NDF.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			6. Well-Being Goal: A Wales of Cohesive Communities Page 58 - Percentage of Households Living in Type of Accommodation : This commentary on this issue refers to property type rather than households. The title should reflect the commentary and if households are meant to be considered here it should be included in the commentary. Otherwise the title should be amended to refer to property type.	Noted.	Text updated.
			Page 58 – “In 2015-16 there were 14,749, ca. 1.1% households known as Houses in Multiple Occupancy (HMOs) with 18,782 predicted for the whole of Wales.” This sentence does not make sense.	Noted.	Text updated.
			Page 58 - Affordable housing availability and building rates – Granted permission There needs to be some recognition that the house building rates will be heavily influenced by the current economic circumstances which inevitably impact on the viability of development and thus on delivery	Noted.	Text updated.
			Page 58 – “In 2015-16, 930 new affordable properties were granted permission provided through planning obligations in Wales. This shows a decrease of 37% from the year before (2014-15 – 1,483 properties). Monmouthshire provided the highest number of affordable properties through planning obligations (165 properties in 2015- 16) compared to five authorities that did not grant permission for any affordable properties (Flintshire, Wrexham, Swansea, Merthyr Tydfil and Pembrokeshire Coast National Park).” Should be amended to read: In 2015-16, 930 new affordable properties were secured through planning obligations in Wales. This shows a decrease of 37% from the year before (2014-15 – 1,483 properties). Monmouthshire provided the highest number of affordable properties through planning obligations (165 properties in 2015- 16) compared to five authorities that did not secure any affordable properties through planning obligations (Flintshire, Wrexham, Swansea, Merthyr Tydfil and Pembrokeshire Coast National Park).	Noted.	Text updated.
2	Natural Resources Wales	--	The NDF is a 20 year plan. At present we rely heavily on European Union (EU) legislation to drive a range of environmental improvement programmes such as air and water quality. Brexit poses significant uncertainty for future environmental improvement drivers. Whilst the details of Brexit are still unknown, the document should identify at a high level potential issues for environmental improvement programmes in Wales in a post Brexit world.	Noted.	Text included in section 4.3.2 on Brexit. Appendix A updated.
			The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 came into force on 10th April 2017 – therefore, going forward, all references to the 2003 Regulations need to be updated.	Noted.	Appendix A updated.
			We wish to amplify our comments on the benefits of accessible green space and green infrastructure. It is hard to know which question to put this under, as it is so cross-cutting. We suggest you elevate green infrastructure to a cross-cutting principle in the NDF in recognition of its ability to deliver benefits to all of the Well-being Goals, usually in the same place and at the same time. Please refer to Annex 2 for more evidence on how green infrastructure contributes to the Well-being Goals.	Noted.	GI added as a question under Objectives 2 and 9 in the ISA Framework. However, the wide-ranging benefits are recognised and will be considered.
			We consider that the assessment of impact of the NDF on the attributes of ecosystem resilience is a key role for the ISA. We include further detail on this, and suggestions for how the guide questions can assess ecosystem resilience.	Noted.	Amendments made to Appendix B, Table 4-1 as well as the

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					main report and ISA Framework.
			We suggest some additional questions to broaden what is assessed under Objective 17 – the sustainable use of natural resources.	Noted.	ISA Framework updated.
			It is our view that geodiversity is not adequately considered in the current ISA. We therefore suggest changes to ensure geodiversity issues are more fully included in the assessment, including changes to guide questions.	Noted.	ISA Framework updated.
			1. We welcome and support the development of the NDF, together with your commitment to ISA and SEA, including your active engagement with us and other consultees through informative workshop sessions. We also welcome the clear and ‘easy to follow’ structure of the ISA report and accompanying appendices.	Noted.	No further action required.
			2. We welcome the prominence given to the State of Natural Resources Report (SoNaRR) as an important source of baseline data and key opportunities, as well as the emerging Natural Resource Policy (NRP), and Welsh National Marine Plan (WNMP) in particular.	Noted.	No further action required.
			3. We wish to see greater prominence given to the Sustainable Management of Natural Resources (SMNR), and clearer linkages to the SMNR principles through the NDF and accompanying ISA. The NDF should provide a framework to help ensure SMNR is applied equally and consistently to sustainably manage the environment and natural resources of Wales, in line with the emerging Natural Resources Policy, and a key role for the ISA is to assess whether this is the case.	Noted.	SMNR principles integrated into ISA Framework.
			4. The ISA must be clear that all aspects of SEA are fully covered, and that the broadening of the scope to include SA alongside seven other appraisals has not lead to any of the statutorily required steps and considerations being lost or overlooked. As the integrated assessment is undertaken, ensure that the SEA aspects are presented in a way that allows easy external evaluation. In particular, how the 10 SEA topics are assessed and presented needs careful consideration.	Noted. Table 5.2.2 in the main report demonstrates which of the SEA Directive topics are covered by which ISA Objective.	No further action required.
			5. We have made a number of suggested amendments and additions to the ISA Objectives and accompanying guide questions, and these can be found in our response to Question 4 in Annex 1.	Noted.	Details of how the ISA Framework has been updated is set out in the Annex to this table.
			6. In relation to the approach to the consideration of alternatives, we encourage you to consider whether analysis of national alternatives and the effective delivery of NDF policies may be most effectively delivered by applying a regional approach for intervention. If such an approach is considered appropriate by Welsh Government, we recommend that any regional approach set out in the NDF should be coterminous with the areas of Wales for which an ‘Area Statements’ will be produced (see our response to Question 5).	Noted.	No further action required.
			7. We are concerned that the ISA does not adequately address present day flood risk and impacts, focussing more on future risks as a result of climate change. It is our view that the NDF needs to look at opportunities to reduce present day flood risk and promote resilience measures, not just look at future risks. The NDF has an important role to play in guiding decisions through the planning process that ensure new development does not cause or exacerbate flood risks	Noted.	Amendments made to Appendix B and key

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					issues and opportunities, in light of earlier comments.
			8. There is an issue regarding the way that Climate Change is dealt with in the ISA, where it appears to be linked to flood risk only. Climate Change will impact on many issues, not simply flood risk. The assessment (and the NDF itself) needs to acknowledge and address the full range of risks identified within the " <i>Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales</i> ", for example in relation to water availability. In relation to this scoping report, without such an acknowledgment, we cannot be sure that the assessment will adopt the comprehensive, systematic approach to climate adaptation that is required.	Noted.	Amendments made to Appendix B and key issues and opportunities, in light of earlier comments.
			9. It is our view that the ISA does not adequately recognise the importance of accessible natural green space. Accessible natural green space can provide important co-benefits for biodiversity, and physical and mental wellbeing, and the NDF has the potential role to play in its future provision. It should be highlighted as an issue and an opportunity, referenced in the baseline, and referred to in the ISA Objectives and guide questions.	Noted.	GI added as a question under Objectives 2 and 9 in the ISA Framework. However, the wide-ranging benefits are recognised and will be considered.
			10. Following on from the above point, there is a need to emphasise the opportunity for the NDF to promote and make provision for nature based solutions and green infrastructure (including, for example, biodiversity networks) which can deliver multiple benefits for identified key issues	Noted.	GI added as a question under Objectives 2, 9 and 7 in the ISA Framework. Nature based solutions added as a question under objective 17. However, the wide-ranging benefits are recognised and will be considered.
3	CADW	--	It would be helpful to revisit the use of terminology relating to heritage throughout the document. For example the term	Noted.	Glossary

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			'historic environment' may be preferable to the term 'cultural heritage' or 'cultural environment' when referring to matters relevant to tangible historic assets. Similarly, 'historic asset' is preferable to 'heritage asset' when referring to tangible historic places. The term 'cultural heritage' tends to have a wider currency referring also to the less tangible elements of our heritage – such as the arts or language. It should also be noted that the Historic Environment refers to both the terrestrial and marine historic environments.		included to define cultural heritage and cultural environment.
			ii) In Table 3-3 Key Themes Resulting from the Review, the theme relating to the historic environment should be reworded to say; “Protect and enhance the distinctiveness of our landscapes and the historic environment, <u>historic assets and their settings</u> ”.	Noted.	Text has been amended to reflect this.
			iii) Please see Appendix D, in which we provide comments on section 7.1.4 of your Appendix B – Baseline Data and Key Issues and Opportunities.	Noted.	To be reviewed and amended as appropriate.
			iv) The Marine Environment. We suggest that there should be a more consistent approach throughout the document to the marine environment and its inclusion (or not) within the NDF. It may be useful to have a clear statement up front about the inclusion of Welsh territorial waters, particularly in section 1.3 of the consultation document, which talks about the NDF being a 'land use plan' but does not define whether this extends beyond Mean Low Water or not. This would add clarity to the NDF's relationship with the marine plan, which we are pleased to see specifically referenced. The most recent iteration of the Welsh National Marine Plan talks about the importance of historic assets and their settings, and makes clear that there are knowledge gaps around underwater historic environment and that, therefore, the precautionary principle needs to be applied.	Noted.	Text has been included to reflect the relationship between the marine and terrestrial planning systems.
			Annex B – Baseline Data and Key Issues and Opportunities Designated wrecks should be included in the dataset/ maps. Marine Character Areas – page 74 Further detailed seascape character areas are in production for other areas of Wales, such as Gower.	Noted.	To be reviewed and amended as appropriate.
			See attachments for further comments - Appendix A, B and D. C is attached to question 5	Noted.	Details of the amendments made are set out in the Annex to this table
4	Newport City Council	--	Figure 2-1 stages in the ISA process. It would be useful to understand how the HRA fits into this timescale of works.	Noted. As stated in section 1.8 of the Scoping Report, HRA Screening will be undertaken alongside the development of the NDF as it emerges. The assessment of NDF content will be dependent on	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				the depth of information available at the different stages. The results of the HRA Screening will be integrated into the ISA where appropriate, as part of an iterative process.	
			Should Stage E of the ISA also identify gaps in the base data for future work to fill?	Noted. Data gaps are referenced within Appendix B	No further action required.
			Table 3-3: The Key theme from the Review identified to Protect and improve the quality of water resources. Should this not also include the quantity of water as identified later on in the report?	Noted.	Theme amended in Appendix A and Table 3-3.
			Table 3-3: The key theme from the Review identified to relieve pressure on natural resources by increasing energy efficiency and promoting the use of national renewable energy resources. Should this also include low carbon energy?	Noted. It is noted that although the use of national renewable energy was a key theme from the review, sourcing energy from low carbon sources is included in the ISA Framework.	No further action required.
			Table 3-3: This review does not include any themes from minerals, noise, contaminated land, unstable land.	Noted.	Themes amended in Appendix A and Table 3-3 to include minerals. It is considered that the

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					themes on soil and water resources encompass land quality. Noise pollution is included under transport in Appendix B, under 'A Wales of Cohesive Communities', as well as under Objective 13 in the ISA Framework.
			Table 4-1, 2 Resilient Wales, Geology and Soils: The British Geological Survey have launched the ASK Network which is a good resource for your attention. http://www.bgs.ac.uk/asknetwork/	Noted. It is considered that the level of detail included in Appendix B is appropriate at this stage.	No further action required.
			Table 4-1, 2 Resilient Wales, Geology and Soils: The introduction of solar farms has raised a clear issue as to the introduction of temporary uses and the impact on soils and agricultural land value in general. It is considered that restoration planning, such as is used in mineral planning, would be a useful approach.	Noted. This is a note for the NDF if appropriate.	No further action required.
			Table 4-1, 2 Resilient Wales, Water Environment: Would a national water cycle study be useful in terms of understanding the challenges of water supply.	It is noted that it is not the role of the ISA to undertake primary data collection.	Data to be incorporated should it become available. No further action required.
			Table 4-1: A Healthier Wales: Should this not include noise pollution?	Noted. Noise pollution is included under transport in Appendix B, under 'A Wales of Cohesive Communities', as well as	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				under Objective 13 in the ISA Framework.	
			Table 4-1: A more equal Wales, Summary of Key Issues: Should this include lifetime of development and or Dementia friendly development.	Noted.	Text amended.
			Table 4-1: A Wales of Vibrant culture and thriving Welsh Language: In the opportunities for the NDF it is mentioned that there are 'opportunities for the NDF to promote awareness of cultural heritage and encourage the enhancement of cultural education centres' Should the NDF do more than promote awareness? should it not enhance and protect cultural heritage? Have the Conservation Principles of Cadw been used in the baseline data review?	Noted. Table 4-1 notes enhancement and promotion of cultural heritage. The CADW conservation principles are covered within the ISA framework. considered.	No further action required.
			Paragraph 5.1.1: This paragraph states that this approach brings together the key assessments into a single assessment framework. It is not clear how the HRA process fits into this process?	Noted. As stated in section 1.8 of the Scoping Report, HRA Screening will be undertaken alongside the development of the NDF as it emerges. The assessment of NDF content will be dependent on the depth of information available at the different stages. The results of the HRA Screening will be integrated into the ISA where appropriate, as part of an iterative	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				process.	
			Paragraph 5.1.2, Geographical Scope: This is stated to be the 'whole of Wales' but it should be clear how this includes the marine areas. Also, the HRA would go beyond national boundaries.	Noted.	Text has been inserted to reflect geographical scope of the NDF – up to mean low water mark.
			Table 5-3: It would be useful for this table to go down to the next level i.e. after the questions provide the measure against which the scores will be given. It is not clear how these questions will be measured e.g. how will the NDF know that it has contributed towards improving access to open space including opportunities for play?	Noted. It is noted that, at this stage of the ISA, the use of specific indicators has not been included in the ISA Framework. However, measurable indicators relating to the guide questions are being considered, and will be included as part of a monitoring framework. This will be included once the predicted significant effects of the NDF have been identified.	No further action required.
			Table 5-3, ISA objective 8: Should this also include noise pollution?	Noise pollution is included under ISA objective 13.	No further action required.
			Table 5-3, ISA objective 9: Should this also include water quantity?	Agreed.	ISA Framework updated
			Table 5-3, ISA objective 12: How will good quality housing be measured?	Noted.	ISA

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
					Framework updated.
			Table 5-3, ISA objective 13: Should this also include seascapes?	Agreed.	ISA Framework updated.
			Table 5-3, ISA objective 14: It would be worth having the definition of the term 'Heritage Asset' in the document.	Agreed.	Definition of heritage asset, in glossary.
			Table 5-3, ISA objective 17: It would be worth having the definition of the term 'Natural Resources' in the document. For example, it is not clear whether this includes Minerals? If it doesn't then should this topic not be represented in the objectives somewhere.	Noted.	Minerals are included throughout Appendix B, Appendix A and the main report as a 'natural resource' definition to be included in glossary.
5	Individual	--	<p>(1) I am concerned in relation to the appendix maps that would appear to have the role of informing the plan as follows:</p> <p>(a) The historic environment is reduced to discrete sites. On Anglesey, as often is the case elsewhere, individual sites of historic importance, more especially those of ancient importance, have an interconnectedness. The landscape they occupy is not remotely as isolated as your maps convey. There must therefore be considerable concern that discrete historic sites are not fragmented and isolated from their true landscape settings, which may cover a large area, in the process of allocating land use categories/permissions. Because development pressures will inevitably attempt to discourage the recognition of larger tracts of landscape importance, this aspect ought to receive more attention.</p> <p>(b) There is reference to the increasingly-discussed and now widespread operation of dark sky areas within Wales, and the aim of reducing light pollution across Wales. However, there is no map or report that appears to inform this aspect of the Scoping Report. I would like to draw your attention, for example, to my own report, prepared for Anglesey County Council, that has mapped in detail the extent of light pollution and remaining areas of relative darkness within that county. The summary report may be found at:</p> <p>http://www.anglesey.gov.uk/Journals/y/i/b/summary_findings.pdf This area of activity may appear to be of secondary importance, but it holds considerable potential to increase</p>	<p>Noted. Appendix B considers historic landscapes, as well as other landscapes and heritage assets. This data will be considered, along with the mapped information.</p> <p>Noted.</p>	<p>Appendix B and main report updated with regards to green infrastructure, which will incorporate heritage assets. Tranquillity mapping has also been added to the baseline, in light of earlier comments.</p> <p>Tranquillity mapping for Wales has also been added to the baseline, in light of earlier comments.</p>

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			tranquility tourism, more especially out-of-season tourism		
6	Dyfodol i'r laith	--	<p>Croesawn y cyfle hwn i roi sylwadau ar yr arfarniad. Gwerthfawrogwn y sylw a roddir i'r Gymraeg o fewn ei gwmpas, a gobeithiwn bydd modd gwneud y gorau o'r cyfle hwn i roi ystyriaeth addas i anghenion y Gymraeg ar draws Cymru a'i chymunedau.</p> <p>O gyflawni hyn, credwn gall yr arfarniad hwn gynnig cyfle gwerthfawr i ddatblygu a sefydlu fframwaith asesu fydd o werth mawr ar gyfer ystyried gofynion y Gymraeg ar draws yr holl feysydd polisi, ac yn enwedig cynllunio, ble mae gwir angen arweiniad cadarn ar hyn o bryd.</p>	Noted.	No further action required.
			<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>We welcome this opportunity to comment on the appraisal. We appreciate the focus given to the Welsh language within its scope, and we hope that it will be possible to maximise this opportunity to give appropriate consideration to the needs of the Welsh language across Wales and its communities.</p> <p>If this is achieved, we believe that this appraisal can offer a valuable opportunity to develop and establish an assessment framework which will be very valuable when considering the needs of the Welsh language across all policy areas, and planning in particular, where there is dire need of firm guidance at present.</p>		
7	Mochdre with Penstrowed Community Council	Yes	The Council is pleased with the way this consultation is being handled in as much as everyone is talking to each other!	Noted.	No further action required.
8	Llandudno Town Council	--	The Town Council considers that the proposed framework is an excellent document and wide ranging. Members noted that on page 10 Section 2.2.1, the document makes reference to Welsh Ministers having due regard to the United Nations Convention on the Rights of the Child but there is no specific reference to Article 9 of the Convention: Children have the right to leave with their parent(s) unless it is bad for them. Children whose parents do not live together have the right to stay in contact with both parents unless this might hurt their child or Article 30 of the Convention: Minority or indigenous children have the right to learn about and practice their own, culture, language and religion. The Town Council asks if the above can be referenced in the document.	Noted. The screening work for the UNCRC considered all of the articles. The Impact Assessment has not identified Article 9 of the UNCRC because it is not something that land use planning nor the NDF can directly have an influence on.	No further action required.
9	Pupils2Parliament	--	Report appended below	Noted. These comments have been passed onto	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				the NDF team and will inform the development of the NDF.	
10	HSE	--	<p>HSE recognises that the consultation is about the ISA in relation to the NDF in Wales, and there is therefore little focus on public safety, and HSE's role concerning this as a statutory consultee within the planning system in Wales.</p> <p>The scoping report mentions safe communities and the need: for a prosperous Wales; to promote employment and investment; and for affordable homes. The NDF will however need to maintain the right balance between promoting industry and the other community needs identified. For example, the existence of major hazard sites, licensed explosive sites and major accident hazard pipelines in and around communities will require the planning system in Wales to consider how best to manage the population around such sites and pipelines.</p> <p>The advice that HSE provides as a statutory consultee is aimed at mitigating the effects of a major accident on the population around such major hazard sites. This consultation does not clearly state the need to consider any proposal in the context of advice from statutory consultees like HSE; we want therefore to stress the importance of continuing to work within the existing planning system arrangements.</p>	<p>Noted. As our proposals for nationally important growth and infrastructure emerge, we will be mindful of the requirement set out in Regulation 26 of The Planning (Hazardous Substances) (Wales) Regulations 2015 to consider the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment. Developing our vision will include consideration of existing and new major hazard sites, licensed explosive sites and major accident</p>	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
				<p>hazard pipelines and their effect on current and future development.</p> <p>Preparation of the NDF is governed by statutory procedure and will constitute part of the 'development plan' for planning decision making purposes. While it will add policies to 'the development plan' it will not affect later decision making mechanisms including how statutory consultees engage with the planning system at the application stage. We welcome the continued input of statutory consultees to the preparation of the NDF.</p>	
11	Joint Response Wales Health Impact Assessment Support Unit,	No	We would welcome a stronger focus on health inequalities within the NDF process and through the use of additional data where relevant.	Noted.	Appendix B and Table 4-1 strengthened in light of this and other

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
	Environmental Public Health Service Wales and Public Health Wales				comments. It is noted that data, such as that relating to noise pollution, tranquillity, active travel, and others, will be considered in relation to health inequalities as part of a holistic approach to assessment, even if they are not included under the health topic within the reporting .
12	Three National Park Authorities	No	N/A		
13	Cardiff County Council	No	N/A		
14	Accessible Retail	No	N/A		
15	Clwydian Range and Dee Valley AONB	No	N/A		
16	Glandŵr Cymru	--	We note and welcome the commitment to undertake and incorporate the results of a Habitat Regulations Assessment (HRA) into future iterations of the ISA.	Noted.	No further action required.
17	Home Builders Federation	No	N/A		
18	Age Cymru	--	<p>1. With reference to the section 'Summary of key issues' for 'A prosperous Wales' (page 23): in relation to 'Key reasons for this relatively poor economic performance' which cites 'There is a relatively high proportion of older people who are retirement age', we would suggest that the document is mindful of the interpretation of this point, and we would highlight the following issues:</p> <ul style="list-style-type: none"> An ageing population may bring challenges but it is also a significant opportunity. To fully grasp this opportunity we must recognise the skills and value that older people bring as employees and contributors to wider society and to the economy. 	Noted.	Appendix B and Table 4-1 amended in light of this and earlier comments.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<ul style="list-style-type: none"> Older people make a significant contribution to Welsh life and the Welsh economy through paid employment, voluntary roles, caring responsibilities and as consumers. For further information please see Age Cymru's 'Public Policy Statement on Employment and Contribution' which is available on the Age Cymru website 		
			2. With reference to the section 'Summary of key issues' for 'A more equal Wales' (page 23): in relation to 'Provision of appropriate services for an older generation (e.g. transport)' we believe that it is important to create an age friendly transport system. An age friendly Wales would see the development of a fully integrated sustainable transport network, with trains and buses linked to other forms of transport including pedestrian and cycle routes, and better integration between transport and key services.	Noted.	Appendix B and Table 4-1 amended in light of this and earlier comments.
19	RTPI Cymru	--	We have no further comments.		
20	Barry Town Council	--	Health issues are a concern in Barry and anyway in which this can be improved would be welcomed.	Noted. Health issues are considered from a national perspective within the Scoping Report.	No further action required.
			Historically the balance between housing, jobs and business facilities in Barry is poor. We would like to see more consideration being given to providing adequate business premises in Barry, without the ability for businesses to grow in the town the jobs are not available, which in turn does not help the well-being of the residents. They have to leave the town to find work, businesses go elsewhere and buildings become derelict.	Noted. Economic issues are considered from a national perspective within the Scoping Report.	No further action required.
			More needs to be done to improve the services for youth between the ages of 14-19. Over the past ten years projects within the town for this age range have depleted and the recent introduction of a youth forum has identified that there is a deficit of activities and services for this age range.	Noted. Community issues are considered from a national perspective within the Scoping Report.	No further action required.
21	Well-Being of Future Generations Commissioner	--	I appreciate that this was the first step of a process. I welcome the work which has been done to take account of the Well-being of Future Generations Act. Given that the Act has been designed specifically to challenge business as usual and to provide for better decision making by the 44 listed public bodies, I believe that it needs to be the foundation stone of the process leading to the publication of the NDF and I hope that my Office will be able to work alongside your team as part of the next steps. I am particularly keen to ensure that the requirement for Welsh Ministers to use the five ways of working to maximize their contribution to each of the seven well-being goals is at the heart of this process. This will reap rewards in terms of policy coherence, clarity of purpose and effectiveness of implementation. Given the impact of the NDF on current and future generations it is very important to use fully the Act and its new ways of working to reach decisions and to plan differently, in a manner which is fit for the future and which will improve the well-being of future generations.	Noted. Engagement will continue as part of the development of the NDF.	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change									
22	Valpak Limited	--	N/A											
23	Newtown and Llanllwchaearn Town Council	Yes	<p>RESTORATION OF THE MONTGOMERY CANAL TO NEWTOWN: The Town Council would like to add restoration of the Montgomery Canal to the considerations being undertaken for the NDF and the Sustainability Appraisal. Council resolved e) July 2017 'Council approves the Canal Restoration Project Initiation Document.' f) Aug 2016 'Committee agrees the circulation of the approved Canal Restoration PID to the identified stakeholders.' The council's project proposal fits well with the Wellbeing of Future Generations (Wales) Act 2015 with particular relevance to the v) Goals: Prosperous Wales, Resilient Wales, Healthy Wales, Cohesive Communities, Vibrant Culture vi) Ways of Working: Long Term, Integration, Collaboration, Involvement In addition to supporting the delivery of the well-being goals, the project fits with a range of Welsh Government economic, social, cultural and environmental policies for, and 4 cross cutting strategies 'Prosperous and Secure', 'Healthy and Active', 'Ambitious and Learning', and 'United and Connected'. Furthermore, the project fits alongside other Welsh Government Impact Assessments for 'Rural Proofing', Economic Development, and Third Sector. A copy of the Project Initiation Document is attached with this consultation response. [separate document]</p>	This is not a comment directly related to the ISA.	Details of the project have been passed to the team dealing with the call for evidence and projects to be considered. No further action required									
24	Tidal Lagoon Power	--	Economic and social (possibly cultural) analysis underdone, probably because usual methodologies have environmental bias because of dominant SEA requirements. As a result the economic analysis so far is very generic and does not get at the issues, especially where the challenges are and why, ditto opportunities. Although a regional analysis, the Cardiff Capital Region Growth and Competitiveness Commission report provides a good structure on how to appraise socio-economic performance and gives an idea of how this interacts with spatial strategies (and I think in the absence of similar for all of Wales, this thinking could be scaled up to plug the gap and inform the NDF).	Noted.	Appendix A amended in light of this and earlier comments.									
25	Persimmon Homes East Wales	--	We would welcome the continuing opportunity to be involved in future stages of the NDF.	Noted.	No further action required.									
26	Royal Society of Architects in Wales (Royal Institute of British Architects)	--	N/A											
27	Mineral Products Association	--	<p>Please see the table below.</p> <table border="1"> <thead> <tr> <th>Para</th> <th>Reference in text</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>1.4.1</td> <td>"over the long term"</td> <td>We are interested in what period is considered long term and if this could be quantified. Is the timescale consistent with NICfW 5-30 years?</td> </tr> <tr> <td>3.1</td> <td>Of particular importance are the following national documents which the NDF will work with and share common aims and objectives: <ul style="list-style-type: none"> • Taking Wales Forward 2016-2021; • The Natural Resources Policy for Wales; • SoNaRR6; and • The emerging Welsh National Marine Plan </td> <td>We question why PPW is not included in the list of National documents.</td> </tr> </tbody> </table>	Para	Reference in text	Comment	1.4.1	"over the long term"	We are interested in what period is considered long term and if this could be quantified. Is the timescale consistent with NICfW 5-30 years?	3.1	Of particular importance are the following national documents which the NDF will work with and share common aims and objectives: <ul style="list-style-type: none"> • Taking Wales Forward 2016-2021; • The Natural Resources Policy for Wales; • SoNaRR6; and • The emerging Welsh National Marine Plan 	We question why PPW is not included in the list of National documents.	Noted.	<p>1.4.1 The NDF will be a 20-year plan.</p> <p>3.1 PPW is included in the PPP review in Appendix A.</p> <p>Table 3.1 – Text on the impact of Brexit added</p>
Para	Reference in text	Comment												
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			Table 3.1		Whilst we appreciate this document is draft, it would be appropriate to reference the Brexit process which will undoubtedly influence the effect of European Directives in the "long term".	<p>to section 4.3.2 of main report.</p> <p>Table 3.1 – Text has been included in section 3.1 to demonstrate the iterative nature of the work and how emerging work will be included as the NDF develops.</p> <p>Table 3.2 – error corrected.</p> <p>Table 3.3 Mineral resources, including their sustainable management and development, have been considered in more detail throughout the main report and appendices, including table 3-3 and table 5-3</p> <p>4.2 the Scoping Report forms a key part in the engagement</p>
			Table 3.1		There is no reference to the work of the NICfW which must be a key consideration in the NDF.	
			Table 3.2	A globally "gesponsibe"	Typographic error – "responsible"	
			Table 3.3		The term, natural resources, is referenced twice in the table linked on both occasions to energy and climate change. The inference is that natural resources are solely hydrocarbons. Soil resources and water resources, both natural resources have individual references. There is no specific reference to the sustainable management and development of mineral resources, which can contribute to many of the sustainability goals highlighted in the document.	
			4.2	This section references the SoNaRR report, produced by Natural Resources Wales in 2016, as a key document for the source of baseline data	NRW has recognised that SoNaRR does not include a discussion on the use and management of minerals. NRW chose to evaluate a cross section of natural resources and their management, based on the evidence readily available to us in a short space of time. They considered that the use and management of minerals as a raw material is very much covered through the existing land use planning regime, and as such did not have the expertise available in house to help them to undertake an assessment. NRW acknowledged that it could have engaged more with others and sought their views on minerals matters, particularly with respect to the wider impacts that management and use of management has on ecosystems and their benefits for wellbeing, but it was claimed that time constraints did not enable NRW this time round. Sadly, the current document appears to have fallen in to the same hole.	
			4.2	Baseline datasets have been developed and are presented in Appendix B	There are no baseline datasets included in Appendix B and none of the figures are included. <ul style="list-style-type: none"> • Figure 1 Designated Nature Conservation Sites; • Figure 2 Landscape Features; 	

Rep Number	Name	Support the question?	Representation		Response	Proposed Change	
						on the ISA of the NDF.	
			4.2		<ul style="list-style-type: none"> • Figure 3 Heritage Features; and • Figure 4 Transportation Network. <p>The Welsh Government's "Practical Guide to the Strategic Environmental Assessment Directive, indicates at paragraph 5.A.5 that the baseline and environmental effects should also include matters not listed in Annex I, ".....such as geological conditions, mineral resources....". The document is silent on these matters.</p>		4.2 The Figures are included as separate documents on the Welsh Government website.
			4.3	Table 4-1 presents the key sustainability issues and opportunities for Wales identified across the seven Wellbeing goals and ISA topic subheadings which stem from the baseline data (Appendix B)	See comment above re absence of baseline data.		4.2 and 4.3 Minerals have been included in more detail throughout the main report and appendices.
			Table 4.1	A prosperous Wales	It is very surprising that there is no reference to National Infrastructure proposals or NICW within this section. Some significant infrastructure projects are planned for Wales directly, whilst other bordering Wales have the potential to create significant raw materials demand. This in itself will create economic and skills development opportunities, such as those linked to HS2 and the tidal lagoon/barrage developments.		Table 4.1 It is not for the ISA to define the scope of the NDF. The NDF itself will identify nationally significant infrastructure projects.
			Table 4.1	A resilient Wales "The NDF has an opportunity to guide the sustainable use of Wales' geology"	This reference is very fleeting and underestimates and under values the potential contribution to be made by the sustainable management and development of Wales' geological resources.		Table 4-1 more detail added re: geological resources and geodiversity throughout the report.
			Table 4.1	Minerals and Waste • The country still has substantial resources if required. However, such extraction can be very damaging to the natural and human environment and as such sustainable management of this is a key issue for any ongoing or future activity. Minerals safeguarding can sometimes also conflict with other forms of development.	This is a typically negative and ill-informed consideration of the value of Welsh mineral resources. Such perceptions referenced in Government documents are unhelpful and now largely unfounded. Furthermore, it is other forms of development that can conflict with the need to safeguard valuable mineral resources and minerals infrastructure.		Table 5.3 – question revised.
			Table 4.1	Minerals and Waste • The NDF has an important role to play with regard to minerals demand (through economic aspirations), planning and management. It can help to guide the sustainable use of such resources through its policy and strategic development proposals.	At last an almost positive consideration and comment, although minerals development is still not considered an "opportunity", unlike waste.		
			Table 5.3	Encourage a reduction in the demand	It is difficult to see how the		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>for raw materials?</p> <p>aspirations and objectives of NDF and WG could be achieved with a policy focussed on the direct reduction of demand for raw material. We ask the direct question of WG to demonstrate this. Renewable and low carbon energy schemes will increase the demand for raw materials. One would question how an improved housing stock of affordable housing will be delivered; how built heritage assets can be restored, how water quality will be improved without raw materials. The focus should be on the sustainable management and development of Wales' raw materials. Development plans, major infrastructure projects and projects such as major housing developments should be accompanied by a comprehensive resource assessment, identifying quantities and supply chain considerations. Until this takes place, it is unlikely that neither WG or the policy makers will actually "get it"! Further, minerals developments create opportunities for landscape scale biodiversity enhancement, flood alleviation, water storage, etc.. It is frustrating that the inherent mindset of document writers sees only negative elements of raw materials supply</p>		
			In conclusion, the draft document is disappointing and demonstrates a lack of understanding in the subject.		
28	Community Housing Cymru	Yes subject to further comment	CHC members have fed back that assessments should be simple to integrate into the NDF and not frustrate the planning process, but facilitate careful analysis of proposed developments before providing permission to proceed. They should not be subjected to dilution or invalidation by organisations who are focussed on making profits where the macro and micro environments suffer.	Noted.	No further action required.
29	Wildlife Trusts Wales	--	<p>Please note all the comments in the introduction – as such, I have not replicated them here [these are inserted below].</p> <ul style="list-style-type: none"> • Biodiversity Loss – Please note the National and International Biodiversity Loss at the front of this response. <p>The Internal Compatibility Matrix for the Appraisal Objectives states that the compatibility was also assessed as uncertain between SA Objective 12 'To encourage the provision of good quality, safe, affordable housing that meets identified needs' and the following objectives:</p> <ul style="list-style-type: none"> - 13 To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscapes; - 14 To encourage the conservation and enhancement of heritage assets; 	Noted. The potential impact from development on biodiversity and natural resources is recognised within Appendix C as not all	No further action required.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<ul style="list-style-type: none"> - 16 To encourage the conservation and enhancement of biodiversity and geodiversity; and - 17 To encourage the sustainable use of natural resources. <p><u>Scoring was assessed as uncertain because new residential development has the potential to adversely affect biodiversity resources through direct land take; landscape distinctiveness and heritage assets through inappropriate siting and natural resources through increased demand for raw materials.</u></p> <p><u>This is not uncertain.</u> The evidence that new residential development impact upon biodiversity should be taken as read as there are numerous examples up and down Wales. However, the matrix scores no negatives whatsoever, and it's inconceivable that there are no potential incompatibilities between e.g. the economic development and housing objectives, and the biodiversity objectives. To suggest otherwise or say its 'uncertain' is disingenuous. This type of 'it will be ok' assessment is repeated throughout the land-use planning system (and agricultural systems).</p> <p><u>It is important that the scoping process does not shy away from addressing complex issues associated with the town and country planning system in Wales, where in many instances there are fundamentally-differing aspirations for the same locations.</u> Maximising the goals should mean that we don't try to solve one aspect (i.e. economy or housing) by creating another problem (i.e. climate change or biodiversity). One of the purposes of SEA is to throw light upon such conflicts, so that they can be addressed at the strategic level. To fail to do so is to postpone the addressing of such problems to the "downstream" project level, where the question becomes a "winner takes all" conflict between jobs and the environment, or housing and the environment. This approach is not maximising and integrating the well-being goals.</p>	development would have an adverse effect as this is dependent on the detail of the development therefore an uncertain effect was noted.	
			<p>The same applies to the matrix showing the relationship between the Wellbeing Goals and Objectives. It's inconceivable that there are no potential conflicts between housing/economic development and biodiversity.</p> <p>The ISA doesn't need to solve all conflicts at this stage, it needs have the courage to acknowledge them, so that they can be addressed "upstream". Experience shows that it is at the strategic level where potential conflicts can be most easily removed before they become embedded.</p>	Noted. Table 3-2 has been removed from the report.	No further action required.
			<ul style="list-style-type: none"> • SEA Issues and Opportunities: Reference to use of the NDF to bring about biodiversity enhancement is welcome, and we look forward to being consulted in more detail as to how Welsh Government proposes that this is achieved. However, there is a lack of any reference to the need for the NDF to avoid development in damaging locations. The five ways of working from the Well-being of Future Generations Act includes 'acting to prevent problems occurring or getting worse'. These ways of working show public bodies how they should apply the sustainable development principle. The Welsh Government state that "Following these ways of working will help us work together better, avoid repeating past mistakes and tackle some of the long-term challenges we are facing"³³. Therefore, development must be in the right place. <p>The admirable aspiration to enhance biodiversity must not come at the expense of avoiding damage, even where hard decisions need to be taken.</p> <p>³³ http://thewaleswewant.co.uk/sites/default/files/Guide%20to%20the%20WFGAct.pdf</p>	Noted.	The issues highlighted in the reporting as well as the ISA Framework state that the NDF must seek to conserve biodiversity. This would mean avoiding location in damaging locations.
			<ul style="list-style-type: none"> • Climate Change: Please note the National and International Biodiversity Loss at the front of this response. 	Noted.	Document reviewed and

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			Table 2-1 Summary of Impact Assessment Screening At this early stage, it has been concluded that the NDF will have a potential impact on negativity climate change. Given the scale and urgency that we need to combat climate change, the documents plans to address climate change is passive at best - the document instead restricts itself to merely providing some adaptation to climate change. A commitment to avoid exacerbating climate change by taking all reasonable steps to combat it through avoiding allocating DNSs which either by their nature or location, would exacerbate climate change, should be inserted into the document.		updated with regard to the integration of climate change principles throughout.
			Table 4-1 Key Sustainability Issues and Opportunities states that “ <i>The NDF should also help to avoid future risks by managing or avoiding geological hazards through the planning system. Exploration for conventional and unconventional sources of oil and gas also remains a possibility in Wales and its consideration will form a part of the emerging Welsh Government Energy Strategy. The NDF will be used to implement the outcomes of the overarching Energy Policy. We would be concerned that this process would be used to determine future energy issues such as fracking especially as Welsh Government have placed a moratorium on fracking in Wales.</i> ”	Noted. It is not the role of the ISA to determine the direction of Welsh Government policy on energy.	No further action required.
			<ul style="list-style-type: none"> Section 1.8 (Will a Habitats Regulations Assessment be undertaken?) implies that HRA has not started yet. HRA should be fully integrated with and produced in parallel with the SEA, and both should start at the same time. The reason for this is to alert stakeholders that Developments of National Significance and/or National Development Framework could impact a Natura 2000 site. If this is not done in parallel, there is a real risk that by the time that the HRA shows that Natura 2000 sites could be impacted on, the DNSs, and NDF policy in general, will be at such a late stage in evolution that it will be difficult, if not impossible, to avoid such adverse impacts. This is contrary to the aims of SEA and strategic HRA, which are to avoid adverse impacts at an early stage, before they become embedded and legitimised. 	It is noted that the HRA process has begun and is being developed.	No further action required.
			<p>There is a need to consider the following as Developments of National Significance</p> <ul style="list-style-type: none"> National Ecological Networks³⁴, SSSIs and Natura 2000 sites– the economic benefits of having these areas in favourable condition is staggering^{35 36}. There is a highly cost effective plan in get all our Natura 2000 sites into favourable conservation status³⁷ Landscape Scale Conservation Projects³⁸³⁹ Green Infrastructure Networks. The Scottish version of the NDF, National Planning Framework, has the Central Scotland Green Network⁴⁰ included as a DNS-equivalent. The Central Scotland Green Network is one of 14 national developments designated in the National Planning Framework for Scotland 2 (NPF2) - published in June 2009. NPF2 states that delivering a better environment in Central Scotland will help to ensure that it can compete economically at a European and global scale. It will make Central Scotland a more attractive place to live, do business in and visit⁴¹. See also Wildlife Trusts Wales – Green Infrastructure: A Catalyst for the Well-being of Future Generations. <p>³⁴ A National Ecological Network should be built around four key principles:</p> <ul style="list-style-type: none"> <i>Landscape connectivity</i> – linear strips of native vegetation along roadsides, around field margins and along river and ditch banks. <i>Habitat connectivity</i> – through stepping stones that allow species to move between larger patches of habitats. <i>Ecological connectivity</i> – that support the life-cycles of plants and animals both temporally and spatially by providing shelter, food and breeding and resting sites. <i>Evolutionary connectivity</i> – that allows genetic exchange and evolutionary modification within wildlife 	This is not a comment directly for the ISA, but will be considered by the NDF team as appropriate.	No further action required.

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			<p>populations. This can be achieved by :</p> <ul style="list-style-type: none"> • Creation of a catchment-scale opportunity map for the whole of Scotland; • Agricultural spend that is targeted at connecting habitats; • Effective regional partnerships that deliver the multiple benefits of the NEN on land and at sea; • New housing developments that incorporate elements of green infrastructure; and • Urban green infrastructure through parks, green roofs, tree-lined streets and sustainable urban drainage systems. <p>³⁵ http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=2&ProjectID=17005 ³⁶ http://ec.europa.eu/environment/nature/natura2000/financing/docs/ENV-12-018_LR_Final1.pdf ³⁷ http://naturalresourceswales.gov.uk/media/674546/nrw28788-life-natura-2000-report-december-2016-update_english_spreads.pdf ³⁸ http://www.wtwales.org/living-landscapes/living-landscape-schemes-wales ³⁹ https://www.rspb.org.uk/Images/futurescapes_wales_tcm9-261753.pdf ⁴⁰ http://www.centalscotlandgreennetwork.org/ ⁴¹ http://www.snh.gov.uk/docs/B959316.pdf</p>		
			<p>Stages E: Monitoring the Significant Effects of the NDF Stage E of the ISA process includes <i>the finalisation of a monitoring framework that will be used to identify issues and significant effects of the NDF over time. Following the adoption of the NDF, a post-adoption ISA Statement may be prepared, alongside a Statement of Environmental Particulars, providing detail of how the ISA process has influenced the development of the NDF, the predicted significant effects, as well as the monitoring framework.</i></p> <p>The reason for undertaking monitoring is to</p> <ul style="list-style-type: none"> - Learn from the process to inform future activities (what went right, what went wrong, how could things have been done differently) and/or - To amend things that go wrong or as Section 4 of the Environment (Wales) Act states “the “principles of sustainable management of natural resources” are— (a)manage adaptively, by planning, monitoring, reviewing and, where appropriate, changing action”; <p>Therefore, we suggest monitoring should do the above. However, common problems with monitoring are</p> <ul style="list-style-type: none"> - Lessons are not learned, and we repeat the same mistakes as before – or if something goes wrong or doesn’t work, the remedial action is do more of the same i.e. If bat boxes don’t work as a mitigation measure on the M4 Relief Road, Welsh Governments plans are to put up more bat boxes. - A construction management plan is only as good as its delivery and many frequently fail causing environmental impacts. - The evidential base for mitigation measures is lacking and thus measures put in place do not work. For example, the M4 Relief Road the Welsh Government expect water voles to use pipes under the motorway (minimum length approx. 70) when they have only been shown to use tunnels of approximately 35m in length. How can this now be remedied? 	Noted.	To be considered at further stages of the ISA. No further action required.
			<p>Therefore, this comes back to a point made above, any plans or projects must only be undertaken if there is robust evidence that they will achieve what they set out to achieve. If not, they should be refused.</p> <p>All plans and projects should maximise all well-being goals (or at least not be detrimental to any) and any mitigation needs to be proven to work, using scientific, empirical evidence and not best guess / grey literature.</p> <ul style="list-style-type: none"> • The ISA must put in place robust frameworks designed to avoid, or substantially reduce, project level conflicts between social and economic development and the protection of nature conservation interests and ecosystem services. They should maximise all well-being goals (or at least not be detrimental to any). There should be 	At this stage, the content of the NDF is unknown. It is unknown whether or not it will include specific projects or	No further action required.

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			<p>proportionate yet robust application:</p> <ul style="list-style-type: none"> - of the best available objective science to understand the potential impacts including using the preventative and precautionary principles - Applying that science robustly and proportionately to inform impact assessments; - Identifying appropriate spatial and policy solutions to ensure appropriate measures are implemented to avoid or minimise impacts at the project level - Co-operative working between local planning authorities, NRW, the Wildlife Trusts and RSPB etc to ensure economic, social and environmental objectives could be met - Encouraging early engagement to try to reduce conflict and to take a positive approach to it as a means by which to deliver more sustainable patterns of land-use and to streamline subsequent decision-making; - Providing mechanisms to disseminate best practice to other local authorities, especially in the treatment of: <ul style="list-style-type: none"> • Applied research, as many of may need to apply cutting edge assessment techniques; • Appropriate design and funding of mitigation measures to secure no adverse effect on the integrity of nature conservation; 	developments	
			<p>Section 3 Review of Relevant Plans, Programmes and Environmental Objectives states that “<i>the NDF may be influenced in various ways by other plans or programmes, or by external environmental (or sustainability) protection objectives such as those laid down in policies or legislation</i>”. We support this is this includes some of the documents mentioned above – Area Statements, National Resources Policy SoNaRR etc.</p> <p>However, it goes onto state that “<i>it is important to remember that the NDF is a national-scale document so the other plans and programmes of relevance will primarily be national, UK or international-scale documents. The NDF will, in-turn, seek to influence sub-national level planning in Wales. Of particular importance are the following national documents which the NDF will work with and share common aims and objectives:</i></p> <ul style="list-style-type: none"> • <i>Taking Wales Forward 2016-2021;</i> • <i>The Natural Resources Policy for Wales;</i> • <i>SoNaRR;</i>” 	Noted.	No further action required.
			<p>Under absolutely no circumstances should the NDF be allowed to influence the above plans or strategies. These plans and strategies are there to help make Wales more sustainable and cannot be influenced by planning policy such as the NDF. The NDF should help to realise these plans not influence.</p>	The NDF will ‘work with and share common aims and objectives’ with the plans and strategies quoted. And will seek to influence ‘sub-national’ plans and strategies, i.e. not the plans quoted, but lower-level planning documents.	No further action required.
			Has a revocation SEA been done for the Wales Spatial Plan?	Noted.	Text to be included in section 1.9 to

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					explain the replacement of the WSP with the NDF.
			Is there a missing arrow in the diagram at Fig 1-3 (running from ISA to LDP/SDP)?	Noted.	Figure 1-3 explains the NDF assessment process. It has been updated to provide further clarity.
			The Environment (Wales) Act should be included within the diagram at Fig 1-3.	Noted.	Figure 1-3 explains the NDF assessment process. It has been updated to provide further clarity however it does not list all relevant legislation.
			There should be a consultation stage at subsequent stages, especially in respect of the reasonable alternatives stage. The 'Reasonable alternatives' could be just as damaging as the original preferred option for example, the Red and Purple 'reasonable alternatives' for the M4 Relief Road.	Noted, the consultation stages for the NDF are set out in the <u>statement of public participation</u> .	No further action required.
			Will there be a final version of this document following the consultation? This is required to create a clear and transparent mechanism for integrating the results of this scoping process.	A final version of the Scoping Report will be published alongside a consultation report.	No further action required.
			The consultation document is incomplete , for example, there is no APPENDIX B - Baseline Data, Key Issues and Opportunities.	This was provided as part of the consultation as a separate document (due	No further action required.

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				to file size).	
			<p>Consultation Bodies: The Welsh Government should give the same weight to comments from non-statutory consultees with significant experience as to comments from statutory consultees.</p> <p>Planning Policy Wales states 5.1.5 <i>The voluntary sector has developed a wide range of expertise and makes a vital contribution to the conservation of the natural heritage. Bodies such as the Wildlife Trusts Wales and the Royal Society for the Protection of Birds are valuable sources of information and advice</i></p> <p>However, in reality, the expertise from the Wildlife Trust and RSPB are not given sufficient weight. The plan-formulator does not even need to state why representations from such bodies are discounted.</p> <p>Environmental stakeholders such as the Wildlife Trusts, RSPB, Friends of the Earth, Woodland Trust, CRPW etc should be invited to the Scoping Workshop.</p>	This is not a comment directly related to the ISA content. All comments are considered with equal weight.	No further action required.
			There is a requirement for the plan-formulator to set out the environmental issues associated with the NDF.	This is part of the role intended for the ISA.	No further action required.
			<p>Cover Letter points:</p> <p>We support processes that enable Welsh Government to fulfil its legal requirement to embed sustainability into their decision-making by maximise the seven Well-being goals and adhering to the five ways of working.</p> <p>The Future Generations Commission has stated “under the new legislation there is a clear expectation that proposals, including the decision-making process itself, will embed the five ways of working and maximise contribution to all of the seven well-being goals... Public bodies across Wales, including Welsh Government, are required to maximise their contribution to all seven goals to ensure we are moving towards becoming a more prosperous, resilient and equal Wales, with healthier, more cohesive communities and a vibrant culture that is globally responsible... This includes a comprehensive consideration of alternative options to addressing the issue in a more sustainable way”¹.</p> <p>We hope that this consultation helps leads Wales to sustainable development rather sustained development.</p> <p>However, while the consultation seems positive, recent major infrastructure projects that have been either brought forward by Welsh Government (the M4 Relief Motorway) or subsidised by Welsh Government (the Circuit of Wales) give cause for real concern.</p> <p>Welsh Government need to decide if they want to be a world leader in sustainable development. Now is a critical time to understand what we mean by sustainable development. Presently we still find major development programmes that raise serious concerns for both WFG Commissioner and eNGO’s. A true test of any new system will be that eNGO no longer need to call for Public Inquiries or Judicial Reviews, instead a system where, at the earliest stages, all elements of sustainable development are considered. Otherwise, and contrary to section 1.3 of this consultation, inclusion in the NDF will not provide a high level of certainty’ for such schemes</p> <p>In addition to these recent major infrastructure projects, we believe this consultation needs to be seen in the context of</p> <ul style="list-style-type: none"> • National and international biodiversity loss • Climate change 	This is not a comment directly related to the ISA.	No further action required.

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			<p>National and International Biodiversity Loss A recent study² highlights that the Earth's sixth mass extinction event is under way. The study, published in the peer-reviewed journal Proceedings of the National Academy of Sciences, states it “eschews the normally sober tone of scientific papers and calls the massive loss of wildlife a “biological annihilation” that represents a “frightening assault on the foundations of human civilisation”³. This aligns with;</p> <ul style="list-style-type: none"> • The State of Nature 2016⁴ which shows that nature is in serious decline across the UK. Over the last 50 years, 56% of species have declined, while 15% are at risk of disappearing from our shores altogether. • WWF Living Planet Index⁵ which reveals that global populations of fish, birds, mammals, amphibians and reptiles declined by 58% between 1970 and 2012. It states that we could witness a two-thirds decline in the half-century from 1970 to 2020 – unless we act now to reform our food and energy systems and meet global commitments on addressing climate change, protecting biodiversity and supporting sustainable development. <p>Welsh Government are looking to address these issues in Wales through the</p> <ul style="list-style-type: none"> • Well-being of Future Generations (Wales) Act 2015 – A Resilient Wales Goal 'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).'The Well-being of Future Generations Act recognises the importance of nature and its biodiversity. The resilient Wales' goal will help with nature recovery objectives in Wales. • Environment (Wales) 2016 – <ul style="list-style-type: none"> i. Section 6 - Biodiversity and resilience of ecosystems duty – a duty on public authorities to ‘seek to maintain and enhance biodiversity’ so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to ‘promote the resilience of ecosystems’. ii. Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity - The Welsh Ministers must also take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps. • Welsh Governments Nature Recovery Plan⁶ which states that biodiversity should be embed throughout decision making at all levels. Placing nature at the centre of decision making is essential to address the underlying cause of biodiversity loss <p>Climate Change Climate change alone is expected to threaten with extinction approximately one quarter or more of all species on land by the year 2050, surpassing even habitat loss as the biggest threat to life on land⁷. Species in the oceans and in fresh water are also at great risk from climate change.</p> <p>The IPCC has predicted that by 2100, assuming that current trends in burning fossil fuels continue, the surface of the Earth will warm on average by as much as 6 degrees Celsius or more⁸. It is not possible to predict how most species, including our own, and how most ecosystems, will respond to such extreme warming, but the effects are likely to be catastrophic⁹.</p> <p>To put an average surface warming of 6 degrees Celsius into context, all the changes we have seen to date — the melting of glaciers, sea ice, and permafrost; the bleaching and dying of coral reefs; extreme storms and flooding, droughts, and heat waves; and major shifts in the ranges of organisms and in the timing of their biological cycles- that have been ascribed to global warming have occurred with an average warming of the Earth’s surface since the late 19th Century, when this warming (and the Industrial Revolution) began, of less than 1 degree C¹⁰.</p>		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>Welsh Government are looking to address these issues in Wales through the</p> <ul style="list-style-type: none"> • Well-being of Future Generations (Wales) Act 2015 – three of the goals require action on climate change, A Prosperous Wales, A Resilient Wales and a Globally Responsible Wales. • Environment (Wales) 2016 - the Act places a duty on the Welsh Ministers to ensure that the net Welsh emissions account in 2050 is at least 80% lower than the baseline. <p>Recent major infrastructure plans Circuit of Wales The Circuit of Wales proposal is for an International MotorSport Facility to be built near Rassau, in Ebbw Vale.</p> <p>The site at Rassau is a mixture of rich acid grassland, heathland and bog, with a stream network throughout. Its home to a wealth of wildlife including rare dragonflies and birds including the hen harrier and grasshopper warbler. Over 200ha of this wildlife-rich habitat will be completely destroyed. The compensation offered by the developer is not equivalent to the value of the wildlife that will be lost, and there are serious doubts as to the success of their proposals for enhancing and creating new habitats. There will also be negative consequences for wildlife in the wider area, as species will be affected by the increased noise and light, and the increased traffic on the local road network.</p> <p>It will also have a very significant greenhouse gas footprint both construction (including removal of hundreds of hectares of peatland) and operation. The developers predict that construction will involve the removal of 500,000 to 700,000 tonnes of peat, releasing tens of thousands of tonnes of greenhouse gases into the atmosphere.</p> <p>It was claimed that the scheme would bring 6000 jobs and required the Government to underwrite nearly half the cost of the scheme (£210m)¹¹. But Economy Secretary Ken Skates said job claims were "overstated" and that the true figure on employment was about 100 direct jobs, with 500 indirect jobs and about 500 construction jobs while the track was being built¹².</p> <p>However, this correct decision not to underwrite the Circuit of Wales was only taken after seven years and after the Welsh Governments had already invested £9m of public money into the scheme¹³. We don't know if the £9m was invested prior to the Well-being Act being given Royal assent but "<i>sustainable development has been embedded in the actions of successive Welsh Governments since devolution</i> -</p> <ol style="list-style-type: none"> <i>Section 121 of the Government of Wales Act 1998 set a legal duty on the National Assembly for Wales to make a Scheme setting out how it proposed to promote sustainable development</i> <i>The first sustainable development Scheme, Learning to Live Differently²⁰, was adopted by the Welsh Government in 2000 economically and environmentally, unsustainable scheme</i> <i>The Government of Wales Act 2006 set a legal duty on Welsh Ministers to make a Scheme setting out how they propose to promote sustainable development</i> <i>'One Wales: One Planet'²¹ published in 2009 confirmed sustainable development as the central organising principle of the then Welsh Assembly Government.</i> <p>Mr John Davies, Welsh Government Expert Witness For Sustainable Development at the M4 Public Inquiry¹⁴</p> <p>M4 Relief Motorway This development, just the like the Circuit of Wales, raises serious concerns about Welsh Governments commitment to sustainability.</p> <p>In Section 240 of the Welsh Governments Sustainable Development expert witness, Mr John Davies Proof of Evidence,</p>		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>he states that the M4 Scheme</p> <p><i>“would conflict with planning policies in respect of cultural heritage, landscape, ecology and nature conservation. Consequently it would fail to meet the fourth part of the planning policy definition of the sustainable development principle in PPW, respect for environmental limits”¹⁵.</i></p> <p>Therefore, it’s logical that if it fails to respect environment limits, the scheme must be unsustainable.</p> <p>Mr Davies states that in relation to Climate Change,</p> <p><i>“Part 2 of the Environment (Wales) Act 2016 deals with climate change and places a duty on Welsh Ministers to set an emissions reduction target for the year 2050, which shall be at least 80% of baseline Welsh greenhouse gas emissions... A Carbon Report...calculates the impact of carbon emissions during construction, amounting to 522,516 tCO2... estimates that carbon neutrality could potentially be achieved by 2066’.</i></p> <p>The latter figure has now drifted to 2072 but it is acknowledged that this figure could drift further. <u>This is a whole 22 years after Wales should have reduced its carbon footprint by 80%.</u> This means that the <u>scheme doesn’t respect or act on climate change, in contradiction to three Well-being Goals and Part II of the Environment Act – and therefore, cannot conceivably be sustainable.</u></p> <p>Why is this relevant to this consultation? In Section 1.7 of this consultation it states that</p> <p><i>“How does the National Development Framework relate to other Welsh Government strategies? In addition to supporting the delivery of the well-being goals, the NDF will have an important role in supporting the delivery of key Government policy including a wide range of economic, social, cultural and environmental policies. This includes ‘Taking Wales Forward’ which is a five-year plan to deliver more and better jobs through a stronger, fairer economy, improve and reform public services, and build a united, connected and sustainable Wales. Taking Wales Forward sets out how the organisation will work differently across traditional boundaries to deliver priorities. Through the development of the four cross-cutting strategies the Government will seize on the opportunity of the Future Generations Act to work differently and engage with others to develop innovative solutions to the challenges we face and help maximise the impact in these uncertain times”</i></p> <p>However, ‘Taking Wales Forward’ also includes the ‘M4 Relief Road’ – building a motorway to bypass a motorway is not an innovative solution to the challenges we face today. It’s a 1960’s solution to a 21st Century problem.</p> <p>The M4 Relief Motorway is a good example of how the Well-being of Future Generations Act and Environment Act are being misused to justify a ‘business as usual’ and unsustainable development. This has been shown by the myriad of objections to the application including from the Well-being of Future Generations Commissioner¹⁶ as well as objections from UK/International experts such as</p> <ul style="list-style-type: none"> - Sir Professor John Lawton (Ecology), - Professor Kevin Anderson (Climate Change), - Professor Calvin Jones (Economics), - Professor Stuart Cole (Transport) - Professor Terry Marsden (Sustainability) 		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>The M4 Scheme is has a major damaging impact upon nearly 10kms of the Gwent Levels SSSI. The ecological mitigation plans do not conform to the requirements of the Environment (Wales) Act 2016, the Wildlife and Countryside Act 1981, or as NRW have put it</p> <p style="text-align: center;">Extent of loss</p> <p>2.3.2 NRW considers the scale of permanent loss of SSSI in the Gwent Levels under the scheme is unprecedented and would not be in accordance with the statutory duties with respect to SSSIs under Section 28G of the 1981 Act and / or with respect to biodiversity and ecosystem resilience under Section 6 of the 2016 Act, and would be contrary to national planning policy.</p> <p>ID/061 revised National Designated Sites Statement of Common Ground</p> <p><u>The Future Generation Commissioner states</u>, in relation to the M4 that <i>“Under the new legislation there is a clear expectation that proposals, including the decision-making process itself, will embed the five ways of working and maximise contribution to all of the seven well-being goals...”</i></p> <p><i>“Building a new road is not in the best interests of future generations. The proposed scheme is not consistent with Wales’ commitment to future generations –building roads is what we have been doing for the last 50 years and is not the solution we should be seeking in 2017 and beyond. The rationale for a new road was conceived over 25 years ago with the main purpose of addressing congestion in the area. I do not agree with the basic premise that this is the “most sustainable, long-term solution to current social, environmental and economic problems associated with this route”. Whilst recognising the congestion issues on this road (which also exist on other roads across south Wales), I believe, and in fact the Well-being of Future Generations Act arguably requires, the Government to explore other ways to address the problem giving greater consideration to the aspirations contained within the National well-being goals, their own well-being objectives and the five sustainable development principles. Consideration of long-term trends, for instance in technology, car usage and working patterns, are particularly important in ensuring that the solution they develop is fit for current and future generations.”¹⁷.</i></p> <p>However, even with all of the above, it is Welsh Governments position that it does fulfil the legal requirements of the Environment (Wales) Act and the Well-being of Future Generations Act.</p> <p>Therefore, the M4 Relief Motorway can either provide a snapshot of the how Welsh Government will view major developments in the future or a cautionary tale of how not to undertake major developments.</p> <p>Balance - Sustained Development or Sustainable Development? The consultation, in Section 2.2 (An integrated approach to assessing impact), repeats the sustainable development definition from the Well-being Act;</p> <p><i>“sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle aimed at achieving the well-being goals”</i></p> <p>This does not state that sustainable development should be at the detriment of one element i.e. economy takes</p>		

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			<p>priority of the environment. However, on page 20 of the consultation it states that</p> <p><i>“Overall, the NDF must help to achieve the important balance of economic and social improvement that is also sustainable and respects the country’s valuable natural and cultural environment.”</i></p> <p>The term balance is inappropriate and is rooted in the old fashioned approach to Sustainable Development – balancing one element against another; which effectively means pursue economic gain and seek to mitigate the resulting environmental damage.</p> <p>The new approach should be about delivering for all aspects of well-being (economic, social, cultural and environmental).</p> <p>In addition, the M4 Relief Motorway, should the Welsh Government pursue it, may well illicit further action such as Judicial Review. Therefore, if NDF projects do not adhere to the actual principles, goals and duties of these Acts, then contrary to section 1.3 of this consultation, inclusion in the NDF <u>will not</u> provide a high level of certainty’ for such schemes.</p> <p>¹ The Future Generations Commissions evidence to the M4 Inquiry – here ² Ceballos et al (2017) Biological annihilation via the ongoing sixth mass extinction signaled by vertebrate population losses and declines http://www.pnas.org/content/early/2017/07/05/1704949114 ³ Earth's sixth mass extinction event under way, scientists warn https://www.theguardian.com/environment/2017/jul/10/earths-sixth-mass-extinction-event-already-underway-scientists-warn ⁴ State of Nature 2016 https://www.wildlifetrusts.org/stateofnature16 ⁵ http://wwf.panda.org/about_our_earth/all_publications/lpr_2016/ ⁶ Welsh Governments Nature Recovery Plan http://gov.wales/docs/desh/publications/160225-nature-recovery-plan-part-1-en.pdf ⁷ Harvard College - Climate Change and Biodiversity Loss http://www.chgeharvard.org/topic/climate-change-and-biodiversity-loss ⁸ <i>ibid</i> ⁹ <i>ibid</i> ¹⁰ <i>ibid</i> ¹¹ http://www.bbc.co.uk/news/uk-wales-40404661 ¹² <i>ibid</i> ¹³ <i>ibid</i> ¹⁴ Mr John Davies, Welsh Government Expert Witness For Sustainable Development at the M4 Public Inquiry – see here ¹⁵ <i>ibid</i> ¹⁶ The Future Generations Commissions evidence to the 4 Inquiry – here ¹⁷ <i>ibid</i></p>		
30	Sustrans Cymru	Yes	<p>Sustrans Cymru notes that Figure 4 Transport Network does not include nationally recognised walking and cycling routes across Wales. These routes form part of people’s everyday journeys as well as forming part of Wales’ tourism offer and visitor experience, thus contributing to the Welsh economy. The Scottish National Planning Framework recognises the role of a long distance walking and cycling network in enhancing the recreation offer and visitor experience as well as ensuring Scottish people have access to the outdoors for health and wellbeing, (Source Scottish Government, 2014, National Planning Framework 3)</p>	Noted.	Figure 4 updated with National cycle route.

Rep Number	Name	Support the question?	Representation	Response	Proposed Change
			Overall recommendation: Figure 4 is amended to include national walking and cycling networks so that this forms part of the baseline data and the ISA's appraisal of the NDF.		
31	Persimmon Homes West Wales	--	We are grateful for the opportunity to comment on the Consultation Document and you will appreciate that our comments are limited to our operating area and expertise i.e. housing matters. It is clear that the NDF will have the potential to be a very important document that will shape policy formulation and delivery across a wide range of areas. As such we would welcome the continuing opportunity to comment and be involved in future stages of the NDF preparation process.	Noted.	No further action required.
32	Individual	Did Not Answer	The Welsh Assembly the local authorities and the public sector need better management I suggest ISO 9001	Noted. This issues does not relate directly to the ISA Scoping Report.	No further action required.
33	Maesteg Town Council	Yes	N/A		
34	Community Council of Carew	Did not answer	N/A		
35	Historic Houses Association	No	No. Thank you for the opportunity to respond to this consultation.		

Annexes to Representations

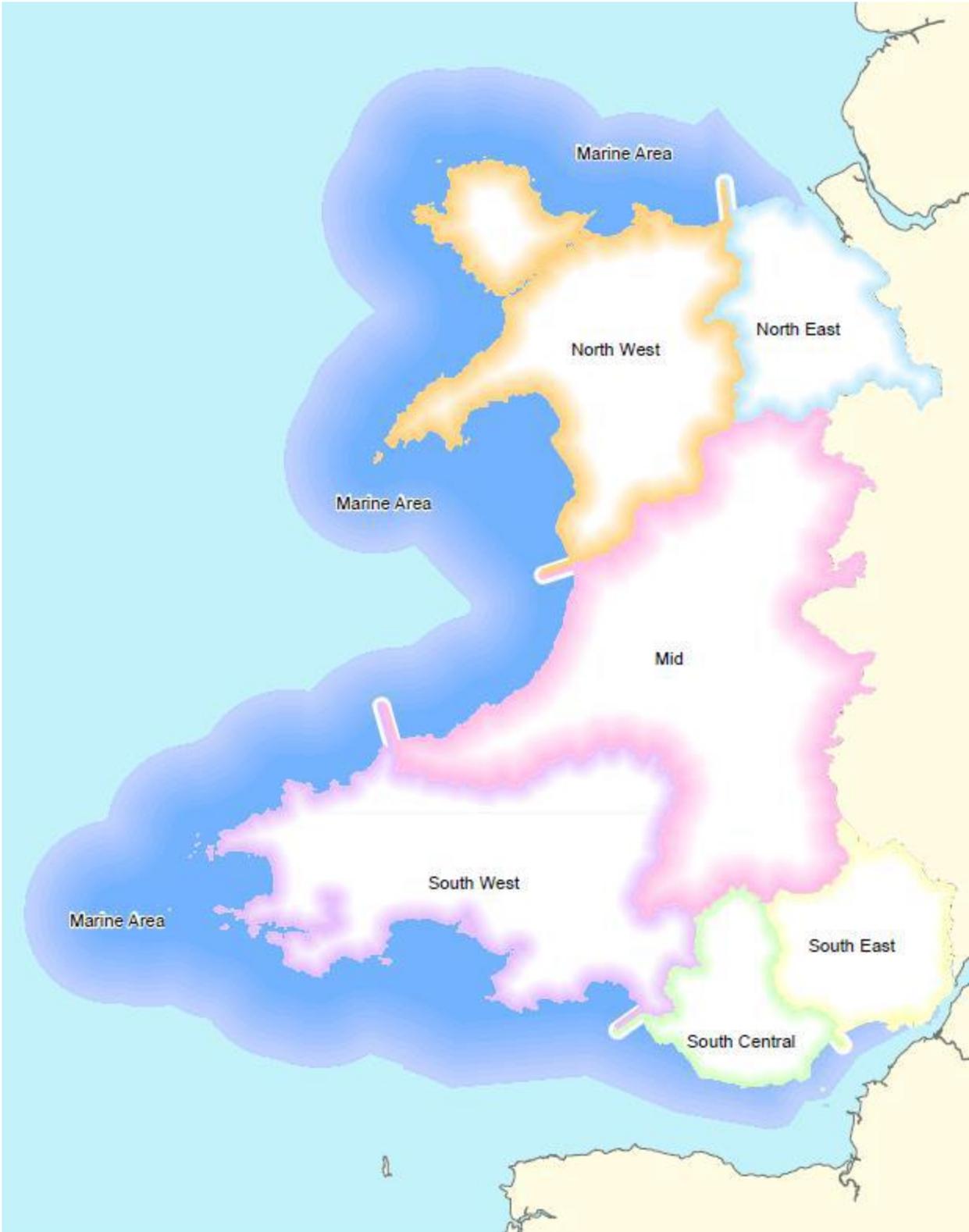
Natural Resources Wales:

Doc 1

Question 2 Table

Landscapes Valued for Distinctiveness and wellbeing	Spatial planning context		
	National (NDF)	Regional (SDF)	Local (LDP)
Designated landscapes	National Parks AONBS		
Non-designated landscapes	Heritage Coasts Registered Historic Landscapes	Special Landscape Areas	
	Tranquillity		
	LANDMAP Outstanding overall evaluations Visual and sensory Historic landscapes Geological landscapes Ancient semi-natural woodland National Nature Reserves	LANDMAP High overall evaluations Visual and sensory Historic landscapes Geological landscapes	LANDMAP Moderate overall evaluations Visual and sensory Historic landscapes Geological landscapes
		Country Parks Forest Parks Local Nature Reserves Accessible Natural Greenspace Urban tree assessment	

An initial spatial representation of the geographic extent of each Area Statement (see answer to Q5)



Annexes to Representations

Natural Resources Wales:
Doc 2

Suggested Changes to Objectives and Guide Questions

<i>Extracts from existing text</i>		Suggested changes to guide questions	
Objective	<i>Will the NDF...?</i>	Will the NDF...?	Reasons
<i>2. To contribute to an improvement in physical and mental health and wellbeing...?</i>	<i>Contribute towards improving access to open space including opportunities for play?</i>	Contribute to the achievement of the Welsh Government’s recommended standards for access to natural green spaces and play space?	We suggest you consider making the guide questions more quantifiable. Target 12 in Climbing Higher is that no-one should live more than a 5 minute walk (300m) from their nearest natural greenspace.
<i>4. To promote sustainable economic growth, diversity and business competitiveness.</i>	<i>Encourage economic growth?</i>	Encourage sustainable economic growth?	
<i>16. To encourage the conservation & enhancement of biodiversity & geodiversity</i>	<i>Promote the establishment of more resilient ecological networks on land that safeguard ecosystem services for the benefit of wildlife and people?</i>	Promote the establishment of more resilient ecological networks on land for the benefit of wildlife and people, and enhancement of ecosystem services?	This will capture much, but not all of ‘connections between and within ecosystems’ which is a component of ecosystem resilience. Current wording could imply an emphasis on expanding the network of protected sites. Whilst this is important, there

			<p>is a need to address the permeability of the landscape generally and avoid continued fragmentation by ‘death by a thousand cuts’. Management of the agricultural landscape is important here as farmland is such an extensive land use in Wales. See also Obj. 17. Current wording also does not consider connections <u>within</u> ecosystems.</p>
16....	<p><i>Encourage the conservation and enhancement of designated nature conservation sites, habitats and species?</i></p>	<p><i>OR this question and the one below could be combined as</i></p> <p>‘Encourage the conservation and enhancement of designated and non-designated nature conservation sites, habitats and species?’</p>	<p>This, together with the subsequent ‘non-designated’ question, will cover the ‘condition’ aspect of ecosystem resilience.</p>
16...	<p><i>Encourage the conservation and enhancement of non-designated habitats and species?</i></p>	<p>Encourage the conservation and enhancement of non-designated nature conservation sites, habitats and species?</p>	<p>This suggested new wording mirrors designated sites wording and now will include non-statutorily designated geological sites such as RIGS (Regionally Important Geological Sites).</p>

16...	<i>Provide an improvement in opportunities for people to access wildlife and open green space?</i>		We suggest this question fits better under other objectives – perhaps 17 (SMNR), 15 (Culture), 2 (Improvements in health and wellbeing) or 4 (Encourage sustainable growth). This is not really about ‘encouraging conservation and enhancement of biodiversity’ except indirectly by connecting it with more people. It is not the biodiversity which will benefit, it is the people.
16...	<i>Encourage the conservation and enhancement of the quality of natural greenspaces?</i>		This will also help to contribute to the Connectivity element of Ecosystem Resilience.
16...	<i>Protect geodiversity?</i>	Protect and encourage the conservation and enhancement of geodiversity?	New wording mirrors other guide questions.
16...		Increase the extent of functioning ecosystems?	A question is needed to address the scale/extent aspect of ecosystem resilience (or incorporate this into wording of existing questions). This could be addressed through habitat restoration and new habitat creation, suitably targeted to complement

			(and benefit from) existing habitats, and to avoid adverse impacts on other ecosystems
<i>17 To encourage the sustainable use of natural resources</i>		To encourage the sustainable management and use of natural resources	The Sustainable Management of Natural Resources is much wider than the existing guide questions. This SMNR objective is cross-cutting and also encompasses many of the other objectives (e.g. 7: Climate change, 16: Biodiversity).
17...	<i>'Encourage a reduction in the proportion of waste sent to landfill?'</i>	Encourage a reduction in the proportion and amount of waste sent to landfill?	Proportion could reduce whilst absolute amount increases.
17...		Increase the resilience of ecosystems?	See also discussion of ecosystem resilience under Q.2 and Obj. 16 above. Given the importance of ecosystem resilience, we suggest a specific question is needed to address it. There will be overlap with the individual elements of ecosystem resilience which are addressed under Obj. 16 above, but the current objective structure already has considerable overlap (e.g. many of the elements of the sustainable

			management and use of natural resources are dealt with more specifically elsewhere as well).
17...		Contribute to the sustainable management of farmland, forests and the wider countryside?	<p>We suggest there is a need for new questions relating to encouraging sustainable production in agriculture and forestry. This will contribute to the connectivity aspects of ecosystem resilience by increasing the 'permeability' of the wider landscape.</p> <p>The Rural Proofing impact assessment 'concludes the NDF potentially has an impact on rural communities. Therefore, objectives encompassing aspects of rural life such as access to services; broadband coverage; and the economy have been incorporated into the ISA framework.' Given the importance of agriculture and forestry in rural communities, we suggest that these should be included in the assessment guide questions too.</p>

Annex 2

How Green Infrastructure (GI) can deliver the Well-being Goals

Well-being Goal	Green Infrastructure (GI) Response
A prosperous Wales	<p>GI saves money and increases productivity³.</p> <p>GI boosts business profits⁴.</p> <p>Sustainable Drainage Systems (SUDS) are always cheaper to install in new developments than regular drains (see the report at the foot of reference⁸).</p> <p>Because GI requires regular, unskilled maintenance it is an excellent source of “starter” jobs and can provide an employment base for the local economy. See Parc Peulwys¹⁴ for an example.</p>
A Resilient Wales	<p>Urban GI can make a significant contribution to the conservation of threatened pollinators^{5,6}.</p> <p>Replacing grey infrastructure with green infrastructure as in the Greener Grangetown³¹ project creates space for nature at the same time as providing essential services for life.</p> <p>Use the techniques in the NHS Wales Heatwave Action Plan¹⁹, The Welsh Government SUDS Standards⁸, and use local green space for allotment growing – it can provide food and space for biodiversity²¹.</p> <p>SUDS offer an extremely cost-effective solution to reduce the frequency and severity of local flooding from storm water. See the Augustenborg estate in Malmo²⁰.</p>
A Healthier Wales	<p>GI brings multiple health benefits, from stress reduction²⁷, ameliorating the effects of environmental noise, intercepting particulate air pollution, providing environments which encourage healthy exercise, and reducing direct hazards such as flooding and urban heat islands. For a summary of benefits and actions see reference³⁴.</p>

<p>A More Equal Wales</p>	<p>The most disadvantaged areas of Wales are host to some of the most degraded environments¹⁴.</p> <p>Engaging local people fully in GI provision and maintenance will restore pride in the local environment, reducing litter, dog fouling and vandalism, whilst improving health and mental well-being. See Parc Peulwys¹⁴, the Green Flag Awards³² and Augustenborg²⁰.</p> <p>A major symptom of disadvantage is the increased prevalence of ill-health, and the installation of GI can have a massively beneficial effect on human health¹¹.</p>
<p>A Wales of Cohesive Communities</p>	<p>When done as part of a three-pronged programme of economic, social and economic development, the installation of GI will reverse deprivation and create a coherent community, where once there was crime and antisocial behaviour^{14, 20, 17,18}</p>
<p>A Wales of Vibrant Culture and Welsh Language</p>	<p>GI is host to and the raw material of some of the most innovative artworks in Wales³⁵. Art is an integral part of GI in Parc Peulwys¹⁴ and has played a pivotal role in engaging the local community in the full spectrum of improvements on this formerly highly disadvantaged estate.</p> <p>Cymdeithas Edward Llwyd exists to promote engagement with the natural environment through the Welsh language, celebrating the links between Wales' rich linguistic and natural heritage³⁶.</p> <p>Wales' only Biosphere Reserve (part of the UNESCO Man and the Biosphere Programme) was founded on the principles of improving economic, social and environmental well-being, and aspires to be "an exemplary area", setting the benchmark for "green", bilingual living³⁷.</p>
<p>A Globally Responsible Wales</p>	<p>GI conserves threatened biodiversity^{5, 6, 21}.</p> <p>What Wales has learned about the role of GI in sustainable development is communicated to the World Network of Biosphere Reserves³⁷.</p>



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35. ten Brink P., Mutafoglu K., Schweitzer J-P., Kettunen M., Twigger-Ross C., Baker J., Kuipers Y., Emonts M., Tyrväinen L., Hujala T., and Ojala A. (2016) *The Health and Social Benefits of Nature and Biodiversity Protection*. A report for the European Commission (ENV.B.3/ETU/2014/0039), Institute for European Environmental Policy, London/Brussels.
36. <http://homeli.co.uk/sultan-the-pit-pony-200m-sculptural-earthwork-in-wales-by-mick-petts/>
37. <http://www.cymdeithasedwardllwyd.org.uk/aCELL/index.php>
38. <http://www.dyfibiosphere.wales/>

Document 1

Response – Noted.

Changes – No further action required.

Document 2

Response – Noted.

Changes – ISA Framework has been updated. It is noted that, at this stage of the ISA, the use of specific indicators has not been included in the ISA Framework. However, measurable indicators relating to the guide questions are being considered, and will be included as part of a monitoring framework. This will be included once the predicted significant effects of the NDF have been identified.

CADW:

Appendix A

Table 1-2 Sustainability Themes linked to ISA Objectives

Themes relevant to ISA of Wales NDF	Relevant Goals	Source – International and European	Source - UK	Source – National	Implications for the NDF	Implications for the ISA	Main SEA Topics	Relevant ISA Objectives
Protect and enhance the local distinctiveness of our landscapes and the historic environment, <u>historic assets and their settings</u> .	1,4,5,6 and 7	Convention Concerning the Protection of The World Cultural and Natural Heritage; European Landscape Convention; Convention on the Protection of Underwater Cultural Heritage, European Convention on the Protection of Archaeological Heritage.	<u>Heritage Protection for the 21st Century</u> ; The Protection of Wrecks Act 1973; Ancient Monuments and Archaeological Areas Act 1979; Protection of Military Remains Act 1986; Planning (Listed Buildings and Conservations Areas) Act 1990; The Treasure Act 1996; Environment Act 1995; <u>UK marine policy statement (2011)</u>	PPW edition 9; Cultural Tourism Strategy; TAN12- Design; Register of Landscapes of Historic Interest; Historic Environment (Wales) Act 2016; Valuing the Welsh Historic Environment; <u>The Historic Environment Strategy for Wales</u> ; UK Climate Change Risk Assessment 2017 Evidence Report; National Seascape Assessment for Wales; Taking Wales Forward 2016-2021; Planning (Wales) Act 2016; One Wales – A Progressive Agenda for the Government of Wales; Valuing the Welsh Historic Environment; <u>Conservation Principles</u> ; <u>Light</u>	The NDF should protect and retain <u>enhance</u> distinctiveness of the national landscapes, valued historic environment and cultural <u>historic assets</u> and <u>their settings</u> .	The ISA Framework should include objectives that seek to protect <u>and enhance</u> local distinctiveness and the historic environment <u>and historic assets</u> .	<u>Historic Environment</u>	13, 14 & 15

				<u>Springs through the Dark: A Vision for Culture in Wales (2016); Technical Advice Note 24: The Historic Environment (2017); Welsh National Marine Plan (forthcoming)</u>				
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Appendix B

Table 4-1 Key Sustainability Issues and Opportunities

Well- being goals	Summary of Key Issues	Opportunities for the NDF to address
<p>6. A Wales of vibrant culture and thriving Welsh Language</p>	<p><u>Landscape, Townscape and Seascape Character</u></p> <ul style="list-style-type: none"> Wales is renowned for its high-quality landscapes with over 50% of the land area being nationally valued for its scenic quality and character. This has implications for new development within these areas with a key challenge for sustainable management being to enable appropriate levels of growth whilst retaining the distinctiveness of places and landscapes. This must also recognise that the natural and historic components of landscape are important to both place and the cultural value of landscape. Landscape character and tranquillity is already under pressure from development with around 1,500 km² of tranquil landscapes lost between 1997 and 2009. In addition, there are non-anthropogenic risks to landscapes from pests, pathogens and invasive species and from changes in frequency and/or magnitude of <u>climate change</u>, extreme weather and wildfire events. <p><u>Historic Environment and historic Assets</u></p> <ul style="list-style-type: none"> Wales has a wealth of historic and cultural assets which are important components of national cultural identity. Many such assets are at risk from, for example, decay, climatic factors, neglect and inappropriate development. As with other environmental factors, recognising and protecting <u>the historic environment and historic</u> -assets is a key challenge for sustainable planning and management. 	<p><u>Historic Environment and Heritage Assets</u></p> <ul style="list-style-type: none"> As with landscape, the NDF has a major role to play in the protection and enhancement of <u>cultural</u> heritage through guidance to the planning system. This should include the recognition that non-designated <u>historic</u> assets are also an important part of the make-up of cultural identity and sense of place and that indirect effects on the setting of assets are also important considerations. Opportunities also exist for the NDF to promote awareness of cultural heritage <u>and the historic environment</u> and encourage the enhancement of cultural education centres. <u>Greater integration of Historic Environment Issues with other topic agenda such as the contribution that it can make to heritage-led regeneration, ‘place-making’ and establishing a ‘sense of place’</u>

Appendix C

ISA Framework for the assessment of the NDF

ISA Objectives	Questions	Well- being goal
<p>13. <u>To contribute to</u> the protection and enhancement of the local distinctiveness of our <u>historic landscapes, townscapes and seascapes.</u></p>	<p>Will the NDF....?</p> <ul style="list-style-type: none"> • <u>Support the</u> protection and enhancement of areas of <u>historic landscape, Registered Parks and Gardens and</u> seascape character, distinctiveness, diversity and quality? • <u>Support the</u> protection and enhancement <u>of historic</u> townscape character and quality? • <u>Promote sensitive design in all development and redevelopment?</u> • <u>Promote heritage-led regeneration?</u> • Encourage a <u>reduction</u> in noise and light pollution? • <u>Encourage the maintenance of areas of tranquillity?</u> • <u>Encourage the conservation and enhancement of the historic landscape?</u> 	<p>A more prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales</p>
<p>14. To <u>contribute to the protection, conservation and enhancement of the historic environment and historic assets and their settings-</u></p>	<ul style="list-style-type: none"> • <u>Support the protection and enhancement of designated historic assets?</u> • <u>Support the protection and enhancement of non-designated historic assets?</u> • <u>Support the protection and enhancement of marine archaeology?</u> • <u>Allow historic assets to be maintained in order to sustain their values?</u> • <u>Promote the significance of historic assets so that they are understood?</u> • <u>Recognise that the historic environment is a shared resource and therefore ensure that there is greater access, understanding and enjoyment of it for all groups in society?</u> • <u>Support wider public engagement so that everyone will be able to participate in sustaining the historic environment?</u> • <u>Ensure that decisions about change are reasonable, transparent and consistent?</u> • <u>Ensure that decisions that impact historic assets are fully documented and that future generations will benefit from the knowledge gained.</u> 	<p>A more prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales</p>

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Appendix D

Baseline Date and Key Issues and Opportunities

7.1.4 Cultural heritage and the Historic Environment

Relevance to the NDF

The Historic Environment and Heritage Assets comprises archaeological remains, ~~intact~~ structures and relict landscapes associated with past human activity. This section also covers cultural activities undertaken by the population. Wales has a large number of designated and non-designated cultural heritage-historic assets reflecting its long history of human occupation. Many of these provide attractive places to live and important tourist attractions, in addition to being central to Welsh cultural identity.

The NDF has a key role to play in the protection and enhancement of the historic environment and heritage-historic assets through guiding decisions made in the planning system. New development can have a range of direct and indirect effects on the historic environment, heritage historic assets and their settings. Some development can be beneficial, but where its impact is adverse this should be avoided or mitigated. This includes effects on cultural activities.

Baseline conditions and trends

Heritage Historic assets in Wales are numerous. This section describes the key types of asset present.

World Heritage Sites

World Heritage Sites are regarded as being universally important and 'belonging to all the peoples of the world, irrespective of the territory on which they are located'. They are inscribed by UNESCO.

Wales currently has three world heritage sites:

- The Castles and Town Walls of Edward I in Gwynedd at Caernarfon, Conwy, Beaumaris and Harlech in North-West Wales;
- Blaenavon Industrial Landscape in South-East Wales; and
- Pontcysyllte Aqueduct and Canal in North-East Wales.

Each of these cover large areas straddling a number of local authorities and have management plans which detail the planning policies of each authority regarding the protection of the World Heritage Sites. Some, such as Pontcysyllte, have buffer zones to add a supplementary degree of protection within the landscape adjacent to the site while others, such as Edward's Castles, have defined their Essential Setting and Significant Views within the management plan to protect the surrounding area. Each of the Welsh World Heritage Sites, their buffer zone, or their essential setting/significant view contain privately owned houses or land. Figure 3 – Heritage Features shows the locations of the World Heritage Sites in Wales.

Listed Buildings

The Welsh Ministers are required by law to compile lists of buildings of special architectural or historic interest, known as listed buildings. The lists are used to help planning authorities make decisions that protect the special architectural or historic interest of such buildings, and their settings. Compilation of the lists is undertaken by Cadw. Listed buildings are classified in grades to show their relative importance. The grades are:

- I — Buildings of exceptional, usually national, interest. Currently, fewer than two per cent of buildings

listed in Wales qualify for this grade;

- II* — Particularly important buildings of more than special interest; and

- II — Buildings of special interest, which warrant every effort being made to preserve them.

There are over 30,000 Listed Buildings (Grade I, Grade II and Grade II *) within Wales (~~Cadw~~), ~~distributed across its counties~~ varying from medieval halls and castles to Edwardian villas.

Scheduled Monuments

Welsh Ministers have a statutory duty to compile and maintain a Schedule of ~~Ancient~~ Monuments. The monuments included on this Schedule are of national importance and cover a diverse range of archaeological sites. Some examples may be completely buried below ground, and may only be known through archaeological excavation. Others are more prominent, and include the great standing ruins of well-known medieval castles and abbeys. The oldest known example in Wales is a natural cave — found to contain the earliest evidence of people in Wales — dating to a quarter of a million years ago. At the other end of the spectrum are twentieth-century military structures. Scheduled monuments are often in a ruinous or semi-ruinous condition or take the form of earthworks.

Over 4,000 monuments have now been scheduled across Wales and the number is increasing as part of an ongoing planned policy of enhancing the Schedule. (~~Cadw~~).

Scheduled monuments are distributed throughout Wales and their locations are presented on Figure 3 – Heritage Features.

~~Registered~~ Historic Battlefields

The locations where historic battles took place can be significant historic assets. They often retain topographical and archaeological evidence, including war graves, which can increase understanding of these events. An Inventory of Historic Battlefields in Wales was launched in February 2017 and is hosted on the RCAHMW website.

Heritage Coasts

Heritage coasts are ‘defined’ rather than designated, so there isn’t a statutory designation process like that associated with National Parks and AONBs. However, they are largely located within areas that are afforded with National Park or AONB status.

Within Wales there are 14 heritage coasts:

- Glamorgan;
- Gower;
- South Pembrokeshire;
- Marloes and Dale;
- St Brides Bay;
- St Davids Peninsula;
- Dinas Head;
- St Dogmaels and Moylgrove;
- Ceredigion;
- Llŷn;
- Aberffraw Bay;
- Holyhead Mountain;
- North Anglesey; and
- Great Orme.

The location of heritage coasts is presented on Figure 3 – Heritage Features.

Historic Parks and Gardens

Wales has a rich inheritance of historic parks and gardens. They form an important and integral part of the historic and cultural fabric of the country. Cadw has undertaken a comprehensive survey of historic parks and gardens in Wales. Those thought to be of national importance are included on the Cadw / ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales. The Register was compiled in order to aid the informed conservation of historic parks and gardens by owners, local planning authorities, developers, statutory bodies and all concerned with them. It was completed in 2002 ~~however although further~~ sites can be added (or subtracted) at any time. There are currently almost 400 sites on the Register.

Sites on the Register are Graded I, II* and II in the same way as listed buildings. Approximately 10% are Grade I and 23% Grade II*. Grade I sites, such as Bodnant, Powis Castle, Dynevor Park, Margam Park, Erddig, Plas Brondanw and Raglan Castle, are of international importance.

Parks and gardens on the Register range from medieval to late twentieth century. Many are multi-period, with features of different styles and periods.

The existing register does not enjoy statutory status. However, the Historic Environment (Wales) Act 2016 places a duty on Welsh Ministers to compile and maintain a statutory register of historic parks and gardens in Wales. The intention is that this provision will be commenced during 2018.

Locations of historic parks and gardens are presented on Figure 3 – Heritage Features.

Historic Landscapes

The Register of Historic Landscapes in Wales is a non-statutory advisory register. Its purpose is two-fold. Firstly, when major change might be contemplated, it is intended to inform policy making and decision making at a strategic level about the historic importance of the areas identified. Secondly, information on the register should be taken into account when determining planning applications where the development requires Environmental Impact Assessment or, if on call in, in the opinion of Welsh Ministers, is of a sufficient scale to have more than a local impact on the historic landscape.

Designated Wrecks

The seas around Wales are littered with the wrecks of vessels of all shapes and sizes. Although all of them have historic value, six currently have legal protection. These six are known as ‘designated wrecks’ and are protected under the 1973 Protection of Wrecks Act.

Heritage at Risk

A key element of Cadw’s heritage regeneration activity is action related to heritage assets in a deteriorating condition. Cadw have been working to identify the number and type of listed buildings at risk or in a vulnerable condition in Wales. Surveys of the condition of listed buildings have been carried out in Wales on a rolling basis for more than 15 years. 2015 data shows that the trend for buildings at risk is moving in the right direction. The number of buildings in an ‘at risk’ or ‘vulnerable’ condition has decreased since the last comparable data available (2013) and the percentage of buildings at risk has fallen from 8.92% to 8.54%. This figure is calculated using existing survey data and the most up-to-date data available from the approximate 20% of the building stock which has been re-surveyed in the past year (Cadw). The percentage of building at risk over time has fallen since 2013.

Over time, there have been additional buildings given listed status. The Historic Environment (Wales) Act 2016 aims to give more effective protection to listed buildings and scheduled monuments, to improve the sustainable management of the historic environment and to introduce greater transparency and accountability into decisions taken on the historic environment. These seek to preserve the cultural heritage and historic environment of Wales and in turn will provide greater financial gain for the Welsh tourism sector.

Cultural activity

According to the National Survey for Wales 58% of people had been to an arts event in the last 12 months, 59% had visited an historic place, and 39% had been to a museum. Of those people that attended 97% of people were satisfied with the arts and historic place they visited, and 96% were satisfied with the museum they visited (National Survey for Wales, 2014 – 2015).

Data Gaps

There are no significant data gaps for the terrestrial historic environment; however, the Marine Plan identifies data gaps for marine cultural heritage.

Historic Environment Records

The Historic Environment (Wales) Act placed a duty on the Welsh Minister to compile and keep up to date a historic environment record for each local authority area in Wales. This provision was commenced in May 2017. The historic environment records contain and signpost information about both designated and non-designated historic assets. They also contain records of the investigation and management of the historic environment. The Welsh Ministers have chosen to discharge their duties relating to historic environment records through the Welsh archaeological trusts and online public access to the core information is available through Archwilio - www.archwilio.org.uk

Appendix A

Response – Noted.

Proposed Change – Changes have been incorporated to reflect the historic and cultural environments.

Appendix B

Response – Noted.

Proposed Change – Tabel 4-1 has been updated to reflect the historic and cultural environments.

Appendix C

Response – Noted. Changes have been made to reflect the proposed amendments.

Proposed Change – ISA Framework updated.

Appendix D

Response - Noted.

Proposed Change – Suggested changes have been incorporated in Appendix B

Pupils 2 Parliament Representation:

***Making Wales good for
children's futures***

***Submission of pupils' views
to the Welsh Government***

***for their consultation on the integrated sustainability
appraisal scoping report for the National
Development Framework***

Introduction

1. This report is a formal submission to the Welsh Government for their consultation on the draft Integrated Sustainability Appraisal Scoping Report for the National Development Framework for Wales.
2. The report is from Pupils 2 Parliament, a project to enable school pupils to consider and feed in their views to parliamentary, national government and national body public consultations and inquiries. The project has been approved by the Clerks of both Houses of Parliament to use the term 'Parliament' in its title.
3. Pupils 2 Parliament aims to bring the particular viewpoint of children and young people to those conducting inquiries and consultations - plus the uniquely fresh and often challenging analysis that children and young people bring to decisions and policies.
4. The project also gives school pupils the chance to learn about and consider key decisions being made by parliament, national government and public bodies, and genuinely to participate in democracy by feeding their views into real national decisionmaking.
5. Pupils' views are independently gathered through discussions with groups of pupils led by someone from Pupils 2 Parliament, with a member of school staff taking notes of the pupils' views. We use information from the relevant consultation or inquiry document to explain the issues. We specialise in putting the issues and questions even-handedly, without leading pupils in any way or suggesting any responses. All views come spontaneously from pupils, with no adult prompt on what they should say. For this consultation, the pupils themselves chose which of the Government consultations open at the time they wanted to give their views to.
6. The information we gave to pupils about this consultation came from the consultation document on the Welsh Government website. We explained that we were collecting the children's views to send to the Government, to help them to work out a checklist of what should be in the big plan they will write soon for how Wales should develop over the next 20 years (the "National Development Framework").
7. We asked the Planning Policy Branch of the Welsh Government which parts of the consultation document it would be most useful to work on with children. We then picked out the parts of the document that were especially to do with making Wales good for children now and in the future, together with parts to do with looking after the environment. We also asked for the children's views on making sure that Welsh Government Ministers do take on board children's rights when they do the final plan for the future of Wales.
8. In our questions we have covered children's rights from the list of rights in the *'United Nations Convention on the Rights of the Child'*. We chose eight of the rights from that list that we thought were most to do with what will eventually go into the future plan for Wales. (These were the children's rights in sections ('Articles') 6, 12, 23, 24, 27, 28, 31 and 36 of the list).



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9. The Welsh Government has already said what it thinks so far should be on the checklist when they check that the future plan covers what it should. These are the 'objectives' in the 'Integrated Sustainability Appraisal' list (called the ISA for short). We agreed with the Welsh Government that we will get children's views on a number of the things on this list. So our questions to the children also cover the objectives numbered 1, 2, 10 and 11 on the ISA checklist.
 10. Taking on board the children's views in this report is part of how the Welsh Government is checking their ideas for the future plan with children, and making sure that the future plan for Wales gets things right for children in Wales.
 11. This report contains all pupil views given, without selection, comment or addition. The views in this report are entirely pupils' own views, and nothing but pupils' views.
 12. Views in the report came from a focus group of 28 pupils aged 9 and 10 from [REDACTED] Primary School, Powys.
-

What are the best things about Wales?

13. First we asked the children what they thought were the best things about Wales, that the planners should take into account. Here (in no special order) is their full list of the best things about Wales:
 - Lots of places to play
 - The countryside
 - Shops
 - Schools
 - The seaside around Wales
 - Views
 - Good environment
 - Lots of places to run around
 - The countryside is safe
 - The land is nice
 - It's fun
 - Nice for walks
 - Good hills to walk over
 - Lots of sports centres and places to do sports
 - Kind people
 - It's very quiet
 - Not many terrorist attacks.
-

What are the worst things about Wales?

14. Then we asked the children what they thought were the worst things about Wales. Again, these are things the children thought the future planners should take into account, and some of them are things the planners should try to do something about:

- The weather
- Not many parks
- Children don't have many rights
- Many houses are too small for living
- Pollution
- The country feels too small
- Water in rivers is too cold for swimming in
- The skate parks are bad
- The driving age needs to be lowered in Wales
- Grass needs to be cut more often on football pitches
- People need to pick up their dog poo
- Bad drivers on country roads
- Drunk drivers
- Not much space to park cars
- Houses are too expensive
- Need for more benches for people to sit on
- Litter
- Chewing gum on pavements
- Graffiti
- New buildings taking up play spaces
- No places to improve yourself in sports
- Not enough picnic places
- Potholes in roads.

All children have the right to stay alive and to be grow up healthy.

15. The first of our questions covering children's rights and the objectives in the Government's proposed checklist for the future plan for Wales was about staying alive and healthy. We asked the pupil group for their own proposals to make Wales healthier. As always, we did not make any suggestions – the proposals for the future plan are entirely their own.

16. The full list of their proposals was:

- Make a lower age limit for buying sugary energy drinks and chewing gum
 - Have a high age limit for smoking
 - Plan for more fruit trees to be grown
 - More shops
 - Get shops to sell healthier food
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-
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- Make fruit and vegetables cheaper to buy
 - Put the prices of unhealthy things up
 - Don't smoke around children
 - Make good use of old factory space (*there is a derelict factory site in their local town*)
 - Make the water from all taps, including hot ones, ok to drink
 - Stop people parking on the road where there aren't parking spaces.
-
-

All children should be able to say what they think about things that matter to them, and to have their views taken seriously (depending on their age and understanding)

17. On this question, children told us about some of the many different things that do matter to them, on which they would like to have a say. These included filling in potholes in roads, wider pavements, having a lower age limit for getting a credit card, better wheelchair access for disabled people, and first aid for people who injure themselves.
18. Overall the group thought that children do have ideas and worries, but that they are not listened to very much. "It is hard for children to have their say." There was also sometimes the problem of being ignored in public, and not taken as much notice of as adults – for example being ignored when they are standing in a queue, and the adult behind them being served instead.
19. Pupils put forward some general principles about children's right to be listened to and taken notice of on things that affect them. "Grown ups should listen more to children", "children should be treated the same in a queue", "let children have more rights to do things", "children and adults should be treated fairly", "treat children and adults the same".
20. In education, the pupils proposed that a good way of taking children's views on board would be for schools to ask children, at the start of each school term, what they would particularly like to learn about during the coming term.
21. There were four specific proposals for how the Welsh Government could listen more to children:
- Let children have a vote on things grown ups can vote on, to get children's views
 - Make it easier for children to write to the Government with their views
 - Inspire children to give their views more on TV
 - Every year, the Welsh Government should do a survey for all children, asking them to feed back what they think about decisions that the Government has made during the year.
-
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Are children's views, worries and ideas listened to and taken seriously?

22. After they had discussed this, we asked the group to vote on whether they thought that children's views, worries and ideas are in fact listened to and taken seriously, as this is on the lists of children's rights and Government objectives.
23. The children voted strongly (by 24 votes to 2) that as children they did not think children's views, worries and ideas are currently being listened to and taken seriously.

Children should be able to get information and ideas of all kinds, in the way they want to get them (as long as it doesn't harm anyone)

24. This was the next issue on the rights and objectives list. Again, the children gave us examples of what sorts of information and ideas they would want to have information about. These definitely covered future local planning issues – like in their own town whether there should be a superstore on a site near the local fire station, whether the library should be made bigger, and whether there should be sports facilities like a trampoline park.
25. Specific proposals for checking the future plan on meeting the children's right to have good access to information and ideas were:
- Better equipment and internet for information in schools
 - Local science information centres covering many different science subjects (the local Spaceguard Centre was given as a good example of one sort of science information centre)
 - Run local information and ideas workshops for children
 - Local museums
 - Information posters or screens in public places
 - "Other places to learn stuff" for yourself, apart from schools.

Children with any sort of disability should get the care and support they need to lead a full life and do things for themselves

26. On this, the children proposed three major items for the Welsh Government's planning checklist:
- Good wheelchair access, with more wheelchair slopes
 - Faster ambulance services with more local ambulance stations
 - More hospitals and places locally for children to go to be treated when injured.

Children should have clean water to drink, good food, and a healthy place to live, not have lots of pollution round them, be taught how to keep themselves healthy, and have good care and treatment when they are unwell.

27. This is a more detailed right and objective about keeping healthy. As well as the proposals they had already made about having more hospitals and treatment centres and faster ambulances, healthier food, and discouraging harmful things like smoking and drinking sugary drinks, the children had a number of long term proposals on what should be covered in the future plan.

28. Two were to do with eating and drinking. These were that there should be more drinking water taps around towns, and, again, having lower prices for fruit and vegetables.

29. The others were to do with healthier transport. One was that the Government should check the future plan includes planning for "more walking and cycling rather than travelling by car". Three more were to do with making cars less unhealthy when they do need to be used. These were that the unhealthy emissions from diesel cars should be reduced, that petrol should be made cheaper than diesel, and that there should be more electric cars on the roads in Wales.

There shouldn't be parts of Wales where people are healthier and other parts where they are less healthy – people should be just as healthy everywhere in Wales

30. The group had already made proposals they thought should improve people's health if they were covered in the plan for the whole of Wales.

31. As well as covering these in the checklist for the plan, the pupils thought that fast food outlets made people using them eat less healthily, and so to be less healthy than in other places. The Government should consider removal of fast food outlets.

Fewer children should have to live with being poor

32. The pupils made these proposals to be covered in the plan for Wales, to counter poverty for children and their families:

- Have local centres for people who are poor to go to for help with things they cannot afford, and where they can also be provided with food if they don't have enough
- Provide blankets to people living on the streets
- Shops that have waste food that is still good should always give it to the poor instead of wasting it (this does happen in some places, but should happen throughout the country)

- Have more jobs to give people employment
- Reduce the age at which children can do light work like paper rounds to help earn money.

Children should have a standard of living that meets their physical and mental needs

33. The pupils' key proposal for the plan on this objective was to do with housing. It was that places to live should be provided for people who cannot afford their own homes.

Children should have a good education, which helps them do as well as they can, teaches them about their country and the environment, and prepares them well for their future life. People should be able to carry on learning new things right throughout their lives. There should be good educational buildings and facilities. Schools should not punish children in a way that takes away their dignity

34. The pupils made three proposals on education to be included in the checklist for the future plan for Wales:

- Children shouldn't have to do tests or homework – just learn in school
- Education should be made more fun for all ages
- There should be more support for home schooling.

Children should be able to relax and play, get to open spaces where they can enjoy themselves, and to join in lots of different sorts of activities

35. Pupils proposed that the plan should cover:

- A park with play equipment in every town in Wales
- Having separate parks and play areas for children and young people of different age groups, so that older children do not spoil things for smaller children
- Having play areas where adults do not tell children how they should play, and where adults do not go on the play equipment and break it
- Children should not have to do work at younger ages, so they can go outside more.

It should be easy to get around to places you need to go in Wales, including walking, cycling, by bus, by train, by car and in ways that don't need people to use cars

36. Children saw many future possibilities for changes and new ideas in transport to be included in the checklist for the new plan for Wales. For the short term, they proposed:

- Introducing a cycling test to be taken at a younger age
- Having more cycle roads or paths
- Having separate paths for walkers and cyclists
- Having bikes to borrow for a limited paid time to use to get around and leave at the end of your journey, as there are now in some big cities in the UK
- Having vehicles that don't pollute.

37. New developments in future transport the pupils thought should be the sort of thing to be encouraged in the future plan over the next 20 years were:

- Passenger-carrying drones
- Passenger vehicles travelling and hovering magnetically above metal tracks
- Zipwires with units carrying passengers overhead in large towns
- ... and even the development of personal jet-packs.

People should be able to communicate well in electronic ways – on the internet, mobiles and in new ways

38. Pupils thought through some of the new developments in communications that might be encouraged in a plan for the next 20 years. Some are not around yet – but others use even quite old fashioned ideas for carrying messages.

39. The proposals were:

- More use of sign language for people needing to communicate this way
 - Teleporting if this ever becomes possible
 - Using drones regularly for deliveries and carrying messages
 - Putting face time on the screens of all electronic communications devices
 - Bringing back the idea of pigeons carrying messages
 - More communication through devices that use virtual reality or holograms to show the person you are talking to
 - Wider use of face time and virtual reality through headsets
 - Ways of shooting or throwing messages across towns – one wish was to be able to throw messages a long distance in bottles, but the final proposal was to use small containers propelled along narrow tubes connecting buildings that need to send things between them. This is something which has been done for many years in some shops.
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People should be able to enjoy the countryside and the coast

40. The pupils wished the planning checklist to cover the following proposals:
- More litter bins around the coast – designed with sealing tops to stop the smell escaping
 - Large telescopes around the coast for people to look out to sea
 - More lifeguards for safety on beaches
 - Places where people can hire different sorts of kit for enjoying the sea – such as wetsuits
 - More lighthouses back around the coast
 - More fun activities in and by the sea (such as an example from Majorca where you could use a towed inflatable ‘banana boat’).
41. One pupil summed up the issue of litter and litter bins along the coast and at beaches when they said “you should enjoy the coast by not having litter”.

Are children are usually treated fairly in Wales?

42. The pupils themselves had talked about children not always being treated as fairly as they thought adults were, and fairness is covered in children’s rights and in the Welsh Government’s objectives for the plan. So we asked the group to vote on whether or not they thought children are *usually* treated fairly in Wales at the moment.
43. The group voted overall (by 15 votes to 11) that they thought children *are* usually treated fairly in Wales at the moment (that is, in June 2017).

Making sure people are treated equally – boys and girls, people of different ages, and people with disabilities

44. The pupil group agreed that fair treatment for all children and people of all age groups, and for children and other people with disabilities, is very important. They thought many of the proposals they had already made would help towards this, and did not have any specific extra proposals to make for the plan checklist on this.

Children should not have to do any activities that are likely to harm them

45. The children made two specific proposals to add to the checklist for looking at what should be covered on this children’s right in the new plan for Wales.

46. The first was that children should not be made to play full contact rugby in high schools in Wales.

47. The second was that the plan should include developing wireless electrical connections to replace electric sockets. This would be far safer, and such connections could safely be used in risky areas such as bathrooms.

The environment should be protected throughout Wales

48. We added this objective from the Welsh Government's list because, although not mainly to do with children or children's rights, it is very much about the sort of Wales children will live in in the future, and it is also something we know from our past consultations that children are very keenly interested in and concerned about.

49. The pupils made a number of practical proposals to be covered in the plan:

- Habitats needed for nature should be encouraged and developed
- When people pick up their dog's mess, the plan should try to make them put their full poo bags in proper bins nearby, and not hang the bags off trees or on the backs of trailers
- Dogs should not be allowed on school playing fields – ways more effective than just notices should be tried to prevent this (the children saw dog fouling as a major and extremely unpleasant damage to the environment, although they commented that not all fouling is from dogs; some comes from wild animals too)
- Grass in parks and areas used for play and recreation should be kept cut so it does not hide sharp objects that can injure playing children
- Hedges along narrow country roads should be kept cut so cars aren't constantly damaged by them.

50. The last word on this came from a pupil who said the plan's aim should be that "every place should have a clean environment".

51. I am grateful to the Head and staff of [REDACTED] primary school for letting me carry out these discussions with their pupils, to the member of staff who took notes of all the pupils' votes and views, and above all to the pupils themselves who gave their fresh thinking, views and ideas for this report.

[REDACTED]
Pupils 2 Parliament

16th July 2017
