



Llywodraeth Cymru  
Welsh Government

# INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK

Appraisal of Draft National Development Framework:  
ISA Report (incorporating Environmental Report)

JUNE 2019

Incorporating

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This document is also available in Welsh.

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## APPENDICES

### APPENDIX A DRAFT NDF OUTCOMES

### APPENDIX B APPRAISAL OF DRAFT NDF, INCLUDING REASONABLE ALTERNATIVES

## ABBREVIATIONS

AA	Appropriate Assessment
AQMA	Air Quality Management Area
CRIA	Child Rights Impact Assessment
cSAC	Candidate Special Area of Conservation
DNS	Developments of National Significance
EA	Environment Agency
EC	European Council
EU	European Union
EqIA	Equalities Impact Assessment
FPI	Foundation Phase Indicator
GI	Green Infrastructure
GIS	Geographic Information Systems
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
ISA	Integrated Sustainability Appraisal
LDP	Local Development Plan
LSE	Likely Significant Effect
NDF	National Development Framework
NPPF	National Planning Policy Framework
NRP	Natural Resources Policy
NRW	Natural Resources Wales
NTS	Non-Technical Summary
PPW	Planning Policy Wales
pSPA	Potential Special Protection Area
SEA	Strategic Environmental Assessment
SA	Sustainability Appraisal
SMNR	Sustainable Management of Natural Resources

SoNaRR	State of Natural Resources Report
UK	United Kingdom
UNCRC	United Nations Convention on the Rights of the Child
WBFG Act	Well-Being of Future Generations Act (2015)
WHIASU	Welsh Health Impact Assessment Support Unit
WLIA	Welsh Language Impact Assessment

# 1 INTRODUCTION

## 1.1 What is the National Development Framework?

- 1.1.1 The Welsh Government is currently preparing a National Development Framework (NDF) to provide a spatial context for the delivery of development in Wales over the next 20 years. The NDF is an important part of the planning system in Wales. More information on the NDF and the planning system is available on the Welsh Government [website](#). The NDF will influence how communities develop over the next 20 years and it is important that we have a comprehensive understanding of the positive and negative effects this can have as we develop the NDF. To do this we are using an Integrated Sustainability Appraisal (ISA). This integrated approach to the appraisal will ensure that we look at the contribution the NDF can make to Wales' seven national well-being goals and embeds the principle of sustainable development at all stages, as set out in the Well-being of Future Generations (Wales) Act 2015<sup>1</sup>. Section 1.3 provides further explanation of the relationship between the NDF, the ISA and the Well-being of Future Generations Act 2015, including how the seven well-being goals have been integrated into the ISA and how the 'ways of working' (see Table 1-2) have shaped the work to date. It also provides explanation of how the NDF fits with other Welsh Government strategies, including 'Prosperity for All'<sup>2</sup>.
- 1.1.2 The NDF will be used to guide both public and private investment. Welsh Government's aim is to ensure investments and developments – whether large or small in scale - contribute to the broader ambitions of the Welsh Government and to the well-being of communities. A broad range of Government strategies and policies have helped shape the NDF including the Welsh National Marine Plan, the Transport Strategy and Prosperity for All: A Low Carbon Wales. The relationship is two-way, with the NDF taking strategic direction and providing a means of delivery and a framework for maximising the potential outcomes. Welsh Government will lead the way with their own investments, ensuring the Wales Infrastructure Investment Plan and Regional Economic Development Plans deliver development which complements the NDF strategy.
- 1.1.3 The NDF should be read alongside Planning Policy Wales (PPW) and does not repeat PPW, which provides planning policy on an all-Wales basis. The NDF replaces the Wales Spatial Plan.

## 1.2 What is the Integrated Sustainability Appraisal?

- 1.2.1 This is an ISA Report (encompassing the requirements of the statutory Environmental Report under the Strategic Environmental Assessment Directive – see below) accompanying the Draft NDF for consultation (ISA Stage C). The process leading up to consultation on this ISA Report has run parallel with the preparation of the NDF, as presented in Figure 1-1. The ISA process has included assessments of the likely sustainability effects of options being considered for the NDF (including positive and negative effects), carried out at a high-level as a reflection of the strategic nature of the NDF. During this process, the ISA has recommended measures for mitigating or avoiding likely negative sustainability effects and for enhancing likely positive sustainability effects.
- 1.2.2 This assessment is reflective of the requirements of several pieces of legislation, including the European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (The Strategic Environmental Assessment (SEA) Directive)<sup>3</sup>, which was transposed directly into Welsh law through the SEA Regulations<sup>4</sup>. Section 3 of the Planning (Wales)

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<sup>1</sup> <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

<sup>2</sup> Welsh Government, Prosperity for All: the national strategy, September 2017, available: <http://gov.wales/docs/strategies/170919-prosperity-for-all-en.pdf>

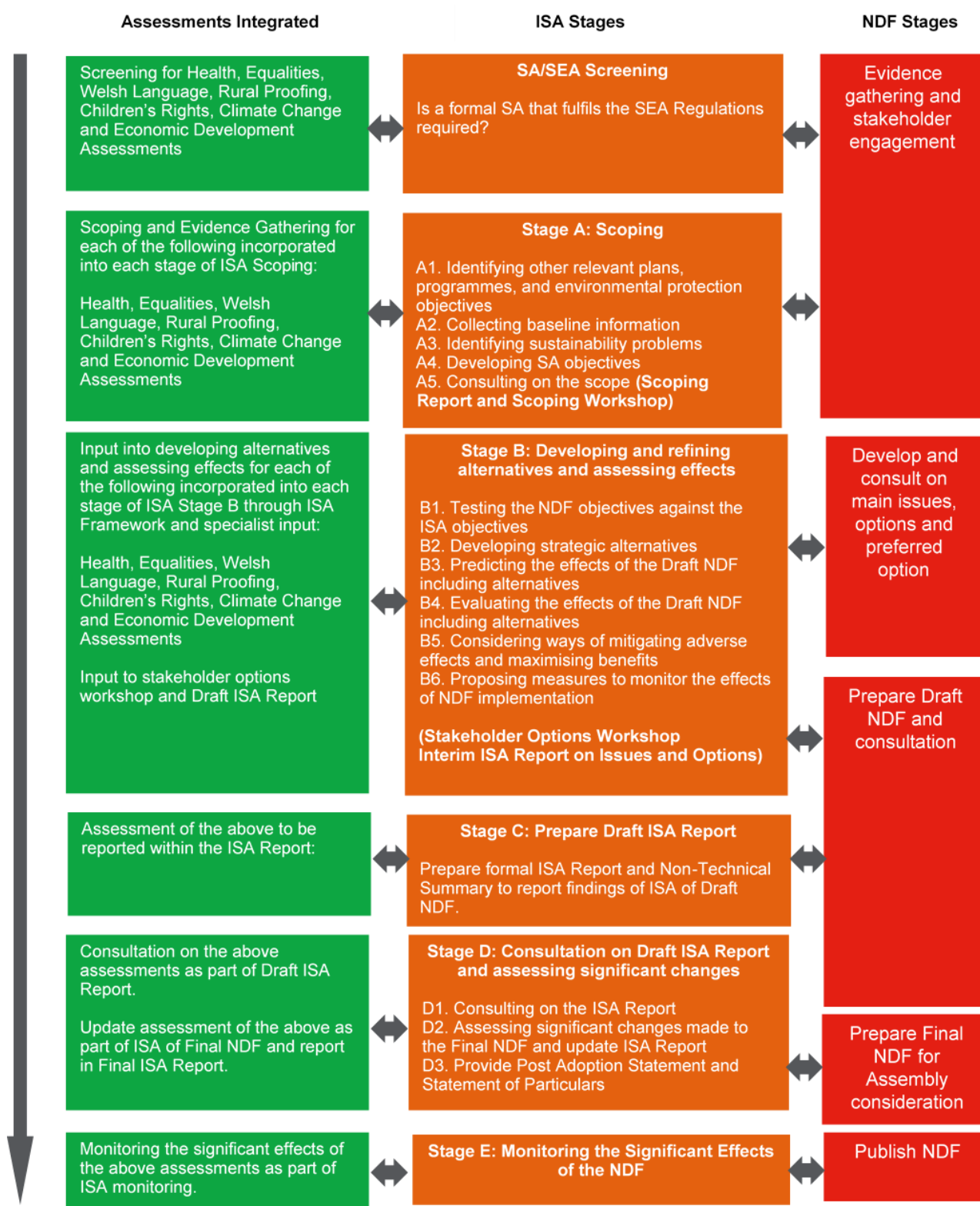
<sup>3</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

<sup>4</sup> Environmental Assessment of Plans and Programmes (Wales) Regulations (SI 2004/1656 (W/170)) and in England, the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633)

Act 2015 amends Part 6 of the Planning and Compulsory Purchase Act 2004 and inserts new Sections 60, 60A, 60B and 60C on the preparation of a NDF for Wales. Section 60B (1) (b) specifically requires the Welsh Government to carry out an appraisal of the sustainability (known as a Sustainability Appraisal (SA)) of the policies in the NDF and this must incorporate the requirements of the SEA Regulations and consideration of impacts on the Welsh language.

- 1.2.3 Sustainability Appraisal (SA) is an assessment of the economic, environmental and social effects of a Plan carried out from the outset of the Plan-making process to ensure that decisions are made that accord with sustainable development principles. SA is a systematic and iterative process that identifies and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these.
- 1.2.4 One of the 'ways of working' (see Table 1-2) that forms part of the sustainable development principle is the need to take an integrated approach to what we do. Given the nature and scope of the NDF we have sought to integrate our approach to the SA and SEA with other statutory and non-statutory assessments. This allows us to take a more rounded view of the sustainability implications and opportunities arising from the NDF. Figure 1-2 presents the additional impact assessments that have been incorporated into the ISA process.
- 1.2.5 The integration of these assessments ensures that a collaborative approach is undertaken on different issues, sharing knowledge and recognising links between topics in a consistent and transparent manner. This provides a robust and thorough mechanism for identifying issues and opportunities, assessing impacts including cumulative and indirect effects, and undertaking monitoring in a holistic manner. Further explanation with regards to how these appraisal processes were 'screened in' to the ISA, as well as how they have been integrated into the ISA Framework of objectives and decision aiding questions, can be found in Chapter 2.

Figure 1-1: Stages in the ISA Process (adapted from ODPM 2005<sup>5</sup>) and NDF Development Stages

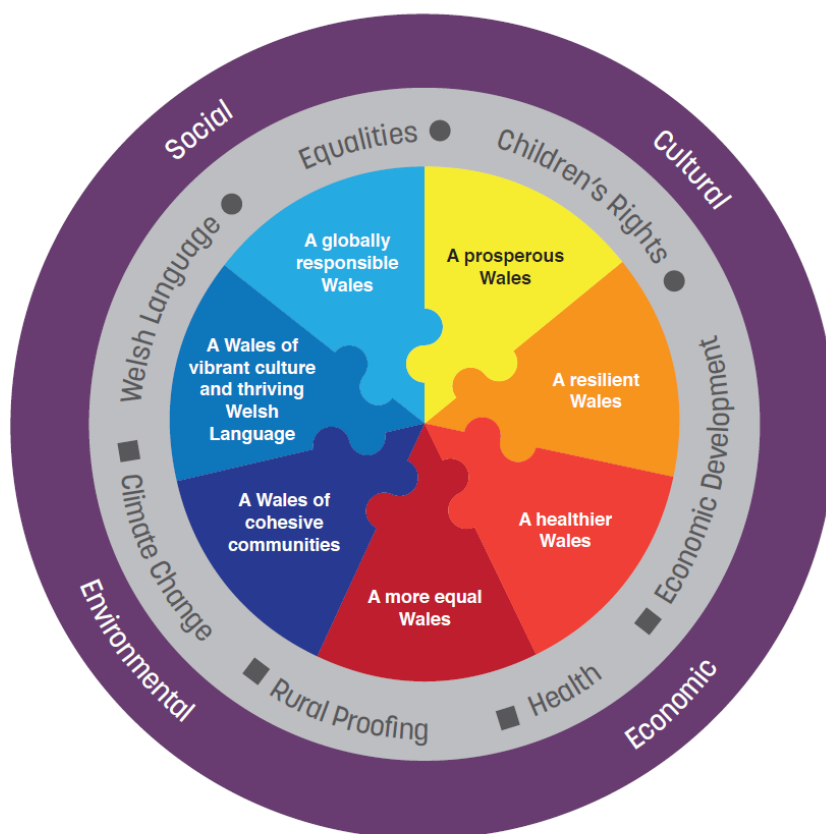


<sup>5</sup> ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"



Figure 1-2: Impact assessments to be integrated alongside SA/SEA

## Integrated Impact Assessments



<b>Key:</b>	Well-being Goals
Government	Integrated Impact Assessments
Statutory	Sustainable Development Components

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## Purpose of this Draft ISA Report

- 1.2.6 This Draft ISA Report represents Stage C of the ISA process (refer to Figure 1-1). As this is not the 'final' ISA Report, we have cross-referred to some previous ISA outputs, which are required for legal compliance, rather than repeating them here. These will be included in the final version of the ISA Report. The stages of the ISA process are reproduced in Figure 1-1. The purpose of this consultation is to explain the iterative assessment process, and how this has shaped the NDF to-date. It presents the potential positive and negative effects of the Draft NDF, to inform the consultation process.

- 1.2.7 It is noted that the scope of the assessment of the NDF is based on the assessment framework of objectives, developed and refined at the ISA Scoping stage<sup>6</sup>. The assessment is high-level, reflecting the national remit of the NDF and its purpose. It is noted that the assessment has taken into account what the NDF could potentially achieve and its national scope. It, therefore, recognises the role and influence of other stakeholders, for example, education providers or health boards, in achieving common goals, albeit outside of the remit of the planning system. The assessment is reflective of the potential for the NDF to guide land-use planning on a national and regional scale and does not seek to provide specific localised design guidance, although its principles will need to be followed in the preparation of lower tier plans, which are required to be in general conformity with the NDF.
- 1.2.8 The assessment of the NDF enables a more transparent and robust decision-making process, enabling the NDF team to develop the plan. The ISA and NDF have been highly iterative processes with regular discussions between the ISA and NDF teams. Recommendations have been made for improvements or alternatives, as appropriate. The collaborative process of working has included meetings and informal review stages to discuss the developing issues. The ISA process has therefore been able to provide the Welsh Government with accurate, robust and transparent information with regards to the sustainability of options (including individually and cumulatively) that has played a major role in the Government's decision-making about what to include in the NDF.

### 1.3 Legislative and non-legislative requirements

- 1.3.1 The ISA incorporates various impact assessments and accounts for the legislative requirements of:
- SA, as required by the Compulsory Purchase Act 2004<sup>7</sup> as amended by Planning (Wales) Act 2015<sup>8</sup>, and as required by Planning Policy Wales 2018 (10<sup>th</sup> edition)<sup>9</sup>;
  - Strategic Environmental Assessment (SEA), as required by Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)<sup>10</sup>, the requirements of which are transposed into Welsh law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regs)<sup>11</sup>;
  - Welsh Language (Wales) Measure 2011 and Standards;
  - Children's Rights Impact Assessment (CRIA), as required by the Rights of Children and Young Persons (Wales) Measure 2011<sup>12</sup>;
  - Equalities Impact Assessment (EqIA), as required by the Equalities Act (2010)<sup>13</sup>;
  - Well-being of Future Generations (WBG) Act (2015)<sup>14</sup>; and
  - Sustainable Management of Natural Resources (SMNR) and the Natural Resources Policy (NRP) as required by the Environment (Wales) Act (2016)<sup>15</sup>.
- 1.3.2 The ISA also accounts for the non-legislative requirements of assessments relating to Rural Proofing; Health Impacts; Climate Change; and Economic Development.
- 1.3.3 A Habitat Regulations Assessment (HRA) has been carried out separately to the ISA. However, outcomes from the HRA process have been factored into the ISA where appropriate.

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<sup>6</sup> ISA Scoping report is available online at: <https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework> [Accessed 29.05.19]

<sup>7</sup> Available online at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed 10.04.19]

<sup>8</sup> Available online at: <http://www.legislation.gov.uk/anaw/2015/4/contents/enacted> [Accessed 10.04.19]

<sup>9</sup> Available online at: <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf> [Accessed 10.04.19]

<sup>10</sup> Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 10.04.19]

<sup>11</sup> Available online at: <http://www.legislation.gov.uk/wsi/2004/1656/contents/made> [Accessed 06.06.19]

<sup>12</sup> Available online at: <http://www.legislation.gov.uk/mwa/2011/2/contents> [Accessed 10.04.19]

<sup>13</sup> Available online at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 10.04.19];

<sup>14</sup> Available online at: <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted> [Accessed 10.04.19]

<sup>15</sup> Available online at: [http://www.legislation.gov.uk/anaw/2016/3/pdfs/anaw\\_20160003\\_en.pdf](http://www.legislation.gov.uk/anaw/2016/3/pdfs/anaw_20160003_en.pdf) [Accessed 10.04.19]

## Well-Being of Future Generations (Wales) Act

- 1.3.4 The Well-being of Future Generations (Wales) Act 2015 (WBFG Act) seeks to directly place Wales on a sustainable path to improving our well-being. The WBFG Act requires that public bodies carry out sustainable development which is defined as:

***“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.”***

- 1.3.5 The Planning (Wales) Act 2015 Section 2 sets out the definition of sustainable development for the planning system and directly refers to the definition in the WBFG Act.

- 1.3.6 Sustainable development is the process of improving well-being. It acknowledges that there are many things that determine a person’s quality of life (their well-being), and that these all can broadly be categorised as environmental, economic, social and cultural factors. These are captured in the well-being goals. This means that improving the quality of our environment, our economy, society and culture can improve the well-being of individuals and that of Wales as a whole. Rather than an end in itself, sustainable development is a way of doing things and the Act guides how public bodies should operate to achieve it.

- 1.3.7 The WBFG Act sets out seven well-being goals over the 20-year period, which the NDF will play an important role in contributing towards (see Table 1-1). These well-being goals are indivisible from each other and explain what is meant by the well-being of Wales. The well-being goals have been integral to the preparation of the Scoping Report and the ISA Framework (Table 1-5). The well-being goals have also been used to inform the review of the evidence, identify issues and structure the assessment Framework. The sustainable development principle defined by the Act is a fundamental part of how public bodies – including the Welsh Government – must now operate. We must act 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, by taking account of the sustainable development principle. The principle is made up of five ‘ways of working’ that public bodies are required to apply in order to maximise the contribution towards sustainable development. What these are, and how the ISA has adopted these ways of working to-date (through reference to the previous ISA reports and actions), is presented in Table 1-2.

Table 1-1: The seven Well-being Goals of the WBFG Act (2015)

Well-being Goal	Description
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.
A resilient Wales	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).
A healthier Wales	A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities.

Well-being Goal	Description
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being

*Table 1-2: Ways of Working and the ISA*

Looking to the long term	
ISA Interim Report, April 2018	The Interim Report sets out how the NDF Preferred Option and Objectives have been developed. The assessment of these against the ISA framework highlighted the more and less sustainable options over the 20-year plan period including aspects which are short, medium and long term. The Preferred Option and NDF objectives have been shaped by the outcomes of these assessments.
Draft ISA Report, 2019	This Draft NDF ISA Report provides an appraisal of all policies in the NDF and predicts and evaluates the impact of them on each SA Objective in the short, medium and long terms. For each Objective, the future trends of each Objective are also identified in terms of whether in the absence of the NDF the baseline is improving, declining or not changing. Appraisal results have been provided to the Plan-making team at early stages in order to inform the development of the NDF.
Taking an integrated approach	
ISA Interim Report, April 2018	<p>The Interim Report sets out the findings of the assessment of the NDF options and objectives as they have been developed against the ISA Framework. The framework enables an integrated approach to be taken to the assessment highlighting synergies or conflicts between proposals which have helped to shape the Preferred Option and the final set of NDF objectives. The Interim Report also includes a compatibility assessment of the NDF objectives to ensure any conflicts or opportunities are highlighted at this early stage.</p> <p>The cross-government approach has continued with the ISA working group reviewing and providing technical comments on the assessment.</p>
Draft ISA Report, 2019	This Draft NDF ISA Report sets out the findings of the assessment of the draft NDF outcomes, strategy and policies and their alternatives as they have been developed against the ISA Framework. The framework enables an integrated approach to be taken to the assessment highlighting synergies or conflicts between proposals which have helped to shape the draft plan. The Plans, policies and programme (PPP) review and update identifies any synergies and conflicts with other PPPs that may impact on the NDF.
Involving people	
ISA Interim Report, April 2018	The Interim Report, although not required through a statutory process, enables the story to be told of how the Preferred Option and Objectives have been developed, aiding understanding of the choices made which will assist the consultation process. The Interim Report was also subject to consultation alongside the NDF Issues, Options and Preferred Option Consultation Report and various engagement events were held to capture a range of views that were fed into the next stage of the NDF process.
Draft ISA Report, 2019	This Draft NDF ISA report will be consulted on with the general public, statutory bodies and other relevant stakeholders. This helps to ensure that the ISA and NDF takes into consideration the interests of a diverse range of people reflective of Wales.

Collaborating with others	
ISA Interim Report, April 2018	The Interim Report set out the findings of appraisals that were the result of a collaborative effort to prepare the ISA Framework. During the process of preparing the Interim Report, collaborative events including a workshop with the NDF team to discuss the developing issues, frequent meetings and informal review stages were held.
Draft ISA Report, 2019	This Draft NDF ISA Report further sets out the findings of appraisals that were the result of a collaborative effort to prepare the ISA Framework. Further collaborative efforts between the ISA team, the NDF team and other relevant people through meetings and discussions have been a consistent and recurring element of the process.
Prevention	
ISA Interim Report, April 2018	The interim report presents the various stages and drafts produced to get to the Preferred Option and final objectives. The assessment sets out recommendations for improvements including addressing negative scores and maximising positive scores to ensure the Preferred Option is as sustainable as possible. This report is also subject to consultation to ensure all issues and opportunities are identified at this early stage in the development of the NDF.
Draft ISA Report, 2019	This Draft NDF ISA Report presents the appraisal findings for all options, and their reasonable alternatives, being considered for inclusion in the NDF. This has enabled the Plan-making authority to select or modify options in order to avoid potentially negative impacts.

## Strategic Environmental Assessment

- 1.3.8 SEA, as required by the SEA Directive and the SEA Regulations (see Section 1.3.1), is a structured and systematic decision support process designed to help ensure that environmental aspects are considered effectively during Plan-making. The process is defined by set stages and tasks to be completed in order to satisfy the requirements of the SEA Directive. Table 1-3 sets out where these various requirements have been satisfied in this ISA Report that has accompanied the preparation of the Draft NDF.

Table 1-3: Requirements for an SEA Environmental Report and where these have been completed

Question	Yes/No/Where
Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) Annex I - Information referred to in Article 5(1)	
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Yes. ISA Scoping Report & Section 2.1 of this report
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Yes. ISA Scoping Report & Section 2.3 of this report
(c) the environmental characteristics of areas likely to be significantly affected;	Yes. ISA Scoping Report & Section 2.3 of this report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Yes. ISA Scoping Report & Section 2.3 of this report
(e) the environmental protection objectives, established at international, Community or Member	Yes. ISA Scoping

Question	Yes/No/Where
State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Report & Section 1.3 of this report
(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Yes. Summarised in Section 2.6 and detailed in Appendices A & B of this report.
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Yes. Summarised in Table 2-8 and detailed in Appendices A & B of this report.
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Yes. Section 2.5 of this Report.
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Yes. Section 2.6 and Table 2-9 of this Report.
(j) a non-technical summary of the information provided under the above headings.	Yes. At the front of this report.

## Environment (Wales) Act

- 1.3.9 The Environment (Wales) Act 2016 introduces the Sustainable Management of Natural Resources (SMNR) and sets out a framework to achieve this as part of decision-making. The objective of the SMNR is *'using natural resources in a way and at a rate that... maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their needs and contribute to the achievement of the well-being goals.'* Planning Policy Wales translates the principles of SMNR into use for the planning system.
- 1.3.10 The requirements of the Environment Act including the priorities identified by the Natural Resource Policy (NRP) have been included in the ISA framework and will inform the development of the NDF. These have a focus on Welsh natural resources, with SoNaRR<sup>16</sup> providing an assessment of the sustainable management of natural resources and the NRP seeking to set out the national priorities in relation to the sustainable management of natural resources in Wales.
- 1.3.11 The NDF through addressing social, economic, environmental and cultural issues and opportunities takes an all-embracing approach to sustainable development where decisions on short- and long-term needs and cost and benefits come together. The ISA helps to secure these outcomes through identifying where multiple benefits can be provided as part of the plan and avoiding or minimising negative impacts.
- 1.3.12 The key features of the SMNR approach to which the planning system can contribute are:
- Improving the resilience of ecosystems and ecological networks;

<sup>16</sup> Available online at: <https://naturalresources.wales/evidence-and-data/research-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en> [Accessed 29.05.19]



- Maintaining and enhancing biodiversity;
- Maintaining and enhancing green infrastructure based on seeking multiple ecosystem benefits and solutions;
- Ensuring resilient locational choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability;
- Taking actions to move towards a more circular economy in Wales; and
- Facilitating the move towards decarbonisation of the economy.

1.3.13 It is recognised how the translation of SMNR into the planning system is an integral part of the essential components of sustainable places, through encouraging approaches based on identifying and securing outcomes which deliver multiple ecosystem benefits. The NDF looks to address these key features and the ISA sets out how this is achieved.

## Equalities

1.3.14 The screening work concluded that the NDF will have a potential impact on equalities and human rights. The nine protected characteristic groups as identified in the Equalities Act 2010 have been screened and the following groups have been screened in for further consideration in the assessment process—race, age, pregnancy and maternity, disability and sex. These protected characteristics have been incorporated in the objectives and decision aiding questions within the ISA Framework. For those protected characteristic groups screened out (gender reassignment, marriage and civil partnership, religion and belief and sexual orientation) it was considered at this stage they would not be affected by the NDF. The Statement of Public Participation (SPP) outlines the details of the consultation on the NDF and the approach to engagement. Protected characteristic groups will continue to be engaged to ensure their voices are heard in the development of the NDF.

1.3.15 The ISA Framework and associated decision aiding questions ensure that the duties within the Equalities Act are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on protected characteristic groups. This includes advancing and promoting equality of opportunity and good relations and wider community cohesion and seeking to create the conditions which assist in eliminating unlawful discrimination, harassment or victimisation through land use planning initiatives.

1.3.16 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on protected characteristic groups where appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.17 Under the equality duty (set out in Section 149 of the Equality Act 2010), many public authorities, including the Welsh Government must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

1.3.18 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Equalities	1, 2, 3, 4, 10, 11 and 12

## Welsh Language

1.3.19 The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:

- What effect, if any, the NDF would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
- How the NDF could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and
- How the NDF could be developed so that it doesn't have or reduces any negative effects which the policy decision would have on opportunities for other persons to use the Welsh language or treating the Welsh language no less favourably than the English language.

1.3.20 Sections 60B (1) (b) and 60B (2) of the Planning and Compulsory Purchase Act 2004 requires the Welsh Government to carry out an appraisal of the sustainability of the policies in the NDF; this must include an assessment of the likely effects on the use of the Welsh language.

1.3.21 The screening work concluded that the NDF will have a potential impact on the Welsh language. Objectives encompassing Welsh language have therefore been incorporated into the ISA Framework. This will ensure opportunities to promote the Welsh language; facilitate its use; to safeguard its future; and see the language thrive, are considered and identified where possible through this work. The Welsh Government has a statutory obligation to fully consider the effects of its work on the Welsh language. The development of all policies, projects, research, legislation, grants, and services must be accompanied by appropriate consideration to the Welsh language, Welsh speaking people and communities.

1.3.22 The Welsh Government must seek opportunities to promote the Welsh language and facilitate its use to safeguard its future and see the language thrive. A Welsh Language Impact Assessment (WLIA) is the process undertaken to ensure these duties are fulfilled. The NDF, as a long-term development plan for Wales, will contain policies and proposals with the potential to impact on the Welsh language, therefore a full WLIA will be required.

1.3.23 The ISA Framework and associated decision aiding questions ensure that impacts on the Welsh language are addressed as the NDF is assessed, this will recognise direct and indirect impacts. Appendix B sets out this detailed assessment of the Draft NDF and highlights impacts where appropriate. Due to the nature and scale of the Draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.24 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Welsh Language	3, 4 and 5

## Children's Rights Impact Assessment

1.3.25 The duty placed on Welsh Ministers is to have due regard to the United Nations Convention on the Rights of the Child (UNCRC) when exercising any of their functions. The children's rights impact assessment is a tool that helps to demonstrate how the legal requirement is met by the Welsh Ministers.

1.3.26 The scoping work concluded that the NDF will have a potential impact on children's rights. The Articles within the UNCRC have been reviewed and the following articles have been identified as the most relevant at this stage – 6, 12, 23, 24, 27, 28, 31 and 36. For these Articles and the 2016



recommendations made by the United Nations Committee on the Rights of the Child, the ISA Framework incorporates objectives covering these areas. The Statement of Public Participation (SPP) outlines the details of the consultation on the NDF and the approach to engagement. Children and young people will continue to be engaged to ensure their voices are heard in the development of the NDF.

- 1.3.27 The ISA Framework and associated decision aiding questions ensure that the relevant articles within the UNCRC are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on children and young people. It will help to ensure that the NDF positively affects children through, for instance, access to education, creating opportunities within which age inequality may be reduced, creating opportunities to ensure children can relax and play and join in a wide range of activities and creating opportunities for the built environment to be designed in a way that is accessible for all.
- 1.3.28 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on children and young people where appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

- 1.3.29 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Children's Rights	1, 2, 3, 10, 11 and 12

## Habitats Regulations Assessment

- 1.3.30 The European Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant effect upon a Natura 2000 site (Special Areas of Conservation (SAC), candidate Special Areas of Conservation (cSAC), Special Protection Areas (SPA)), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The Directive was transposed into UK law via the Habitats Regulations. The overarching process is referred to as Habitats Regulations Assessment (HRA). Potential Special Protection Areas (pSPA) and Ramsar sites are also included as Natura 2000 sites for the purposes of HRA in government policy, but this is not covered within the law.
- 1.3.31 This ISA report does not satisfy the requirements of HRA. The HRA is a separate process, with reports publicly available. Appraisals carried out in the ISA are informed by outcomes of the HRA. For example, where the HRA identifies a likely significant effect on a Natura 2000 site, this effect is included in the ISA appraisal results (ISA Objective 16). See Section 1.5 for further information regarding the HRA of the NDF.

## Non-Legislative Impact Assessments

### Rural Proofing

- 1.3.32 The screening work concluded that the NDF will have a potential 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. The ISA Framework and associated decision aiding questions ensure that impacts on rural communities, business etc. are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on these areas. It will help to ensure any potential impact on rural areas and communities are addressed.

1.3.33 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on rural areas as appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.34 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Rural Proofing	2, 3, 4, 5, 10, 11, 12, 13, 16 and 17

## Climate Change

1.3.35 The screening work concluded that the NDF will have a potential impact on climate change. Objectives encompassing climate change have been incorporated into the ISA Framework to ensure the causes and consequences of climate change are considered and identified where possible through this work.

1.3.36 The ISA Framework and associated decision aiding questions ensure that impacts on climate change, including adaptation, mitigation and resilience are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on these areas.

1.3.37 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on climate change as appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.38 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Climate Change	2, 3, 4, 6, 7, 8, 9, 10, 13, 16 and 17

## Health

1.3.39 The screening work concluded that the NDF could have an impact on health. The assessment of health has been based on the broad, participatory and inclusive methodology as advocated in Wales and described in 'HIA: A Practical Guide' (WHIASU, 2012) and has used the wider determinants of health as a framework for discussion. The ISA Framework encompasses health objectives that reflect the Public Health Wales indicators.

1.3.40 The ISA Framework and associated decision aiding questions ensure that impacts on health, including well-being, physical and mental health and wider determinants of health are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on these areas.

1.3.41 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on health and well-being as appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

#### 1.3.42 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Health	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13,14, 15, 16 and 17

### Economic Development

1.3.43 The screening work concluded that the NDF will have a potential impact on the economy. Economic objectives have been incorporated into the ISA Framework to ensure issues and opportunities are considered and identified where possible through this work.

1.3.44 The ISA Framework and associated decision aiding questions ensure that impacts on economic development, including increasing employment opportunities, promoting economic inclusion and sustainable economic growth, diversity and competitiveness as well as third sector opportunities are addressed as the NDF is assessed, this will recognise direct and indirect impacts the planning system can have on these areas.

1.3.45 Appendix B sets out this detailed assessment of the draft NDF and highlights impacts both positive and negative on economic development as appropriate. Due to the nature and scale of the draft NDF there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

#### 1.3.46 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Economic Development	1, 3, 4, 6 and 17

## 1.4 The ISA and NDF processes so far

1.4.1 The ISA Process has followed that set out in Figure 1.1. The process can be seen as accounting for Stages A to Stage E.

### Evidence Gathering, ISA Scoping and Stakeholder Engagement

1.4.2 The NDF preparation commenced with a process of evidence gathering and stakeholder engagement. This was initiated in winter 2016/17 with a call for evidence for the NDF including a call for projects. This was followed by a series of engagement events held at four locations nationally to help identify key spatial issues for the NDF. In parallel to this, the NDF was screened to determine if a formal SEA was required. The requirement was confirmed, and this formed the basis on which the ISA was developed.

1.4.3 In Spring 2017, further work was undertaken to identify issues for the NDF following the engagement events. At this stage initial ideas were developed for the potential NDF objectives and strategic options.

1.4.4 Stage A of the ISA (Scoping) also commenced at this time which included further evidence gathering and analysis of sustainability issues and opportunities which dovetailed into the NDF evidence. The draft Scoping Report for the ISA of the NDF was one of the first stages in engagement and collaboration for the NDF. Consultation on the draft Scoping Report was undertaken between 28 April and 21 July 2017. In addition, a workshop was held early May 2017 with stakeholders who represent the range of assessment processes to be integrated into the ISA. The ISA Scoping Report was issued to Natural Resources Wales and Cadw for comment. It was also sent to transboundary

statutory consultees, notably the Environment Agency, Natural England and Historic England, for their comments; as well as wider stakeholders such as the Royal Society for the Protection of Birds (RSPB).

- 1.4.5 This work constituted Stage A, 'Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope', of Figure 1.1. This included the following five tasks:
- A1: Identifying other relevant policies, plans and programmes and ISA objectives;
  - A2: Collecting baseline information;
  - A3: Identifying sustainability issues and problems;
  - A4: Developing the ISA Framework; and
  - A5: Consulting on the scope of ISA.
- 1.4.6 The Final Scoping Report (April 2018)<sup>17</sup> represents the initial stage of the ISA. It follows an integrated approach which has been shaped through engagement and involvement of stakeholders and follows the methodology set out in the published guidance<sup>18</sup> seeking to:
- Set the scope and level of detail of the ISA;
  - Identify relevant plans, policies, programmes and initiatives that will inform the ISA process and the NDF;
  - Identify relevant information about existing and predicted future social, economic, cultural and environmental conditions in Wales at a national scale;
  - Identify key sustainability issues and opportunities; and
  - Present a framework for the ISA, against which the NDF can be appraised.
- 1.4.7 Responses to the comments received, and how they have influenced the revisions to the ISA, are set out in the consultation report which is available [here](#)<sup>19</sup>.

## Objectives and Options Development, Further Engagement, ISA and HRA Screening

- 1.4.8 Drawing upon the consultation feedback, work began in Summer/Autumn 2017 on further developing outline NDF Objectives and Strategic Options. This used all work that had been undertaken to-date including, for example, the evidence base, the engagement event and consultation records and the emerging ISA and HRA. An initial, high-level, HRA Screening was also undertaken at this time<sup>20</sup>. The objectives and options were then used as part of the pre-event pack for the upcoming engagement on emerging objectives and options. The engagement events took place in October 2017 and the results were recorded.
- 1.4.9 In November 2017 the initial objectives and options were subject to ISA and the results of this were fed back to the NDF team to influence their further development. The next iteration of objectives and options were then further subject to ISA and Preliminary HRA Screening in winter 2017/18. These findings were documented in an Interim ISA Report<sup>21</sup> that accompanied consultation on the Issues

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<sup>17</sup> ISA Scoping report is available online at: <https://gweddiill.gov.wales/topics/planning/national-development-framework-for-wales/integrated-sustainability-appraisal-for-the-ndf/integrated-sustainability-appraisal-scoping-report-for-the-national-development-framework/?lang=en> [Accessed 17.06.19]

<sup>18</sup> ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

<sup>19</sup> <https://beta.gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework>

<sup>20</sup> Preliminary HRA Screening Report available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-preliminary-hra-screening-report.pdf> [Accessed 290519]

<sup>21</sup> Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]

and Options version<sup>22</sup> of the NDF between 30 April 2018 and 23 July 2018. The ISA was further refined and amended in light of the consultation responses received.

1.4.10 This work constituted Stage B, ‘Developing and Defining Options’, of Figure 1-1. This included the following six tasks, the results of which are set out in detail in Appendices A and B with a proposed monitoring framework set out in Chapter 2:

- B1: Testing the plan objectives against the SA objectives;
- B2: Developing the plan options;
- B3: Predicting the effects (including cumulative and secondary effects) of plan options and alternatives;
- B4: Evaluating the effects (including cumulative and secondary effects) of plan options and alternatives;
- B5: Considering ways of mitigating negative effects and maximising beneficial effects; and
- B6: Proposing measures to monitor the significant effects of the plan’s implementation.

1.4.11 This Draft ISA Report also completes certain tasks of Stage B for the purpose of refining and defining policy options (see Appendices A and B). The structure of this report has been consulted upon with the wider consultees, as part of the iterative process of drafting.

## Draft NDF

1.4.12 Based on the above, the Draft NDF has been produced in accordance with the five ways of working required by the Well-being of Future Generations Act. It has been a staged approach based on developing a series of realistic options and refining them to a preferred option, before moving on to a full draft plan. This work has been strongly influenced by public and stakeholder involvement and a cross-Government collaborative approach (see Chapter 2).

1.4.13 The purpose of this document is to provide a formal Draft ISA Report that includes a Non-Technical Summary (NTS) and which satisfies the requirements of an ‘Environmental Report’ as required by the SEA Directive. This Report constitutes Stage C (see Figure 1-1) and documents the outcomes of Stages A and B whilst providing further iterations of tasks under Stage B.

## Other Reports

1.4.14 The ISA Reports that have been prepared so far, and where they can be accessed, are set out in Table 1-4.

*Table 1-4: Existing ISA Reports and where to find them*

Existing ISA Reports	Where to find them
Integrated Sustainability Appraisal of the National Development Framework Scoping Report April 2017, Arcadis	Available online at: <a href="https://gov.wales/sites/default/files/consultations/2018-01/consultation_document-en.pdf">https://gov.wales/sites/default/files/consultations/2018-01/consultation_document-en.pdf</a> [Accessed 10.04.19]
Integrated Sustainability Appraisal of the National Development Framework Appraisal of Alternative and Preferred Options: ISA Interim Report	Available online at: <a href="https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf">https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf</a> [Accessed 10.04.19]

<sup>22</sup> NDF Issues and Options consultation, available online at: <https://gov.wales/national-development-framework-issues-options-and-preferred-option> [Accessed 29/05/19]

Existing ISA Reports	Where to find them
April 2018, Arcadis	

## 1.5 Summary of Habitats Regulations Assessment To-Date

- 1.5.1 A consideration of the likelihood of significant effects (also known as HRA screening) was undertaken to determine if the NDF (either in isolation and/or in combination with other plans or projects) would generate a negative impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. The results of the HRA Screening have been integrated into the ISA where appropriate (within the assessment of ISA Objective 16), as part of an iterative process. The designations of relevance to the HRA are presented in Figure 1 (Appendix B) Designated Nature Conservation Sites, of the ISA Scoping Report<sup>23</sup>.
- 1.5.2 The Preliminary HRA Screening Report (April 2018)<sup>24</sup> was consulted upon alongside the Interim ISA Report and the NDF Issues, Options and Preferred Option. The document provided a preliminary screening of the potential impacts as a result of the types of policy/likely types of development that could occur as a result of the NDF Preferred Option. In some instances, it was possible to screen out an objective/sub-objective from further assessment. However, in most cases, the potential for a likely significant effect could not be easily determined at that stage and further HRA screening was required of the policies and proposals of the Draft NDF.
- 1.5.3 The HRA process has been as follows:
- Evidence Gathering: A Rules of Thumb document (Appendix A of the June 2019 HRA Report) provided advice to Welsh Government with regards to the requirements of the HRA and how this should influence initial drafting of the NDF. It was a guide to assist in development of objectives, policy and strategic locations;
  - Issues and Options: Review of objectives and the Issues and Options document providing verbal feedback to Welsh Government (no formal reporting);
  - Draft Preferred Option: Preliminary HRA Screening Report (April 2018) – provided a high-level review of the draft NDF Preferred Option and recommendations to inform the on-going NDF policy development;
  - This stage: Draft NDF: HRA Report for the Draft NDF (June 2019) - incorporating the in-combination assessment, together with the Screening assessment and an Appropriate Assessment of the draft policies; and
  - Next stage: Final NDF: Final HRA Report following consultation period to take account of any updates made to the NDF for final publication and adoption.

## 1.6 How the ISA has been undertaken

### Geographical Scope

- 1.6.1 The geographical scope of the ISA has been driven by the geographical scope of the NDF i.e. the whole of Wales and up to the mean low-water spring tide. The Welsh National Marine Plan sets the policy context from the mean high-water spring tide. The relationship between marine plans and

<sup>23</sup> Figure 1: Designated nature conservation sites, <https://gweddiill.gov.wales/topics/planning/national-development-framework-for-wales/integrated-sustainability-appraisal-for-the-ndf/integrated-sustainability-appraisal-scoping-report-for-the-national-development-framework/?skip=1&lang=en> [accessed 17.06.19]

<sup>24</sup> Assessment of Preferred Spatial Option: Preliminary HRA Screening Report <https://gov.wales/sites/default/files/consultations/2018-04/180430-preliminary-hra-screening-report.pdf> [accessed 17.06.19]



land-use planning under the Marine Act<sup>25</sup>, sees a shared overlap in the intertidal zone. The geographical scale of particular baseline issues means that they will relate closely to neighbouring England and potentially Ireland as well as with the marine environment. This also means that both terrestrial and marine effects are possible and will need to be considered.

## Temporal Scope of the ISA

- 1.6.2 The NDF is intended to apply until 2040 following publication in 2020. This timescale has been reflected in the ISA. If there are likely to be any sustainability effects of the NDF that would last longer than this, these have also been considered.

## ISA Framework

- 1.6.3 A key output of the ISA Scoping Stage was the ISA Framework. Whilst the SEA Directive does not require the use of sustainability objectives, they are a recognised tool for undertaking ISA. The ISA Framework (Table 1-5) is the main assessment tool used during the ISA and comprises a series of 17 Objectives covering social, economic, cultural and environmental issues. These Objectives have been used to test the sustainability performance of the NDF. Each Objective links to the baseline information; key sustainability issues and opportunities in Wales; and other plans, programmes and strategies relevant to the NDF. These were established during the Scoping stage and subsequently form the basis of the assessment. An update to the PPP Review was undertaken as part of this stage of the ISA. However, no updates to the ISA Framework were required. As the baseline was largely based on Natural Resources Wales SoNaRR, the baseline has not been updated at this stage. The ISA Framework also incorporates the requirements of the other integrated assessments.
- 1.6.4 Annex 1(f) of the SEA Directive lists the following twelve topics that require consideration in any SEA, as well as the interrelationship between these topics.

### SEA Directive (Annex 1) Requirements for environmental problems and topics to be considered during SEA

Information to be provided in SEA includes:

*“(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;*

...

*(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;...”*

- 1.6.5 The topics listed in Annex 1(f) were carried through into the ISA Objectives set out in the ISA Framework (see Table 1-6). In some cases, several topics are incorporated into one ISA Objective, such as the topics of biodiversity, fauna and flora being incorporated into ISA Objective 16 ‘To create opportunities for the conservation and enhancement of biodiversity and geodiversity’. In other cases, ISA Objectives are more focussed on one particular SEA topic, such as ISA Objective 8 ‘To create opportunities to encourage the protection and improvement of air quality’, which is focussed on the topic of air. The topic of ‘material assets’ is varied and is considered to comprise all natural and built assets in Wales, such as transport infrastructure, built infrastructure and buildings. The varied elements of material assets come through in nearly all ISA Objectives. Where Annex 1(f) requires the ‘interrelationship between the above factors’, this is brought out in the cumulative and synergistic effects assessment in Chapter 2 as well as more generally in all assessments, such as where assessments identify the potential impacts of development on air quality and the implications of this

<sup>25</sup> The Marine and Coast Access Act 2019 (the Marine Act) <http://www.legislation.gov.uk/ukpga/2009/23/contents> (accessed 17.06.19)

for human health or biodiversity (e.g. new development could lead to an increase in road traffic, which could worsen air quality, and this could have a potential adverse effect on human health and any nearby habitats sensitive to atmospheric nitrogen deposition).

- 1.6.6 The ISA Objectives go beyond the SEA topics to also factor in social and economic elements that are not a focus of the SEA Directive but are a key element of SA and other impact assessments, such as Welsh language.
- 1.6.7 The intention of the ISA is to enable the principles of sustainable development to be embedded into the NDF from the outset. The appraisal framework of objectives and decision aiding questions has been designed to embed the principles of sustainable development, in the context of what the NDF could potentially achieve. Each stage of the ISA has been undertaken using an iterative process, with feedback and communication between the NDF and ISA teams. This process enables the NDF to take a more sustainable direction in its development.
- 1.6.8 The basic principles of the approach to the appraisal are outlined in the Scoping Report (section 5.1) and are reflective of the requirements in the SEA Practical Guide (see footnote 5 in section 1.3). In summary, the appraisal would be primarily qualitative and undertaken by professional SA practitioners.
- 1.6.9 It is noted that the approach is reflective of the requirements of the SEA Regulations. Section 2.2 of the ISA Scoping Report provides detail of the statutory requirements for Equalities Impact Assessment; Welsh Language Impact Assessment; and Children's Rights Impact Assessment. The Welsh Government requirements for Health Impact Assessment; and assessments relating to Rural Proofing; Climate Change; and Economic Development, are also summarised.



Table 1-5: ISA Framework

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	<ul style="list-style-type: none"> <li>• Encourage and support an increase in levels of participation and attainment in education for all members of society?</li> <li>• Encourage and support an improvement in access to lifelong learning opportunities?</li> <li>• Encourage and support an improvement in the provision of education and training facilities through land use planning initiatives?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A healthier Wales  A more equal Wales  A Wales of cohesive communities  A Wales of vibrant culture and thriving Welsh Language</p>
2. To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	<ul style="list-style-type: none"> <li>• Contribute towards an improvement in access to health and social care services especially in isolated/rural areas?</li> <li>• Contribute towards a reduction in health inequalities amongst different groups in the community including specifically children and older people?</li> <li>• Contribute towards healthy lifestyles and promote well-being including walking and cycling, through land use planning initiatives?</li> <li>• Contribute towards a reduction in levels of child poverty and fuel poverty?</li> <li>• Contribute towards improving access to natural green space, wildlife, open space including opportunities for play, leisure and recreation?</li> <li>• Contribute towards an increase in green infrastructure?</li> <li>• Create opportunities for communities to adapt to the risks to health from climate change?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A healthier Wales  A more equal Wales  A Wales of cohesive communities</p>
3. To create opportunities for an increase in employment across the country and promote economic inclusion	<ul style="list-style-type: none"> <li>• Create opportunities to increase employment across all working age ranges?</li> <li>• Create opportunities to improve physical access to jobs through land use planning initiatives?</li> <li>• Create opportunities for an increase in the number of people who are satisfied with their job?</li> <li>• Create opportunities for new investment and growth in the number of skilled workers?</li> <li>• Support opportunities for the development of city regions?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A more equal Wales  A Wales of cohesive communities  A globally responsible Wales</p>

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
4. To create opportunities for sustainable economic growth, diversity and business competitiveness	<ul style="list-style-type: none"> <li>• Create opportunities for sustainable economic growth?</li> <li>• Create opportunities for diversification within the economy and encourage new business formation and inward investment?</li> <li>• Create opportunities for businesses who are innovation-active<sup>26</sup>?</li> <li>• Create opportunities for and promote sustainable tourism, sensitively capitalising on environmental, cultural, heritage and leisure assets?</li> <li>• Create opportunities for enhancements to the rural economy and rural diversification (including agriculture, forestry, SMEs, micro businesses and the development of digital connectivity)?</li> <li>• Create opportunities to maintain and encourage third sector activities?</li> <li>• Create opportunities for businesses and infrastructure to become more resilient when facing the risks from climate change?</li> <li>• Help deliver physical infrastructure to support sustainable economic growth, including digital infrastructure and sustainable travel infrastructure?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A more equal Wales  A Wales of vibrant culture and thriving Welsh Language  A globally responsible Wales</p>
5. To contribute towards the future well-being of the Welsh Language	<ul style="list-style-type: none"> <li>• Encourage an increase in the number of Welsh language speakers across Wales?</li> <li>• Encourage an increase in the proportion of Welsh language speakers who are fluent across Wales?</li> <li>• Encourage an increase in the number of people who speak Welsh daily and who can speak more than just a few words of Welsh?</li> </ul>	<p>A 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>
6. To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	<ul style="list-style-type: none"> <li>• Create opportunities to reduce greenhouse gas emissions from existing and new development?</li> <li>• Create opportunities to reduce greenhouse gas emissions from power generation, heavy industries and transport?</li> <li>• Create opportunities whereby sustainable design is required to be an integral part of new development?</li> <li>• Create opportunities to reduce the demand for energy and increase energy efficiency?</li> <li>• Create opportunities to increase the potential for the generation of low and zero carbon energy sources?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A healthier Wales  A more equal Wales  A Wales of cohesive communities  A globally responsible Wales</p>

<sup>26</sup> As defined in the DBEIS community innovation survey

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
7. To contribute to the reduction and management of flood risk	<ul style="list-style-type: none"> <li>Contribute to the reduction and management and promote awareness of flood risk?</li> <li>Encourage all new development to be climate change resilient?</li> <li>Promote the benefits of green infrastructure, which can include sustainable flood risk management?</li> <li>Create opportunities for communities in existing flood risk areas to become more resilient to flood risk?</li> <li>Direct all new development away from areas of high flood risk?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
8. To create opportunities to encourage the protection and improvement of air quality	<ul style="list-style-type: none"> <li>Create opportunities to improve and protect air quality?</li> <li>Reduce the likelihood of new Air Quality Management Areas being required?</li> <li>Create opportunities within which potential emissions from power generation, transport and heavy industry may be reduced?</li> <li>Create opportunities to ensure that the most vulnerable communities are not disproportionately affected by poor air quality?</li> <li>Create opportunities to ensure that sensitive habitats and water resources are not negatively affected by air pollution?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
9. To create opportunities to protect and enhance the quality and quantity of water features and resources	<ul style="list-style-type: none"> <li>Create opportunities to protect and enhance ground and surface water quality and quantity?</li> <li>Create opportunities to protect and enhance waterways as part of a wider green infrastructure network?</li> <li>Create opportunities to protect and enhance coastal waters?</li> <li>Create opportunities for the sustainable use of water resources in both domestic and industrial settings?</li> <li>Create opportunities to reduce the risks from climate change to water resources and supply infrastructure?</li> <li>Create opportunities for the protection and enhancement of the quality of water features and resources and support integrated decision making in the marine environment?</li> <li>Support integrated decision making and collaboration across land and sea interfaces and boundaries?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
10. To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	<ul style="list-style-type: none"> <li>• Create opportunities for the provision of integrated and inclusive public transport services that meet people's needs?</li> <li>• Create opportunities for the provision of highways infrastructure (including walking and cycling routes) that meets people's needs, including business, commercial and personal use?</li> <li>• Create opportunities for the use of sustainable travel modes and encourage a reduction in dependence on the private car?</li> <li>• Create opportunities for an improvement in access to cultural and recreational facilities?</li> <li>• Create opportunities for the provision of new and improvement of existing digital connective infrastructure?</li> <li>• Create opportunities for the maintenance and improvement of access to essential services and facilities, particularly in rural areas?</li> <li>• Create opportunities to reduce the risks from climate change to transport infrastructure?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A healthier Wales  A more equal Wales  A Wales of cohesive communities  A Wales of vibrant culture and thriving Welsh Language  A globally responsible Wales</p>
11. To create the opportunities within which an improvement in social cohesion and equality can be achieved	<ul style="list-style-type: none"> <li>• Create opportunities within which social cohesion and equality can be improved?</li> <li>• Create opportunities within which equalities based on background or circumstances can be improved?</li> <li>• Create opportunities within which gender inequality may be reduced?</li> <li>• Create opportunities within which age inequality may be reduced?</li> <li>• Create opportunities within which inequalities based on disability can be improved?</li> <li>• Create opportunities for children who have any kind of disability to lead full and independent lives?</li> <li>• Create opportunities for children to develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment?</li> <li>• Create opportunities to ensure children can live to a standard that is good enough to meet their physical and mental needs?</li> <li>• Create opportunities to ensure children have access to an education?</li> <li>• Create opportunities to ensure children can relax and play, and join in a wide range of activities?</li> <li>• Create opportunities for the development of strong, cohesive communities?</li> <li>• Create opportunities to reduce levels of crime and the fear of crime?</li> <li>• Create opportunities to improve the number of people satisfied with their neighbourhoods as a place to live?</li> <li>• Create opportunities for older and disabled people to participate in their communities and wider society?</li> <li>• Create opportunities to reduce loneliness amongst the community?</li> <li>• Create opportunities for the built environment to be designed in a way that is accessible for all?</li> </ul>	<p>A prosperous Wales  A resilient Wales  A healthier Wales  A more equal Wales  A Wales of cohesive communities  A Wales of vibrant culture and thriving Welsh Language</p>

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
12. To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	<ul style="list-style-type: none"> <li>• Create opportunities for the provision of sufficient accommodation to meet identified needs in all areas?</li> <li>• Create opportunities for the provision of good quality homes?</li> <li>• Create opportunities within which the availability of affordable housing should increase?</li> <li>• Create opportunities within which rural housing needs can be met?</li> <li>• Create opportunities within which levels of homelessness are reduced?</li> <li>• Create opportunities within which there is a reduction in the number of households in income poverty or material deprivation?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
13. To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	<ul style="list-style-type: none"> <li>• Create opportunities for the protection and enhancement of areas of landscape and seascape character, distinctiveness, diversity and quality?</li> <li>• Create opportunities for the protection and enhancement of townscape character and quality including historic townscapes?</li> <li>• Create opportunities to promote sensitive, place-responsive design in all development/redevelopment?</li> <li>• Create opportunities to reduce noise and light pollution?</li> <li>• Create opportunities to maintain areas of tranquillity<sup>27</sup>?</li> <li>• Create opportunities to encourage well designed and accessible places and networks for people and nature within our townscapes?</li> <li>• Create opportunities for landscapes to become more resilient to the effects of climate change?</li> </ul>	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
14. To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	<ul style="list-style-type: none"> <li>• Create opportunities for the protection, conservation and enhancement of designated and non-designated historic assets, as defined in the glossary?</li> <li>• Create opportunities to promote historic assets, so that there is greater access, understanding and enjoyment of these for all?</li> <li>• Create opportunities for heritage-led regeneration?</li> <li>• Create opportunities for the conservation and enhancement of Wales' historic landscapes?</li> </ul>	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales

<sup>27</sup> Figure 7-1 in Appendix B of the Scoping Report November 2017

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
15. To create the opportunities for the protection and promotion of Welsh culture	<ul style="list-style-type: none"> <li>• Create opportunities within which Welsh culture can thrive, through land use planning initiatives?</li> <li>• Create opportunities for access to Wales' cultural and heritage assets and activities?</li> <li>• Recognise, protect, promote and enhance Welsh culture?</li> <li>• Create opportunities for cultural-led regeneration?</li> </ul>	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
16. To create opportunities for the conservation and enhancement of biodiversity and geodiversity	<ul style="list-style-type: none"> <li>• Create opportunities for the establishment of more coherent and resilient ecological networks on land for the benefit of wildlife and people, and enhancement of ecosystems services?</li> <li>• Create opportunities to increase the extent and diversity of functioning ecosystems?</li> <li>• Create opportunities to increase the resilience and adaptability of ecosystems?</li> <li>• Create opportunities for the conservation and enhancement of designated and non-designated nature conservation sites, habitats and species?</li> <li>• Create opportunities for the conservation and enhancement of marine ecosystems?</li> <li>• Create opportunities for the conservation and enhancement of the quality of natural green space?</li> <li>• Create opportunities to protect, conserve and promote geodiversity so that that there is a greater access, understanding and enjoyment of it for all?</li> <li>• Create opportunities for species and habitats to adapt to changing climatic conditions?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
17. To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	<ul style="list-style-type: none"> <li>• Create opportunities to use recycled and secondary materials in construction?</li> <li>• Create opportunities for the use of locally sourced sustainable materials?</li> <li>• Create opportunities to remediate contaminated land and prevention of further contamination?</li> <li>• Create opportunities to contribute to the sustainable management of farmland, forests, and the wider countryside?</li> <li>• Create opportunities to reduce hazardous waste?</li> <li>• Create opportunities within which soil quality can be maintained and/or enhanced?</li> <li>• Create opportunities to protect peatland?</li> <li>• Create opportunities to safeguard protected mineral resources?</li> <li>• Create opportunities to develop brownfield land where this is sustainable?</li> <li>• Create opportunities to increase the proportion of waste recycling and re-use?</li> <li>• Create opportunities to reduce the proportion and amount of waste sent to landfill?</li> <li>• Increase the resilience of ecosystems?</li> <li>• Improve the provision of nature-based solutions to improve air quality, adapt and mitigate climate change, manage flood risk, and improve health and well-being?</li> </ul>	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales

Table 1-6: SEA Directive topics and main ISA objectives of relevance

SEA Directive Topic	Main ISA Objective(s)
Biodiversity	7, 9, 16 and 17
Population	1, 2, 3, 4, 5, 10, 11, 12 and 15
Human Health	1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16 and 17
Fauna	7, 9 and 16
Flora	7, 9 and 16
Soil	7, 9, 13, 16 and 17
Water	6, 7, 9, 16 and 17
Air	6, 8 and 10
Climatic Factors	2, 4, 6, 7, 8, 9, 10, 13, 16 and 17
Material Assets	3, 4, 6, 9, 12, 13, 14, 16 and 17
Cultural Heritage including architectural and archaeological heritage	5, 13, 14 and 15
Landscape	7, 13, 14 and 17

Table 1-7: Integrated impact assessments and main ISA objectives of relevance

Impact Assessment	Main ISA Objective(s)
Health	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17
Equalities	1, 2, 3, 4, 10, 11 and 12
Welsh Language	3, 4, 5
Rural Proofing	2, 3, 4, 5, 10, 11, 12, 13, 16 and 17
Children's Rights	1, 2, 3, 10, 11 and 12
Climate Change	2, 3, 4, 6, 7, 8, 9, 10, 13, 16 and 17
Economic Development	1, 3, 4, 6 and 17

## Methodology

1.6.10 The approach adopted included the following steps (refer to Figure 1-1):

- B1: Testing the plan objectives against the SA objectives;
- B2: Developing the plan options;
- B3: Predicting the effects (including cumulative and secondary effects) of plan options and alternatives;



- B4: Evaluating the effects (including cumulative and secondary effects) of plan options and alternatives;
- B5: Consider ways of mitigating negative effects and maximising beneficial effects; and
- B6: Proposing measures to monitor the significant effects of the plan's implementation.

1.6.11 Table 1-8 and 1-9 present the scoring method for each of the assessments presented in this report.

1.6.12 It is noted that the B1 assessments were not repeated at this stage of the ISA process, although the NDF objectives were refined to become 'outcomes'. An explanation of the relationship between the assessed NDF Objectives and the NDF Outcomes, the reasoning behind their evolution, and how further ISA is not necessary, is presented in Appendix A.

1.6.13 Table 1-8 presents the key for the assessment of the Draft NDF Policies and Reasonable Alternatives. This is the same approach to that taken for the Alternative Options and the Preferred Option, as presented in the Interim ISA Report<sup>28</sup>. Used alongside the ISA Framework (Table 1-5), this enables the potentially significant sustainability effects, whether positive or negative, to be drawn out of the assessment, enabling a framework for recommendations to be made for improvements to the NDF at this stage. How these recommendations have been taken into account has also been identified. Table 1-9 provides a definition of terminology of types of effects that, alongside direct effects, have been considered in the assessment.

1.6.14 Our integrated approach to assessing the impact of the NDF brings together key assessments into a single appraisal framework. However, the approach is clear in that all potential significant effects will be set out within the assessments, including specific effects that relate to the specific assessment types. Set in the context of the seven well-being goals, the various areas for consideration cover the social, economic, environmental and cultural aspects of Wales now, and in the future. Tables 1-6 and 1-7 demonstrate how the requirements of the SEA Directive and the impact assessments have been included within the ISA Framework of objectives to be used to appraise the NDF.

*Table 1-8: Assessment Key for NDF Draft Policies and Reasonable Alternatives*

Scoring of Assessment	
<b>++</b>	Strong positive – likely to result in progress towards the objective (significant)
<b>+</b>	Minor positive – likely to result in very limited progress towards the objective
<b>0</b>	Neutral outcome
<b>+/-</b>	Range of possible positive and negative outcomes
<b>?</b>	Uncertain outcome
<b>-</b>	Minor negative – likely to be to the very limited detriment of achieving the objective
<b>--</b>	Strong negative – likely to be to the limited detriment of achieving the objective (significant)

<sup>28</sup> Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]



*Table 1-9: Definitions of Secondary, Cumulative and Synergistic Effects*

Type of Effect	Definition
Secondary (or indirect)	Effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.

*Source: A Practical Guide to the Strategic Environmental Assessment Directive, ODPM*

## 2 ASSESSMENT OF THE DRAFT NDF

### 2.1 Contents of the Draft NDF

2.1.1 The Draft NDF is structured in the following way:

- 1. Introduction;
  - *Sets out what the NDF is, how it fits with wider Welsh Government policy and how it fits with strategic and local development plans.*
- 2. Wales: An Overview of Challenges and Opportunities;
  - *Sets out an overview of Wales and some of the key demographic, economic, environmental and social trends; and identifies the challenges and opportunities that have shaped the first NDF*
- 3. NDF Outcomes;
  - *Sets out the 11 NDF Outcomes which are a collective statement of where the Welsh Government wants Wales to be in 20 years' time.*
- 4. Strategic and Spatial Choices: The NDF Spatial Strategy;
  - *Sets out the spatial strategy and its policies. The spatial strategy will be the guiding framework for where large scale change and nationally important developments will be focused over the next 20 years.*
- 5. The Regions.
  - *Sets out the NDF policies for Wales' three regions.*

2.1.2 The appraisal in the ISA has focussed on chapters 3, 4 and 5 of the Draft NDF; the Outcomes, Spatial Strategy and Regional Policies and their reasonable alternatives.

### Relationship between the NDF and other Plans and Programmes

SEA Directive (Annex 1) Requirements for identifying other relevant plans
<p>The identification of other relevant Plans should account for:</p> <p><i>“(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; ...</i></p> <p><i>(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation; ...”</i></p>

2.1.3 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. The ISA Scoping report identified an extensive list of relevant plans and programmes and how the NDF and ISA should account for these. Of particular importance are the following national documents which the NDF will work with and share common aims and objectives:

- Taking Wales Forward 2016-2021;
- Prosperity for All: The National Strategy;
- Prosperity for All: Economic Action Plan;
- Prosperity for All: A low Carbon Wales;

- The Natural Resources Policy for Wales, incorporating Sustainable Management of Natural Resources (SMNR) and ecosystem resilience principles; and
- The emerging Welsh National Marine Plan<sup>29</sup>.

2.1.4 The iterative nature of this work will ensure new plans, policies and programmes which are published as the NDF develops can and will be taken into account. This may include for example Area Statements, which are to be produced by Natural Resources Wales. However, due to the scale of these documents, they may be more appropriate for consideration within regional or local level plans.

## 2.2 What the ISA has appraised to date

2.2.1 The ISA is an iterative process which involves appraisal and feedback to the plan-makers at numerous stages of the NDF's development. To date, the ISA has appraised the following:

*Presented in the Interim ISA Report and summarised in this Draft ISA Report:*

- Analysis of Future Trends – this considers how the baseline trends for the topics covered by the ISA Objectives are likely to develop in the absence of a NDF. It gives a useful benchmark summary against which the appraisal of the NDF can be compared;
- The NDF Vision and Outcomes (previously called NDF Objectives) (including Reasonable Alternatives to these);
- Strategic Options (Reasonable Alternatives) for the Spatial Approach (four options and a benchmark/Do-Nothing option); and
- The NDF Preferred Option (the preferred Spatial Approach).

*Presented in this Draft ISA Report:*

- The Draft NDF (including Spatial Approach, Policies and their Reasonable Alternatives).

2.2.2 The appraisal findings for each of these stages are presented in sections 2.3 to 2.6 below.

## 2.3 Future trends

### SEA Directive (Annex I) Requirements for baseline data and key sustainability issues

The requirement to identify sustainability problems and issues arises from the SEA Directive, where the Environmental Report required under the Directive should include:

*“(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;*

*(c) the environmental characteristics of areas likely to be significantly affected;*

*(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EE...”*

2.3.1 The ISA Scoping report brought together a detailed analysis of the current state of the environment in Wales, characteristics of the environment likely to be significantly affected by the NDF as well as existing environmental problems relevant to the NDF.

2.3.2 Table 2-1 presents the likely evolution of the relevant aspects of the environment without the implementation of the NDF. These likely future trends of the environmental baseline are considered

<sup>29</sup> <https://gov.wales/marine-planning>

to be either static, improving or declining. Future trends were calculated based on an analysis of baseline data identified and compiled during the ISA Scoping stage and how these trends have changed over time for all of Wales. For example, the future baseline for the ISA Objective related to air quality is considered to be improving. This is primarily as a result of the historic decline in heavy industry in Wales and the subsequent reduction in the emissions of pollutants such as Nitrous Dioxide and particulate matter. Whilst air quality in Wales has been improving overall there are still areas in Wales where air pollution is of poor quality, particularly where Air Quality Management Areas (AQMAs) have been designated, and where concerted efforts are required to improve it.

*Table 2-1: Future trends in Wales for each ISA Objective*

ISA Objective		Future Baseline
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	Static
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	Improving
3	To create opportunities for an increase in employment across the country and promote economic inclusion	
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	
5	To contribute towards the future well-being of the Welsh Language	
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	
8	To create opportunities to encourage the protection and improvement of air quality	
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	
15	To create the opportunities for the protection and promotion of Welsh culture	
7	To contribute to the reduction and management of flood risk	Declining
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved	
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes	
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	

ISA Objective	Future Baseline
17 To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	

## 2.4 NDF Outcomes (including reasonable alternatives) (Task B.1)

2.4.1 Extensive consideration has been given to the development of the NDF's Outcomes. These were developed originally during the preparation of the Preferred Strategy as the NDF Vision and Objectives. Following the publication of PPW10 and the consideration of the responses to the Preferred Option Consultation, it was determined that a set of NDF Outcomes was the most appropriate way of establishing both a vision and objectives for the NDF.

2.4.2 The compatibility assessment of the original NDF objectives was undertaken in three iterations and is presented in the Interim ISA Report<sup>30</sup>. The commentary provided in Table B-2 of the Interim ISA Report presents the iterative process of assessment, and how the ISA recommendations have been taken into account, where relevant. This demonstrates that the majority of the recommendations of the ISA have been incorporated into the NDF. This has included the following improvements, which will improve the potential for the NDF objectives to contribute to more sustainable development, compared to previous iterations:

- Strengthened consideration of landscape (NDF objective 6);
- NDF objectives shortened, simplified where necessary and given greater focus;
- Additional text added to objective 4 relating to population retention, to strengthen communities;
- Reference to marine planning has been included (NDF objective 6);
- Text added to include consideration of pollution (NDF objective 6);
- Improvement to the Welsh Language objective to include consideration of socioeconomic infrastructure of communities; and
- Additional NDF objective relating to cohesive communities added.

2.4.3 PPW10 was published in December 2018. One of the driving factors in the preparation of PPW10 was the importance of updating national planning policy to fully take account of the WBFG Act. Significant engagement and consultation events were undertaken in the preparation on PPW10 to help deliver this. PPW10 states:

*"Key Planning Principles*

*2.13 The plan-led system underpins the delivery of sustainable places. To ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The 5 Key Principles (see Figure 3) represent a guiding vision for all development plans, including the NDF. These principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place.*

*2.14 These principles will enable the goals and five ways of working set out in the Well-being of Future Generations Act to be realised through land use planning. They provide the context and will act as a catalyst for the positive delivery of the planning system across Wales."*

and

<sup>30</sup> Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]

*“2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places.”*

- 2.4.4 Consultation responses to the Preferred Option consultation questioned the need for the NDF to contain a vision and objectives. It was suggested that the WBFG Act and PPW (which was being revised at the time of the Preferred Option consultation) could provide the overarching vision and objectives for the NDF. The NDF, in seeking to develop its own vision and objectives, risked establishing different or competing goals and unintentionally could introduce a position at variance with the sustainable development duty of the WBFG Act.
- 2.4.5 The Welsh Government determined that in light of these issues, it was preferable for the NDF's proposed Vision and Objectives to be replaced by a single set of NDF Outcomes. The 5 Key Principles in PPW are the guiding vision for the NDF and the NDF Outcomes take forward the national outcomes set out in PPW to create an overarching set of Outcomes for the NDF.
- 2.4.6 Three alternatives were considered to this change. The first was to retain the vision and objectives as they were proposed in April 2018. For the reasons above, this was discounted. The second was to retain a vision and objectives but to amend them to be more aligned with the 5 Key principles and PPW national outcomes. This was considered unnecessarily complicated and risked creating confusion on the relationship between PPW's approach and the NDFs, particularly given PPW's clear advice on the approach to be taken. The third option was to have no overarching principles or outcomes or similar content in the NDF. It was considered important that the NDF should respond to the clear requirements set out in PPW. In the absence of NDF Outcomes, it would be difficult to establish what the NDF was trying to achieve, to take a 'whole plan' approach to policy issues, and to monitor the success of the NDF in the future.
- 2.4.7 Tables A-1 and A-2 of Appendix A demonstrate that the NDF Objectives and Outcomes align, and therefore a further compatibility assessment with the ISA Objectives is not necessary. An explanation of the relationship between the assessed NDF Objectives and the NDF Outcomes and the reasoning behind their evolution, is presented.

## 2.5 NDF Reasonable Alternatives (Task B.2)

### SEA Directive requirements for considering reasonable alternatives

#### SEA Regulations Annex 1(h):

*“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”*

#### SEA Directive Art. 5(1):

*“Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.”*

- 2.5.1 For the purpose of satisfying the requirements of a SEA Environmental Report, it is necessary for the ISA report to identify and evaluate the environmental effects of proposals in the NDF, alongside the identification and evaluation of environmental effects of reasonable alternatives to these proposals. The purpose of using reasonable alternatives is to show that evidence has generated the proposed Plan rather than vice-versa.

- 2.5.2 Determining if an alternative is reasonable is typically an evaluative and qualitative assessment for the planning authority. SEA Guidance states that “only reasonable, realistic and relevant alternatives need to be put forward”. The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Should an option be considered to be clearly so unreasonable that no reasonable person acting reasonably could have made it, then it is considered that it would not constitute a ‘reasonable alternative’.

## Spatial approach

- 2.5.3 The Interim ISA Report documents the appraisal of the NDF Alternative Options and Preferred Option. Four Alternative Options for the NDF were developed together with a Benchmark Option which comprises not producing an NDF. Each option was subject to ISA in November 2017. A full description of the NDF Alternative Options can be found in Appendix B of the Interim ISA Report<sup>31</sup>. Each of the Alternative Options was structured as follows:

- Summary overview;
- Why has this option been developed? (rationale on how the option is a Reasonable Alternative)
- Full overview: How would this option help meet the objectives?
- What are the key assumptions that support this option?
- What would Wales in 2040 look like?
- What did the October 2017 engagement say about this option?

- 2.5.4 In summary, these options were:

- Alternative Option 1 – An option focussing growth in the strongest market areas
- Alternative Option 2 – An option focussed on creating strong communities across all Wales
- Alternative Option 3 – An option to deliver decarbonisation and climate change objectives
- Alternative Option 4 – An option focussed on the sustainable management of Wales’s natural resources
- Benchmark Option - Do Not Prepare the NDF

- 2.5.5 Appendix B also provides reasoning for why these options were carried forward or otherwise.

## The ‘Benchmark Option’

- 2.5.6 The NDF will replace the Wales Spatial Plan (WSP). It is important for the ISA to assess reasonable alternatives for the emerging NDF which contain various options including a ‘do nothing/ business as usual’ option – which includes the retention of the WSP. This will assess the implications and effects of the replacement of the WSP by the NDF as the SEA Directive requires that the relevant aspects of the current state of the environment and the likely evolution without the plan are considered, along with the environmental characteristics of areas that are likely to be significantly affected. Other aspects will also be considered as part of the ‘do nothing’ option, such as the outside influence of the National Health Service or the police force on health or crime level improvements for example, as the WSP does not act in isolation. However, the influence of planning will be the key consideration in the assessment.

## Summary of Assessment of Alternative Options (November 2017)

- 2.5.7 Table 2-2 presents a summary of the assessment scores for each of the Alternative Options. The full assessment tables with commentary are presented in Appendix B.

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<sup>31</sup> Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]



## Alternative Option 1

- 2.5.8 As can be seen from the summary table, Alternative Option 1 (an option focussing growth in the strongest market areas) performs the least well when assessed against the ISA objectives. Strong negative effects have been predicted against 3 of the ISA objectives (relating to health and well-being; social cohesion and equality; and the sustainable use of natural resources). No strong positive effects have been predicted for this option. The increase in prosperity across the strongest market areas could lead to an increase in inequality, between urban and more rural areas, and particularly existing areas of deprivation such as the Valleys and North Wales coast. The option is not driven by SMNR principles, therefore there is potential for development in the growth areas to be led by primarily economic goals leading to potentially negative effects. There are some benefits to this option, in that the option seeks to direct growth to the strongest market areas. This will create opportunities to increase employment but is focused on identified growth areas rather than across every part of Wales. Therefore, it is unlikely to contribute to economic inclusion across the country. The option is, however, likely to lead to significant positive effects in relation to improving access to jobs in growth areas, increasing the number of people satisfied with their jobs, and creating opportunities for investment and growth and development of skills, particularly in relation to city regions.

## Alternative Option 2

- 2.5.9 Alternative Option 2 (an option focussed on creating strong communities across all Wales) performed significantly better than Alternative Option 1, with strong positive effects predicted against six of the ISA objectives (relating to: education; health and well-being; air quality; connectivity of communities; social cohesion and equality; and the sustainable use of natural resources). The option focuses on a dispersed approach based on local need, which may reduce inequalities and lead to an increase in benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment, that may have major beneficial effects. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change. No strong negative effects were predicted for this option.

## Alternative Option 3

- 2.5.10 The assessment of Alternative Option 3 (an option to deliver decarbonisation and climate change objectives) also led to the prediction of strong positive effects against six of the ISA objectives (relating to health and well-being; energy efficiency and greenhouse gas emissions; climate change resilience; air quality; connectivity of communities and the sustainable use of natural resources). The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by, and build resilience to these. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects. The option also seeks to build climate change resilience into communities, businesses, and the natural environment. No strong negative effects were predicted for this option. Uncertainties with regard to this option have been predicted. The NDF will support major changes to urban form and development patterns, to contribute to the realisation of a low-carbon economy. What this means in terms of built development is unclear and could mean the development of increased housing and infrastructure in 'sustainable' locations, thereby potentially having a negative impact on landscape; noise and light pollution; areas of tranquillity and heritage assets. The option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments have potential for significant landscape (and townscape and seascape) and visual impacts although this will depend on the design and location. Further, there is some uncertainty over whether the option might result in, cumulatively, negative effects on biodiversity/geodiversity; as many of the areas deemed suitable for renewable energy schemes could include undeveloped greenfield sites near to existing rural communities.



## Alternative Option 4

2.5.11 Strong positive effects were predicted against seven of the ISA objectives in the assessment of Alternative Option 4 (an option focussed on the sustainable management of Wales's natural resources) (relating to energy efficiency and greenhouse gas emissions; climate change resilience; air quality; water quality; landscape and townscapes; biodiversity and geodiversity; and the sustainable use of natural resources). The option includes significant emphasis on the climate change resilience, based on the Environment (Wales) Act, which positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The option would seek to deliver the SMNR principles, including the reduction of pollution, avoiding impacts. It has a very strong focus on preserving the natural environment, despite also promoting a degree of rural development. It recognises how the natural environment underpins economic sustainability and has a very strong focus on environmental protection.

## Do Nothing

2.5.12 No strong effects were predicted for the 'do nothing' option. Although the WSP and other policies and strategies would continue to be in place without the NDF, trends, such as higher than average deprivation in the South Wales valleys and some North Wales coastal towns, are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF. Further, the potential to reduce greenhouse gas emissions and take a national approach to issues such as flood risk and environmental management, whilst accommodating new development and economic growth may not be achieved without strategic direction from the NDF.

Table 2-2: Summary of the Assessment of Alternative Options (November 2017)

ISA Objective	Alternative Option				
	1	2	3	4	5
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+/-	++	+	+/-	+
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	--	++	++	+	+
3. To create opportunities for an increase in employment across the country and promote economic inclusion	+	+	+	+/-	+/-
4. To promote sustainable economic growth, diversity and business competitiveness	+/-	+	+	-	+/-
5. To encourage the protection and promotion of the Welsh Language	+/-	+	+	+	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	-	+	++	++	+
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	-	+	++	++	+
8. To encourage the protection and improvement of air quality	-	++	++	++	+/-
9. To contribute to the protection and enhancement of the quality of water features and resources	+/-	+	+	++	+

ISA Objective	Alternative Option				
	1	2	3	4	5
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	+/-	++	++	+	+
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	--	++	+	+	+
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	+/-	+	+/-	-	+/-
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	-	+	?	+	+
15. To encourage the protection and promotion of Welsh culture	+/-	+	+	+	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	+/-	+	+/-	++	+
17. To encourage the sustainable use of natural resources	--	++	++	++	+/-

## Development of the Preferred Option

2.5.13 Following the assessment of the Alternative Options, the Welsh Government team refined the NDF Options, and developed a Preferred Option.

2.5.14 The Preferred Option was developed around five themes, reflective of Planning Policy Wales, Edition 10 (PPW):

- Placemaking;
- Distinctive & Natural Places;
- Productive & Enterprising Places;
- Active & Social Places; and
- Wales's Regions.

2.5.15 The Preferred Option was a hybrid option which seeks to incorporate many of the benefits of the alternative options. Table 2-3 sets out which elements of the Alternative Options were taken forward to the Preferred Option. As such, all of the proposed alternatives individually were rejected. None of the options were considered to be preferable alone as each demonstrated some negative outcomes to varying degrees and would not deliver the balanced sustainable development required. Therefore, the Welsh Government has sought to identify the most positive elements of each to contribute towards developing a preferred option. Alternative Option 1 was determined to be too limited socially and geographically in terms of potential positive outcomes. Strongest market areas would potentially do well, but these would be narrowly focused around the largest cities and towns only. Areas outside these settlements would not do well, inequality would potentially grow and there would be clear negative effects on people and the environment. Alternative Options 2, 3 and 4 were all considered better than Option 1 with clear positive effects. None of these options however was considered

sufficiently positive in their own right and it was clear through the iterative process of considering the options, that combining elements from different Options would create a Preferred Option which would be more positive than any of the individual Options. The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative, and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options, have been considered in developing the Preferred Option. The Welsh Government response in Appendix B highlights the findings and how they shaped the Preferred Option. Consideration was given to the effects of each of the options against each of the ISA objectives.

Table 2-3: Summary of Elements Taken Forward to Preferred Option (Assessed February 2018)

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
1	2, 3, 5	<p>The creation of more cohesive, equitable communities (P3, P2, PE9, AS1)</p> <p>The importance of social infrastructure in placemaking (P3, AS1)</p> <p>Reversing rural depopulation (R1, R2, R3, R4, PE6)</p> <p>Improvements in digital connectivity (PE3)</p> <p>Local community connectivity and reducing the need to travel (P2, AS4, R1, AS1)</p> <p>In response to the potential uncertainty in delivery, as identified by Arcadis, without the economic drivers and strengths that could be achieved under option 1(A Spatial Strategy focussing growth in the strongest market areas), the Preferred Option has a strong focus on supporting economic objectives (P3, PE5, PE6, PE7, PE9).</p>
2	2, 3, 4, 5	<p>Improving accessibility within rural communities and reversing population decline (P3, AS1, AS4, R4)</p> <p>Increasing access to the natural environment (P2, DN3, DN5)</p> <p>Sustainable communities, well designed and planned (P2, P3, AS1, AS4, R1)</p> <p>Adaption to risks from climate change / climate change resilience (P1, P2)</p> <p>Delivery of small-scale renewable energy (P2, PE2)</p> <p>Decarbonisation of the economy (P1, PE8)</p> <p>Utilising sustainable locations, improving connectivity and increasing Sustainable travel methods (P2, AS4)</p> <p>Focus on rural communities (P2, P3, R4, R5)</p> <p>Reduction in air, water, and other types of pollution (P1, P2, P3, DN2)</p> <p>An increase in green spaces (DN3, DN5)</p> <p>Improve the delivery of health services (P2, R3, R4)</p>
3	1, 2, 3	<p>Contribute to economic inclusion across the country (P1, P3, PE3, PE5, PE6, AS1)</p> <p>Improving access to jobs in growth areas (P1, PE4, PE5, PE6, PE7, AS1)</p> <p>City regions (PE5, PE6, AS1, R3)</p> <p>Opportunities for investment and growth (P1, PE1, PE3, PE4, PE5)</p> <p>Support specialisation and clusters in certain areas (R1, R5)</p> <p>Regional transport infrastructure (PE8, R3, R4)</p>
4	2, 3	<p>Supporting local economic diversity (P3, PE5, PE6, PE9, PE10, AS1, R1)</p> <p>Support for SMEs, third sector and micro businesses (P3, PE5, PE6, R1)</p> <p>Enhancements to the rural economy and rural diversification (P3, PE4, PE5, PE6, AS1, R1, R4, R5)</p> <p>Support for a sustainable economy and growth in sectors associated with this (P1, PE4, PE5, PE6, R1)</p> <p>The delivery of digital infrastructure and sustainable travel infrastructure (P3, PE8, AS4, R3, R4)</p>

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
		In response to the potential to limit competitiveness and economic growth and investment identified by Arcadis by focusing on green growth and decarbonisation, the Preferred Option has a strong focus on supporting a range of growth and investment opportunities (R1, R3, R5, PE5, PE6, PE9)
5	2, 3, 4, 5	Strong focus on investment in local opportunities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) More sustainable communities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) Seeking to reverse rural de-population leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1, R4, R5)
6	2, 3, 4	Reducing harmful emissions (P1, P2, P3, DN2, DN5, PE8) Developing a sustainable pattern of living through sustainable design and locational choices (P1, P2, P3, DN2, AS1, R3, R4) Sustainable management of natural resources (P1, P3) Reducing the need to travel through sustainable located development (P1, P2, P3) Enabling local renewable energy schemes (P2, PE2) Reducing the need to travel (P2, P3, PE3, AS4)
7	3, 4	Sustainable management of flood risk (P1, P2, DN1, DN2, PE1, PE8) Anticipating and adapting to the risks from climate change (P1, P2, DN1, DN2, PE1, PE8) Sustainable management of natural resources (P1, P2, DN1, DN2, PE1, PE8) Building climate change resilience into communities, businesses, and the natural environment (P1, P2, DN1, DN2, PE1, PE8)
8	2, 3, 4	Reducing travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities (P1, P2, P3, DN2, PE8, R1) Reducing the need to travel (P1, P2, P3, AS1) Encouraging walking, cycling and working from home (P1, P2, P3, PE3, AS4) The development of community owned renewable energy initiatives (P1, P2, PE2)
9	2, 3, 4	Efficient use of water and the reduction of pollution (P2, P3, DN1, DN2) Preserving the natural environment which would include water quality and resources (P2, P3, DN1, DN2) Supporting SMNR principles (P3, DN1, DN2)
10	2, 3	Supporting active travel (P2, AS4) Reducing private car use (P1, PE3, AS1, R1) Ensuring jobs & services are accessed locally (P3, PE3, PE6, AS1, R1, R3, R4, R5) Providing social infrastructure in deprived communities (P2, P3, PE9, R1, R3, R4) Reversing rural population decline (PE3, PE6, AS1, R1, R4, R5) Ensuring connectivity between uses (AS1, R1, R3, R4) Prioritising walking, cycling, rail electrification & public transport (P2, PE8)
11	2, 3, 4	Reducing inequality (P2, P3, DN2, PE9, AS1, R1) Ensuring access for all to facilities, services & housing (P2, P3, PE3, AS1, R1) Focusing on supporting rural areas (P3, PE2, PE6, R4, R5) Reducing health inequalities (P1, P2, P3, DN, AS42, R4)
12	2	A focus on delivery across Wales (P2, P3, AS1, AS2, AS3, R2, R3, R4) Providing good quality, affordable housing to meet people's needs (P2, P3, AS1, AS2, AS3) The testing of the options identified concerns regarding delivery, larger scale house building, and meeting identified needs. Parts AS3 and R2 of the Preferred Option address these issues, seeking

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
		through the NDF to provide national and spatial direction for the delivery of housing across Wales.
13	4	Recognising the importance of the natural environment and landscapes (P1, P3, DN1, DN2, DN3, DN4, PE10) Enhancing natural environment and landscapes (P1, DN1, DN2, DN3, DN4, PE10) Recognising the importance of local facilities and spaces (P2, DN3, DN5, AS1)
14	2, 4	Recognising the importance culture and heritage (DN3, DN6, PE10) Recognising the importance of historic landscapes (DN3, DN6, PE10) Recognising and considering the relationship between heritage and other objectives (e.g. energy) (DN3, DN6, PE10)
15	2, 3, 4	Ensuring a local focus (P3, DN6, PE6, R1, R3, R4) Improving access to cultural heritage assets and activities (P2, P3, DN5, DN6, AS1, AS4, R3, R4) Recognising the natural environment and landscape as a distinctive part of Welsh culture (DN1, DN3)
16	2, 4	Building resilience to ecosystems and habitats (P1, P2, P3, DN1, DN2, DN4) Prioritising natural resource implications (P1, P2, DN1, DN2, DN4)
17	2, 3, 4	Support for the principles of SMNR (P1, P2, DN1, DN2, DN3, PE1, PE4, R1) Support for nature-based solutions (P1, P2, DN1, DN2, DN5) Increasing resilience in ecosystems and habitats (P2, P3, DN2, DN4)

## Assessment of the NDF Preferred Option (February 2018)

- 2.5.16 At this stage, the Preferred Option was assessed at a high level. Table 2-4 presents a summary of the findings of the assessment. The full assessment of the Preferred Option assessment can be found in Appendix B.
- 2.5.17 In summary, strong positive effects were predicted against six of the ISA objectives, with no strong negative effects predicted. Strong positive effects were predicted against ISA objectives 2 (health and well-being); 3 (employment); 4 (economic growth); 10 (connectivity of communities); 11 (social cohesion and equality); and 17 (sustainable use of natural resources).
- 2.5.18 The NDF Preferred Option sought to provide a strong policy framework, to ensure that health and well-being outcomes, for both current and future generations, were central to spatial decision making. The regional approach sought to recognise that disadvantaged and deprived communities are not disproportionately impacted by health inequalities and was predicted to lead to an increase in access to health and social care services, especially in rural areas. Added to this, the decarbonisation and climate change agenda sought to build national resilience to the effects of climate change, which was considered likely to lead to cumulative and long-term health and well-being benefits. The overarching 'Placemaking' theme as well as the Preferred Option more generally, included details relating to the determinants of community cohesion, which could include aspects such as the Welsh Language, housing need, connectivity and community facilities and services. The creation of opportunities for the improved connectivity of communities, resilience to climate change and sustainable access to facilities was a key theme of the Preferred Option and provided the basis of many of the strategic policies, leading to potential significant benefits.

- 2.5.19 'Sustainable Places' was the goal of the NDF. Connectivity and digital infrastructure were elements of this, which could increase physical access to employment opportunities for an increased number of communities across Wales. The overarching 'placemaking' theme also highlighted that economic inclusion was an important principle of the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. One of the key aims of the Preferred Option was that Wales would become prosperous and secure. A key element of this was the transition to a low carbon economy, which could bring opportunities that would create a wide range of benefits. The regional approach, including identifying city regions and growth deal areas, could lead to further economic benefits, providing a strategic focus for investment.
- 2.5.20 Decarbonisation and climate change were key foundations of the NDF, and aspects relating to this were integrated throughout the Preferred Option. Measures such as a transition to a low carbon economy (PE4), supporting the Welsh Government's strategic decarbonisation goals, were assessed as having the potential to lead to significant benefits. This could be compounded by the strong focus of the Preferred Option to improve the connectivity of communities through active travel measures (AS1, AS4, R3 and R4), the decarbonisation of transport (part of PE8), generation of energy from low carbon energy sources (PE1, PE2), and the implementation of green infrastructure measures (DN5) and other environmental enhancements (DN3 and DN4). However, the strategy also included a requirement for improvements to the existing and expansion of the national road network (AS5 and part of PE8), although to decrease congestion in the short or medium terms, in the long term, this was assessed as having the potential to lead to an increase in traffic volumes, leading to negative effects for greenhouse gas emissions and air quality, although this effect was predicted as uncertain. On balance, minor positive effects were predicted, particularly for local air quality, where road building may help to improve air quality within communities. Further, although 'high quality' housing is mentioned in the 'Placemaking' theme, this was not included within the strategic policies, which was predicted to leading to potential uncertainty in delivery of the decarbonisation agenda.
- 2.5.21 Policies included within the 'Distinctive & Natural Places' theme, included the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4) and facilitating green infrastructure (DN5). This was predicted to potentially leading to positive effects for landscape and ecology. However, again, the strategy also included a requirement for improvements to the existing and expansion of the national road network (AS5), although to decrease congestion in the short or medium terms, in the long term, this was predicted to have the potential to lead to an increase in traffic volumes, leading to negative effects, particularly in relation to noise pollution in South East Wales. This could be further exacerbated by Policy R3, relating to the development of city regions and growth areas, which could also have negative townscape effects. However, the green infrastructure policy (DN5) could reduce the effects to some degree. Further potential negative landscape impacts were predicted as potentially resulting from nationally significant transport or renewable energy infrastructure projects. However, impacts may be mitigated on a project level basis or through more specific planning policies. Policies relating to the development of more rural areas, such as R1, R2, and R4, were predicted to lead to negative effects against the areas of dark skies and tranquil areas.

Table 2-4: Summary of results of the appraisal of the Preferred Option carried out in February 2018

ISA Objective	Preferred Option
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+
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	++
3. To create opportunities for an increase in employment across the country and promote economic inclusion	++
4. To promote sustainable economic growth, diversity and business competitiveness	++
5. To encourage the protection and promotion of the Welsh Language	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	+/-
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	+
8. To encourage the protection and improvement of air quality	+
9. To contribute to the protection and enhancement of the quality of water features and resources	+
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	++
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	++
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	+
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	+
15. To encourage the protection and promotion of Welsh culture	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	+/-
17. To encourage the sustainable use of natural resources	++

## Recommendations

2.5.22 Although strong positive effects were predicted for social and economic indicators, it was considered through the ISA that the potential for the NDF to contribute to environmental sustainability in particular could be strengthened. In order to improve the potential for the Preferred Option to contribute towards the ISA objectives, a number of recommendations were made, which were considered by the Welsh Government. These recommendations and how they were considered are recorded in the appraisal table for the Preferred Option in Appendix B. Feedback from the ISA of the



Preferred Option was then used to refine the final Preferred Option, which was consulted on alongside the Interim ISA Report (April 2018).

2.5.23 The following direct amendments were made for the final draft Preferred Option for this consultation:

- The goal of the Welsh Government of a million Welsh Speakers by 2050 has been included within the Preferred Option in the Place making section under 'Cohesive Communities & Welsh Language'
- Policy DN2 has been redrafted to incorporate avoidance of flood risk.

2.5.24 Annex C and section 3.2 of the Preferred Option ISA Interim Report sets out how the recommendations of the ISA of the Preferred Option have been taken into consideration.

2.5.25 Although recommendations were made against each ISA objective, it was considered that only the above two changes should be made at this stage of drafting the NDF. Reasons why some of the recommendations within the ISA may not have been appropriate include:

- The NDF should be read as a whole and the provisions to address the specific ISA recommendations are already covered elsewhere in the Preferred Option.
- The current stage provides a high-level overview of the NDF, setting out the key strategic objectives and a spatial direction for the preparation of the NDF. Some of the suggested changes are detailed in nature and lend themselves to consideration at the next stage of the process, where detailed policy will be developed to deliver the NDF objectives.
- Following re-drafting of the Preferred Option for this consultation, the wording referred to in the ISA recommendation no longer exists or the recommendation is no longer relevant.

### Development of the Draft NDF (July 2019)

2.5.26 In light of the consultation on the Preferred Option (alongside the Interim ISA Report), evidence, engagement and previous ISA work, the three overarching policies Decarbonisation & Climate Change, Health & Well-being and Cohesive Communities & Welsh Language were considered to be the key areas of focus in the preparation of the Draft NDF. The potential for a more economically driven and market focussed overview was considered. Consideration was also given to how explicitly these policy issues should be drawn through the NDF and their relationship with the NDF Outcomes. The NDF Outcomes specifically considered these three policy areas as they were developed.

2.5.27 It was concluded by the Welsh Government that a focus on Decarbonisation & Climate Change, Health & Well-being and Cohesive Communities & Welsh Language remains important. There is no need to significantly amend them or prepare a new Preferred Option and there are no realistic, reasonable alternative approaches. The NDF Outcomes will ensure a focus on them. The Welsh Government has determined that these three areas are 'whole plan'. Responding to the challenges of climate change, improving people's health and shaping cohesive communities requires co-ordinated action across all policy areas. All policies in the Draft NDF have therefore been developed to help deliver them and the NDF Outcomes, and it will be the monitoring of the whole plan that will demonstrate the success in delivering them.

2.5.28 The Draft NDF policies have been prepared to deliver the NDF Outcomes and the NDF Spatial Strategy. The Spatial Strategy was effectively developed alongside and as part of the same process of developing the Preferred Strategy and was taken forward to completion after following last summer's consultation. The review of evidence, key Welsh Government and other key stakeholder strategies, engagement and discussions with a wide range of people across Wales, and the ISA process itself, have led to the development of a spatial strategy that seeks to focus growth in three key strategic areas – Cardiff & Newport, Swansea Bay and Llanelli, and Wrexham and Deeside. Within each region, secondary growth areas are identified to provide a focus for regionally scaled and local growth. The Spatial Strategy focuses on resources across Wales, particularly the parts of

Wales suitable for wind and solar energy generation and provides a strong framework for supporting our natural resources.

- 2.5.29 Table 2-5 identifies the Preferred Option (assessed February 2018) and how the Draft NDF Spatial Strategy and Policies (assessed May 2019) have been developed in the context of them. In most cases a policy issue identified in the Preferred Option, is addressed in multiple NDF policies. This reflects the integrated nature of the NDF preparation and the 'whole plan' approach to addressing the overarching policy aims. Consideration was given to preparing a NDF policy directly under each of the Spatial Issues and Strategic Policy Direction set out in the Preferred Option (April 2018). It was considered this approach did not allow for issues that have been identified across the consultation and subsequent research and engagement to be introduced; did not adequately reflect the spatial nature of issues in the context of a development plan; did not allow a view to be taken that the policy issue was appropriately and robustly already provided for in PPW10; and did not account for the interrelated nature of many policy issues. The reasonable alternatives that were considered as part of the detailed development of Draft NDF policies are set out in Appendix B.
- 2.5.30 There are two main ways that PPW has influenced the development of the first Draft NDF. Firstly, PPW establishes the overarching policy objectives for the planning system and this includes the NDF. The principle of placemaking, the relationship between planning policy and the Well-Being of Future Generations Act, the Key Planning Principles and the National Sustainable Placemaking Outcomes are all established by PPW and have all directly influenced the NDF. Secondly, PPW covers a broad range of planning policy areas. The NDF does not repeat policy contained in PPW. If PPW did not exist or was significantly different from its present form, it is likely that the NDF would be a different plan. The current version of PPW and its content has therefore strongly influenced the NDF.
- 2.5.31 The Welsh Government believes that just as the first NDF is being created now, it is important that the strengthened regional tier established by the 2015 Planning Act, is given the opportunity to commence and tackle those planning issues that are best addressed at the regional level. The Draft NDF regional policies reflect this and seek to provide a framework to support and help commence regional planning rather than effectively undertake the role of a regional plan themselves.

*Table 2-5: How the preferred option proposed for the NDF in February 2018 has been incorporated into the policies proposed in the Draft NDF (assessed May 2019)*

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
<p><b>P1 Decarbonisation &amp; Climate Change</b></p> <p>The NDF will ensure that the planning system in Wales plays a key role in facilitating clean growth and decarbonisation and helps build resilience to the impacts of climate change. The transition to a low carbon society will bring opportunities around clean growth and quality jobs and deliver wider benefits, including better places to live and work, clean air and water and improved health outcomes. Achieving the Welsh Government's strategic decarbonisation goals, which include a reduction in our greenhouse emissions by at least 80% by 2050 are a key driver which all development plans must support.</p>	<p>NDF Outcomes &amp; Spatial Strategy</p> <p>P1, P2, P3, P4, P6, P7, P8, P9, P10 to P15</p> <p>P16</p> <p>P17, P18, P19, P21, P22</p> <p>P23, P24, P26</p> <p>P27, P28, P29, P30, P31</p>
<p><b>P2 Health &amp; Well-being</b></p>	<p>NDF Outcomes &amp;</p>

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
<p>The NDF will provide a strong policy framework requiring that physical and mental health and well-being outcomes, for both current and future generations, are central to spatial decision making. The NDF will recognise that disadvantaged and deprived communities can be disproportionately impacted by health problems and its regional focus will allow for regional inequalities to be tackled.</p> <p>The NDF and other development plans, must co-ordinate delivery of infrastructure to ensure essential services, including health and education, are connected and accessible. The NDF will make a positive contribution to the overall determinants of health. For example, resilience measures for climate change and transport policies will improve air and water quality and provide walking, cycling and green infrastructure to support healthier lifestyles. The reduction of fuel poverty, through the support for decentralised, localised energy generation and the delivery of high-quality housing, will have a positive impact on people's health and well-being.</p>	<p>Spatial Strategy</p> <p>P1, P2, P3, P4, P5, P6, P7, P8, P9, P10 to P15</p> <p>P16</p> <p>P17, P18, P19, P21, P22</p> <p>P23, P24, P26</p> <p>P27, P28, P29, P30, P31, P33</p>
<p><b>P3 Cohesive Communities &amp; Welsh Language</b></p> <p>The NDF will ensure that the planning system in Wales plays a key role in delivering cohesive communities. Strong and inclusive land use planning is essential to ensuring existing and future communities are well planned and equitable for all. The planning system must play its role in ensuring that no one is disadvantaged on the basis of who they are or where they live and must support actions to address existing problems.</p> <p>Development plans at all levels must ensure that health and economic inequalities are addressed; that all members of society have access to services and facilities, including health, education and digital infrastructure; that the planning system facilitates the delivery of land for high quality housing that meets all society's needs, in locations that are sustainable, accessible and connected; and that communities are resilient to environmental threats such as flooding, pollution and poor air quality.</p> <p>The NDF will ensure that Welsh speaking communities are supported and create conditions that enable the language to prosper. The NDF will support communities by enabling appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed and helps create the conditions to realise the Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050.</p> <p>Economic inclusion is an important principle and the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. It must also ensure that high quality, modern infrastructure, which is a key enabler of competitiveness and productivity, is well planned to be a catalyst for wider regeneration and supporting vibrant communities.</p>	<p>NDF Outcomes &amp; Spatial Strategy</p> <p>P1, P2, P3, P4, P5, P6, P7, P10 to P15,</p> <p>P16</p> <p>P17, P18, P19, P21, P22</p> <p>P23, P24, P26</p> <p>P27, P28, P29, P30, P31, P33</p>
<p><b>DN1 Identify national natural resources.</b></p> <p>NDF policies will maintain and enhance natural resources, improve resource efficiency and minimise the unsustainable use of natural resources.</p>	<p>P8 to P15, P16</p>
<p><b>DN2 Identify areas of current and future potential environmental risk.</b></p> <p>NDF policies will require that new development avoids areas of environmental risk and builds resilience to the risks from flooding, air quality, water quality, increases in temperatures, loss of habitats and ecosystems.</p>	<p>P16</p>
<p><b>DN3 Nationally important landscapes, seascapes, nature conservation sites and habitats will be identified. Opportunities for growth, expansion, greater connectivity and enhancement will be identified.</b></p> <p>NDF policies will require the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats.</p>	<p>P8, P16</p>

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
<b>DN4 Nationally important ecosystems will be identified.</b> NDF policies will require strengthening of nationally important ecosystem resilience through greater diversity, connectivity, scale, condition and adaptability.	P8, P16
<b>DN5 Nationally important green infrastructure and opportunities for new infrastructure will be identified.</b> NDF policies will require the protection and enhancement and facilitate the delivery of new green infrastructure.	P8, P16, P33
<b>DN6 Nationally important historic and cultural assets will be identified. Opportunities for new national cultural development will be identified.</b> NDF policies will require the protection, promotion and enhancement of historic and cultural assets and facilitate the delivery of new national cultural development.	P1, P2, P3, P16
<b>PE1 Nationally important energy generation, storage and distribution infrastructure will be identified. Locations for new national scale renewable and low-carbon energy generation, storage and distribution infrastructure will be identified.</b> NDF policies will support the delivery of the Welsh Government's renewable energy targets including 70 per cent of electricity consumed in Wales from Welsh renewable sources by 2030 and locally owned renewable energy capacity in Wales, reaching 1 GW by 2030. Policies will support generation through a range of renewable and low-carbon technologies, storage and distribution infrastructure.	P10 to P15, P22
<b>PE2 All Wales</b> NDF policies will provide a framework for the delivery of decentralised, local energy generation and distribution including community owned renewable energy schemes across the whole of Wales.	P13
<b>PE3 All Wales</b> NDF Policies will provide a framework for the delivery of modern digital infrastructure across the whole of Wales and will require technological capacity to be built into the design of new development, infrastructure (including transport infrastructure) and areas of growth and regeneration.	P6
<b>PE4 Nationally important employment, mineral and waste areas will be identified. Locations for new nationally significant growth, including projects, linked to connectivity infrastructure and growth areas, will be identified.</b> NDF policies will provide a framework to support growth in sectors helping deliver decarbonisation objectives, the transition to a low-carbon economy; and the circular economy.	P16, P17, P18, P23, P24, P27, P28, P29
<b>PE5 Existing and new locations for nationally important economic growth sectors.</b> NDF policies will provide a framework to support growth in key national sectors. This framework will include facilitating the infrastructure required to support their growth.	P16, P17, P18, P23, P24, P27, P28, P29, P10 to P15, P6, P20, P21, P22, P25, P26, P31, P32
<b>PE6 All Wales.</b> NDF policies will provide a framework to support growth including in the foundational sectors, which include the care, tourism, food and retail sectors across the whole of Wales.	P1, P2, P3, P4, P16, P17, P18, P20, P23, P24, P27, P28, P29, P32, P33
<b>PE7 Wales – England Border.</b> NDF policies will promote cross border spatial economic development, land use and transport planning, to maximise the positive, long term outcomes for both Welsh and adjoining regions.	P16, Draft NDF Section 5
<b>PE8 Nationally important roads, railways, ports and airports will be identified. Proposals for new infrastructure investment including rail electrification, public transport hubs and metro schemes will be identified.</b> NDF policies will provide a framework for investment in existing and new national transport infrastructure to decarbonise the transport sector, improve connectivity, efficiency and improve air quality.	P16, P17, P20, P21, P23, P25, P26, P27, P28, P31, P32

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
<b>PE9 Nationally targeted regeneration areas will be identified.</b> NDF policies will require regeneration activities support health and well-being benefits and focus on building places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive.	P16, P17, P18, P23, P24, P27, P28, P29
<b>PE10 National Marine Plan designations and national projects with a marine-terrestrial relationship will be identified.</b> NDF policies will provide a framework to ensure the delivery of national projects and policies covering the marine-terrestrial planning regimes.	Introduction, P20, P25
<b>AS1 All Wales</b> NDF policies will require that strategic housing development is linked to connectivity, infrastructure, key facilities (including health and education) and areas of growth; and supports the aim of providing better jobs and facilities closer to home.	P1, P2, P3, P4, P16, P17, P18, P23, P24, P27, P28, P29
<b>AS2 All Wales</b> NDF policies will require that strategic housing development meets the needs of everyone and that the types of housing required are considered alongside locational and numerical considerations.	P5, P16
<b>AS3 All Wales</b> NDF policies will identify a national policy-based population and housing projection, which will include an all Wales range of housing numbers for the plan period.	Draft NDF Section 5
<b>AS4 National active travel (including walking and cycling) infrastructure will be identified. Improvements to existing and opportunities for new national active travel (including walking and cycling) infrastructure will be identified.</b> NDF policies will provide a framework for improvements to existing and new national active travel (including walking and cycling) infrastructure.	P1, P16,
<b>R1 Three regions – North Wales, Mid &amp; South West Wales and South East Wales will be identified.</b> NDF policies will provide a framework for regional planning including the preparation of SDPs. The framework will support growth based on the regions distinctive strengths, to create more diverse, resilient economies, connected communities and address regional inequalities.	P16 to P33
<b>R2 Three regions – North Wales, Mid &amp; South West Wales and South East Wales will be identified.</b> NDF policies will identify regional policy-based population and housing projections for each region, which will include a regional range of housing numbers for the plan period.	P16 to P33
<b>R3 City region and growth deal areas will be identified.</b> NDF policies will provide a framework for connected, accessible and well-planned city region and growth deal areas through the co-ordinated delivery of national and regional transport, energy and digital infrastructure, housing and key services and facilities.	P17, P18, P23, P24, P27, P28, P29
<b>R4 Rural areas within the three regions will be broadly identified.</b> NDF policies will provide a framework for rural housing, services and facilities (including health and education) employment and connectivity (digital and transport) infrastructure to ensure Wales's rural communities retain and attract people.	P4, P16
<b>R5 Rural areas within the three regions will be broadly identified.</b> NDF policies will provide a framework for responding to the challenges and opportunities arising from exiting the EU over the plan period. Supporting agriculture and businesses and providing a clear framework for diversification and co-ordination with key Government strategies will be key policy objectives.	P4, P16

Table 2-6: Draft NDF Policy names and numbers

Policy Name	Policy number
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Policy Name	Policy number
Sustainable Urban Growth	<b>1</b>
Supporting Urban Centres	<b>2</b>
Public Investment, Public Buildings and Publicly Owned Land	<b>3</b>
Supporting Rural Communities	<b>4</b>
Delivering Affordable Homes	<b>5</b>
Planning in Mobile Action Zones	<b>6</b>
Ultra Low Emission Vehicles	<b>7</b>
Strategic framework for biodiversity enhancement and ecosystem resilience	<b>8</b>
National forest	<b>9</b>
Wind and Solar Energy in Priority Areas	<b>10</b>
Wind and Solar Energy Outside of Priority Areas	<b>11</b>
Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty	<b>12</b>
Other Renewable Energy Developments	<b>13</b>
Priority Areas for District Heat Networks	<b>14</b>
Master planning for District Heat Networks	<b>15</b>
Strategic Policies for Regional Planning	<b>16</b>
Wrexham and Deeside	<b>17</b>
North Wales Coastal Settlements	<b>18</b>
Green Belts in North Wales	<b>19</b>
Port of Holyhead	<b>20</b>
Transport Links to North West England	<b>21</b>
North West Wales and Energy	<b>22</b>
Swansea Bay and Llanelli	<b>23</b>
Regional Centres	<b>24</b>
Haven Waterway	<b>25</b>
Swansea Bay Metro	<b>26</b>
Cardiff	<b>27</b>



Policy Name	Policy number
Newport	<b>28</b>
The Heads of the Valleys	<b>29</b>
Green Belts in South East Wales	<b>30</b>
Growth in sustainable transit orientated settlements	<b>31</b>
Cardiff Airport	<b>32</b>
Valleys Regional Park	<b>33</b>

## 2.6 Summary of assessment of the Draft NDF

- 2.6.1 The July 2019 Draft NDF (assessed May 2019), including its Spatial Strategy and Policies, has been appraised for their likely effects against each of the ISA Objectives. A summary of the assessment findings for each of these elements is provided below, followed by a detailed analysis of the likely cumulative, synergistic and secondary impacts of all Draft NDF proposals in-combination.

### Spatial Strategy

- 2.6.2 The 'spatial strategy' of the NDF is the overall approach taken to the distribution and location of the proposed land-uses and policies. The NDF doesn't provide a chapter specifically focussed on setting out the spatial strategy. Rather, the spatial strategy pursued in the NDF emerges from its policies. The spatial strategy is therefore not repeated here but can instead be found in the NDF and predominantly in Chapter 4. The Spatial Strategy has been appraised in this ISA, the results of which are summarised in Table 2-7 and set out in full in Appendix B. This is different to a 'cumulative effects assessment' or the appraisals of individual policies, as the holistic appraisal of the 'spatial strategy' is focussed on the impacts associated *only* with the locational aspect of the proposed policies and land-uses.
- 2.6.3 The Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability impacts, with significant positive impacts on most ISA Objectives likely. Overall, the proposed spatial approach would be expected to help facilitate enhanced accessibility and increased capacity of education and health services throughout Wales, although there could be a risk of additional pressure being placed on their existing capacity in some urban areas. The approach would also facilitate excellent access to open spaces and the countryside for new people, which is important for physical and mental well-being. The support for significant economic growth and new housing that satisfies needs should help to reduce poverty and homelessness and better enable people of all backgrounds in many regions of Wales to pursue healthy and high-quality lifestyles. The spatial approach would be likely to help contribute towards significant economic growth in Wales, particularly in urban areas. The range of employment opportunities in regions across Wales, and the accessibility of these opportunities for areas currently most employment deprived, is likely to be significantly boosted. The proposed spatial approach would be expected to help ensure that identified housing needs are satisfied at national, regional and local levels.
- 2.6.4 The proposed approach would direct the majority of new development towards existing urban regions and this should enable more sustainable development that facilitates lower-carbon living for people due to the good access to public transport modes and the shorter distances needed to travel to access key services and amenities. Generally speaking, people in existing towns and settlements would have excellent access to key services, communal areas and amenities.



- 2.6.5 Based on the assumption that appropriate sewage capacity is available in urban areas, focussing new development in these areas is also an effective means of reducing the risk of adversely impacting water quality as less development would be likely to be situated near natural waterbodies or to result in the loss of greenfield land and vegetation, which help to filter water pollutants. For a similar reason, development in urban areas would also be less likely to adversely impact ecological connectivity in the countryside or to result in an adverse impact on a sensitive biodiversity designation. At the same time, brownfield sites and urban areas can be of high-biodiversity value, particularly as many of the existing towns and cities are coastal. Development in existing towns and cities would be expected to be able to make a more efficient and sustainable use and management of natural resources, particularly soils, due to opportunities for using brownfield sites, existing building and reused materials.
- 2.6.6 Focussing on existing towns and cities is an effective means of directing the majority of new development away from distinctive and natural landscapes in the countryside as well as landscapes designations including National Parks and AONBs. This is caveated somewhat by the potential risk of significant growth in towns and cities altering the existing townscape character. Impacts on historic environments and heritage assets are typically more severe in rural areas where the newly built form can more greatly discord with their setting than they may do in urban locations. However, heritage assets are typically far more numerous in urban areas and so there is some potential for alterations to their setting - these alterations could be beneficial where development would revitalise a derelict or vacant plot.
- 2.6.7 The proposed Spatial Strategy would be likely to help enhance Welsh culture to a minor extent, primarily due to the protection afforded to rural areas where cultural and traditional places and activities are prominent. Likewise, impacts of the proposed approach on Welsh language are likely to be somewhat limited although the new development facilitated by the approach is an opportunity to increase the number of Welsh speakers. There could be a risk that new economic development in settlements near the English border, such as Newport, could increase the number of people crossing the border for work purposes and this could potentially dilute rates of Welsh speaking.
- 2.6.8 The Spatial Strategy focusses on three clusters of major towns and cities. In these regions there is extensive flood risk present and there is a risk that the significant level of development proposed would place some new development in active floodplains at risk of flooding (although it is expected that development would still accord with national planning policy and NRW advice). There is also a risk that the development and growth would result in the loss of previously undeveloped land and above-ground vegetation that currently plays an important role in attenuating flood risk, such as permeable soil surfaces and upslope woodland. It should be recognised that situating development in the main towns and cities should limit these effects due to the plentiful opportunities for using brownfield sites and enhancing the presence of green infrastructure.

Table 2-7: Summary of the long-term effects of the Spatial Strategy Assessment

ISA Objective	Spatial Strategy
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+
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	++
3. To create opportunities for an increase in employment across the country and promote economic inclusion	++
4. To promote sustainable economic growth, diversity and business competitiveness	++
5. To encourage the protection and promotion of the Welsh Language	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	++
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	-
8. To encourage the protection and improvement of air quality	++
9. To contribute to the protection and enhancement of the quality of water features and resources	+
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	++
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	+
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	++
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	+
15. To encourage the protection and promotion of Welsh culture	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	++
17. To encourage the sustainable use of natural resources	++

## Policies

- 2.6.9 The appraisals of policies proposed in the NDF identified the likely impacts of each policy on each Objective in the short, medium and long terms. Section 1.6 in this report sets out the methodology. Table 2.8 presents the scores for each of the policies proposed in the NDF against each ISA Objective. These show that the likely impacts of policies are largely mixed, although the majority of impacts are anticipated to be positive with only a very limited number of potential significant negative effects identified. Over time, impacts of policies are generally expected to increase in magnitude as their influence on future decision making and planning across Wales grows and accumulates. For each policy, the Welsh Government considered reasonable alternatives, including a do-nothing (i.e.

have no policy) approach. The appraisals of the preferred options are presented alongside the appraisals of their reasonable alternatives to enable quick comparisons. The assessment results helped the Plan-makers decide which of the policy options to pursue, amend or reject. Table 2-8 only presents the ISA Scores for the preferred policies (i.e. those proposed in the NDF). For ISA scores and appraisals of reasonable alternatives, see Appendix B.

- 2.6.10 All policies in the NDF would be expected to have either negligible, neutral, minor positive or significant positive impacts on ISA Objectives 1 – 4, as well as ISA Objectives 10 - 12, which are related to topics on education, health, economy, employment, connectivity, social cohesion and housing. Impacts on all other ISA Objectives (5, 6, 7, 8, 9, 13, 14, 15, 16 & 17) are more mixed. Various policies would be highly likely to make a positive contribution towards achieving these ISA Objectives. However, many of the policies proposed in the NDF would encourage or support new investment, development and growth in various industries and regions of Wales and there are likely to be a range of impacts associated with new development that make achieving ISA Objectives more difficult. New development typically involves, for example, a degree of increase in local car use, water and energy consumption, land uptake or alteration to the surrounding townscape or landscape character. These are sustainability risks frequently associated with the impacts of new development. Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in GHG emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals be subject to more detailed analysis of their contribution to GHG emissions which could then inform a targeted mitigation strategy. Throughout the appraisals, which are presented in full in Appendix B, recommendations have been made that could help to reduce the risk or magnitude of potential adverse effects. A summary of these recommendations is presented in Table 2-8. During the iterative process of the ISA, the NDF has incorporated a range of recommendations that have helped to enhance the overall sustainability performance of NDF proposals.

Table 2-8: ISA Scores for all policies proposed in the NDF for all ISA Objectives, including scores at the short, medium and long terms (see Table 2-6 for Policy names)

	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes			14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity			17 Natural resources		
Policy	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L						
P1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+				
P2	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+				
P3	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+			
P4	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+			
P5	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	-	-	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+			
P6	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	0	0	0	0	0	0		
P7	0	0	0	+	+	+	0	0	+	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
P8	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	0	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+		
P9	0	0	+	0	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+		
P10	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	0	0	0	0	0	0	+	0	0	0	-	-	-	-	-	-	0	0	0	+	+	+	+	+	
P11	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+
P12	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
P13	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	-	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
P14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
P15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
P16	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
P17	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	0	0	+	+	+	+	+	+	+	+	+	0	-	-	0	-	-	0	0	-	0	-	-	0	-	-
P19	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
P20	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	-	-	-	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	0	0	-	-	-	-	-	-	
P21	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	0	0	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	0	0	-	-	-	-	-	-	
P22	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	-	-	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	+	+	+	-	-	-	-	-	-

	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes			14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity			17 Natural resources			
Policy	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L							
P23	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	-	-	-	0	-	-	-	-	-	-	-	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-		
P24	-	-	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	+	+	-	-	-	-	-	-	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-	
P25	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	-	-	+	+	+	-	-	-	+	+	+	+	+	+	+	+	-	-	-	+	+	+	0	0	0	-	-	-	+	+	+		
P26	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	0	0	0	-	-	-	0	0	0	+	+	+	-	-	-	-	-	
P27	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	-	-	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-
P28	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	-	-	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-	
P29	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	0	0	+	+	+	+	+	+	+	+	+	0	0	-	-	-	-	0	0	0	-	-	-	-	-	-	
P30	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	0	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	0	0	0	+	+	+	+	+	+			
P31	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	0	0	0	-	-	-	-	-	+	+	+	-	-	-	-	-	-	
P32	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	-	-	-	0	0	0	-	-	-	?	?	?	+	+	+	+	+	+	+	0	0	0	0	-	-	0	-	-	0	+	+	-	-	-	-	-	
P33	+	+	+	+	+	+	0	0	0	0	0	0	?	?	?	0	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+			

## Cumulative, secondary, synergistic, indirect effects

- 2.6.11 In addition to appraising each of the proposals in the Draft NDF separately they have all been appraised in-combination for their likely cumulative, secondary and synergistic effects against each ISA Objective. The detailed results of this process are presented in Appendix B. A summary of these results is provided in Table 2-9.
- 2.6.12 The Draft NDF was identified as being likely to result in highly positive impacts on the more social and economic ISA Objectives, including those related to education, health, employment, economy, connectivity, social cohesion, housing and culture. For many of these the identified impacts would be likely to become significantly positive over the medium- and long-term.
- 2.6.13 More mixed impacts were identified for eight of the ISA Objectives. These are predominantly associated with the natural environment, including energy and GHG emissions, air quality, flood risk, water, landscapes & townscapes, cultural heritage, biodiversity & geodiversity as well as natural resources. For most of these, it is unclear whether the positive or negative effects would outweigh the other. Adverse impacts are the consequence of new development and growth in Wales, supported and encouraged by various Draft NDF policies, that would be likely to lead to some degree in energy and natural resource consumption and air emissions. Recommended mitigation measures are included within Table 2-10.

Table 2-9: Summary of cumulative, synergistic and secondary effects appraisal for each ISA Objective

ISA Objective	Short-term	Medium-term	Long-term
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+	+	++
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	+	+	++
3. To create opportunities for an increase in employment across the country and promote economic inclusion	+	+	++
4. To promote sustainable economic growth, diversity and business competitiveness	+	++	++
5. To encourage the protection and promotion of the Welsh Language	+	+	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	+/-	+/-	+/-
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	+/-	+/-	+/-
8. To encourage the protection and improvement of air quality	+/-	+/-	+/-
9. To contribute to the protection and enhancement of the quality of water features and resources	+/-	+/-	+/-
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	+	++	++

ISA Objective	Short-term	Medium-term	Long-term
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	+	+	++
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	++	++	++
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	+/-	+/-	+/-
15. To encourage the protection and promotion of Welsh culture	+	+	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	+/-	+/-	+/-
17. To encourage the sustainable use of natural resources	+/-	+/-	+/-

## Avoiding, reducing or mitigating negative effects and maximising positive effects – summary of recommendations

2.6.14 Throughout the appraisals of Draft NDF policies recommendations have been made for each policy against each ISA Objective, where appropriate, in order to help avoid or mitigate negative effects and to help maximise positive effects. Recommendations have also been made alongside the cumulative effects assessment. A summary of the recommendations made in this ISA Report to help enhance the sustainability performance of the NDF are presented in Table 2-10. In response, the Welsh Government considers that the spatial policies and proposals contained in the Draft NDF, coupled with topic based national planning policies provided in PPW and associated guidance, provide the suite of national planning policy to broadly align with the recommendations. Some of the recommendations have raised points for which it is considered necessary to strengthen the NDF. The Welsh Government's response to the recommendations is further provided in Table 2-10.

Table 2-10: Summary of recommendations made in the ISA to help enhance the sustainability performance of the Draft NDF

Summary of recommendations	Welsh Government's comment
<ul style="list-style-type: none"> <li>The Draft NDF should maximise opportunities to strengthen links and connectivity between rural areas and more isolated communities with essential services, amenities and goods including education facilities, health services, employment areas, communal spaces and a diverse range of natural habitats.</li> </ul>	<ul style="list-style-type: none"> <li>The Draft NDF will include a policy on 'Sustaining Rural Communities' to ensure that the needs of rural communities with regard to housing, transport, businesses and services are met. The Draft NDF will include a policy on 'Strategic framework for biodiversity enhancement and ecosystem resilience' to deliver cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems.</li> </ul>
<ul style="list-style-type: none"> <li>In some cases, spatial implications of NDF policies are uncertain. The provision of a map would provide a more detailed idea of where benefits and impacts of policies would be likely.</li> </ul>	<ul style="list-style-type: none"> <li>The Draft NDF will include national and regional mapping.</li> </ul>



Summary of recommendations	Welsh Government's comment
<ul style="list-style-type: none"> <li>New development supported through the NDF should seek to provide open space and green infrastructure (GI) elements that offer new and existing occupiers with good access to a diverse range of species.</li> </ul>	<ul style="list-style-type: none"> <li>PPW and TAN 5: Nature Conservation &amp; Planning set out national policy in relation to GI, landscape and biodiversity and ecological networks. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> <li>PPW defines placemaking, the key planning principles and the national sustainable placemaking outcomes which include policy on facilitating accessible and healthy environments.</li> </ul>
<ul style="list-style-type: none"> <li>The NDF should maximise on opportunities to ensure that new GI elements in developments are integrated into a coherent GI network extending throughout the locality and beyond. This GI network should include a diverse range of native species in order to facilitate the free movement of wildlife as well as attractive and safe walking and cycling routes for people. In particular, this network should seek to connect people with places of employment. The GI network can also be designed, managed, laid out and situated in a strategic approach to enhance the other ecosystem services it would provide, including filtering air pollutants, capturing carbon, filtering water, reducing flood risk, enhancing local character, protecting views and preserving soils.</li> </ul>	<ul style="list-style-type: none"> <li>PPW and TAN 5: Nature Conservation &amp; Planning set out national policy in relation to GI, landscape and biodiversity and ecological networks. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> <li>PPW defines placemaking, the key planning principles and the national sustainable placemaking outcomes which include policy on facilitating accessible and healthy environments.</li> <li>NDF policy 'Strategic framework for biodiversity enhancement and ecosystem resilience' specifically refers to strategic green infrastructure and its role as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.</li> </ul>
<ul style="list-style-type: none"> <li>The NDF could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside. The NDF could explicitly refer to the need for any development supported in the NDF to accord with Welsh Government policy on flood risk, to avoid building on active flood plains where feasible, to incorporate Sustainable Drainage Systems and other measures to help alleviate flood risk for the development and nearby properties.</li> </ul>	<ul style="list-style-type: none"> <li>PPW and TAN 15: Flooding: sets out national policy in relation to flooding. PPW includes policy in relation to SUDs. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> <li>The Draft NDF identifies the importance of flooding as an issue and identifies flooding in the context of each region and the importance of flooding issues informing regional strategic decisions on locations for growth and new infrastructure.</li> <li>Given the well-established existing policy guidance on flooding, it is not necessary to repeat this in the NDF.</li> </ul>

Summary of recommendations	Welsh Government's comment
<ul style="list-style-type: none"> <li>Wildlife and GI elements proposed in policies in the NDF, such as the new national forest proposed in P9, could be strategically located in order to maximise its flood risk alleviation ecosystem service value, for example by ensuring some of the forest covers upland areas or is in an active floodplain.</li> </ul>	<ul style="list-style-type: none"> <li>PPW and TAN 5: Nature Conservation &amp; Planning set out national policy in relation to GI, landscape and biodiversity and ecological networks. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> <li>Flooding is an important issue and the National Forest could potentially play a role in alleviating flood risk. It is agreed that the NDF can be strengthened by highlighting this. The text that supports policy P9 National Forest will be expanded to cover this issue.</li> </ul>
<ul style="list-style-type: none"> <li>The NDF could more closely consider the potential impact of dense development in urban location on air quality and the extent to which this can be managed through the design and layout of development – not only to minimise the development's adverse impact on air quality but also to protect site users from existing pollution.</li> </ul>	<ul style="list-style-type: none"> <li>PPW sets out national planning policy in relation to air quality. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> <li>Air quality is an important issue and it is agreed that the NDF will be strengthened by additional content on this point. The text that supports policy P1 – Sustainable Urban Growth will be expanded to cover this issue.</li> </ul>
<ul style="list-style-type: none"> <li>Development in town and city centres could be required to enhance existing townscape character through high-quality design measures, considerate layout and potentially vernacular architecture whilst also enhancing the accessibility of places and networks for people and nature within our townscapes. New development supported in the NDF, of all kinds, should be carefully located to minimise adverse impacts on character, setting and views. The potential for heritage and culture led regeneration should be recognised here.</li> </ul>	<ul style="list-style-type: none"> <li>PPW, TAN 12: Design and TAN 24: The Historic Environment set out national planning policy in relation to design and the historic environment. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</li> </ul>
<ul style="list-style-type: none"> <li>Several policies in the NDF refer to sustainable place-making principles such as for new development on Government land holdings. The NDF could provide a more detailed definition of what it considers to be sustainable place-making, ideally in line with the various ISA Objectives, and beyond protecting or enhancing environmental aspects 'sustainable' place-making should be accepted as required enhancements to the current state of the environment.</li> </ul>	<ul style="list-style-type: none"> <li>PPW defines placemaking, the key planning principles and the national sustainable placemaking outcomes.</li> </ul>

## Findings of HRA and how these have fed into the assessment

- 2.6.15 The June 2019 HRA Report summarises how the draft NDF has evolved from the Issues and Options stage through to the Draft NDF, along with the HRA work undertaken at each stage of the process. The HRA Report comprises the HRA Screening of the policies set out in the draft NDF; followed by the Appropriate Assessment (AA) of those policies where likely significant effects (LSEs) on Natura 2000/ Ramsar sites could not be screened out. The Draft NDF identifies 33 policies covering a range of topics, which set the direction for development in Wales from 2020 to 2040. The HRA screened out 13 of these policies, with 20 policies carried through to AA.
- 2.6.16 The HRA considered that none of the policies in the NDF actively direct development in a manner that potential impacts could not be avoided or mitigated at the lower-tier level. Therefore, deferring the requirement for HRA to these lower-tier plans and/or projects would be appropriate due to the deliverable mitigation at that stage.
- 2.6.17 The HRA also determined that the inclusion of Policy P8 within the NDF will indirectly provide protective buffering for Natura 2000/ Ramsar sites by protecting ecosystem services, ecological networks and biodiversity in the wider countryside, whilst also providing safeguarding standards to which other policies within the NDF, as well as those in lower-tier plans, will be required to adhere.
- 2.6.18 Policy P16 sets the criteria for lower-tier Strategic Plans (and their constituent LDPs) to follow when identifying allocations for development. As with Policy P8 this policy includes reference to identifying ecological networks, which the HRA also considered will indirectly provide protective buffering for Natura 2000/ Ramsar sites by protecting ecosystem services, ecological networks and biodiversity in the wider countryside. Policies P10, P11, P13, P20, P21, P22, P25, P26 and P32 all relate to the types of development that typically have a higher likelihood of leading to adverse effects on Natura 2000/ Ramsar sites. This is because of the size and scale of the developments (energy and port-related activities) and because they tend to be more likely to be located away from existing urban areas, and/or on the coast, where the risk of conflicting with European sites designated for nature conservation is higher. As such, specific mitigation measures have been recommended in the HRA to provide a strong guide to lower-tier plans and projects which emerge from these elements of the NDF. The HRA concludes that, on the assumption that these mitigation measures are adopted at the lower-tier planning or project scales, significant effects would be avoided.
- 2.6.19 The Appropriate Assessment did not identify any residual effects, assuming that Policy P8 is properly complied with, and due consideration is given to the mitigation measures set out in Table 4 of the HRA report when implementing these policies at the regional and local levels. Lower-tier plans would be required to take the potential implications of development on Natura 2000/ Ramsar sites into account during the planning process, and to adopt the high-level mitigation measures proposed; as well as more specific measures (to be determined during subsequent HRAs). Furthermore, the potential for in-combination effects to arise when spatial planning is being undertaken at the strategic and local level would be fully assessed, and appropriate measures put in place within the lower-tier plans to ensure that any in-combination effects would not adversely affect the integrity of Natura 2000/ Ramsar sites.
- 2.6.20 The findings of the HRA process have informed the ISA process. As the HRA has not identified any LSEs of any policies either alone or in-combination on a Natura 2000 site, the ISA has also not identified a significant effect on these sites. It should be noted that whilst significant effects have been ruled out, it is still possible that policies in the NDF were recorded in the ISA as having a minor adverse effect on a European site.

## Monitoring – Significant effects (Task B.6)

- 2.6.21 The ISA has identified the likely effects of the NDF on ISA Objectives over the short, medium and long terms. An indication of the certainty of these effects was also provided. However, there is a risk

that the sustainability impacts of the NDF, including the impacts of specific policies or the cumulative impacts of policies in-combination, are different to those anticipated, such as due to unforeseen circumstances. It is therefore an essential component of delivering sustainable development to monitor the impacts of the NDF in relation to the predicted impacts. Regular monitoring then enables the relevant authorities to alter plans as necessary should unexpected negative effects arise or expected positive effects not arise. Monitoring comprises Stage B.6 of the ISA.

- 2.6.22 It is anticipated that the Welsh Government will be monitoring the implementation and impacts of the NDF post-adoption to feed into future plan review and revision. Table 2-9 proposes a monitoring framework to keep track of the sustainability impacts of the NDF, for which it would be appropriate to integrate with NDF monitoring. This is a draft and will be subject to discussion and refining with Welsh Government. In addition to monitoring the extent to which the NDF results in the impacts identified in the ISA, the monitoring framework will provide an indication of the impacts of the NDF on the environmental baseline in Wales and this can be compared with the future trends of this baseline set out in Table 2-1.

Table 2-9: Proposed Monitoring Framework

ISA Objective		Effects to be monitored	Proposed indicators for monitoring	Data source
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	The NDF would be likely to lead to a long-term significant positive impact on encouraging and supporting more, and improved, opportunities for people across Wales to learn new skills and qualifications.	Indicators relating to education and deprivation including equitable distribution of opportunity, specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	The NDF would be likely to lead to a significant positive impact on improving the physical, mental and social health and well-being for all.	Indicators relating to health and deprivation specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
3	To create opportunities for an increase in employment across the country and promote economic inclusion	The NDF would be likely to lead to a significant positive effect on employment and economic inclusion for people throughout Wales.	Indicators relating to employment and deprivation specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	The NDF would be likely to lead to a significant positive effect on sustainable economic growth, diversity and business competitiveness.	Indicators relation to sustainable economic growth specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
5	To contribute towards the future well-being of the Welsh language	The NDF would be likely to help protect and improve the well-being of the Welsh language.	Indicators relating to the protection and increase in use of the Welsh language specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	<p>Development supported by the NDF could potentially make achieving GHG emissions reduction targets more difficult.</p> <p>Development supported by the NDF could lead to an increase in energy consumption, and much of this is likely to be non-renewably sourced.</p>	Indicators relating to energy consumption, renewable energy generation and Wales' carbon footprint specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.

ISA Objective		Effects to be monitored	Proposed indicators for monitoring	Data source
7	To contribute to the reduction and management of flood risk	The NDF supports new development in new regions in Wales where there is extensive flood risk. This could potentially expose new people or properties to a risk of flooding.	Indicators relating to number of people and properties at risk of flooding specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
8	To create opportunities to encourage the protection and improvement of air quality	Development supported by the NDF could help to ensure people in Wales are able to make relatively efficient and low-emission movements.  Development supported by the NDF would be likely to make achieving air quality improvement targets more difficult in some locations.	Indicators related to air quality specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	The NDF would support new development that would increase water consumption in Wales.  New development supported by the NDF could potentially pose a risk to the quality of natural water bodies, including along the coast.	Indicators related to water quality and water resource availability specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	The NDF would be expected to make a significant positive contribution towards the creation of opportunities for improving connectivity between people and places, key services, goods and services.	Indicators related to deprivation in terms of access to services specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved	The NDF would be expected to make a significant positive contribution towards the creation of opportunities for enhancing the cohesiveness of communities across Wales and moving towards a more equal society.	Indicators related to equality and cohesion specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	The NDF would be expected to make a significant positive contribution towards ensuring that needs for good quality, safe and affordable housing are being provided for in regions and communities across Wales.	Indicators related to housing provision specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.

ISA Objective		Effects to be monitored	Proposed indicators for monitoring	Data source
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	<p>The NDF would be likely to lead to new development taking place predominantly in urban areas, which could help to avoid adverse impacts on sensitive natural landscapes.</p> <p>Development in urban areas could pose a risk to surrounding townscapes and settlement character.</p>	Indicators related to the condition of landscapes and townscapes as well as the impact of new land-uses on condition specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	The NDF supports new development in regions throughout Wales where it could potentially alter the setting of sensitive heritage assets and historic areas.	Indicators related to the condition of heritage assets and historic areas in Wales specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
15	To create the opportunities for the protection and promotion of Welsh culture	The NDF would be likely to help create opportunities for protecting and improving the accessibility of Welsh cultural places and activities.	Indicators related to Welsh culture specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	<p>The NDF supports new development across Wales that could potentially reduce the connectivity and coherence of ecological networks.</p> <p>New development supported by the NDF could potentially increase public access associated disturbances at sensitive habitats.</p> <p>New development supported by the NDF could potentially result in the direct loss of sensitive habitats or functionally linked land.</p>	Indicators related to the condition of biodiversity designations, ecological connectivity, geodiversity areas and tree canopy specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	The NDF supports new development in regions across Wales that would be likely to lead to an increase in the consumption of natural resources.	Indicators related to natural resources and their availability specifically in relation to the role of the NDF, to be developed and agreed.	To be confirmed.



### 3 CONCLUSION

- 3.1.1 This document comprises the ISA of the Draft NDF. It satisfies the requirements of an Environmental Report as per the SEA Directive for this stage in the process. Further information will be provided in the ISA of the Final NDF to ensure full compliance with the Directive.
- 3.1.2 The ISA is a process that has been highly integrated alongside the development of the NDF, involving a close working relationship between ISA experts and the Welsh Government. During this process, the ISA has enabled the Welsh Government to embed the principles of environmental, sustainability and wider considerations into the Draft NDF outcomes, strategy and policies, from the outset. The ISA has provided a structured means of considering the benefits, costs and risks of a wide range of options.
- 3.1.3 The ISA also provides a consultation tool, providing the general public and statutory bodies with an analysis of how the NDF has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the NDF.
- 3.1.4 The July 2019 Draft NDF (assessed May 2019), including its Spatial Strategy and Policies, has been appraised for its likely effects against each of the ISA Objectives.
- 3.1.5 The Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability impacts, with significant positive impacts on most ISA Objectives likely. All policies in the NDF would be expected to have either negligible, neutral, minor positive or significant positive impacts on ISA Objectives 1 – 4, as well as ISA Objectives 10 - 12, which are related to topics on education, health, economy, employment, connectivity, social cohesion and housing. Impacts on all other ISA Objectives (5, 6, 7, 8, 9, 13, 14, 15, 16 & 17) are more mixed. Various policies would be highly likely to make a positive contribution towards achieving these ISA Objectives.
- 3.1.6 The Draft NDF was identified as being likely to result in highly positive impacts on the more social and economic ISA Objectives, including those related to education, health, employment, economy, connectivity, social cohesion, housing and culture. For many of these the identified impacts would be likely to become significantly positive over the medium and long terms.
- 3.1.7 More mixed impacts were identified for eight of the ISA Objectives. These are predominantly associated with the natural environment, including energy and GHG emissions, air quality, flood risk, water, landscapes & townscapes, cultural heritage, biodiversity & geodiversity as well as natural resources. For most of these, it is unclear whether the positive or negative effects would outweigh the other. Adverse impacts are the consequence of new development and growth in Wales, supported and encouraged by various NDF policies, that would be likely to lead to some degree in energy and natural resource consumption and air emissions. However, it should also be noted that the NDF is intended to be applied alongside a wider suite of policy including PPW which will also help to mitigate uncertain negative effects at the more local level. The NDF does not intend to duplicate this policy.
- 3.1.8 Where negative effects have been predicted, the ISA has provided recommendations which, if incorporated into the policy in question, would be likely to help avoid or mitigate potential negative effects or to enhance positive effects. Recommendations made to the Welsh Government have been a key feature of the ISA process from its inception. The Welsh Government has proved highly receptive to measures for enhancing the sustainability performance of the NDF and subsequently made enhancements and amendments to the NDF throughout. Recommendations made to the Welsh Government, and how these were taken into consideration, were particularly discernible for the following elements of the NDF:

- **NDF Outcomes (formerly called NDF Objectives):** The compatibility assessment of the NDF objectives (now refined as Outcomes for the Draft NDF) was undertaken in three iterations. The results of these assessments led to the refinement of the objectives as presented in the 2018 Issues and Options NDF. The majority of the recommendations of the ISA were incorporated into the NDF.
- **NDF Preferred Option:** Options considered in the Issues and Options NDF were appraised in the Interim ISA Report. Alongside these appraisals, the ISA made various recommendations to help enhance the sustainability of the preferred option and these were taken into consideration by the Welsh Government.
- **Draft NDF Policies:** during the detailed appraisals of Draft NDF policies carried out for this ISA Report, recommendations were made for each policy against each ISA Objective, where appropriate, and these were provided to the Welsh Government at an early stage. As and when the policies were amended, the new policy wording was factored into the appraisals. These appraisals and accompanying recommendations are provided in their entirety in Appendix B. In response to the most recent recommendations contained within this report, the Welsh Government considers that the spatial policies and proposals contained in the Draft NDF, coupled with topic based national planning policies provided in PPW and associated guidance, provide the suite of national planning policy to broadly align with the recommendations. Some of the recommendations have raised points for which it is considered necessary to strengthen the NDF.

## **4 CONSULTATION AND NEXT STAGES**

### **Stages C and D: ISA Report and Consultation**

- 4.1.1 This Draft ISA Report is published (Stage C) to accompany and inform the Draft NDF consultation (Stage D).
- 4.1.2 Following the consultation on the Draft NDF the ISA will again be updated to reflect any significant changes in the NDF as a result of the consultation (continuation of Stage D). A Final ISA Report will then be produced to accompany the Final NDF.

### **Stages E: Monitoring the Significant Effects of the NDF**

- 4.1.3 Stage E of the ISA process includes the finalisation of a monitoring framework that will be used to identify issues, both positive and negative and significant effects of the NDF over time. Following the adoption of the NDF, a post-adoption ISA Statement will 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. A Draft Monitoring Framework is provided in Section 3 of this Report.
- 4.1.4 Further information about future stages of the ISA process can be found in Section 1 of this report.

## Appendix A Draft NDF Outcomes

### Development of draft NDF Outcomes

These tables provide an explanation of the evolution of the NDF Objectives from those consulted on at the Issues, Options and Preferred Options stage to those which will form part of the Draft NDF.

Following the consultation on the Issues, Options and Preferred Option Consultation, Edition 10 of Planning Policy Wales (PPW) was published<sup>32</sup>. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales as required by the Planning (Wales) Act and Well-being of Future Generations (Wales) Act 2015.

PPW sets out the Key Planning Principles for Wales which represent a guiding vision for all development plans, including the NDF. These Key Principles shape the NDF, which will no longer contain a Vision. PPW requires every development plan to take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes, considering the scale of the plan.

Welsh Government has reviewed the Preferred Option Objectives in light of the Key planning principles and Placemaking Outcomes from PPW (Table A-1) and, taking on board the engagement and ISA findings to date, have developed a set of NDF Outcomes. The development of this work is set out in Table A-2. The outcomes are presented in Table A-3.

The compatibility assessment of the NDF objectives was undertaken in three iterations. The commentary provided in Table B-2 of Appendix B of the Interim ISA Report presents the iterative process of assessment, and how the recommendations have been taken into account, where relevant. This demonstrates that the majority of the recommendations of the ISA have been incorporated into the NDF. This has included the following improvements, which will improve the potential for the NDF objectives to contribute to more sustainable development, compared to previous iterations:

- Strengthened consideration of landscape (NDF objective 6);
- NDF objectives shortened, simplified where necessary and given greater focus;
- Additional text added to objective 4 relating to population retention, to strengthen communities;
- Reference to marine planning has been included (NDF objective 6);
- Text added to include consideration of pollution (NDF objective 6);
- Improvement to the Welsh Language objective to include consideration of socioeconomic infrastructure of communities; and
- Additional NDF objective relating to cohesive communities added.

**It makes sense, for the NDF Objectives to align with the Outcomes of PPW, in order that the spatial planning across Wales is delivered consistently. Table A-1 and A-2 demonstrate that they align, and therefore a further compatibility assessment with the ISA Objectives is not necessary.**

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<sup>32</sup> Welsh Government, Planning Policy Wales, Edition 10, December 2018, available: <https://beta.gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

Table A-1: NDF Preferred Option Objectives and the National Sustainable Place Making Outcomes (PPW)

NDF – Preferred Option Objectives	Key Planning Principles and National Sustainable Placemaking Outcomes
<p><b>1. Climate change, decarbonisation and energy</b></p> <ul style="list-style-type: none"> <li>• To enable the transition to a low-carbon economy</li> <li>• To enable management of and adaptation to the consequences of climate change</li> <li>• To support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets</li> </ul>	<p><b>Creating and Sustaining communities</b></p> <ul style="list-style-type: none"> <li>• Enables Welsh Language to thrive</li> <li>• Appropriate development densities</li> <li>• Homes and jobs to meet society's needs</li> <li>• A mix of uses</li> <li>• Offer cultural experiences</li> <li>• Community based facilities and services</li> </ul>
<p><b>2. Economic prosperity and regeneration</b></p> <ul style="list-style-type: none"> <li>• To provide strategic direction for the delivery of infrastructure that supports economic prosperity for all and green growth</li> <li>• To support the national and foundation sectors; and growth and innovation in a low carbon economy</li> <li>• To support strong, regional economies</li> <li>• To tackle inequality and provide strategic direction for regeneration initiatives.</li> </ul>	<p><b>Making best use of resources</b></p> <ul style="list-style-type: none"> <li>• Makes best use of resources</li> <li>• Prevents waste</li> <li>• Prioritises the use of previously development land and existing buildings</li> <li>• Unlocks potential and regenerates</li> <li>• High quality and built to last</li> </ul>
<p><b>3. City Regions &amp; Growth Deals</b></p> <ul style="list-style-type: none"> <li>• To support the effective delivery of city region deals and growth deals across Wales.</li> </ul>	<p><b>Growing our economy in a sustainable manner</b></p> <ul style="list-style-type: none"> <li>• Fosters economic activity</li> <li>• Enables easy communication</li> <li>• Generates its own renewable energy</li> <li>• Vibrant and dynamic</li> <li>• Adaptive to change</li> <li>• Embraces smart and innovative technology</li> </ul>
<p><b>4. Rural Wales</b></p> <ul style="list-style-type: none"> <li>• To enable the delivery of jobs, services and infrastructure to strengthen rural communities and retain young people.</li> <li>• To support resilience and diversification in the rural economy</li> </ul>	<p><b>Maximising environmental protection and limiting environmental impact</b></p> <ul style="list-style-type: none"> <li>• Resilient biodiversity and ecosystems</li> <li>• Distinctive and special landscapes</li> <li>• Integrated Green Infrastructure</li> <li>• Appropriate soundscapes</li> <li>• Reduces environmental risks</li> <li>• Manages water resources naturally</li> <li>• Clean air</li> <li>• Reduces overall pollution</li> <li>• Resilient to climate change</li> <li>• Distinctive and special historic environment</li> </ul>
<p><b>5. Housing</b></p>	<p><b>Facilitating accessible and healthy environments</b></p>

<ul style="list-style-type: none"> <li>• To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth.</li> </ul>	<ul style="list-style-type: none"> <li>• Accessible and high-quality green space</li> <li>• Accessible by means of active travel and public transport</li> <li>• Not car dependent</li> <li>• Minimises the need to travel</li> <li>• Provides equality of access</li> <li>• Feels safe and inclusive</li> <li>• Supports a diverse population</li> <li>• Good connections</li> <li>• Convenient access to goods and services</li> <li>• Promotes physical and mental health and well-being</li> </ul>
<p><b>6. Natural Resources, Circular Economy &amp; Flooding</b></p> <ul style="list-style-type: none"> <li>• To strengthen the resilience of biodiversity assets, including habitats species and designated sites.</li> <li>• To support the sustainable management of our natural resources and facilitate nature recovery</li> <li>• To protect, promote and enhance nationally important landscapes</li> <li>• To provide strategic direction to manage and adapt to the potential threat of flooding</li> <li>• To ensure resource efficiency, minimise the unsustainable use of resources and support the development of the circular economy</li> <li>• To support the reduction of pollution and improve air, noise and water quality</li> <li>• To support the delivery of the objectives of the Welsh National Marine Plan</li> </ul>	
<p><b>7. Culture &amp; Heritage</b></p> <ul style="list-style-type: none"> <li>• To protect, promote and enhance national cultural and historic assets</li> <li>• To support opportunities for new national cultural development</li> </ul>	
<p><b>8. Transport</b></p> <ul style="list-style-type: none"> <li>• To support a reduction in travel by private vehicles and a growth in walking, cycling and public transport</li> <li>• To facilitate the delivery and improvement of key transport infrastructure to decarbonise travel</li> </ul>	
<p><b>9. Welsh Language</b></p> <ul style="list-style-type: none"> <li>• To support the socioeconomic infrastructure of communities and help to create the conditions to realise the</li> </ul>	

Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050	
<b>10. Health &amp; Well-being</b> <ul style="list-style-type: none"> <li>• To support healthy and active lifestyles and improve access to services</li> <li>• To support the reduction of health inequalities across Wales</li> </ul>	
<b>11. Digital Infrastructure</b> <ul style="list-style-type: none"> <li>• To support the delivery of digital infrastructure and help achieve the Welsh Government's objective of 100% coverage of broadband and telecoms services across Wales</li> </ul>	
<b>12. Cohesive Communities</b> <ul style="list-style-type: none"> <li>• To support the delivery of cohesive communities</li> </ul>	

Table A-2 How the Preferred Option Objectives relate to the Draft NDF Outcomes

The Draft NDF Outcomes are concise and focused. These are supported by and expanded upon in the descriptions.

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
<b>1. Climate change, decarbonisation and energy</b> 1.1 To enable the transition to a low-carbon economy 1.2 To enable management of and adaptation to the consequences of climate change 1.3 To support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets	This NDF Objective is incorporated within the proposed Outcome 11. The previous impact highlighted on landscape is captured within Outcome 9.	<b>A Wales where people live ...</b>  11.. in places which are decarbonised	The challenges of climate change demand urgent action on carbon emissions, and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new work sectors.
<b>2. Economic prosperity and regeneration</b> 2.1 To provide strategic direction for the delivery of infrastructure that supports economic prosperity for all and green growth 2.2 To support the national and foundation sectors; and growth and innovation in a low carbon economy 2.3 To support strong, regional economies 2.4 To tackle inequality and provide	Section 2.1 and 2.2 of this NDF Objective is incorporated within the proposed Outcome 6. Sections 2.3 and 2.4 are incorporated within Outcome 3. The national and foundation sectors, although aren't directly referenced are captured within the term sectors more generally.	3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth  6..in places where prosperity, innovation and culture are promoted	The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.  Development Plans will have a forward thinking, positive attitude towards economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses.
<b>3. City Regions &amp; Growth Deals</b> 3.1 To support the effective delivery of city region deals and growth deals across Wales.	This NDF Objective is incorporated within the proposed Outcome 5.	5..and work in towns and cities which are a focus and springboard for sustainable growth	Cities and large towns are magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide. Development plans will enable and support aspirations for large towns and cities to grow, founded on sustainability and urban design principles, active travel and investment in key



NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
			built and green infrastructure to enable population and economic growth whilst reducing pollution. Areas outside the urban centres will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services
<b>4. Rural Wales</b> 4.1 To enable the delivery of jobs, services and infrastructure to strengthen rural communities and retain young people. 4.2 To support resilience and diversification in the rural economy	This NDF Objective is incorporated within the proposed Outcome 2. The outcome has been expanded to reference all people and not just young people which will enable this to be refined to reflect the evidence/ trends within regions.	2..in vibrant rural places with access to homes, jobs and services	In rural areas job opportunities and community services will be supported,, to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.
<b>5. Housing</b> 5.1 To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth.	This NDF Objective is incorporated across the proposed Outcomes 1, 2 and 3. This reflects placemaking principles – not thinking about housing in isolation.	1..and work in connected, inclusive and healthy places  2..in vibrant rural places with access to homes, jobs and services  3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.  In rural areas job opportunities and community services will be supported, to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.  The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
			public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.
<b>6. Natural Resources, Circular Economy &amp; Flooding</b> 6.1 To strengthen the resilience of biodiversity assets, including habitats species and designated sites. 6.2 To support the sustainable management of our natural resources and facilitate nature recovery 6.3 To protect, promote and enhance nationally important landscapes 6.4 To provide strategic direction to manage and adapt to the potential threat of flooding 6.5 To ensure resource efficiency, minimise the unsustainable use of resources and support the development of the circular economy 6.6 To support the reduction of pollution and improve air, noise and water quality 6.7 To support the delivery of the objectives of the Welsh National Marine Plan	<p>This NDF Objective is incorporated within the proposed Outcomes 9 and 10. Waste is captured within the definition of resources. The relationship with the Welsh National Marine Plan will be addressed within the draft NDF.</p>	<p>9. in places that sustainably manage their natural resources and reduce pollution  10. in places with biodiverse, resilient and connected ecosystems</p>	<p>Wales' natural resources, including its minerals, coast, water, forests and landscape, support a range of activities and sectors and are assets of great value in their own right. The environmental, social and cultural value of our resources will be managed, maintained and enhanced, while economic benefits will be utilised sustainably and appropriately by promoting nature-based solutions and a circular economy. Across Wales better resource choices will be reflected in more sustainable places, which benefit from reductions in levels of pollution and be healthier and more liveable.</p> <p>The variety of flora and fauna found across Wales makes Wales a special place. Biodiversity underpins the functioning of healthy resilient ecosystems and the multiple benefits they provide. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems. The planning system will ensure wildlife is able to thrive in healthy, diverse habitats, both in urban and rural areas, recognising and valuing the multiple benefits to people and nature.</p>
<b>7. Culture &amp; Heritage</b> 7.1 To protect, promote and enhance national cultural and historic assets 7.2 To support opportunities for new national cultural development	<p>This NDF Objective is incorporated within the proposed Outcome 6. This reflects the NDF role and focus around heritage and tourism.</p>	<p>6..in places where prosperity, innovation and culture are promoted</p>	<p>Development Plans will have a forward thinking, positive attitude towards economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of</p>

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
			tourists, and providing a distinctive and trusted brand for Welsh businesses
<b>8. Transport</b> 8.1 To support a reduction in travel by private vehicles and a growth in walking, cycling and public transport 8.2 To facilitate the delivery and improvement of key transport infrastructure to decarbonise travel	This NDF Objective is incorporated across the proposed Outcomes 1 and 7.	1..and work in connected, inclusive and healthy places 7..in places where travel is sustainable	<p>Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.</p> <p>All methods of travel will need to have low environmental impact and low emissions, with ultra-low emission vehicles and public transport replacing today's petrol and diesel varieties. Active travel and public transport will be a significant part of the transport mix, allied with a reduced reliance on private vehicle use, with sustainable transport infrastructure embedded within new developments to enable easy and convenient access from one place to another for commuting, business, tourism and leisure purposes</p>
<b>9. Welsh Language</b> 9.1 To support the socioeconomic infrastructure of communities and help to create the conditions to realise the Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050	This NDF Objective is incorporated within the proposed Outcome 4.	4.. in places with a thriving Welsh Language	We aim to have a million Welsh speakers in Wales by 2050 – an increase of almost 80% on current levels. Where Welsh is the everyday language of the community, development will be managed to ensure there are jobs and homes to enable the language to remain central to those communities' identities. Elsewhere education authorities will develop the infrastructure they need and to generate other facilities where the language can develop as a natural, thriving part of communities.
<b>10. Health &amp; Well-being</b> 10.1 To support healthy and active lifestyles and improve access to services 10.2 To support the reduction of health inequalities across Wales	This NDF Objective is incorporated across the proposed Outcomes 1 and 3. This reflects the wider determinants of health.	1..and work in connected, inclusive and healthy places 3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth	<p>Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.</p> <p>The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will</p>

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
			address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.
<b>11. Digital Infrastructure</b> 11.1 To support the delivery of digital infrastructure and help achieve the Welsh Government's objective of 100% coverage of broadband and telecoms services across Wales	This NDF Objective is incorporated within the proposed Outcome 8.	8..in places with world-class digital infrastructure	Broadband provision will develop and evolve, beginning with comprehensive coverage of superfast and progressing to ultra-fast fibre, which will help businesses to be more productive, resilient and innovative. Better digital communication will enable changes to the economy and way of life and ensure Wales can lead and keep pace with the latest global technological advancements.
<b>12. Cohesive Communities</b> 12.1 To support the delivery of cohesive communities	This NDF Objective is incorporated across the proposed Outcomes 1, 2 and 3.	1.. and work in connected, inclusive and healthy places 2..in vibrant rural places with access to homes, jobs and services 3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.  In rural areas job opportunities and community services will be supported, to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.  The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.

Table B-3: The Draft NDF Outcomes

A place where people live...	
1.	and work in connected, inclusive and healthy places...
2.	in vibrant rural places with access to homes, jobs and services...
3.	in distinctive regions that tackle health and socio-economic inequality through sustainable growth...
4.	in places with a thriving Welsh Language...
5.	and work in towns and cities which are a focus and springboard for sustainable growth...
6.	in places where prosperity, innovation and culture are promoted...
7.	in places where travel is sustainable...
8.	in places with world-class digital infrastructure...
9.	in places that sustainably manage their natural resources and reduce pollution...
10.	in places with biodiverse, resilient and connected ecosystems...
11.	in places which are decarbonised.

## **Appendix B**

### **Appraisal of Draft NDF, including Reasonable Alternatives**

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## Keys for assessments

Tables B-1 to B-5: Keys, terms and effects for assessment tables

Scoring of Assessment		
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)	
+	Minor positive – likely to result in limited progress towards the ISA objective	
0	Neutral outcome	
+/-	Range of possible positive and negative outcomes	
?	Uncertain outcome	
-	Minor negative – likely to work against the achievement of the ISA objective	
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)	
Type of Effect	Definition	
Secondary	Indirect effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.	
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.	
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.	
Key and terms		
Scale	Geographic extent: Local; Sub-regional; Regional/National; or International.	
T/P	Temporary/Permanent	
Cert	Certainty: Low; Medium; or High	
ST	Short Term	
MT	Medium Term	
LT	Long Term	
Future Baseline: Summary of predicted future trends for each ISA Objective, without the implementation of the NDF		
Improving	Static	Declining

The appraisals in this Appendix satisfy the requirements of impact assessments including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language (Wales) Measure 2011 and Standards, Children's Rights Impact Assessment (CRIA), Equalities Impact Assessment (EqIA), Well-being of Future Generations (WFG) Act (2015)<sup>1</sup>; and Sustainable Management of Natural Resources (SMNR) & the Natural Resources Policy (NRP). Where appropriate, boxes prior to appraisal results indicate which impact assessments other than SA and SEA are particularly relevant to the appraisal.

<sup>1</sup> Available online at: <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted> [Accessed 10.04.19]

## Appraisals of Alternative Options (February 2018)

During the Issues and Options stage of the NDF, five alternative options were considered for the strategy to be adopted. These are presented in Tables B-5 to B-9 below. Following these, an appraisal table is provided for each ISA Objective, within which the appraisal of the five alternative options against that ISA Objective is shown. These appraisals were originally prepared for the Interim ISA Report published online in April 2018<sup>2</sup>. The final row in each table indicates how preferable elements of each option could be carried through to the preferred option.

Table B-5: Alternative Option 1

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas
<p><b>Summary Overview</b></p> <p>This option focuses the long-term growth and development of Wales around the strongest market areas. It seeks to support economic growth in areas where markets are strongest and which have the best potential to grow. This option recognises that many objectives – deprivation, regeneration, physical and mental health, language, resilience of natural resources - are directly linked to economic prosperity.</p> <p>The role of the NDF will be to direct growth to these areas and provide the infrastructure required to support growth. It will take a top-down approach to the delivery of major infrastructure and make clear choices on which parts of Wales will grow and how they should grow. The planning system will be responsive to opportunities for supporting economic growth and will not constrain or delay investment in identified growth areas.</p>
<p><b>Why has this option been developed?</b></p> <p>There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan which provided a framework for nationally important infrastructure. The need for greater certainty and speed of delivery were identified as important and it was recognised that the national planning tier is the appropriate level at which to plan for national needs. Local and regional planning cannot easily balance local impacts with national interests. We were told there is a need for a clear top-down approach to dealing with national issues.</p> <p>There was recognition that many of the challenges faced in Wales stem from economic issues and that much health, deprivation, well-being and other issues can be addressed through improving economic circumstances. Over the long term, there is a need to support a dynamic and growing economy and there was recognition that strong businesses and new investment have positive benefits for Wales. There is a need to support economic growth and investment.</p> <p>It was identified that silo thinking and un-coordinated approaches mean that investment is not focussed on a clear goal and decisions made through the planning system lack coherency. A NDF focussed on economic growth, offers the opportunity to ensure all land-use decisions at all levels are working towards a common goal. There is a need to ensure a clear, economic focus.</p> <p>This option has been developed and subject to further engagement in October 2017.</p>
<p><b>Full Overview: How would this option help meet the NDF objectives?</b> <i>Note: 'objectives' here refers to the 'NDF Objectives' at the time of appraisal, which have since been translated into the NDF Outcomes.</i></p>
<p><b>Cultural Assets</b></p> <p>This NDF supports existing and the provision of new heritage, sporting and arts development assets where they provide economic opportunities. It recognises that these should be economically viable and promotes appropriate housing and commercial uses around them, to maximise economic potential. Culture-led regeneration projects are supported where they provide direct opportunities for economic growth. Developments at all scales and opportunities for cross-subsidisation with other developments are supported. Cultural projects unable to demonstrate an economic value are not prioritised.</p>
<p><b>Housing</b></p> <p>House building is viewed as a significant economic driver in its own right with large potential multiplier effects for local economies. Housing development which meets market</p>

<sup>2</sup> Interim ISA Report, April 2018, Available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf>

### Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

demand is facilitated, helping to attract and retain a skilled labour force. New housing provision is particularly targeted at areas within commuting distance of economic growth areas. Significant new land allocations are made to accommodate development, with release of large sites in and around settlements if necessary. This may include managed release of greenfield land, following policy and capacity reviews. Affordable housing initiatives are progressed in areas where economic growth is particularly concentrated, aiming to meet the needs of key workers. Market housing is directed to areas attractive to the market, with unattractive areas reliant on public investment only. Opportunities for cross-subsidisation of housing and other developments are supported.

#### **Climate change, decarbonisation & energy**

Investment in energy is driven by the private sector. Development patterns continue to focus primarily on the most viable technologies including wind energy developments (with large-scale schemes predominating). Off-shore developments would be facilitated through appropriate on-shore infrastructure. Opportunities for green jobs within these sectors are high on the agenda.

Issues arising from climate change, such as rising sea levels and flooding are approached from an economic perspective. Steps will be taken to address these challenges in so far as they minimise risks to growth. Decarbonisation objectives will be supported where they provide economic opportunities and growth. Economic land allocations take climate change into account to minimise risks to business.

#### **Broadband & digital infrastructure**

Telecommunication and digital technology is a key priority, with the NDF supporting provision of the required infrastructure through the market, as well as encouraging technological capacity to be built into the design of new buildings, infrastructure (including transport infrastructure) and areas of urban expansion and renewal. Infrastructure will be provided on the basis of market demand only and to serve the areas of greatest growth potential.

#### **Economic prosperity & economic regeneration**

This NDF responds to market demand as well as need and is based on active engagement with business and industry, with an emphasis on increasing land supply and minimising business development costs. Significant new land allocations are made to accommodate development, with release of sites in and around settlements. This includes the release of greenfield land, following policy and capacity reviews. This NDF would support commercial development in the most viable locations, including both in-town and out-of-town locations. Town-centre focussed development would not be prioritised over out-of-town and the market would determine the most viable location. Brownfield sites (including those in use) attractive to the market would be released for new economic uses. Enterprise Zones are a key focus of intervention. Existing commitments to community regeneration are reviewed, so that future investment can be targeted at people with the most significant economic potential rather than those with greatest social need. Poverty will be tackled by improving the overall prosperity of Wales rather than focussing on specific areas.

#### **Rural Wales**

This NDF supports increasing prosperity in all parts of Wales, though its focus will be on the most profitable urban areas and it will only support significant investment in rural parts of Wales where this is market driven. It will not seek to reverse depopulation and will actively provide opportunities for people to move to more prosperous, better served areas to support growth objectives. Support for agriculture would be primarily focussed on food security. National Parks and AONBs would be supported for their economic value.

#### **City Regions & Growth Deals**

Cities are the primary drivers of the economy and the primary focus of economic investment. Wider regions provide both workers and potential consumers and this NDF supports wider regional interventions that improve economic productivity. A larger, dynamic workforce provides a larger employment pool and this is attractive to the market. Whilst this NDF will support the principles of city regions, its focus will be on the most profitable economic core and it will be expected that the benefits of growth will spread across the region over time predicated on accessibility.

#### **Transport**

Large scale strategic infrastructure projects are taken forward, such as metro projects, directly through the NDF to allow a high level of growth and facilitate land release. Road and public transport infrastructure are upgraded. Internal (inter-city region) and external links by air, sea and high-speed rail are promoted. International profile is important to promote Wales and attract investment. Projects which seek to promote external connectivity are taken forward. Transport links to key gateways are substantially improved to help stimulate private sector investment, and in response to business needs. Facilitating the easy movement of international freight, through key gateways by road and rail will be a key priority. Expansion of Cardiff Airport if required, improvements to the infrastructure that support it and economic opportunities for growth in and around the airport will be facilitated.

## Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

### Natural Resources

This NDF supports the realisation of the economic potential of Wales's natural resources. It would also support the principle of the circular economy and ensuring the full economic potential is realised of all resources, including waste. Investment would be driven by the private sector. Environmental quality is recognised as a strong potential driver of growth, making Wales attractive to visitors and potential investors.

Ecological, biodiversity and landscape designations, particularly at the local and regional level, will be reviewed where they prevent growth and the delivery of physical infrastructure. Over the life of the NDF, the role of national and international designations will be reviewed, in particular in light of Brexit, to understand their role in supporting national economic priorities. Agricultural land could be released for other uses including the best quality land.

### Welsh Language

This NDF will support all initiatives that support economic growth and by delivering new employment opportunities, help retain Welsh speakers in Wales. Its focus will be on areas with the strongest economic potential and movements of Welsh speakers from weaker to stronger market areas will be supported.

### Health

Good health and well-being enable economic potential to be fulfilled. This NDF focuses growth and services in the strongest urban areas. Health facilities will be planned to support growth.

### What are the key assumptions that support this option?

- Cities and their regions are viewed as the primary drivers. Growth is focussed in these areas, with more limited growth in mid-Wales, small towns and regeneration areas.
- The identification of national transport projects is driven by their potential to facilitate economic growth in particular in the strongest market areas. Internal connectivity is improved by substantial multi-modal infrastructure investment. External connectivity is actively improved including enhanced air and sea links, and new high speed rail links to England and beyond to Europe. Freight links between continental Europe and Ireland are also improved.
- There are significant levels of investment in transport, energy and digital infrastructure as key drivers of growth, with prioritisation of projects which offer the greatest improvements in connectivity and support the widest range of objectives.
- Public investment in new infrastructure is driven by the desire to facilitate and attract new investment, both in existing strong market areas and areas of the greatest economic potential.
- The identification of Developments of National Significance would be important, providing clear direction from the Governmental, certainty and greater expediency in decision making.
- There will be higher rates of housing and economic development and increased land take overall.
- Greenfield land for development is released, with development focusing on areas that are already most accessible and in strong market areas.
- Planning controls are streamlined in priority investment areas and some environmental regimes, particularly at the local level, are relaxed where legislative requirements provide scope to do so.
- Planning controls are less prescriptive. Wider planning policy, the sequential test and proximity principle for example are relaxed to give wider spatial choices.
- Affordable housing provision focuses on links with the economy, in terms of locational decisions and market sectors (e.g. key worker housing).
- Environmental initiatives focus on place-making and therefore coincide with areas with greatest economic investment potential. Environmental quality is recognised as a driver of growth, but there is reduced emphasis on environmental justice. Multiple benefits are not necessarily pursued.
- Businesses themselves seek to be more sustainable in operational terms, pursue energy efficiency and are assisted in adapting to climate change to reduce potential economic effects.
- The private sector leads investment in energy sector and waste, leading to variation in types and levels of provision.

### What would Wales in 2040 look like?

#### Cultural Assets

National investment in cultural assets is economically driven and has focussed on the strongest market growth areas, as part of a package of wider investment initiatives.

#### Housing

### Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

Both private and social housing has focussed in strongest market growth areas. The NDF has facilitated through SDPs and LDPs, major urban expansion and greenfield release. Parts of Wales outside of these areas deal with local issues only and do not have a national strategic role.

#### **Climate change, decarbonisation & energy**

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support their expedient delivery. Areas of greatest potential for wind, solar, tidal and other energy generation are the focus for new development. Grid, transmission and storage infrastructure is facilitated. Strong support has been given to new economic opportunities in these sectors.

#### **Broadband & digital infrastructure**

The planning system is aligned at all levels to support delivery of infrastructure. The market determines investment and is primarily focused on strongest market growth areas.

#### **Economic prosperity & economic regeneration**

Has focussed on the strongest market growth areas, driven by the delivery of new transport, energy and telecommunications infrastructure and a clear direction for the land-use system to support growth in these areas.

#### **Rural Wales**

Has been supported to ensure food, energy and water security for wider societal benefits. New investment has been limited to that promoted by the market and there has been no active intervention to reverse depopulation and other social trends.

#### **City Regions & Growth Deals**

There has been strong support for city regions in Cardiff, Swansea and North East Wales. Investment in new infrastructure has supported their growth, which has been facilitated by alignment of the land-use system at all levels.

#### **Transport**

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support its expedient delivery. The focus has been on supporting the strongest market growth areas and improving international connections that support economic growth.

#### **Natural Resources**

Driven by the market, the economic realisation of natural resources has been strongly promoted across the whole of Wales.

#### **Welsh Language**

The primary focus has been on improving the economic health of Wales. Opportunities to support the Welsh language have been supported from an economic rather than spatial perspective. Welsh language speakers have moved away from the traditional heartlands in North-West and Mid-West Wales to the strongest market growth areas.

#### **Health**

The provision of services and facilities have been planned to support growth areas.

### What did the October 2017 engagement say about this option?

#### **Positive**

There was a strong sense that cities are economic drivers and it is unrealistic to think national scale growth objectives can be met without a strong and clear focus on them. Providing infrastructure to support cities and their regions is necessary and generally supported. These are ultimately the areas where the majority of people in Wales live and work.

The importance of identifying key infrastructure and providing a framework to ensure its expedient delivery is a key role for the NDF. In doing so it will provide clear national direction and by focusing growth in key urban areas, will help shape the investment of national utility providers. Focussing investment in a geographically smaller area (as opposed to all-Wales) can help leverage funding and send a clear statement to potential investors.

The NDF is the opportunity to drive national projects from national level and provide a clear spatial strategy for all other Government policies. This is currently missing.

Notwithstanding the concerns that a market driven approach does raise, it is important that it is recognised Wales is a poor country and this type of nationally driven, economic focus is required to break the cycle.

This option can help overcome local political barriers. It also recognises that you do need to create prosperity to address other environmental, social and cultural objectives. The failure to link economic prosperity to other outcomes and the belief that we can do everything equally prevents us from addressing some of the major issues affecting Wales. This is well intentioned thinking but doesn't provide the necessary leadership and avoids us from having to take difficult decisions. This option would be an important



### Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

step in moving Wales forward and is what long term strategic decision making is about.

#### Negative

There was a strong sense that this option was the opposite of long-term planning. It only reflects where Wales is now and does not seek to deliver real change. It supports existing growth patterns and does not provide a spatial strategy for the whole of Wales. It would not be transformational but rather the opposite.

Focussing on the strongest urban centres and cities will not address issues outside these immediate areas. It will both reinforce existing inequality and create new inequalities, as areas outside of the preferred growth regions are not supported. Social, environmental and cultural objectives should not be viewed purely through an economic lens and it is unlikely that these objectives can be met if the sole focus is what is attractive to the market. Such an approach is contrary to the Well-being Act.

There was clear recognition that economic growth is important and, if it is planned and assessed appropriately, has positive outcomes that provide a wide range of benefits. However, the long-term spatial development of Wales cannot simply be left to the market to determine and the planning system exists to influence growth and how our places should change, to ensure the widest possible benefits. What happens if markets collapse? What is the role of the Government if not to consider and plan for the long-term interests of the whole nation?

Environmental quality is not a barrier to overcome. It adds value and is intrinsic to our well-being. This option lacks environmental consideration and risks short term economic gain over long term environmental resilience. It would not ensure the sustainable management of our natural resources. Markets are short term and are not strategically orientated. Strong concerns were expressed regarding the loss of agricultural land to other uses, including potentially the best farming land.

This option is too outward looking and is not about Wales. It doesn't play to the strengths of Wales - green space, landscape and biodiversity.

#### Realistic

This option was considered to be realistic. Some considered that as it would reflect current development patterns and trends, it would be the easiest option to adopt. It was also the easiest option to grasp and it was clear how this option could shape other relevant strategies. It was clear how investment in infrastructure could be prioritised to support this option. Others thought that this approach did not represent the status quo; it would represent a major policy shift but that if we decided to do it, we could.

Table B-6: Alternative Option 2

### Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

#### Summary Overview

This option focusses on the whole of Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another. Long term objectives will be met through actions and investment across the whole of Wales and by direct support to local communities to support bottom-up solutions to national issues. This option will deliver strong local communities, providing access to jobs, housing, services and facilities that they need and with a strong focus on people, their well-being and sustainability.

The role of the NDF will be to distribute growth and infrastructure across the whole of Wales with a focus in particular on supporting areas of greatest need and where markets are weaker. It will retain a clear focus on the delivery of national objectives and co-ordinate the actions at the regional and local level to meet these aims.

#### Why has this option been developed?

There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan. There was also a belief that as well as having a national perspective which considered Wales as a whole, the NDF should relate to local communities and support them to deliver their aspirations. A NDF which considered, for example, south east and north east Wales only would not be a national plan. A NDF which was seen to impose top-down housing, energy or transport policies without taking the opportunity to consider bottom-up solutions as well would not reflect the views of many. It was felt by some that the impact of national decisions on local communities was not recognised enough.

There was a view that the NDF should not seek to pick 'winners' or focus too heavily on a one-size fits all approach. Local communities experience different housing issues, language issues, different depopulation and social challenges. The NDF must be flexible enough to allow different, appropriate solutions and create the space for SDPs and LDPs to find solutions.

## Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

This option has been developed and subject to further engagement in October 2017

### Full Overview: How would this option help meet the NDF objectives?

#### Cultural Assets

This NDF would recognise the importance of our heritage in shaping Wales and seek to maintain and promote our distinctively Welsh communities. It would require that new development actively contributes to, rather than detracts from, our cultural capital. Our existing cultural assets will be protected, promoted and enhanced and new cultural developments supported. There will be strong support for local scale community projects that could provide cultural and associated benefits. For example, culture led projects benefitting health and wellbeing through the provision of both formal and informal recreation activities.

#### Housing

Access to housing and in particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. Interventions would seek to support affordable housing over other types of housing where necessary. Support will be given for new and innovative housing designs and self and custom build developments will be facilitated, where they provide additional opportunities for new housing and help meet community housing needs. As well as meeting housing needs, new housing will help sustain local communities and support vital services.

In addition to affordability, lifetime homes and the provision of housing to meet the needs of people at all stages of their lives will be prioritised. The type of housing needed will be an important issue, recognising that we need to build the right type of housing in the right places and not focus only on the number of houses required.

#### Climate change, decarbonisation & energy

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale energy and transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives. Local ownership of energy projects and decentralised grid and storage infrastructure will be strongly supported.

The functioning of communities and their needs would be the primary focus. Policies would focus on local, place-based solutions and maximising community benefits.

Decentralised energy generation and distribution would be supported including community owned renewable energy schemes. For larger scale energy policy, there would be a strong emphasis on assessing the impacts on local communities and ensuring the economic opportunities arising from such investment, directly benefits local communities, in terms of jobs, energy costs and other benefits. Actions to increase energy efficiency, in both new and existing developments will be supported, helping meet wider energy objectives, reduce energy costs and address issues of fuel poverty.

#### Broadband & digital infrastructure

The provision of modern digital infrastructure would be supported, with an emphasis on ensuring all communities in Wales are connected to the latest and best technology.

Areas that may not otherwise be served by the market in a timely manner will be the focus of Government investment and this NDF will support all steps to increase access to digital services and resources.

#### Economic prosperity & economic regeneration

This NDF would support local employment opportunities, diverse local economies and vibrant local centres. It would encourage local distinctiveness and recognise that economic prosperity helps support well-being. Providing better jobs closer to homes, will both reduce the need to travel and allow those who wish to stay and live in their local communities to do so. Regeneration objectives and tackling deprivation would shape major strategic investment decisions, focussing investment on those areas in greatest need. This NDF would seek to avoid reliance on trickledown economics or prosperity growing outwards from key growth poles and instead promote strong, local centres across all parts of Wales. Poverty will be tackled by focussing on the different issues affecting communities across Wales and shaping responses to meet these needs.

#### Rural Wales

Reversing population decline would be a priority in rural areas. This NDF would seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure through all levels of the planning system, thereby helping to ensure Wales's rural communities retain and attract all ages and all members of our society. Investment decisions, the delivery of new infrastructure and the co-ordination of other key Government strategies would be aligned to support these objectives.

#### City Regions & Growth Deals

The city regions would be supported and this NDF would place a strong emphasis on ensuring that investment and opportunities within city regions benefit all. Investment would be supported where it maximises the benefits for all communities and where potential positive outcomes are achieved wider than the central regional urban core.

## Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

Connectivity will be an important feature.

### Transport

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives.

The functioning of communities and their needs would be the primary focus. Transport policies would focus on local accessibility, with public transport connecting homes, jobs and key services, and places will be shaped around walking and cycling. Ensuring accessibility to key transport hubs will be a priority. Supporting active travel initiatives would be a key objective. This NDF would seek to tackle the negative consequences around transport choices. Health objectives would be a key influence, supporting healthy transport modes and addressing directly air and noise quality issues. Traffic reduction measures, including potentially significant changes to road networks would be pursued if necessary, to secure benefits for local communities.

### Natural Resources

This NDF would strongly support the principles of SMNR, recognising the unsustainable management of our resources will negatively impact upon all communities in Wales. Through actions such as increasing resource efficiency and reducing pollution, the aim is to build greater resilience into our ecosystems and biodiversity and support the delivery of national objectives. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure the long-term economic sustainability of our communities. They also provide resources that are fundamental to the prosperity and security of wider industries and ultimately that of our towns and cities. Securing social, economic, health, cultural and environmental benefits and enhancements for local communities through the SMNR approach will be a key priority.

### Welsh Language

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities for every area and planning the provision of new homes so that population change is carefully managed.

### Health

The NDF would promote good health and well-being for everyone. Supporting the creation of high-quality places with improved access to integrated community facilities and services, including digital access. The NDF will look to tackle inequalities throughout Wales and deliver a range of high-quality houses and improved access to the natural environment, to support health objectives.

### What are the key assumptions that support this option?

- The planning system and locational choices will ensure that all parts of Wales support the development of sustainable settlements.
- Sustainable settlement patterns are key – homes close to jobs and key services and facilities, reducing the need to travel and ensuring sustainable transport options when required. A strong emphasis is placed on maintaining a good range of accessible community facilities.
- Land-use planning principles will be used to ensure the jobs, services, facilities and recreational activities people use will be close to home. Where they cannot be provided locally, they will be easily accessible by sustainable transport options. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- It is accepted there will remain a need for large-scale national projects. A full assessment process will be required, to ensure that alternative options are considered including locally scaled approaches.
- The provision of local, affordable housing is a key issue with strong support for local and self-build housing.
- The NDF seeks to enable the most disadvantaged communities to benefit from growth and supports community empowerment and good governance.
- Accessibility is central to decision making and locational choices must maximise accessibility to all members of society.
- Improving health is a key objective and influences all policy decisions. Air quality improvements are directly targeted. Local well-being and quality of life is the key objective in land use decisions.
- Regeneration and tackling deprivation are a key strategic focus. Tackling the legacy of previous development and industry is a priority as well as addressing all areas

## Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

of poor environmental quality.

- The NDF emphasises digital connectivity, thereby encouraging more flexible and home working, a better work life balance and reducing the need to travel and congestion. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- Community owned renewable energy schemes are prioritised. Initiatives to increase energy efficiency in homes and end fuel poverty are supported by the planning system. Areas where renewable energy is being generated receive direct community benefits and emphasis is placed on schemes being located closer to where people live. Support for distribution and storage networks.
- Strong support for principles of circular economy

### What would Wales in 2040 look like?

#### **Cultural Assets**

Strong focus on community scaled projects across all parts of Wales has created distinctive communities.

#### **Housing**

Dispersed across all of Wales, housing has focussed on meeting community needs and helped build sustainable communities.

#### **Climate change, decarbonisation & energy**

Energy needs are met through a dispersed, community scaled approach following a move away from fewer, large scale developments. Communities are energy exporters.

Land use principles have sought to reduce the need to travel and where trips are made, by the most sustainable methods.

#### **Broadband & digital infrastructure**

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge. Investment has focussed on peripheral and rural areas, accepting landscape change.

#### **Economic prosperity & economic regeneration**

Public investment has been balanced across all parts of Wales. The focus on ensuring strong local economies through the planning system and key Government strategies has increased prosperity nationally.

#### **Rural Wales**

Depopulation has been reversed and there is strong demand for housing in rural areas.

#### **City Regions & Growth Deals**

Successful city regions have been planned to ensure the widest possible benefits for their full regions, recognising the needs of communities across the region.

#### **Transport**

Communities have been shaped to reduce the need to travel within them and where trips are made, including between settlements, they are done so by sustainable and accessible transport methods.

#### **Natural Resources**

Agriculture, forestry, renewable energy, water and tourism have all supported the growth in high quality jobs across the whole of Wales and helped secure the long term economic sustainability of our communities.

#### **Welsh Language**

Strong support and investment in local communities has ensured Welsh language objectives are being met.

#### **Health**

Strong focus on integrated community health facilities, ensuring communities can access facilities locally and digitally. Investment in good quality places and increased access to the natural environment,

### What did the October 2017 engagement say about this option?

#### **Positive**

There was welcome support for the principle of developing a fully all Wales spatial strategy. It was identified as important that the NDF process does not start on the assumption of a top-down, directional strategy and that understanding how national issues could be addressed from the local, community level was important. Housing,

### Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

energy, employment and transport are typically cited as examples of where the top-down approach of the planning system fails to recognise what local communities want and does not properly assess the uneven impacts of these national decisions on all parts of Wales.

There was concern that city regions, growth deals and major projects such as the M4 focus on defined, urban parts of Wales only. This option, by consciously focussing on the whole of Wales, is a positive attempt to think beyond the usual areas.

There was support for the principle of seeking to focus public investment in the areas of greatest need and ensuring private investment in the strongest market areas is planned to deliver the widest possible benefits.

The ability to develop local approaches under a unified national framework was welcomed. Housing and economic growth were frequently given as examples of areas where issues vary greatly across Wales. Focussing only on a single, narrow aspect such as housing numbers rather than the type and quality of housing, does not support the delivery of wider objectives. Community focussed approaches would be more flexible and allow appropriate solutions to be developed.

This option was considered to be a good fit with the Well-being Act, seeking not to prioritise one area or one outcome over another but rather seeking to understand how objectives could be met across the whole of Wales.

#### Negative

Whilst the overall aspiration of this option was supported, many thought it lacked focus and it was not clear what the spatial strategy would be. Rather than directing growth and the delivery of infrastructure, this option would create the conditions for bottom-up approaches to be developed but not provide certainty on where or how.

It was expressed that this option would be a missed opportunity to positively drive change from the national level. There was uncertainty about what the relationship would be between different tiers of the planning system. LDPs were considered the most appropriate plan to plan for local areas. Climate change, economic prosperity, solutions to housing issues and tackling many of the issues Wales will face between now and 2040 will require big, national solutions. We should not be afraid of setting a clear national spatial strategy and this is the role of Government.

Rather than provide a strategy to consider how national issues could be addressed from the bottom-up, there were strong concerns that this option could become a NIMBY charter. A point made frequently was that those most likely to be involved in the planning process do not necessarily represent the wider community and that one of the key drivers for the introduction of the NDF, was the ability to consider and address issues at the national level.

Views were expressed that the understanding of the relationship between the planning system and the Well-being Act required careful consideration. Everywhere can't have everything and all goals cannot be met equally in all cases. The aspiration is welcome but this is not realistic and decisions have to be made. A spatial strategy and the development of a NDF should be about making important decisions in the right way.

#### Realistic

Given existing plans, strategies and Government commitments, it was considered that in the short term it would be difficult to move to this spatial approach. In light of this, the option and underlying assumptions have been amended to reflect that, particularly in the short term, large scale projects will be supported, and over the life of the NDF there may be a need for large, nationally scaled projects. The primary focus under this option will, however, be clearly on locally scaled solutions and ensuring that future strategic decisions start from a bottom-up perspective. With this amendment, this option was considered realistic.

Table B-7: Alternative Spatial Option 3

### Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

#### Summary Overview

This option focuses on decarbonisation and climate change and makes our response to these issues the primary consideration for the NDF. There is overwhelming evidence supporting the need for urgent action on climate change. The planning system has a pivotal role in facilitating the transition to a low carbon society by ensuring decarbonisation is at the forefront of land use choices. Targets for renewable energy and greenhouse gas emissions and emerging carbon budgets will significantly shape this spatial strategy. This NDF focuses particularly on land use, the relationship between different uses and the connectivity between them. It places a strong emphasis on planning how our settlements will grow, interconnect and understanding the consequences that will arise from the choices we make and the opportunities arising from doing things differently.

### **Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.**

Existing urban and rural patterns will be adapted to improve their sustainability. This NDF will support major changes to urban form and development patterns, including in existing areas, if they are required to meet objectives and contribute to the realisation of a low-carbon economy.

#### **Why has this option been developed?**

Across all the issues and discussion of potential spatial options for the NDF, the strongest consensus emerged around the importance of tasking the NDF with responding to climate change issues and supporting the decarbonisation agenda. It was suggested that this option has no plausible counter view to it (e.g. support carbonisation, worsen climate change issues) and as such must be considered across the NDF process. There was also a clear view that this option was not and should not be a negative option. It offered a positive opportunity to develop our society and economy in new ways and this should be embraced.

There was a belief that land-use planning principles were key and that the planning system should take the lead in 'planning' our future. Problems have been exacerbated by a lack of joined-up thinking, short-term goals and a failure to understand the interrelated consequences of many of our decisions.

This option has been developed and subject to further engagement in October 2017

#### **Full Overview: How would this option help meet the NDF objectives?**

##### **Cultural Assets**

This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. It would support cultural development that helped achieve our decarbonisation objectives.

##### **Housing**

This NDF would focus on the location of new development, connectivity between uses and energy efficient, zero carbon sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Housing will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned housing development will not be supported.

As a first principle, the NDF will seek to direct housing to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported. This NDF would support housing development in the most sustainable locations, which may be green and brownfield, with a focus on resource efficiency, quality and innovative design.

##### **Climate change, decarbonisation & energy**

This NDF will adopt a positive and proactive approach to increasing the generation of renewable and low carbon energy through a range of technologies and support innovation and growth in the renewables sector. The decarbonisation of energy and other sectors will be a key priority. The NDF will direct renewable energy generation to the most appropriate locations and provide a framework to support its delivery. As well as large scale projects, this alternative option will support regional and local scale energy projects, maximising the potential for sustainable projects at all levels. It will also provide flexibility to ensure that new emerging technologies and opportunities are supported.

The storage and transmission of energy will be planned for to support a modern and efficient energy sector. Actions to increase energy efficiency, in both new and existing developments will be supported. Land use patterns and the provision of new infrastructure will be shaped by the potential risks from climate change. This NDF will anticipate the risks from flooding; increases in temperatures; loss of habitats and vegetation; increasing urban heat islands; and harmful effects on ecosystems and ensure future development patterns consider, are shaped by and build resilience to these. There will be an acceptance that some areas will remain vulnerable to potential impacts and the consequences of this planned for. Coastal changes and the potential impacts upon cities, towns and communities will influence spatial choices.

The NDF will promote SUDs as an integral part of new development, encouraging water (including floodwater) to be a more normalised feature of the built environment through planned and managed schemes. Actions to increase energy efficiency, in both new and existing developments will be supported.

##### **Broadband & digital infrastructure**

This NDF would fully support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways, support new working practices and reduce the need to travel.

##### **Economic prosperity & economic regeneration**

This option will positively support sustainable low-carbon growth. Emerging opportunities in sectors helping deliver decarbonisation objectives will be strongly supported and



### Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

the framework will support innovation, R&D and the development of new technologies. Green growth and the circular economy will be strongly supported. This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Employment and regeneration initiatives will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned development will not be supported. Land use choices will reduce the need to travel and ensure connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to these objectives and that they have been planned to support the widest range of benefits. Choices on the location of strategic employment centres will be shaped by existing and proposed centres of populations and sustainable transport networks. Poverty will be tackled by providing modern, high quality housing, addressing fuel poverty, supporting a transition to a prosperous, low-carbon economy and improving well-being for all in Wales.

#### **Rural Wales**

This NDF will seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure in rural areas. There will be support for community energy projects which can help subsidise local services and infrastructure. It would support locally focussed communities, which reduce the need to travel and when trips are made, can be done so sustainably. It will require a clear focus on how growth, investment and new infrastructure is planned across the whole of Wales, to ensure that spatial choices support decarbonisation objectives in both rural and urban areas.

#### **City Regions & Growth Deals**

This NDF will support the development of connected, accessible and well-planned city regions, which co-ordinate the delivery of growth and infrastructure in a manner that maximises positive outcomes. The delivery of regional transport infrastructure which supports decarbonisation objectives will be a priority and the NDF will provide a clear framework for their delivery. Key projects and infrastructure must be planned in the context of wider social, economic, cultural and environmental uses.

#### **Transport**

Land use choices will reduce the need to travel, ensuring that connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to meeting these objectives. This NDF will support actions and investment to decarbonise the transport sector and ensure the land use planning system at all levels is aligned to facilitate delivery. Walking, cycling, electrification and public transport are prioritised. Bus as well as rail services will be important. Major new road investment will be supported where it significantly reduces congestion; supports significant improvements in efficiency; and supports wider objectives including those in relation to air quality and the environment.

Airport expansion may be limited or offset. Investment supports improvements to external rail and sea links. Emerging technologies such as electric cars will be supported where they help decarbonise transport movements. As a first principle this NDF would seek to minimise the need to travel and as a second principle, ensure trips are made in the most sustainable manner.

#### **Natural Resources**

This NDF supports the core SMNR principles of improving efficiency, minimising the unsustainable use of resources, reducing pollution and delivering renewable energy. Alongside steps to reduce carbon emissions, this NDF will support actions to build resilience to climate change in our communities, businesses and natural environment. This NDF will support nature-based solutions to strengthen biological diversity, including the provision of green networks and infrastructure. The contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. This NDF will have strong support for the principles of the circular economy and resource efficiency. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.

#### **Welsh Language**

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.

#### **Health**

This NDF will co-ordinate delivery of infrastructure to reduce the need to travel and provide digital ways of accessing services. Resilience measures for climate change provide opportunities to increase health and well-being including improved air and water quality. The reduction of fuel poverty will have a positive impact on people's health and well-being.

### Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

#### What are the key assumptions that support this option?

- Renewable and low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed across Wales.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- There is a presumption in favour of actions to address climate change.
- There will be strong alignment between land use and transport planning at the national, regional and local levels.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Strong focus on the location of new development, connectivity between uses and energy efficient, sustainable design. Locational choices require that new development is located in sustainable locations.
- Relationship between settlements and regions will be planned in the context of wider social, economic, cultural and environmental objectives and to support the delivery of decarbonisation aims.
- As a first principle, the NDF will seek to direct new development to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported.
- Spatial choices will be shaped by the location of main population centres and sustainable transport infrastructure. As well as reducing transport movements, reducing congestion and emissions will shape key decisions.
- Land use, major projects and infrastructure must be resilient to climate change impacts.
- Options for rail and bus connectivity are actively prioritised. Targeted road improvements are made to accommodate sustainable development. UK and international connections will be rail and sea based in preference to air. The sustainable movement of freight will be a priority considering rail, water and electric vehicles options.
- SUDS and sustainable flood management proposals are developed on a large scale. Infrastructure is provided to ensure a steady supply of water.
- Housing will be provided in the most sustainable and integrated locations, with access to jobs, services and facilities, and sustainable transport options central to the choices on new housing.

#### What would Wales in 2040 look like?

##### **Cultural Assets**

National projects have been developed in the most sustainable accessible locations, planned alongside other land uses.

##### **Housing**

Energy efficient, well designed housing has been planned and built to create sustainable, accessible communities.

##### **Climate change, decarbonisation & energy**

There has been an increase in the generation of renewable and low carbon energy across Wales through a range of technologies. There has been strong growth in the renewables and low carbon sectors. Sound planning has ensured key spatial choices have supported the delivery of national objectives and Wales is on its way to exceeding its 2050 decarbonisation targets.

##### **Broadband & digital infrastructure**

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

##### **Economic prosperity & economic regeneration**

There has been strong growth in renewable and low-carbon sectors, supporting a transition to a low-carbon society and an increase in prosperity for all parts of Wales. Wales is recognised as a world leader in these fields.

##### **Rural Wales**



### Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Spatial choices have supported decarbonisation objectives in both rural and urban areas and supported the delivery of wider social, economic, environmental and cultural goals. Community energy schemes and improved digital and low carbon infrastructure have helped tackle depopulation.

#### **City Regions & Growth Deals**

Well planned regions and new infrastructure, have supported prosperous regions which have helped deliver climate change and decarbonisation objectives.

#### **Transport**

Strong alignment between national planning and transport strategies has resulted in well planned, sustainable and accessible communities across Wales and supported a switch to low carbon transport and public transport.

#### **Natural Resources**

SMNR principles have helped improve efficiency, minimise the unsustainable use of resources, reduce pollution and deliver renewable energy.

#### **Welsh Language**

Strong support and investment in local communities has ensured Welsh language objectives are being met.

#### **Health**

Delivery of well-planned and designed places with connected infrastructure, have improved air quality.

### What did the October 2017 engagement say about this option?

#### **Positive**

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate.

There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader.

There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

#### **Negative**

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it.

It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small-scaled actions.

Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment.

Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

#### **Realistic**

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table B-8: Alternative Spatial Option 4

### Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

#### **Summary Overview**

This option focuses on the sustainable management of our natural resources. It recognises that unsustainable management will negatively impact upon future generations and provides a positive framework to help realise the social, economic, environmental and cultural value of our natural resources and ensure key ecological networks and habitats are adapted and resilient to change. Through increasing resource efficiency and reducing pollution, this NDF will help build greater resilience into our ecosystems and

#### **Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources**

biodiversity. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure long term economic sustainability.

This NDF would use baseline evidence to guide development to the most suitable locations, strongly prioritising natural resource implications in spatial decision-making. It will have a strong focus on how decisions are taken and the outcomes that should be achieved, using the NDF's development plan status to firmly embed key principles into the decision-making process at all levels.

#### **Why has this option been developed?**

The Environment (Wales) Act positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The Act is intended to help secure Wales' long-term well-being, so that current and future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities. This option has been developed to test how the national spatial plan can support the delivery of the requirements of the Environment Act.

This option has been developed and subject to further engagement in October 2017

#### **Full Overview: How would this option help meet the NDF objectives?**

##### **Cultural Assets**

This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including for tourism, outdoor recreation, local employment and physical and mental health. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces, that represent both cultural and ecological assets. Development that undermined the integrity of our landscapes or natural resources would be strongly resisted and would be directed towards less culturally sensitive locations.

##### **Housing**

This NDF would focus on the location of new development in terms of its relationship to ecological networks, and the need to create attractive and healthy environments for people to live in. It would direct housing away from areas likely to have a significant impact on ecological networks and flooding issues and towards locations that reduce the need to travel. New housing development would embrace the multiple benefits that green infrastructure can provide for health and well-being and would support the creation of and promote access to open space and wider ecological networks.

##### **Climate change, decarbonisation & energy**

This alternative would prioritise adaptability to change for both people and species. Networks of green and natural spaces would be enhanced and protected in order to help adapt to climate change. This NDF will anticipate the risks from flooding, air quality, increases in temperatures, loss of habitats and vegetation, increasing urban heat islands and harmful effects on ecosystems and ensure future development patterns consider, are shaped by and build resilience to these.

Habitats vulnerable to development pressure including floodplains, woodlands and urban green infrastructure would be prioritised for proactive and preventative action. Actions would include steps to safeguard and encourage urban tree coverage, avoid the fragmentation of floodplains through development, secure sustainable drainage systems, ensure water sensitive design and deliver appropriate soil carbon management. This option would strongly support greater energy efficiency and realising the opportunities across Wales to generate renewable energy.

##### **Broadband & digital infrastructure**

This NDF would support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways; support new working practices and reduce the need to travel; and support our aspirations for lower carbon living.

##### **Economic prosperity & economic regeneration**

This NDF would recognise that Wales' abundance of natural resources is one of our greatest economic assets, underpinning our vibrant tourism and leisure sector, agricultural industry, and world-class home-grown food and drink sector. This NDF would realise the economic opportunities of Wales' natural resources (alongside other resources), while building their resilience to create an environment which will nurture the businesses of the future. Economic development would be directed away from areas where there was the potential for conflict with important ecological networks, and new development would incorporate green infrastructure and support the creation of wider ecological networks. Opportunities for green growth and realising economic opportunities from the sustainable management of resources would be supported. Poverty will be addressed by ensuring local communities benefit from Wales's natural resources and by supporting positive energy, housing and economic development.

##### **Rural Wales**

#### Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

This NDF would focus on maintaining and supporting our natural resources as the bedrock of our rural economy, particularly our agricultural and tourism sectors. Maintaining healthy and resilient ecosystems and distinctive local landscapes will be important for supporting rural Welsh communities' sense of place and identity. The focus would be to support nature-based solutions that harness the multiple benefits of our natural resources to support the economy and culture of rural communities, and to ensure that ecological networks are managed to support the delivery of cultural, economic, social and environmental objectives. It would support development in rural areas that helped achieve ecological and resilience objectives and seek to resist development that could undermine the integrity of key networks.

##### **City Regions & Growth Deals**

This NDF will recognise that green spaces and networks are vital if our city regions are to be attractive places to live and work. It would support the development of ecological networks including green infrastructure across well planned city regions. The provision of infrastructure and new development will be planned to respond to the impacts of climate change and support the protection and enhancement of ecological networks and the sustainable management of natural resources. It will support a greater regional understanding of issues, such as for example river catchments, and ensure decisions are planned and taken in the fullest regional context.

##### **Transport**

This NDF would prioritise development locations that reduce the need to travel and would focus on the role of public transport and interventions that encourage the reduction of air pollution. New transport infrastructure would incorporate green infrastructure and be designed to create green corridors and wider ecological networks and would be located to avoid fragmenting habitats or adversely impacting air or water quality.

##### **Natural Resources**

The principles of SMNR would shape this NDF, helping deliver key benefits for health and well-being, resource efficiency and security, economic prosperity and community identity, through prioritising the fundamental role that our natural resources play in supporting these and a wide range of other beneficial outcomes. This option will work closely with the Natural Resources Policy. It would also focus on improving the resilience of ecosystems, including their diversity, connectivity, scale, condition and adaptability. Environmental enhancement would be prioritised, and the creation of habitats and networks to allow ecological resilience would be actively progressed. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use. Improving air quality will be a key priority.

##### **Welsh Language**

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.

##### **Health**

This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including reducing pollution, increasing access to natural green spaces, benefitting physical and mental health. Increasing prosperity through green growth will help to reduce inequality in health.

##### **What are the key assumptions that support this option?**

- Principles of SMNR as a key driver of this alternative and are firmly embedded in the planning system through the NDF.
- Agriculture, forestry, renewable energy, water and tourism are strongly supported.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- Strong links with the Wales Marine Plan and Natural Resources Policy provide a coherent framework for all activity in Wales and provide the focus for considering the environmental effects of development and the assessment of reasonable alternatives.
- Other policy and regulatory areas are aligned, respecting spatial constraints and pursuing sustainable development opportunities.
- All land (including urban) is considered a natural resource capable of supporting biodiversity and integration of green infrastructure, or nature-based solutions, to enhance biodiversity and ecosystem resilience, will be an expectation of development.
- Increasing the extent of innovative green networks and high quality and biodiverse habitats, particularly in city regions, will help foster our connection with nature.
- SUDS and sustainable flood management will be prioritised. Infrastructure is provided to ensure a steady supply of water. River catchments are a key consideration in

#### Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

plan making and decisions.

- Natural green spaces are safeguarded and enhanced including alongside key transport routes to form green networks and across city regions. Green networks take on new spatial forms, including approaches following linear patterns and linking with natural biodiversity networks.
- Green networks seek to deliver strategic benefits for habitat continuity and species movement.
- Impacts on biodiversity, landscapes, water bodies and soil are avoided, mitigated and adapted. Species populations and their habitats will be enhanced.
- Renewable & low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed throughout the country.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Presumption in favour of actions to address climate change

#### What would Wales in 2040 look like?

##### **Cultural Assets**

National projects have been developed based on Wales' distinctive landscape and natural environment.

##### **Housing**

Housing has been built across Wales, in locations that maximise the multiple benefits of Wales' natural resources, supporting health and well-being objectives and with no significant impacts on important ecological areas.

##### **Climate change, decarbonisation & energy**

Wales has planned for and adapted to climate change risks, ensuring resilience across Wales. There has been an increase in the generation of renewable and low carbon energy.

##### **Broadband & digital infrastructure**

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

##### **Economic prosperity & economic regeneration**

There has been strong growth in agriculture, forestry, renewable energy, water and tourism, supporting a transition to a low-carbon society. Wales is recognised as a world leader in these fields.

##### **Rural Wales**

Rural areas are prosperous, healthy and resilient having benefited from growth and investment in maintaining and supporting our natural resources.

##### **City Regions & Growth Deals**

City regions, planned around green infrastructure and natural resources, are attractive, healthy and prosperous. They are exemplars of how growth has been shaped to deliver our well-being objectives.

##### **Transport**

Transport solutions have delivered new green networks, supporting health and ecological goals and the sustainable movement of people.

##### **Natural Resources**

Wales leads the world in realising the multiple benefits of its natural resources.

##### **Welsh Language**

Strong support and investment in local communities has ensured Welsh language objectives are being met

##### **Health**

Delivery of high-quality places with sustainable access to facilities and services. Improved access to nature and a reduction in pollution.

#### Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

##### What did the October 2017 engagement say about this option?

###### Positive

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate. There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader. There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

###### Negative

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it. It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small scaled actions. Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment. Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

###### Realistic

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table B-9: Alternative Spatial Option 5

#### Benchmark Option - Do Not Prepare the NDF

##### Summary Overview & Why has this option been developed?

This alternative option would involve not preparing a NDF. The existing Wales Spatial Plan would remain the national spatial plan. The WSP does not have development plan status.

The Planning (Wales) Act requires the preparation of a NDF. This option is therefore not realistic.

It does however provide the opportunity to consider what would happen if a NDF were not prepared and how national strategic planning decisions would be taken. It provides an important benchmark against which to understand the other potential options.

The WSP remains an important strategic plan and much of the key policy approaches remain valid. One of its key weaknesses is its lack of development plan status and an ability to influence decision making. This situation would remain. The ability of the planning system to respond to the requirements of the Environment Act, Well-being of Future Generations Act and the Welsh Government's decarbonisation objectives would be restricted to actions at the local level and without an overarching strategic view.

##### Full Overview: How would this option help meet the NDF objectives?

###### Cultural Assets

Culture would be promoted at community and local levels. There is recognition of links to economic prosperity but overall this would not be a priority area.

###### Housing

Climate change would be an urgent issue and major development would be determined in the context of its impact upon climate change objectives. Ensuring resilience to sea level rises would be important, reducing risks to both people and property.

###### Climate change, decarbonisation & energy

### Benchmark Option - Do Not Prepare the NDF

Actions at the local level would be required to ensure all development contributed to climate change objectives, with support for example, for active travel and greening spaces initiatives. Energy policy would reflect national policies (e.g. decarbonisation and energy targets) and would be based on a regional approach, with regions expected to utilise their strengths and competitive advantages.

#### **Broadband & digital infrastructure**

Broadband coverage would be viewed as a regional issue, with challenges such as 'not spots' a matter for regions to address themselves. High speed broadband would be a priority for areas of high value economic activity. Government intervention would be re-active, addressing issues unable to be addressed by the market.

#### **Economic prosperity & economic regeneration**

Regeneration would be a key tool to improving prosperity across Wales. Projects would be regional in scale with the Welsh Government playing a key role in identifying project areas, drivers and setting ambitions for future outcomes. Maximising existing regional strengths is central to economic prosperity objectives and actions at regional and local levels are the primary lever in helping reduce inequality and deliver prosperity to all.

#### **Rural Wales**

There would be a very strong focus on rural areas. Delivering accessible community facilities and services to rural areas would be a key priority. European and Government funds will be made available to help achieve this. Transport and jobs are also key issues in helping maintain vibrant rural life and there would be strong support for actions in these areas.

#### **City Regions & Growth Deals**

The development of city-regions to drive economic prosperity, around Cardiff, Swansea and in the north east would be supported. Each city region has distinct strengths and these will form the basis of efforts to develop strong regional economies. The regional approach outlined in the WSP for other areas of Wales would be supported.

#### **Transport**

Day to day transport issues will be addressed through a bottom-up approach. Issues across an area will be brought together to identify regional priorities and regional issues brought together to identify national priorities. Transport investment is seen as a key tool in supporting regeneration and economic objectives.

#### **Natural Resources**

Natural resources are considered from a local perspective. They are local assets which help determine the nature and scale of development appropriate in an area. There is no overriding national policy or approach other than the need to ensure they are used in a sustainable way.

#### **Welsh Language**

There is support for a modern bilingual society, where the Welsh language is a community attribute. Planning will help provide spaces for community life to flourish. There is no strong alignment between language and prosperity.

#### **Health**

Building sustainable communities through tackling inequality, improving health and eradicating child poverty. Creating and sustaining the right set of services and locating the services within or close to key settlements, accessible by public transport.

#### **Relationship with SDPs/LDPS**

The position would remain as it currently stands, with SDPs and LDPS having to have regard to the WSP but with a limited relationship in practice. Strategic development plans would be left to define their own strategic objectives in the absence of an all-Wales context. Issues in relation to renewable energy, depopulation and uneven housing development would be dealt with through LDPS in those areas not covered by a SDP (or where an SDP has not yet been prepared).

#### **What are the key assumptions that support this option?**

- No national development plan.
- The local development planning system would be the primary tier of plan making and decision taking. In time in parts of Wales, SDPs may be prepared.
- Current trends will continue and progress towards key Welsh Government targets and objectives would remain on their current trajectories.
- Spatially, the national planning policy position would not be changed to reflect the requirements of the Environment and WCFG Acts.
- Regeneration and rural areas will be a major focus.
- Broadband is a relatively minor consideration.

#### **Benchmark Option - Do Not Prepare the NDF**

- Housing would be viewed in isolation and not linked to wider objectives.
- Transport objectives would be linked in part to prosperity objectives but not seen as a central component in the delivery of wider objectives.
- Natural resources and energy would be viewed as regional matters, with no national perspective and no priority status.
- Climate change would be a central and priority issue.



Scoring of Assessment	
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)
+	Minor positive – likely to result in limited progress towards the ISA objective
0	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative – likely to work against the achievement of the ISA objective
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)

*Table B-10: Appraisal of options against ISA Objective 1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Children's Rights, Economy*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where markets are the strongest. This would provide beneficial effects for these areas. Indirect benefits may arise from the development of skills through employment opportunities within the areas of market focus. However, the ISA objective seeks to achieve high levels of education for all members of society. Whilst the option may lead to significant benefits for some, it is unlikely to contribute towards reducing education inequality, and may lead to greater polarisation, particularly in areas of greatest education deprivation such as the valleys or north west Wales. This may negatively affect those who aren't engaged in industries that may be created as part of the market focus. This option does not address the provision of or access to education or training skills provision. There is an opportunity for more specific reference to education and skills development, including how equality in education provision will be achieved, to be included.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option has a very strong focus on reducing inequalities and meeting local needs, seeking to deliver strong local communities. This bottom up approach includes the delivery and provision of access to services and facilities, which could include education and training facilities and lifelong learning opportunities. Positive effects from this option may arise from the provision of social infrastructure across all areas of Wales. Reversing rural depopulation may benefit rural school viability, which would also be positively reinforced by improvements in digital connectivity. This compares positively against the narrow urban focus considered in Option 1. However, there is potential uncertainty in delivery without the economic drivers and strengths that could be achieved under option 1. This could be strengthened should this option be taken forward as preferred.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option has the potential to include access to education and training, particularly in sectors relating to decarbonisation, however, this is not included within the option in its current form. There is a strong emphasis within the option on local community connectivity and reducing the need to travel. This should lead to positive effects on accessibility to education, leading to minor positive effects, particularly in areas that may currently be isolated from services and facilities.
4: A spatial strategy focussed on the	+/-	The option has the potential to include access to education, skills and training, however, this is not included within the option in its current form. Locating development in sustainable locations could improve accessibility to educational facilities indirectly. However, it is less likely



Alternative Option	Score	Commentary
sustainable management of Wales's natural resources		than option 3 to deliver a reduction in inequalities nationally. Alternatively, it could lead to an exacerbation of education inequalities in more rural areas, should the option lead to an increase in the isolation of rural communities for environmental protection reasons.
5: Benchmark Option: Do not prepare the NDF	+	Without the NDF, it is likely that the WSP and other policy initiatives would continue to form the development plan nationally. Current policy looks to address accessibility issues to facilities such as education and recognises the need for investment in education to enable future economic growth. Therefore, positive effects are predicted against this objective.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative, and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Option 2 scored highest against ISA Objective 1. The testing identified the importance of ensuring the preferred option included:</p> <ul style="list-style-type: none"> <li>• The creation of more cohesive, equitable communities (P3, P2, PE9, AS1)</li> <li>• The importance of social infrastructure in placemaking (P3, AS1)</li> <li>• Reversing rural depopulation (R1, R2, R3, R4, PE6)</li> <li>• Improvements in digital connectivity (PE3)</li> </ul> <p>In response to the potential uncertainty identified by Arcadis in delivery without the economic drivers and strengths that could be achieved under option 1, the preferred option has a strong focus on supporting economic objectives (P3, PE5, PE6, PE7, PE9).</p> <p>Alternative Option 3 also scored positively and highlighted the importance of the preferred option including:</p> <ul style="list-style-type: none"> <li>• Local community connectivity and reducing the need to travel (P2, AS4, R1, AS1)</li> </ul>

*Table B-11: Appraisal of options against ISA Objective 2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural proofing, Children's Rights*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	<p>The increase in prosperity across the strongest market areas may lead to an increase in health benefits in those areas. However, the option is likely to reduce the potential for access to healthcare facilities, limiting good access only to the strong market areas. This could lead to an increase in inequality, between urban and more rural areas, specifically impacting on children and older people and particularly existing areas of deprivation such as the Valleys and North Wales coast, leading to significant negative effects.</p> <p>The provision of new infrastructure, focused in existing strong areas of market demand, may lead to an increase in concentrated pollution, leading to negative effects on the health of urban populations. It would be unlikely that this option would create opportunities to adapt to</p>

Alternative Option	Score	Commentary
		risks to health from climate change, even in areas of growth, as it would not be a priority. The provision of green infrastructure and open space would be based on market provision, which would potentially lead to a reduction in supply. Negative effects from a loss of green spaces through development may result and would have a limited contribution towards healthy lifestyles.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option focuses on a dispersed approach based on local need, which may reduce inequalities and lead to an increased in health benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment, that may have major beneficial effects for physical and mental health. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change and impacts on health. The delivery of small-scale renewable energy could reduce fuel poverty.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option particularly focuses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability, delivering climate change resilience and the resulting health benefits that may result. There is the potential to achieve large scale health benefits through the decarbonisation of the economy, which could result in an improvement in air quality, water quality, and a reduction in other types of pollution that may affect health. Further, the focus on utilising sustainable locations, improving connectivity and increasing sustainable travel methods should increase access to facilities, leading to multiple direct and indirect health benefits. There is the potential for a decrease in health inequalities in rural areas through the focus on locally focused communities.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has the potential to deliver significant land far reaching health benefits through a reduction in air, water, and other types of pollution that may affect health and delivering climate change resilience. The focus on utilising sustainable locations, connectivity, and an increase in green spaces, could lead to multiple direct and indirect health benefits. However, it is unlikely to lead to significant positive benefits in relation to addressing issues that affect health such as isolation, and ageing population, housing quality.
5: Benchmark Option: Do not prepare the NDF	+	Existing policy seeks to improve the delivery of health services, improve access and tackle inequality, which could lead to positive effects against this objective over time.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Options 2 and 3 scored highest against ISA Objective 2. The testing identified the importance of ensuring the preferred option included:</p> <ul style="list-style-type: none"> <li>Improving accessibility within rural communities and reversing population decline (P3, AS1, AS4, R4)</li> <li>Increasing access to the natural environment (P2, DN3, DN5)</li> <li>Sustainable communities, well designed and planned (P2, P3, AS1, AS4, R1)</li> <li>Adaption to risks from climate change / climate change resilience (P1, P2)</li> <li>Delivery of small scale renewable energy (P2, PE2)</li> <li>Decarbonisation of the economy (P1, PE8)</li> <li>On utilising sustainable locations, improving connectivity and increasing sustainable travel methods (P2, AS4)</li> <li>Focus on rural communities (P2, P3, R4, R5)</li> </ul> <p>Alternative Options 4 and 5 also scored positively and highlighted the importance of the Preferred Option including:</p>

Alternative Option	Score	Commentary
		<ul style="list-style-type: none"> <li>Reduction in air, water, and other types of pollution (P1, P2, P3, DN2)</li> <li>An increase in green spaces (DN3, DN5)</li> <li>Improve the delivery of health services (P2, R3, R4)</li> </ul>

*Table B-12: Appraisals of alternative options against ISA Objective 3: To create opportunities for an increase in employment across the country and promote economic inclusion*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+	The option seeks to direct growth to the strongest market areas. This will create opportunities to increase employment but is focused on identified growth areas rather than across every part of Wales. Therefore, it is unlikely to contribute to economic inclusion across the country. The option is likely to lead to significant positive effects in relation to improving access to jobs in growth areas, increasing the number of people satisfied with their jobs, and creating opportunities for investment and growth and development of skills, particularly in relation to city regions.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option could lead to an increase in economic opportunities across Wales, but this may be limited by a lack of clear support for economic growth and the markets. Positive effects of the option include supporting job satisfaction and physical access to employment opportunities, but it is noted that it may not create opportunities for investment and growth. The lack of focus on city regions could result in a limited opportunity.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focusses on the sustainable use of land and improving existing urban and rural patterns, including how they can improve their potential to achieve more sustainable development, and delivering sustainable access to job and facilities. To some extent this reflects current national policy and could create opportunities in a more sustainable employment market and increase skills in this type of economy. Further, it could support specialisation and clusters in certain areas. The option looks to deliver regional transport infrastructure that is well connected, and provides active travel opportunities with wider community benefits, supporting city region and growth deals. It is noted that deliverability may be an issue, including associated costs.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+/-	This option may limit growth and therefore employment opportunities, with opportunities being limited to certain parts of Wales. Therefore, this option may limit the potential for social inclusion, particularly in less developed areas that may be afforded greater environmental protection. The delivery of green infrastructure, climate change resilient networks and access to the natural environment, could create attractive places to live, work and invest, providing a regional context and potential support to city regions and growth deals. Positive effects could be achieved through a potential boost in the green growth economy, which may include employment opportunities across rural Wales.
5: Benchmark Option: Do not prepare the NDF	+/-	A regional focus would remain without the NDF, seeking to achieve economic prosperity, including maximising regional strengths, to reduce inequality and deliver prosperity. Delivery would be achieved through regeneration initiatives and existing WG planning policies such as PPW. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region. These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue,

Alternative Option	Score	Commentary
		leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		<p>The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Options 1, 2 and 3 scored highest against ISA Objective 3. The testing identified the importance of ensuring the preferred option included:</p> <ul style="list-style-type: none"> <li>• Contribute to economic inclusion across the country (P1, P3, PE3, PE5, PE6, AS1)</li> <li>• Improving access to jobs in growth areas (P1, PE4, PE5, PE6, PE7, AS1)</li> <li>• City regions (PE5, PE6, AS1, R3)</li> <li>• Opportunities for investment and growth (P1, PE1, PE3, PE4, PE5)</li> <li>• Support specialisation and clusters in certain areas (R1, R5)</li> <li>• Regional transport infrastructure (PE8, R3, R4)</li> </ul>

*Table B-13: Appraisals of alternative options against ISA Objective 4: To create opportunities for sustainable economic growth, diversity and business competitiveness*

*Relevant impact assessments (in addition to SA & SEA): EQIA, Rural Proofing, Climate Change, Economy*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	<p>Through directing growth to the strongest market areas, this option may have positive effects on competitiveness and inward investment, which may lead to positive trickle-down effects in some areas. However, the ISA Objective seeks to achieve sustainable economic growth, which is unlikely to be achieved under this option. Opportunities to become more resilient to climate change may only be delivered where they are compatible with the economic growth targets.</p> <p>The option could help to deliver infrastructure in growth areas or where the market demands. However, it is unlikely that the option would contribute to enhancements to the rural economy and rural diversification.</p>
2: A spatial strategy focussed on creating strong communities across all Wales	+	<p>This option is sustainable in principle, if it can be delivered. The option supports local economic diversity and delivers small scale infrastructure projects. Further, it is likely to support SMEs, third sector and micro businesses. This option could contribute to enhancements to the rural economy and rural diversification.</p> <p>However, the potential significance of positive effects could be reduced as it is not a 'powerhouse option', which could potentially limit competitiveness and economic growth and investment.</p>
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	<p>The option focuses on land use and improving existing urban and rural patterns, which could support a sustainable economy and growth in sectors associated with this. This could lead to benefits against this objective including the delivery of digital infrastructure and sustainable travel infrastructure.</p> <p>However, the option is potentially limited by the focus being entirely on green growth and decarbonisation. Associated costs, deliverability and technology advancement may limit progress. Further, it is less supportive of some other growth sectors.</p>

Alternative Option	Score	Commentary
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	-	The option supports a narrow approach to sustainable growth with limited impact on national prosperity and economic diversity. It focuses on certain parts of Wales, which are likely to be less environmentally sensitive. This could lead to potentially negative effects as current trends of inequalities and lower than average earnings in Wales are likely to continue. This option would look to deliver resilient economic development when facing the risks from climate change, recognising that Wales' natural resources are one of its greatest economic assets.
5: Benchmark Option: Do not prepare the NDF	+/-	Without the NDF, a regional focus to economic growth would prevail, seeking to reduce inequalities and deliver prosperity. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region. These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Options 2 and 3 scored highest against ISA Objective 4. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Supporting local economic diversity (P3, PE5, PE6, PE9, PE10, AS1, R1)</li> <li>• Support for SMEs, third sector and micro businesses (P3, PE5, PE6, R1)</li> <li>• Enhancements to the rural economy and rural diversification (P3, PE4, PE5, PE6, AS1, R1, R4, R5)</li> <li>• Support for a sustainable economy and growth in sectors associated with this (P1, PE4, PE5, PE6, R1)</li> <li>• The delivery of digital infrastructure and sustainable travel infrastructure (P3, PE8, AS4, R3, R4)</li> </ul> <p>In response to the potential to limit competitiveness and economic growth and investment identified by Arcadis by focusing on green growth and decarbonisation, the Preferred Option has a strong focus on supporting a range of growth and investment opportunities (R1, R3, R5, PE5, PE6, PE9)</p>

Table B-14: Appraisals of alternative options against ISA Objective 5: To contribute towards the future well-being of the Welsh language

Relevant impact assessments (in addition to SA & SEA): Welsh Language, Rural Proofing

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option promotes growth in established areas (SE Wales and NE Wales), which could attract Welsh speakers from Welsh speaking communities. This could lead to a dispersal of communities of Welsh speakers leading to an overall dilution. This could be exacerbated by an increase in connectivity with England to these growth areas. Alternatively, it could lead to the creation or strengthening of Welsh speaking communities in the urban areas. The net loss of Welsh speakers from Wales may be reduced as a more dynamic economy

Alternative Option	Score	Commentary
		provides opportunities for young adults to remain in Wales.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option could support Welsh speaking communities but is reliant on developing appropriate employment opportunities to achieve this. This may be achieved through a strong focus on investment in local opportunities and a reversal of rural de-population, leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
5: Benchmark Option: Do not prepare the NDF	+	Language as a community asset is recognised, but a lack of link to the economy means that the potential impact may be limited. Other initiatives external to planning based on the Welsh Government target, could have a positive effect against this objective. Current trends demonstrate that the number of people using the Welsh languages is increasing.
Developing the Preferred Option (Welsh Government Comment)		<p>The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. Alternative Options 2, 3, 4 and 5 scored highest against ISA Objective 5. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Strong focus on investment in local opportunities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1)</li> <li>• More sustainable communities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1)</li> <li>• Seeking to reverse rural de-population leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1, R4, R5)</li> </ul>

*Table B-15: Appraisals of alternative options against ISA Objective 6: To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design*

*Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change, Economy*

Alternative Option	Score	Commentary
1: A spatial strategy	-	Through this option, economic growth is the main priority; decarbonisation and environmental regulation may only be imposed where they



Alternative Option	Score	Commentary
focussing growth in the strongest market areas		are compatible with the economic growth targets and may limit opportunities to reduce demand and deliver sustainable design. This may lead to some minor benefits, although the reduction of greenhouse gases is not likely to be a priority, so negative effects are likely. Further, the option is likely to lead to an increase in the need to travel as rural growth would have less support.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option has the potential to achieve positive effects through enabling local renewable energy schemes and reducing the need to travel, which could reduce vehicular greenhouse gas emissions over time. Delivering good quality, energy efficient housing potentially reducing energy demand. However, a lack of national backing and strategic direction could minimise its potential, as it is likely that fewer national scale renewable energy schemes would be likely to be delivered.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	This is the key priority of this option – a broad and all-encompassing focus on reducing harmful emissions and developing a sustainable pattern of living through sustainable design and locational choices.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	In this option, although reducing greenhouse gas emissions is not specifically mentioned, it is likely that a focus on the sustainable management of natural resources will have overall significant positive effects on all aspects of the natural environment, although large scale renewable energy generation may be limited. Climate change adaptation is also likely to be achieved through a natural resources approach. Reducing the need to travel through sustainable located development.
5: Benchmark Option: Do not prepare the NDF	+	Government targets are applied. Some positive effects against this objective may be achieved through existing planning policy and other government initiatives. Existing trends show that greenhouse gas emissions have been steadily falling in Wales, although more action is required to meet existing and future targets. The potential to reduce greenhouse gas emissions whilst accommodating new development and economic growth may not be achieved without strategic direction from the NDF.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Options 3 and 4 scored highest against ISA Objective 6. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Reducing harmful emissions (P1, P2, P3, DN2, DN5, PE8)</li> <li>• Developing a sustainable pattern of living through sustainable design and locational choices (P1, P2, P3, DN2, AS1, R3, R4)</li> <li>• Sustainable management of natural resources (P1, P3)</li> <li>• Reducing the need to travel through sustainable located development (P1, P2, P3)</li> </ul> <p>Alternative Options 2 also scored positively and highlighted the importance of the preferred option including:</p> <ul style="list-style-type: none"> <li>• Enabling local renewable energy schemes (P2, PE2)</li> <li>• Reducing the need to travel (P2, P3, PE3, AS4)</li> </ul>

Table B-16: Appraisals of alternative options against ISA Objective 7: To contribute to the reduction and management of flood risk

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy	-	The option promises protection and resilience in vital economic sectors and areas. However, it may follow that protection and resilience

Alternative Option	Score	Commentary
focussing growth in the strongest market areas		against flood risk would not be offered on a wider basis, which could lead to negative effects in some communities. Further, the city region areas include large areas of land that are subject to high flood risk, which could lead to negative effects. An increase in greenfield development in these areas and a lack of potential provision of sustainable design include sustainable drainage and green infrastructure, could lead to negative effects.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option doesn't specifically mention flood risk. However, the dispersed growth strategy could have a positive impact, as it may reduce the growth of populations in the urban areas of Wales that are at risk of flooding. Further, it is likely to include measures to support other communities that may be at risk of flooding. Sustainable growth may also lead to a reduction in an increase in flood risk.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	Sustainable management of flood risk, and increased resilience in appropriate areas, are at the heart of this option. Sustainable drainage solutions are key, and a positive relationship between built environment and water is encouraged. The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by and build resilience to these. Coastal processes including sea level rise would influence settlement strategy. The option also seeks to build climate change resilience into communities, businesses, and the natural environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option includes significant emphasis on the climate change resilience, based on the Environment (Wales) Act, which positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The option prioritises sustainable drainage systems and sustainable flood management. A strategy focussed on the sustainable management of natural resources is likely to lead to significant positive effects against this objective.
5: Benchmark Option: Do not prepare the NDF	+	Flood risk is a significant issue in Wales including coastal, fluvial and surface water flooding. Without the NDF, the current approach to flood risk management would be maintained, which could help to protect communities and business from flood risk over time. However, the potential for significant national strategic approaches to flood risk to be aligned with development management may be missed.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.</p> <p>Alternative Options 3 and 4 scored highest against ISA Objective 7. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Sustainable management of flood risk (P1, P2, DN1, DN2, PE1, PE8)</li> <li>• Anticipating and adapting to the risks from climate change (P1, P2, DN1, DN2, PE1, PE8)</li> <li>• Sustainable management of natural resources (P1, P2, DN1, DN2, PE1, PE8)</li> <li>• Building climate change resilience into communities, businesses, and the natural environment (P1, P2, DN1, DN2, PE1, PE8)</li> </ul>

Table B-17: Appraisals of alternative options against ISA Objective 8: To create opportunities to encourage the protection and improvement of air quality

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change



Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option is likely to result in intensification of development in areas around the motorway and trunk road network which have the lowest (worst) air quality levels. A likely consequence of the option is that air quality may become worse in some of the most urban areas and may even result in new Air Quality Management Areas (AQMA) being created. There is potential for areas of worsened air quality to coincide with more vulnerable communities within the city region focus areas. However, air quality in less developed areas is likely to remain unchanged. The option promotes little investment in reducing the need to travel in less accessible areas (such as rural areas) which suggests that a continued focus on private car journeys would prevail.
2: A spatial strategy focussed on creating strong communities across all Wales	++	This option could reduce travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities. Sustainable communities are proposed which seek to reduce the need to travel and hence may reduce vehicular emissions. Further, it would encourage walking, cycling and working from home. This could lead to improvements in air quality including the development of community owned renewable energy initiatives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option identifies air quality as a priority. Further, the option includes an objective to reduce the need to travel and ensure connectivity and accessibility; these key priorities make a clear link to the need for air quality improvements for all projects.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	Improving air quality is a key priority for the option together with wider environmental protection. As with options 2 and 3, there is a focus on sustainable travel and a development pattern which reduces the need to travel is expected. It is also assumed that this option is relatively lower growth compared to option 1, so the extent of vehicle and industrial emissions is also expected to be lower. However, it is noted that it is not a 'low growth' option by intent. Significant beneficial effects are likely to result from the implementation of the option both directly and indirectly.
5: Benchmark Option: Do not prepare the NDF	+/-	This option would see a continuation of existing trends in air quality. Whilst air quality is good in Wales generally, there are areas, particularly in the south that suffer from poor air quality, notably in relation to road traffic. Some of these areas also correspond with some of the most deprived communities in the south. Over time, air pollution is expected to decline as a result of continued regulation and, in particular the uptake of cleaner vehicle technologies. However, the volume of road traffic is expected to increase in the near future particularly in the city regions (Cardiff, Swansea and north east) which already suffer from the poorest air quality overall. However, the Welsh Government decarbonisation agenda may reduce growth to some degree.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.</p> <p>Alternative Option 2, 3 and 4 scored highest against ISA Objective 8. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>Reducing travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities (P1, P2, P3, DN2, PE8, R1)</li> <li>Reducing the need to travel (P1, P2, P3, AS1)</li> <li>Encouraging walking, cycling and working from home (P1, P2, P3, PE3, AS4)</li> <li>The development of community owned renewable energy initiatives (P1, P2, PE2)</li> </ul>

*Table B-18: Appraisals of alternative options against ISA Objective 9: To create opportunities to protect and enhance the quality and quantity of water features and resources*

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change		
Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to direct economic growth to the strongest market areas and deliver infrastructure to support this growth. This could have a negative impact on water resources in those areas, not least because the option is likely to involve the development of (potentially large) greenfield sites. Little is expected in terms of the provision of green infrastructure, SuDS etc. The negative impacts on water resources in these growth areas include an impact on water resource, the coast, a physical impact on watercourses from pressures on water use and effluents. Further, climate change could exacerbate impacts. The impact will however depend on the location and delivery of development. Standard mitigation measures will be required for new development, however, and the role of statutory bodies (NRW) and other planning policies (PPW) will still apply. Conversely, less development is likely to take place in more isolated rural areas which would, on the whole, limit the impact on water resources and quality in those areas.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option focuses on a local focus of development in settlements spread across Wales. Housing delivery is expected to include energy and water efficient designs. The option would deliver development across Wales at a smaller scale, which could be within the capacity of natural resources of an area although it is also expected that this would need to involve greenfield sites given the rural nature of much development. This bottom up approach could help to ensure capacity or thresholds not exceeded subject to standard mitigation measures being applied. The option is also heavily focused on resource efficiency and includes both SMNR and Sustainable Development principles.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option looks to deliver sustainable development and promotes sustainable drainage, which would be beneficial for water resources and quality. There are possible impacts on watercourses from hydropower/tidal lagoons and an increase in (sustainable) rural development. However, the option identifies that the contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. The option also supports SMNR principles including water efficiency and reducing pollution. This is likely to improve the sustainability of any new development from a spatial and project specific perspective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option would seek to deliver the SMNR principles including efficient water use and the reduction of pollution, avoiding impacts. It has a very strong focus on preserving the natural environment which would include water quality and resources, despite also promoting a degree of rural development. It recognises how the natural environment underpins economic sustainability. The use of sustainable drainage systems will help to deliver water resources and water quality benefits.
5: Benchmark Option: Do not prepare the NDF	+	This option is focused on natural resources from a local perspective, ensuring they are used in a sustainable way. This could ensure they are within the capacity of natural resources of an area. This locally focused approach would ensure capacity or thresholds are not exceeded. In 2015 39% of water bodies in Wales were classified as being of 'good' ecological status, a slight drop since 2014 but still significantly better than in England. It is anticipated that a continuation of current policies and regulation would help to improve water quality in the future following current development patterns.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		<p>Alternative Option 4 scored highest against ISA Objective 9 and Options 2 and 3 scored positively. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Efficient use of water and the reduction of pollution (P2, P3, DN1, DN2)</li> <li>• Preserving the natural environment which would include water quality and resources (P2, P3, DN1, DN2)</li> <li>• Supporting SMNR principles (P3, DN1, DN2)</li> </ul>

*Table B-19: Appraisals of alternative options against ISA Objective 10: To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	<p>The option has a strong support for delivering digital infrastructure (as do all options) and large infrastructure projects such as the Metro. There could be a negative impact on rural areas, with the focus of the option being on the larger urban areas and city regions. Consequently, this does not address issues of rural isolation. It is not a community focussed option, so any benefits realised would only be secondary to economic aims. These are also only likely to be realised in the city region areas.</p> <p>The option does not address active travel and the reduction of risks from climate change.</p>
2: A spatial strategy focussed on creating strong communities across all Wales	++	<p>The option seeks to deliver active travel and reduce private car use, through a community focus, with jobs and services being accessed locally. Digital connectivity is a priority. The option is particularly focussed on addressing areas of need, including providing social infrastructure for more deprived communities and in rural areas thereby reversing population decline. These measures could lead to significant positive effects against this objective.</p>
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	<p>The option seeks to deliver active travel and reduce private car use, through a focus on land use, the relationship between different uses, and the connectivity between them. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects against this objective. Walking, cycling, rail electrification and public transport would be prioritised.</p> <p>All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.</p>
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	<p>This option is not considered to be as strong as options 2 and 3 with regards to connectivity, as the focus relates more to the management of the natural environment. However, there is a potential for active travel to be promoted through the aims of this development option. It also promotes sustainable rural development which can also benefit community retention.</p> <p>All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.</p>
5: Benchmark Option: Do not prepare the NDF	+	<p>Access to services and transport accessibility is currently weakest in rural areas of Wales although the WSP and National and local transport plans continue to provide a strong focus on improving this. Transport currently follows a largely bottom-up approach and transport investment is seen as a key priority for regenerating and connecting communities.</p>
Developing the Preferred Option (Welsh Government)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral – against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how</p>

Alternative Option	Score	Commentary
Comment)		<p>they have shaped the Preferred Option.</p> <p>Alternative Options 2 and 3 scored highest against ISA Objective 10. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Supporting active travel (P2, AS4)</li> <li>• Reducing private car use (P1, PE3, AS1, R1)</li> <li>• Ensuring jobs &amp; services are accessed locally (P3, PE3, PE6, AS1, R1, R3, R4, R5)</li> <li>• Providing social infrastructure in deprived communities (P2, P3, PE9, R1, R3, R4)</li> <li>• reversing rural population decline (PE3, PE6, AS1, R1, R4, R5)</li> <li>• Ensuring connectivity between uses (AS1, R1, R3, R4)</li> <li>• Prioritising walking, cycling, rail electrification &amp; public transport (P2, PE8, )</li> </ul>

*Table B-20: Appraisals of alternative options against ISA Objective 11: To create opportunities within which an improvement in social cohesion and equality can be achieved*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	- -	<p>The option is economically focused with benefits only likely to be experienced by some members of the larger urban communities which would benefit from investment. This, is likely to reinforce or exacerbate existing inequalities.</p> <p>The urban focus of the option does not benefit all members of society including children and protected characteristic groups, including those in more rural areas or other communities that would receive little investment under this option. This is likely to make issues of rural de-population and isolation worse.</p>
2: A spatial strategy focussed on creating strong communities across all Wales	++	<p>This option is the opposite of Option 1 and is far more locally focused. It actively seeks reduce inequalities, as it seeks to deliver improved access for all to a range of facilities, services and housing. These benefits could be felt in communities across Wales including more isolated rural areas.</p> <p>Positive effects from the option could also come from delivering good design and increasing access to nature.</p>
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	<p>The option aims to reduce the need to travel and reduce fuel poverty. This includes aims to sustain social infrastructure, housing and employment in rural areas. These are positive measures which work towards achieving social cohesion and maintaining community spirit. However, the option has little focus on children or protected characteristics beyond this.</p>
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	<p>The option could achieve benefits to for social cohesion through creating a strong sense of place and increasing connectivity between communities through green infrastructure.</p> <p>Benefits relating to the reduction in inequalities are unclear, although a reduction in pollution and increase in access to greenspace overall, could lead to a reduction in geographical and subsequent health inequalities for some communities. The option has little focus on children or protected characteristics beyond this.</p>

Alternative Option	Score	Commentary
5: Benchmark Option: Do not prepare the NDF	+	The Welsh planning policy framework seeks to build sustainable communities through tackling inequality, improving health and eradicating child poverty. It is anticipated that this would continue under a no-NDF scenario, although the significance of the potential benefits is unclear, and would benefit from a strategic approach, which could be provided through the NDF.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Option 2 scored highest against ISA Objective 11 and Options 3 and 4 scored positively. The testing identified the importance of ensuring the preferred option included:</p> <ul style="list-style-type: none"> <li>• Reducing inequality (P2, P3, DN2, PE9, AS1, R1)</li> <li>• Ensuring access for all to facilities, services &amp; housing (P2, P3, PE3, AS1, R1)</li> <li>• Focusing on supporting rural areas (P3, PE2, PE6, R4, R5)</li> <li>• Reducing health inequalities (P1, P2, P3, DN, AS42, R4)</li> </ul>

*Table B-21: Appraisals of alternative options against ISA Objective 12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs*

*Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where the markets are the strongest (primarily likely to be focussed in the south and north-east). This would lead to the delivery of housing but due to this focus on the strongest market areas, this is unlikely to meet housing needs across much of the rest of Wales beyond local needs only. This is therefore not a balanced option in terms of meeting housing needs. The market focus also has the potential to limit the range and type of housing proposed unless this can be carefully controlled within the NDF.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a strong focus on local housing delivery across Wales. In particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. It also recognises the need to deliver housing through local, self-build initiatives achieving a community led approach. The option performs strongly against multiple elements of the ISA Objective. However, it has not been assigned a major positive assessment as the option may be detrimental to large scale housing delivery where it is required. It appears more focussed on local needs only with the assumption that this would be smaller scale.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	The option seeks to deliver sustainable development and could lead to the development of quality homes with regards to meeting energy efficient design. It is about a sustainable focus towards the delivery of housing being in the right locations and as part of wider social, economic, cultural and environmental uses. This is positive in terms of some aspects of the ISA Objective. However, a potential concern relates to whether sufficient delivery of housing for a full range of needs would be achieved. Meeting a range of housing needs does not seem to be the focus of this option.
4: A spatial strategy	-	This option is also focussed on identifying sustainable locations for new housing and ensuring high standards of sustainable design in

Alternative Option	Score	Commentary
focussed on the sustainable management of Wales's natural resources		the context of the natural environment. The potential effect of this could be that insufficient housing is delivered of appropriate types and in appropriate areas to meet identified needs.
5: Benchmark Option: Do not prepare the NDF	+/-	Continuation of current planning policy would seek to deliver housing across Wales. However, viability concerns may mean that the focus of development would continue to be on the urban areas, exacerbating current deprivation trends. There is an opportunity for housing to be linked strongly to wider objectives. This opportunity may be missed should the NDF not be developed.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.</p> <p>Alternative Option 2 scored highest against ISA Objective 12. The testing identified the importance of ensuring the preferred option included:</p> <ul style="list-style-type: none"> <li>• A focus on delivery across Wales (P2, P3, AS1, AS2, AS3, R2, R3, R4)</li> <li>• Providing good quality, affordable housing to meet people's needs (P2, P3, AS1, AS2, AS3)</li> </ul> <p>The testing of the options identified concerns regarding delivery, larger scale house building and meeting identified needs. Parts AS3 and R2 of the preferred option address these issues, seeking through the NDF to provide national and spatial direction for the delivery of housing across Wales.</p>

*Table B-22: Appraisals of options against ISA Objective 13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes*

*Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	<p>The option seeks to direct growth to the strongest market areas and seeks to support economic growth in areas where markets are the strongest. This will include providing the infrastructure required to support growth, which could have a negative effect on landscape and townscape quality; noise and light pollution; and areas of tranquillity. This will take a top down approach, which may not strongly consider local landscape or townscape quality, with a focus on national interests. The option may also lead to the review of landscape designations, where they may prevent growth and the delivery of physical infrastructure. This may include local, national or international designations. Agricultural land could be released for other uses including the best quality land. This could lead to significant negative effects on landscape considerations over the short, medium and longer term.</p> <p>The only reason a major negative assessment has not been made is that this option is likely to lead to very little development in the more rural and existing higher quality landscapes within Wales.</p>
2: A spatial strategy focussed on creating strong communities across all Wales	+/-	<p>The option focusses on a dispersed approach, which, 'does not seek to prioritise one area over another'. Bottom up approaches to local and national development schemes could reduce the ability of the national government to regulate the protection of nationally important landscapes, townscape and seascapes. Further, the potential development of areas across the entire country could lead to a cumulative loss of tranquillity and dark skies and development may occur in slightly more sensitive areas (although major landscape protection designations would still exist) than if development were to occur solely within city-regions. However, conversely, the schemes</p>



Alternative Option	Score	Commentary
		that may be promoted are likely to be of a smaller and more local scale, promoting active travel modes. Further, they could reduce the need for national level infrastructure interventions, through the development of locally sustainable communities that reduce the need for travel. This could provide benefits for landscape assets on a national as well as local level. Positive effects could be achieved through the potential creation of opportunities to promote sensitive, place-responsive design in development, in terms of being reflective of the requirements of the local community.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option particularly focusses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability. Overall, the principles of the option are considered to be in line with the ISA Objective, and could provide opportunities for the protection and enhancement of townscape character and quality including historic townscapes. The NDF will support major changes to urban form and development patterns, to contribute to the realisation of a low-carbon economy. What this means in terms of built development is unclear and could mean the development of increased housing and infrastructure in 'sustainable' locations, thereby potentially having a negative impact on landscape; noise and light pollution; and areas of tranquillity. The option states that the option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments have potential to have significant landscape (and townscape and seascape) and visual impacts although this will depend on the design and location. The option description goes on to state that green networks and infrastructure will be supported. This could have significant positive effects against this objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option seeks to build greater resilience into ecosystems and biodiversity, which could have positive indirect effects on biodiversity. The option goes on to recognise that the natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to enhance landscapes and natural resources for the multiple well-being benefits they provide. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces. Development that would undermine the integrity of landscapes would be strongly resisted and would be directed towards less culturally sensitive locations. This could lead to significant benefits against this objective.
5: Benchmark Option: Do not prepare the NDF	-	Landscape (and townscape/seascape) protection is encouraged through the WSP, PPW and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)	<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option.</p> <p>Alternative Option 4 scored highest against ISA Objective 13. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Recognising the importance of the natural environment and landscapes (P1, P3, DN1, DN2, DN3, DN4, PE10)</li> <li>• Enhancing natural environment and landscapes (P1, DN1, DN2, DN3, DN4, PE10)</li> <li>• Recognising the importance of local facilities and spaces (P2, DN3, DN5, AS1)</li> </ul>	

*Table B-23: Appraisals of alternative options against ISA Objective 14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings*

*Relevant impact assessments (in addition to SA & SEA): HIA*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option seeks to direct growth to the strongest market areas. This will include providing the infrastructure required to support growth, which could have a negative effect on any heritage assets in those areas. The option does not focus on heritage protection and as such is unlikely to steer development away from sensitive areas. It is also likely that limited development would occur (other than for local needs) across large areas of Wales, thereby avoiding any potential heritage impacts in those areas. The option may still lead to heritage led regeneration, if this is considered to be economically advantageous, although it is also likely that economic led development could override the value of heritage designations or assets.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has more of a community focus which has potential to lead to existing culture and heritage being recognised and promoted through a community led approach. A minor positive impact is assigned to the ISA Objective as it is considered that there would only be limited progress towards the objective as it is questioned whether a local level focus would deliver national objectives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option has uncertain effects on heritage assets. The focus on renewable energy, energy storage and transmission may affect historic landscapes, whereas locating development in sustainable locations could discount these areas from such development, it will be dependent on the delivery. Positive effects could be delivered through the potential for an increase in sustainable access to the historic environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has uncertain outcomes which would be dependent on the delivery. The option is focused on SMNR principles; however, it is considered that if there were a physical overlap between these areas there could be a positive effect on heritage. Further to this, the option supports tourism, which could have potential heritage benefits if delivered sensitively and appropriately. There is uncertainty over the delivery of renewable energy and its impact on the historic environment. It is considered that there is a greater chance of positive effects from this option than in comparison to option 3.
5: Benchmark Option: Do not prepare the NDF	+	Protection of the historic environment is encouraged through the WSP, PPW and is enforced by Cadw in addition to local authority planning powers. This option looks to conserve and celebrate Wales' unique heritage, recognising the need for high quality environments to create communities. However, new development and infrastructure will continue to cumulatively put pressure on the historic environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2 and 4 scored highest against ISA Objective 14. The testing identified the importance of ensuring the Preferred Option included: <ul style="list-style-type: none"> <li>• Recognising the importance culture and heritage (DN3, DN6, PE10)</li> <li>• Recognising the importance of historic landscapes (DN3, DN6, PE10)</li> <li>• Recognising and considering the relationship between heritage and other objectives (e.g. energy) (DN3, DN6, PE10)</li> </ul>

Table B-24: Appraisals of alternative options against ISA Objective 15: To create the opportunities for the protection and promotion of Welsh culture

Relevant impact assessments (in addition to SA & SEA): HIA



Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support growth in economic areas where markets are the strongest could have both positive and negative effects, which are dependent on the location and viability of development. There is potential to have cultural-led regeneration. There is potential that the strategy may not recognise local culture in national projects or ignores areas where they are not economically attractive, which could lead to negative effects against this objective.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a local focus which could support distinctive communities and actively contribute to Welsh cultural capital. There could be, however, fewer opportunities for culture led regeneration due to the dispersed nature of the option and the potential lack of economic viability of schemes.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focuses on improving urban and rural patterns of development, which may lead to an increased local focus which could strengthen Welsh culture in these areas. An indirect effect, through increasing sustainable travel, may increase access to cultural heritage assets and activities. The option raises the question around the potential for re-use of buildings/places leading to cultural access/regeneration to help deliver the decarbonisation agenda.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option seeks to build greater resilience into ecosystems and biodiversity and this protection and enhancement of the natural environment may lead to existing cultural practices being maintained rather than eroded. This option recognises the natural environment and landscape as a distinctive part of Welsh culture.
5: Benchmark Option: Do not prepare the NDF	+	The option focuses the promotion of culture at the local level. Recognising the links to economic prosperity but this is not identified as a priority.
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.</p> <p>Alternative Options 2, 3 and 4 scored highest against ISA Objective 15. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Ensuring a local focus (P3, DN6, PE6, R1, R3, R4)</li> <li>• Improving access to cultural heritage assets and activities (P2, P3, DN5, DN6, AS1, AS4, R3, R4)</li> <li>• Recognising the natural environment and landscape as a distinctive part of Welsh culture (DN1, DN3)</li> </ul>

*Table B-25: Appraisals of alternative options against ISA Objective 16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity*

*Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	<p>The option seeks to direct growth to the strongest market areas and deliver Infrastructure development to support this growth. This could impact on habitats, species and biodiversity in the growth area, especially as large greenfield sites are anticipated to be developed under this option. Mitigation and avoidance measures would be needed.</p> <p>However, it is more likely that the growth areas would be of relatively more limited conservation value due to them already being affected by urbanisation. In addition, those areas outside of the key growth areas would be less likely to receive development (beyond local needs). This would include more rural areas that are, in general terms, often more sensitive or valuable in conservation terms.</p> <p>Significant negative impacts may arise if economic growth takes precedence over internationally/nationally designated sites although it is not clear if this is a potential outcome of the option. Further, the option does not recognise the value of Wales' biodiversity/geodiversity and is unlikely to deliver resilient ecosystems in the growth areas. This may also potentially impact on adaptation to climate change.</p>
2: A spatial strategy focussed on creating strong communities across all Wales	+	<p>Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities.</p> <p>The carrying capacity of the natural environment could be considered by bottom up approach, supporting SMNR principles so will include ecosystem resilience.</p> <p>Opportunities would exist could deliver active travel, including corridors for wildlife.</p> <p>It is shaped by sustainable development principles.</p>
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	<p>Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities.</p> <p>The option builds on the resilience of ecosystems and address loss of habitats and vegetation. There are benefits to biodiversity in the long term through adaptation to climate change.</p> <p>The option could have potential local impacts on biodiversity due to renewable energy development however, mitigation could be possible.</p> <p>The option sets out nature-based solutions which will benefit biodiversity and help to deliver ecosystem resilience.</p>
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	<p>The option focuses on building greater resilience to ecosystems and biodiversity with the prioritisation of natural resources implications in decisions. It could create habitats and networks and seeks to avoid any negative impacts on the natural environment. It has a very strong focus on environmental protection.</p>
5: Benchmark Option: Do not prepare the NDF	+	<p>Biodiversity and geodiversity protection is encouraged through the WSP, PPW, national/international law and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.</p>
Developing the Preferred Option (Welsh Government Comment)		<p>The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.</p> <p>Alternative Option 4 scored highest against ISA Objective 16 and Option 2 scored positively. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>Building resilience to ecosystems and habitats (P1, P2, P3, DN1, DN2, DN4)</li> </ul>

Alternative Option	Score	Commentary
		<ul style="list-style-type: none"> <li>Prioritising natural resource implications (P1, P2, DN1, DN2, DN4)</li> </ul>

*Table B-26: Appraisals of alternative options against ISA Objective 17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value*

*Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change, Economy*

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The option is not driven by SMNR principles therefore there is potential for development in the growth areas to be led by primarily economic goals rather than those reflecting, for example, resource protection, sustainable materials use, minerals protection etc. This has potential for such development to adversely affect the achievement of this ISA Objective. There are positive messages including supporting the circular economy and the recognition of environmental quality as a strong driver of growth, but this would be likely to be outweighed by the drive for growth in other objective areas.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option strongly supports the principles of SMNR which is assumed to mean that this ISA Objective could be strongly achieved.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option supports the core SMNR principles and nature-based solutions. There is a clear aim to increase resilience in ecosystems and habitats through this option, which could lead to significant positive effects on this ISA Objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	This option is strongly focussed on the sustainable management of natural resources, leading to a direct correlation for the achievement of significant positive effects for this ISA Objective.
5: Benchmark Option: Do not prepare the NDF	+/-	The protection of natural resources is underpinned by policy and guidance in the WSP and PPW. The Environment (Wales) Act 2016 puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way. Part 1 of the Act – Sustainable management of natural resources (SMNR) – enables Wales' resources to be managed in a more proactive, sustainable and joined-up way. However, new development and infrastructure will continue to cumulatively put pressure on resources and not producing an NDF would be an opportunity missed to provide the required levels of strategic guidance (including principles of the SMNR) to development plans.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		<p>Alternative Options 2, 3 and 4 scored highest against ISA Objective 17. The testing identified the importance of ensuring the Preferred Option included:</p> <ul style="list-style-type: none"> <li>• Support for the principles of SMNR (P1, P2, DN1, DN2, DN3, PE1, PE4, R1)</li> <li>• Support for nature-based solutions (P1, P2, DN1, DN2, DN5)</li> <li>• Increasing resilience in ecosystems &amp; habitats (P2, P3, DN2, DN4)</li> </ul>

## Appraisal of the Preferred Option (February 2018)

The Interim ISA Report that accompanied the Issues and Options NDF in April 2018 provided an appraisal of the preferred option (appraisals were carried out in February that year), the results of which are presented below.

ISA Objective	Score	Commentary
<p>1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life</p> <p><i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Children's Rights, Economy</i></p>	+	<p>The Preferred Option for the NDF Preferred Option sets out that 'learning' is part of its foundation. The core element of the Preferred Option is 'Placemaking'. This 'theme' sets out that the NDF and other development plans must 'co-ordinate delivery of infrastructure to ensure essential services, including health and education, are connected and accessible.' Further text sets out that economic inequalities must be addressed, which could include education levels. Strategic policies AS1 and R4 (specifically for rural areas) seek that the development of housing is linked to key facilities, including education. Positive effects in relation to the achievement of a potential increase in levels of participation in education as a result of the Preferred Option are predicted. Economic growth policies (such as PE4, PE5 and PE6) could also lead to indirect positive effects through the growth of skills. PE9 requires that regeneration activities focus on building places that, <i>inter alia</i>, create jobs and enhance skills and employability, which could lead to further positive effects against this objective.</p> <p>It is suggested that further detail could be included to improve the significance of positive effects. This might include the mention of the development of skills in key growth sectors, as part of their strategic development, leading to lifelong learning opportunities. Although this is mentioned as part of the 'placemaking' theme, and under PE9, it is suggested that it would be useful for it to also be included within the strategic policies relating to growth sectors.</p>
Welsh Government Comment		Skills are addressed within Policy PE5 and the infrastructure required to support the growth in economic sectors. These policies will be expanded upon further in the next stage of the NDF, draft plan. Therefore, no change is required.
<p>2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across</p>	++	<p>Part of the foundation of the NDF is the long-term aim of building a Wales that is 'healthy and active'. The overarching 'Placemaking' theme seeks that the focus of the NDF includes 'health and well-being and cohesive communities', which are likely to provide the foundation for significant positive effects against this objective. The NDF seeks to provide a strong policy framework, to ensure that physical and mental health and well-being outcomes, for both current and future generations, are central to spatial decision making. The regional approach seeks to recognise that disadvantaged and deprived communities are not disproportionately impacted by health inequalities and it may lead to an increase in access to health and social care services, especially in rural areas. Added to this, the decarbonisation and climate change agenda seeks to build national resistance to the effects of climate change, which is likely to lead to cumulative and long-term health and well-being benefits. Policies in relation to</p>

ISA Objective	Score	Commentary
Wales <i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Rural proofing, Children's Rights</i>		active travel and community connectivity (AS1, AS4, R3 and R4) and green infrastructure (DN5), high quality housing (under the Health and Well-being element of the Placemaking theme and strategic policy AS2, which seek to meet community needs) and other environmental improvements (such as those included in strategic policies DN1, DN2, DN3, DN4, DN6, PE1) and economic sector and regeneration support under strategic policies PE6 and PE9, are likely to have significant benefits against this objective by addressing a range of the overall determinants of health and having particular benefits for vulnerable groups. Active travel initiatives could lead to a decrease in greenhouse gas emissions, air, noise, land and water pollution, leading to indirect benefits, added to the potential direct physical and mental health and well-being benefits arising from formal and informal physical activity. It is recommended that further detail in relation to what will be considered as part of the national green infrastructure could be included within the Preferred Option, specifying that it would incorporate active travel infrastructure, as well as high quality and biodiverse green spaces, to improve communities' access to natural green space.
Welsh Government Comment		Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.
3: To create opportunities for an increase in employment across the country and promote economic inclusion <i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy</i>	++	<p>'Sustainable Places' is the goal of the NDF. Connectivity and digital infrastructure are elements of this, which could increase physical access to employment opportunities for an increased number of communities across Wales. The overarching 'placemaking' theme also highlights that economic inclusion is an important principle of the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. This could lead to significant benefits against this objective.</p> <p>The strategic policies under the 'Productive and Enterprising Places' theme could lead to benefits against this objective. Strategic policies PE5, PE6, PE7 and PE9 could lead to economic improvements that could lead to positive effects for employment and economic inclusion PE5 recognises the importance of high value advanced science and technology sectors to the economy, which could create skilled high-income workers. PE6 supports foundational sectors where there are clear opportunities for growth in investment and employment.</p> <p>Strategic policy PE3 (relating to digital infrastructure) could enhance inclusive employment, through providing opportunities for a wider range of communities to participate in employment by providing the infrastructure necessary to support this across the country. Policies relating to support for rural areas, such as R4, could lead to similar benefits. Improvements to the transport network (such as PE8) and improving the connectivity of communities, such as AS1, which supports the aim of providing better jobs closer to home, could also lead to positive effects against this objective.</p> <p>Support for city regions is reflected in policy R3 of the Preferred Option, which could lead to positive effects against this objective. PE6 provides some sector specialisations, although it is unclear as to whether this is the extent of the sectors that the NDF would like to target. It is recommended that similar content for other types of sectors would be useful, should other sectors also be of national importance in the context of the NDF. This could lead to an improvement in the range of employment types across Wales, which could lead to an increase in job satisfaction and skills.</p>
Welsh Government Comment		Policy PE6 has been amended to ensure it addresses growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan. There are no changes required at this stage,
4: To create opportunities for	++	One of the key aims of the Preferred Option is that Wales will become prosperous and secure. A key element of this is the transition to a low carbon economy, which could bring opportunities that would create a wide range of benefits. Another key

ISA Objective	Score	Commentary
sustainable economic growth, diversity and business competitiveness <i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, Rural Proofing, Climate Change, Economy</i>		<p>element of the NDF is to deliver the physical infrastructure (PE5 and PE8), including digital infrastructure (PE3), to support growth, which could lead to significant positive effects against this objective and encourage inward investment. The provision of a framework to support the transition to a low carbon economy and the circular economy (PE1, PE2, PE3 and PE4) could also lead to significant benefits against this objective.</p> <p>The regional approach, including identifying city regions and growth deal areas, could lead to further economic benefits, providing a strategic focus for investment. The policies within the Preferred Option build upon the overall strategy and includes the need for NDF policies to promote national and foundational growth sectors (PE5, PE6); cross-border spatial economic development (PE7); rural economic development (R4); as well as regeneration activities (PE9), which could cumulatively lead to significant benefits against this objective.</p> <p>Strategic policy DN2 seeks that new development is more resilient to the effects of climate change. Alongside other measures within the Preferred Option, this could lead to positive benefits against this objective.</p> <p>See recommendation under ISA Objective 3 in relation to growth sectors and the encouragement of innovation and inward investment within the regions. This could help to provide greater direction for diversification within the economy and enable the delivery of the decarbonisation agenda more effectively.</p> <p>It is suggested that the content of policy R5 could be widened to support all businesses, as it may not just be rural enterprises that are affected post-Brexit. Further, it is suggested that text relating specifically to the sustainable management of agriculture and rural businesses would be prioritised.</p>
Welsh Government Comment		<p>It is noted that PE5 and PE6 address growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan.</p> <p>It is considered that policy R5 as drafted does cover all businesses and not just rural business.</p> <p>The Preferred Option provides a supportive economic framework recognising the potential impact from Brexit on rural areas.</p> <p>There are no changes required at this stage.</p>
5: To contribute towards the future well-being of the Welsh language <i>Relevant impact assessments (in addition to SA &amp; SEA): Welsh Language, Rural Proofing</i>	+	<p>The 'Placemaking' theme of the Preferred Option sets out that the NDF Preferred Option is focussed on three spatial aspects, one of which includes the Welsh Language. As decisions must demonstrate that they are compatible with the Placemaking theme in the first instance, this could lead to positive effects against this ISA objective. Measures to provide housing and employment and improve the connectivity within communities could reduce outmigration of people from Welsh speaking communities, improving viability and vitality in these areas. This could lead to positive effects against this objective.</p> <p>The goal of the Welsh Government of a million Welsh Speakers by 2050 could be incorporated into the text, as the renewable energy goal is included.</p>
Welsh Government Comment		<p>This goal has been included within the Preferred Option in the Place making section under 'Cohesive Communities &amp; Welsh Language'</p>
6: To create opportunities within which greenhouse gas	+/-	<p>Decarbonisation and climate change is one of the three spatial aspects of the Placemaking theme, and aspects relating to this are integrated throughout the Preferred Option. Measures such as a transition to a low carbon economy (PE4), supporting the Welsh Government's strategic decarbonisation goals, could lead to significant benefits. This could be compounded by the strong focus of</p>



ISA Objective	Score	Commentary
emissions can be reduced and limited and encourage energy efficient and sustainable design <i>Relevant impact assessments (in addition to SA &amp; SEA): HIA, Climate Change, Economy</i>		<p>the Preferred Option to improve the connectivity of communities through active travel measures (AS1, AS4, R3 and R4), the decarbonisation of transport (part of PE8), generation of energy from low carbon energy sources (PE1, PE2), and the implementation of green infrastructure measures (DN5) and other environmental enhancements (DN3 and DN4).</p> <p>However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5 and part of PE8), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, although this is uncertain. Further, although 'high quality' housing is mentioned in the 'Placemaking' theme, this is not included within the strategic policies, which could lead to potential uncertainty in delivery.</p> <p>It is recommended that reference to the sustainable design of built development is included within the Preferred Option. It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives. See recommendations relating to the diversification of the economy under ISA Objective 4.</p>
Welsh Government Comment		<p>The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF.</p> <p>It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage.</p> <p>Response to recommendation for Objective 4 is covered in Objective 4.</p>
7: To contribute to the reduction and management of flood risk <i>Relevant impact assessments (in addition to SA &amp; SEA): HIA, Climate Change</i>	+	<p>A key focus of the Preferred Option is the 'Placemaking' theme, which is to provide the foundation of all spatial choices. Part of this is that the NDF will ensure that the planning system helps to build resilience to the impacts of climate change, which includes flood risk. Further, text relating to cohesive communities specifies that development plans should ensure that communities are resilient to environmental threats such as flooding. Strategic policy DN2 specifically seeks that new development builds resilience to the risks from flooding. This could lead to positive effects against this objective for communities where new development may occur. This may include the building specific measures, as well as wider community flood resilience measures, which could benefit the wider community. These aspects, however, aren't specified in the policy at present due to its strategic nature.</p> <p>Further detail could be provided in relation to the policy relating to green infrastructure, specifying that the development and enhancement of green infrastructure throughout communities could help to reduce existing as well as future flood risk, including within existing communities, not just new development. See also recommendation under ISA Objective 6. Sustainable design of buildings could also help to reduce flood risk.</p>
Welsh Government Comment		<p>Policy DN2 has been redrafted to incorporate avoidance of risk. Resilience to risks of flooding are also covered within the placemaking policy and policy DN2. Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage. Response to recommendation for Objective 6 is covered in Objective 6 above.</p>
8: To create opportunities to	+	<p>One of the key principles of the Preferred Option is to implement the Welsh Government's decarbonisation agenda. Measures such as improving the connectivity of communities nationally (AS1, AS4, part of PE8, R3 and R4), green infrastructure (DN5) and</p>

ISA Objective	Score	Commentary
encourage the protection and improvement of air quality <i>Relevant impact assessments (in addition to SA &amp; SEA): HIA, Climate Change</i>		<p>environmental enhancement measures (DN3 and DN4), and the provision of a framework to provide sustainable transport (AS4 and part of PE8) and low carbon energy generation (PE1 and PE2) should lead to positive effects relating to air quality and therefore associated health impacts, with resulting benefits for human health. Ensuring that communities are resilient to environmental threats such as poor air quality is a key element of the 'Placemaking' theme as well as strategic policy DN2. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective. However, this effect is uncertain. On balance, minor positive effects may result, particularly for local air quality, where road building may help to improve air quality within communities.</p> <p>It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives.</p> <p>It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage.</p>
Welsh Government Comment		
<p>9: To create opportunities to protect and enhance the quality and quantity of water features and resources</p> <p><i>Relevant impact assessments (in addition to SA &amp; SEA): HIA, Climate Change</i></p>	+	<p>Policies included within the 'Distinctive &amp; Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4), promoting resource efficiency (DN1) and facilitating green infrastructure (DN5), should lead to positive effects against this objective. Implementing the National Marine Plan (strategic policy PE10) Strategic Resource Areas should lead to support for integrated decision making in the marine environment.</p> <p>Measures such as improving the connectivity of communities nationally and the provision of a framework to provide sustainable transport and reduce the need to travel through improved connectivity (and low carbon energy generation (PE1 and PE2), and support for the transition to a low-carbon economy and the circular economy (PE4, PE8, AS1, AS4, R3 and R4) should also lead to positive effects for water resources overall.</p> <p>It is suggested that Policy DN2 could be made more positive, seeking to reduce/avoid environmental 'risks' as opposed to building community resilience to them.</p> <p>It is recommended that Policy PE10 is moved to the Distinctive &amp; Natural Places section of the Preferred Option, as it is unclear why it is located in Productive and Enterprising Places. Further, it is recommended that reference is made to the Natural Resources Policy for Wales, incorporating the SMNR principles.</p> <p>Policy DN1 could be more specific about the 'natural resources' it refers to using more efficiently, which could include the use of water, as part of a wider ecosystems services and climate change resilient approach.</p> <p>Policy DN2 has been redrafted to incorporate avoidance of flood risk.</p> <p>The location of Policy PE10 reflects the structure of the revised PPW.</p> <p>The term Natural Resources are defined within the Environment (Wales) Act 2016. No change required at this stage.</p>
Welsh Government Comment		
10: To create opportunities for the improved connectivity	++	<p>The creation of opportunities for the improved connectivity of communities, resilience to climate change and sustainable access to facilities are considered within the Preferred Option and provide the basis of many of the strategic policies, leading to potential significant benefits against this objective. Policies relating to the delivery of green infrastructure (DN5); digital infrastructure (PE3);</p>



ISA Objective	Score	Commentary
of communities and sustainable access to basic goods, services and amenities for all groups <i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change</i>		<p>decarbonising the transport sector (PE8); housing and connectivity infrastructure (AS1); national active travel infrastructure (AS4); city region and growth deal areas (R3); and rural areas and connectivity (R4), should all contribute to the achievement of the aims of this ISA objective.</p> <p>The requirement for the identification of 'Nationally important roads' is repeated in PE8 and AS5. It is suggested that the content of AS5 be moved to the Productive and Enterprising Places theme, as it is considered that the nationally strategic road network would not necessarily contribute to the enhancement of active places. The 'Productive and Enterprising Places' theme could also consider the role of air and sea travel within the NDF.</p> <p>It is recommended that opportunities for improvement in accessibility to cultural and recreational facilities could be added to the strategic policies, to strengthen benefits against this objective.</p>
Welsh Government Comment		<p>Policy AS5 has been deleted as this is covered by policy PE8.</p> <p>There are a number of policies within the Preferred Option including Placemaking, DN6, AS1 and AS4 that address connectivity and access to cultural and recreational facilities through promotion of assets and delivery of infrastructure. Policy PE8 already addressed ports and airports. No change required at this stage.</p>
11: To create opportunities within which an improvement in social cohesion and equality can be achieved <i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Rural Proofing, Children's Rights</i>	++	<p>It is considered that the principles of the Preferred Option are generally in line with this ISA Objective and that further specific detail is not necessarily appropriate at this level of plan-making. The overarching 'Placemaking' theme as well as the Preferred Option more generally, includes details relating to the determinants of community cohesion, which can include aspects such as the Welsh Language, housing need, connectivity and community facilities and services.</p> <p>It is considered that measures to improve health and well-being across Wales, including that the regional focus will allow for regional inequalities to be tackled, could lead to positive effects. Further, specific measures to enhance social cohesion and ensuring that existing and future communities are equitable for all; that all member of society have access to services and facilities; and that the delivery of land for housing that meets all society's needs (in the Placemaking theme and strategic policy AS2), should lead to significant benefits against this objective. This could be in relation to all equalities groups, particularly in relation to potential age inequalities, where older or younger groups; as well as those with disabilities, certain health conditions or low incomes, may currently be less able to travel to access services and facilities. Strategic Policy R4 further seeks to retain and attract people to rural communities, which could lead to further benefits against this objective.</p> <p>The NDF could make reference to other aspects of community cohesion, such as improving personal safety and social interaction and integration. Although 'secure' is mentioned within the 3<sup>rd</sup> paragraph of the NDF, it is not mentioned again within the NDF Preferred Strategy. Further, it is unclear what is meant by 'secure' as this could also mean secure in economic terms.</p> <p>More could also be made of the need to reduce poverty and deprivation inequalities, including that affecting children, as well as to consider the integration of communities including those with different cultural or ethnic identities. Poverty is mentioned in relation to fuel poverty within the Preferred Option but is not specifically mentioned elsewhere.</p>
Welsh Government Comment		<p>The first section of the Preferred Option which sets the context has been reviewed and redrafted and through this redraft the references to secure is no longer included.</p>

ISA Objective	Score	Commentary
		<p>There are a number of policies within the Preferred Option including P3 which deals with community cohesion which will be expanded upon at the next stage of the NDF, the draft plan.</p> <p>Policy R1 addresses deprivation and inequalities and will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.</p>
<p>12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs</p> <p><i>Relevant impact assessments (in addition to SA &amp; SEA): EQIA, HIA, Rural Proofing, Children's Rights</i></p>	+	<p>The Strategic Policies included under the 'Active &amp; Social Places' theme within the Preferred Option, should lead to some positive effects against this ISA Objective. Strategic Policy AS2 seeks that NDF policies will require that strategic housing development will meet the needs of everyone and the types of housing required are considered in the context of locational and numerical considerations, which could lead to positive effects against this objective in that it should meet housing needs. Policy in relation to resilience to climate change, could reduce fuel poverty, leading to further positive effects.</p> <p>Policy AS3 goes on to state that national policy-based population and housing projections will be produced. However, Policy R2 states that NDF policies will identify regional policy passed population and housing projections for each region. Clarity on approach should be provided to ensure efficiency in delivery.</p> <p>The Placemaking theme mentions the need for the delivery of high-quality housing, although this is not included within the strategic policies. See recommendation under ISA objective 6.</p>
Welsh Government Comment		<p>The Preferred Option should be read as a whole and both policies AS3 and R2 apply. It is considered that the wording and location of the policies within the general AS policy and a regional R2 policy provide clarity on the different approaches and no change is required at this stage.</p> <p>The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF. No change is required at this stage.</p>
<p>13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes</p> <p><i>Relevant impact assessments (in addition to SA &amp; SEA): HIA, Rural Proofing, Climate Change</i></p>	+/-	<p>Policies included within the 'Distinctive &amp; Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4) and facilitating green infrastructure (DN5), should lead to positive effects against this objective.</p> <p>However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, particularly in relation to noise pollution in South East Wales. This could be further exacerbated by Policy R3, relating to the development of city regions and growth areas, which could also have negative townscape effects. However, the green infrastructure policy (DN5) could reduce the effects of development on townscape and landscape to some degree. Further potential negative landscape impacts could result from nationally significant transport or renewable energy infrastructure projects. However, impacts may be mitigated on a project level basis or through more specific planning policies.</p> <p>Further, policies relating to the development of more rural areas, such as R1, R2, and R4, could lead to negative effects against the areas of dark skies and tranquil areas.</p> <p>See recommendation under ISA objective 6.</p>
Welsh Government Comment		See response Objective 6.

ISA Objective	Score	Commentary
14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings <i>Relevant impact assessments (in addition to SA &amp; SEA): HIA</i>	+	<p>Policies included within the 'Distinctive &amp; Natural Places' theme, including the protection and enhancement of nationally important landscapes (DN3), could lead to positive effects against this objective, in relation to historic landscapes.</p> <p>Strategic policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate that delivery of new cultural development, which could lead to positive effects against this objective.</p> <p>It is suggested that the significance of the positive effects could be improved through integrating the need for cultural enhancement into the overarching 'placemaking' theme, to improve its prominence. Further, heritage-led regeneration could be included within the regeneration policy (PE9).</p>
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. The policies within the Preferred Option are to be read as a whole and one is not prioritised over another. No change is required at this stage.
15: To create the opportunities for the protection and promotion of Welsh culture <i>Relevant impact assessments (in addition to SA &amp; SEA): HIA</i>	+	<p>Strategic Policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate the delivery of new cultural development, which could lead to positive effects against this objective.</p> <p>It is recommended that the recognition, protection, promotion and enhancement of Welsh Culture is included within the overall 'Placemaking' theme as part of the overall focus of the NDF. Further, it is considered that access to cultural assets could be included as part of policies seeking to improve national connectivity. Further, culture-led regeneration could be included within the regeneration policy (PE9).</p>
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. DN6 also looks to promote historic and cultural assets, which will be expanded upon at the next stage of the NDF, the draft plan. The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity <i>Relevant impact</i>	+/-	<p>Policies included within the 'Distinctive &amp; Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats, as well as strengthening ecosystem resilience and facilitating green infrastructure, should lead to positive effects against this objective. Specifically, strengthening nationally important ecosystem resilience through greater diversity, connectivity, scale, condition and adaptability, could lead to significant positive effects, and enable species to adapt to a changing climate.</p> <p>However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective.</p>

ISA Objective	Score	Commentary
<i>assessments (in addition to SA &amp; SEA): HIA, Rural Proofing, Climate Change</i>		<p>The 'Placemaking' theme provides the first principle through which all spatial choices are first considered. Within this text is reference to green infrastructure to support healthy lifestyles. It is suggested that the wider benefits and potential for a green infrastructure network could be highlighted within the 'Placemaking' theme, to give it greater status and to ensure that the range of environmental enhancements to be achieved are given prominence. This could then be linked to a range of strategic policies, including active travel and connectivity of communities including health and well-being and access to greenspace, flood risk management, temperature regulation, air and noise quality, water and soil quality and ecosystem connectivity.</p> <p>See recommendation under ISA objective 9 in relation to SMNR principles. It is recommended that policies DN2 and DN4 could consider the role of ecosystems services more widely, not just focussing on designating specific areas as 'nationally important' as this may remove the connectivity, diversity and interconnectedness that the NDF is seeking to strengthen. This could also help to improve mitigation against the potential effects of development on the natural environment and include the protection of geology and soils.</p>
Welsh Government Comment		The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
<i>17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value Relevant impact assessments (in addition to SA &amp; SEA): HIA, Rural Proofing, Climate Change, Economy</i>	++	<p>Strategic Policy DN1 states that NDF policies will improve resource efficiency and minimise the unsustainable use of natural resources. It is considered that this is likely to lead to benefits against this objective.</p> <p>Policy R5 states that the NDF policies will provide a framework for responding to the challenges and opportunities arising from exiting the EU over the plan period, including supporting agriculture and businesses. This could help to contribute towards the sustainable management of farmland, forests and the wider countryside.</p> <p>Policy PE4 specifically seeks that nationally important employment, mineral and waste areas are identified, seeking to promote a transition to a low carbon and circular economy. This could lead to significant benefits against this objective.</p> <p>It is unclear if Policy DN1 refers simply to all 'natural resources' and therefore including minerals and waste as well as wind power and water, amongst many, or if it is limited to certain types. Clarity on this could improve the potential for successful policy implementation.</p>
Welsh Government Comment		The term Natural Resources is defined within the Environment (Wales) Act 2016. No change is required at this stage.

## Appraisal of the Spatial Strategy (Draft NDF) (April 2019)

The 'spatial strategy' of the NDF is the overall approach taken to the distribution and location of the proposed land-uses and policies. The NDF doesn't provide a chapter specifically focussed on setting out the spatial strategy. Rather, the spatial strategy pursued in the NDF emerges from its policies. The spatial strategy is therefore not repeated here but can instead be found in the NDF and predominantly in Chapter 4. Table B-27 provides an appraisal of the likely impacts of the overall distribution and location of all policies and land-uses proposed in the NDF. *Note: this is different to a 'cumulative effects assessment' or the appraisals of individual policies, as this holistic appraisal is focussed on impacts associated only with the locational aspect of the proposed policies and land-uses.*

Table B-27: Appraisal of the spatial strategy (April 2019)

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	Referencing education with regards to services in the strategy would provide clarity and ensuring facilities are accessible and inclusive.
		The Spatial Strategy looks to create sustainable places which could include the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), for people of all ages and physical accessibility. The Spatial Strategy could support an improvement in educational attainment over the long term for children and young people and increase access to training and grow skills for all members of society, as within urban areas it aims to ensure 'co-locating homes, jobs and services' and to capitalise on the advantages of sustainable transport through the various Metro schemes. Focussing on the three main clusters of towns and cities should help to enhance links between the more education deprived areas in Wales and education facilities and opportunities. Focussing growth in these areas may therefore help to encourage improved educational attainment for those in most need.								
2	To contribute to an improvement in		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT ++	The strategy recognises the ambition to improve health,

<sup>3</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement	
	physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	<p>The Spatial Strategy could support an improvement in health and well-being in the long term by aiming to improve access to services and also infrastructure for all members of society including children and young people. This could lead to a reduction in inequalities by, for example, ensuring increased access health, education and housing opportunities and which would help to reduce child poverty.</p> <p>Focussing new growth in the three main clusters of towns and cities would be likely to help enhance the links between areas of health deprivation and health facilities and services. The proposed Spatial Strategy would therefore be likely to help improve access to important health services for those most in need.</p> <p>There is a risk that new growth and development, and the likely population increase this would facilitate, could place existing health services and facilities under greater pressure. Whether such services would be placed over-capacity is largely dependent on the distribution of development in relation to services and what their existing capacity status is. It is assumed that new or expanded health services or facilities would be provided to match growing needs.</p> <p>The Strategy notes that the majority of people in Wales live in urban areas. It will be important that they benefit from ecosystems services through increased use of green infrastructure, nature-based solutions and active travel opportunities, which would bring multiple health benefits both physically and mentally. It doesn't, however, specifically mention those who live in rural areas and how they might benefit from improvements in green infrastructure, this could be recognised.</p> <p>People in rural areas will however have good access to a National Forest for Wales and its associated health benefits.</p>									this could be widened to recognise the potential to improve well-being and reduce inequalities. The strategy could include how rural communities could benefit from improvements to green infrastructure.
3	To create opportunities for an increase in employment across the country and promote economic inclusion		SS	Scale: Reg	T/P: P	Cert: L	ST +	MT ++	LT ++	Development in the three clusters of towns and cities should address the imbalance in economic inclusion in existing settlements and should seek to enhance the links between the more economically deprived areas and new economic growth.	
		<p>The towns and cities in the three clusters focussed on in this strategy are generally where the most populous workforces live in Wales and where the most concentrated economy currently is. They are also where some of the highest rates of employment and economic deprivation in Wales can be found.</p> <p>A key element of the Spatial Strategy is to ensure that jobs and homes, alongside essential services and facilities, are co-located. This should lead to positive effects against this objective in the medium and longer terms, through ensuring that land use planning outcomes improve the physical accessibility of jobs and could bring employment opportunities across all working age ranges.</p> <p>The approach taken will be based on improvements regionally, through the development of the three main urban clusters of cities and towns, being: 'Cardiff, Newport and the Valleys; 'Swansea Bay'; and 'Wrexham and Deeside'.</p>									



Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
		<p>The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective.</p> <p>The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.</p>								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		SS	Scale: Nat	T/P: Perm	Cert: L	ST +	MT ++	LT ++	It is not clear how the Spatial Strategy might contribute to the development of the third sector and sustainable tourism. Specific growth sectors could be specifically mentioned as part of the strategy, to give a formal direction of support.
		<p>The Spatial Strategy seeks that the focus on urban areas will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. This focus could help to create positive effects against this objective in the medium and longer terms.</p> <p>The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective.</p> <p>The Spatial Strategy is clear with regards to the support for the physical infrastructure needed to support sustainable economic growth.</p> <p>The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.</p>								
5	To contribute towards the future well-being of the Welsh Language		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	No recommendations.
		<p>The Spatial Strategy recognises the importance of the Welsh language. It states its desire to grow the Welsh language and notes ‘In all parts of Wales, the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving community, Welsh language or economy’.</p> <p>The focus on achieving sustainable and proportionate population and job growth in each region and sub-regional area across Wales can help achieve the Government’s ambitions for the Welsh language. The strategy recognises the inter-relationship between homes, jobs, services and transport, and their influence on the way society operates. The strategy for these issues in combination deliver the best conditions possible for the language to thrive</p> <p>The Strategy will contribute positively towards the future of the Welsh language in all areas of Wales including rural areas.</p> <p>The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to the Welsh</p>								



Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
		language as it would likely mean less out-migration in search of economic opportunities, including of people with Welsh language skills. This effect is likely to be more pronounced in rural areas of Wales. There is a risk that new economic development in proximity to the border with England could increase the flow of workers crossing the border to work in Wales, particularly where public transport options are enhanced, and this could potentially dilute rates of Welsh speaking in some locations.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		SS	Scale: Int	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations.
		<p>The Spatial Strategy is fundamentally based on an approach which seeks to encourage sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services, as well as the efficient use of resources. This should lead to positive and significant effects against this objective nationally, as these principles will also be reflected through resulting planning policies at the regional and local levels.</p> <p>The focus on the three clusters of towns and cities would be expected to help ensure that new residents and businesses have good access to the public transport modes on offer in these urban areas. Urban locations generally enable more efficient movements than rural locations, including via active travel modes, as people, jobs and key services and amenities are in greater proximity to each other than is typically seen in rural locations. The strategy could therefore enable a lower-emission way of life than if growth were focussed in areas where sustainable transport options are more limited, although it is accepted that any degree of growth would be likely to be accompanied by some degree of increase in car and HGV use.</p> <p>The Spatial Strategy makes a number of key strategy points, which could contribute to significant positive effects against this objective, including policy directions relating to national important ecological networks, the development of a national forest for Wales, the use of ultra-low emission vehicles, and powering and heating places with renewable energy and district heat networks. This includes the development of priority areas for solar and wind energy generation.</p>								
7	To contribute to the reduction and management of flood risk		SS	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	It is recommended that the strategy consider how a focus on adapting to a changing climate, including flood risk, could be integrated into the national spatial approach to planning for development. This may
		<p>The Spatial Strategy seeks to create more sustainable developments, with a focus on sustainable settlement patterns and reducing contributions to greenhouse gas emissions. Given the high-level nature of the spatial strategy and the lack of specificity about where new development would take place, there is a large degree of uncertainty over the likely impacts of the strategy and flood risk.</p> <p>The precise level of risk will largely depend on micro-siting decisions. Additionally, new development would be expected to conform with PPW as well as NRW advice and this would be</p>								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
		likely to reduce the extent to which new development is exposed to flood risk. However, specific mention of adapting to the changing climate within the Spatial Strategy is minimal and potentially limited to the use of natural resources and the development of opportunities to enhance green infrastructure at a strategic scale, and to create and restore habitat networks and green corridors. Although this could contribute to indirect benefits for the reduction and management of flood risk, this has not been specified as a key aim. The focus of the strategy are three clusters or urban areas, much of which is coastal. It is therefore likely that the significant level of growth here could alter local levels of flood risk, such as by resulting in the loss of greenfield land, soils and above-ground vegetation. On the other hand, growth in these locations could be an opportunity to secure new investment for improved flood risk defence schemes in these locations subject to the emerging policy in TAN 15. The risk of flooding should be seen in the context of climate change, which is expected to exacerbate flood risk and alter its distribution. The precise characteristics of how climate change will alter flood risk are largely uncertain but coastal areas will likely witness significant change to flood risk. Overall it is considered that a minor adverse effect over time on the flood risk objective cannot be ruled out, but appropriate micro-siting and avoidance and mitigation measures adopted at Strategic and Local Development Plan stages can mitigate this.								include directing development away from areas of flood risk.
8	To create opportunities to encourage the protection and improvement of air quality		SS	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	The benefits of green infrastructure to air quality, including from the national forest, could be specified. This might then enable specific species of tree to be targeted, to maximise benefits, especially within urban areas. The strategy could specify that it will seek to move away from polluting industries, particularly around Deeside, where it indicates that heavy industry is abundant.
9	To create opportunities to protect and enhance the		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	The Spatial Strategy could specifically mention waterways as part of the

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
	quality and quantity of water features and resources	achieving biodiversity and green infrastructure enhancement in our urban areas. Effective innovative, nature-based solutions to the challenges of urban form, design and density will be required in order to reap the well-being rewards of living in exemplar, future-resilient settlements'. Although water is not specifically mentioned, a nature-based approach could lead to positive effects for water quality and quantity including opportunities to protect and enhance water resources and quality. Water is not, however, specifically mentioned. This may reduce the potential of the strategy to improve water quality over the current deteriorating trend and reduces certainty in the assessment.						intended green infrastructure network as well as the need for water quality to be improved nationally.		
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT ++	No recommendations
		The Spatial Strategy could support an improvement in creating opportunities for the improved connectivity of communities and sustainable access to goods and services for all members of society including children and young people over the long term. It specifically aims to ensure 'co-locating homes, jobs and services' and to capitalise on the advantages of sustainable transport through the various Metro schemes. For rural areas, it refers to active travel infrastructure supporting development in rural settings, the use of Mobile Action Zones supporting rural and isolated communities through enabling electronic communications and digital infrastructure and development within rural areas being 'complimentary' in order to 'support local aspirations and need'. All of these measures could ensure an increase in inclusive access services, helping to facilitate the improved connectivity of communities. For example, children and young people should be better able to keep in touch digitally, particularly in rural locations, and use public transport in order to access services such as education. The Strategy recognises the opportunities Metro schemes will bring to Wales. It states that land in proximity and with good access to Metro stations 'is an important and finite resource and will play a key role in delivering sustainable urban places'. Metro schemes will bring increased public transport provision to rural areas. Increased provision of public transport in rural areas will mean those living in isolated parts of Wales will have improved connectivity giving them access to basic goods and services, helping to reduce isolation and inequality.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	See objective 10. The strategy could be strengthened through expanding the list of important functions of rural areas to include health and well-being, tourism and
		The Spatial Strategy facilitates for improvements in terms of sustainable transport, communications etc., which should ensure improved connectivity and better access to services for people The Strategy creates opportunities for social cohesion and equality in the long term. For children and young people, it could mean they are better able to access services such as opportunities for play and recreation as a result of the Strategy promoting sustainable transport.								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
		<p>The Strategy states ‘Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas. Developing our urban areas - some of which may be underperforming - is not the easiest Spatial Strategy to achieve, but it is the right ambition for Wales and supports the Government’s commitment to social justice.’</p> <p>This helps ensure development occurs in the most sustainable locations, creating places which are inclusive and does not have a negative impact on rural areas.</p> <p>The Strategy recognises that ‘rural areas have an important function as a provider of food, energy and mineral resources’ this could be strengthened to include health and well-being, tourism, renewable energy. The Strategy also specifies that the policies on supporting urban centres, delivering affordable homes, supporting communities through the use of publicly owned land, mobile action zones and the provision of electric vehicle charging infrastructure all apply to Wales’ rural areas. They should be considered as priority issues for the preparation of Strategic and Local Development Plans across the whole of Wales. This could lead to positive indirect effects against this objective.</p>								renewable energy.
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations.
		<p>Positive benefits may be derived from the Spatial Strategy with regards to the delivery of affordable housing which would be likely to grow in a major positive impact in the long-term as a result of the focus on facilitating growth. The regeneration of urban areas could lead to an improvement in housing quality and abundance for communities in these areas, which could lead to positive effects in relation to seeking to reduce homelessness and improving the availability of affordable homes of good quality. The Spatial Strategy would also support the maintenance of rural communities, which could ensure that affordable housing is also developed in these areas, as it seeks to support local aspirations and need. The Strategy specifies that affordable housing should be considered as a priority issue for the preparation of Strategic and Local Development Plans across the whole of Wales.</p> <p>The provision of good quality, affordable housing can also help to deliver a range of health benefits including through reducing child poverty.</p>								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The Strategy could include seascapes as an integral part of the landscape/townscape consideration. Given the quantity of development being pursued, careful management of this
		<p>The Spatial Strategy could lead to benefits for both the landscape and townscapes across Wales. The focus on urban areas could lead to urban regeneration initiatives, leading to positive effects. In turn, this could help protect landscapes in more rural areas from development. In particular, aspects of the strategy relating to sustainable and active travel, green infrastructure, and the national forest, could lead to long term significant benefits for the landscape, including helping to</p>								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
	seascapes	maintain areas of tranquillity and reducing noise and light pollution and could help to increase the accessibility of townscapes. In areas designated for landscape importance, the strategy notes that protection against inappropriate development remains in place. This should help to protect landscapes in the short and medium terms. Further, the Strategy states that ‘as the population of Wales becomes increasingly urban, it is clear that the opportunity to optimise well-being benefits from ecosystems will be greatest in these areas. Through the innovative use of nature-based solutions, and by increasing well-integrated green infrastructure in and around urban areas, development can restore natural features and processes into cities and landscapes, maintain and enhance the strategic functioning of our natural resources and ecological networks, and provide locally accessible, high quality green spaces and corridors.’ This could lead to significant positive effects against this objective.								development will be required to avoid adverse impacts on this Objective.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	The regional approach within the Spatial Strategy could specify that the important character of communities (both urban and rural) will need to be reflected in regeneration initiatives.
		It is unclear from the Spatial Strategy if there is an intention to support heritage-led regeneration initiatives, and the conservation and enhancement of the historic environment, historic assets and their settings. The focus on urban areas could lead to urban regeneration initiatives, leading to the potential for positive effects, although this is uncertain. The development of rural areas seeks to focus on local character, which could also lead to positive effects against this objective. In general, the proposed strategy would focus development in urban areas and this would help to avoid impacts on historical landscapes in rural areas. On the other hand, urban locations are often rich in heritage assets and so avoiding adverse impacts on historical assets in every case would require careful management. Through improved connections and potential regeneration initiatives this could achieve increased inclusive access and opportunity for people to understand and enjoy the historic environment.								
15	To create the opportunities for the protection and promotion of Welsh culture		SS	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	See recommendation for objective 14. It is further recommended that the Spatial Strategy include more detail relating to Welsh culture, with detail on how this might be enhanced regionally.
		Aside from ambitions to grow the Welsh language, it is unclear from the Spatial Strategy how the NDF intends to create opportunities for the protection and promotion of Welsh culture. Minor positive effects may be experienced through the protection of rural areas, including the focus on local character, the intention to support local aspirations and needs and steadily grow the population in rural areas which will help to protect and promote Welsh culture. There are also opportunities through urban regeneration initiatives for potential positive effects. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to Welsh culture for								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>3</sup>						Recommendations for Mitigation or Enhancement
		smaller settlements in rural areas as it would likely mean less out-migration in search of economic opportunities, including of people who support, facilitate or partake in Welsh cultural activities and places, and this would be likely to help protect cultures and communities.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The policy could mention the need for the protection of geodiversity as an integral part of wider environmental conservation.
		<p>The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits for biodiversity may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. Well integrated green infrastructure and nature-based solutions in urban areas are encouraged, as well as the development of a National Forest for Wales, across multiple sites.</p> <p>The Spatial Strategy generally directs development away from locations in Wales where the more valuable biodiversity, geodiversity and protected areas are found.</p> <p>These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend. All of the above has positives for rural areas, in particular a National Forest for Wales including access for those living in rural areas.</p>								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		SS	Scale: Nat	T/P: Temp	Cert: Med	ST ++	MT ++	LT ++	No recommendations.
		<p>The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits against this objective may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. In particular, the conservation of water resources is a key area of focus. These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend.</p>								

## Appraisals of Policies (Draft NDF) (May 2019)

The Draft NDF policies have been grouped in accordance with Table B-28. An appraisal table is provided for each policy grouping.

*Table B-28: Groupings of draft NDF policies*

Policy Group	Policies
1	P1, P2, P4
2	P3
3	P5
4	P6
5	P7
6	P8, P9
7	P10, P11, P12, P13, P14, P15
8	P16
9	P17, P18, P19 P20, P21 P22
10	P23, P24, P25, P26
11	P27, P28, P30, P30, P31, P32, P33



Table B-29: Policies and reasonable alternatives in Policy Grouping 1

Policy Grouping 1	
<b>P1 – Sustainable Urban growth</b>	Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed-use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.
<b>P1RA1 – Do Nothing</b>	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
<b>P2 – Supporting Urban Centres</b>	Proposals for new public service facilities of a significant scale should be located in town and city centres. A sequential approach must be used to assess development plan allocations and to determine planning applications for developments. Only in exceptional circumstances should public service facilities of a significant scale be approved outside of town and city centres.
<b>P2RA1 – Do Nothing</b>	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
<b>P4 – Supporting Rural Communities</b>	The Welsh Government supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. The future for rural areas are best planned at the regional and local level. Strategic and Local Development Plans should plan positively to meet the needs of rural communities with regard to housing, transport, businesses, services and diversification in the agricultural sector.
<b>P4RA1 – Flexible settlement boundaries</b>	This option would enable local authorities to operate flexible settlement boundaries to plan positively for rural communities. This could be expanded to reference specific sectors (such as housing, public services, economic development) with specific remits for each of these areas and a policy statement outlining what approach should be adopted.
<b>P4RA2 – Do Nothing</b>	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-30: Appraisal of Policy Grouping 1

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Potential to strengthen links and connectivity to more rural areas to education and skills facilities.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			<p>Policy P1 and P2 would help to increase access for all to education and training facilities which would look to be focused in town and city centres, particularly via sustainable transport modes (walking, cycling and public transport). These would be direct effects of Policy P1 that would be likely to grow over time. It is recognised Policy P1 would not impact directly on children and young people in rural areas.</p> <p>Doing nothing approaches would not maximise the opportunities to focus development and improve connections to facilities in these areas and therefore the potential attainment in education for children and young people across Wales. The do-nothing approach would be likely to conform with baseline trends.</p> <p>P4 The policy looks to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services for all. The supporting text recognises the importance of inclusive access within rural communities to facilities and services which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of increasing access to education services within these areas, leading to improvements in educational attainment.</p> <p>Policy P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.</p>							

<sup>4</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Potential to strengthen links and connectivity to more rural areas to improve access to facilities and services and improve connections to the natural environment.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P1 and P2 focus development on town and city centres and creating improved access to facilities, active travel infrastructure and green infrastructure for people of all ages and physical abilities. This could have a positive effect on health both mentally and physically and could improve air quality through reducing the need to travel by car. These would be direct effects of Policy P1 that would be likely to grow over time. Over the long term, Policy P1 could result in increased numbers of children and young people in urban areas being able to walk or cycle in order to access developments with associated services, including education and leisure, through public transport provision. Encouraging the use of walking and cycling to access services should result in health benefits for children and young people within urban communities across Wales. This policy is an urban policy and therefore not applicable to rural areas. Policy P1RA1 - Doing nothing would not result in maximum opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. The do-nothing approach would be likely to conform with baseline trends. P4 The policy recognises the important role of housing, economic growth, services which will have positive impacts on the health and well-being of rural communities, reducing isolation and inequalities for all. Such an approach could result in benefits in terms of enabling children and young people to access services within these areas, leading to improvements in health and well-being. Policy P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approach would be likely to conform with baseline trends.							
3	To create opportunities for		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	P1 could recommend that

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
an increase in employment across the country and promote economic inclusion			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	walking and cycling access routes at new developments are incorporated into local Green Infrastructure (GI) networks. Well-connected, attractive and safe GI networks that provide space for pedestrians and cyclists whilst being designed to be of a high biodiversity value (value provided by the species planted throughout the networks as well as the free movement of wildlife they facilitate) can provide a raft of social, economic and environmental benefits, including more accessible employment opportunities for local people.
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
	Policy P1 would help to ensure that new higher density development, including developments such as leisure, offices and commercial activities, are located in town and city centres. This would situate significant employment opportunities within locations that are highly accessible for local people, particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. This would be a direct effect of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of employers are encouraged to situate in town and city centres and promote economic inclusion and develop city regions in the process. This should lead to opportunities for young people in particular to access employment. There are clear geographical differences in employment activity in Wales with pockets of higher than average deprivation in the South Wales valleys and in some North Wales coastal towns. It is unclear the extent to which P1 would help to combat this deprivation. The increase in accessibility through the metro scheme and policies P26 and P31 in the NDF which support improvements to the Swansea Bay and South Wales metros could help to reduce inequalities in these areas but this would depend on the implementation. A policy that generates liveable urban areas should generate work opportunities, which helps retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language's traditional strongholds. Policy P1 is aimed at promoting urban centres and therefore has a neutral impact on rural areas. The alternative to this, P1RA1, would be to have no policy, thus leaving PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of commercial land and employment opportunities and promote economic inclusion by									

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
		recognising that the futures of sustainable rural communities are best planned at the regional and local level. This could result in benefits in terms of enabling young people in particular to access employment opportunities. P4RA1 could also help to benefit economic inclusion and reducing deprivation as it would enable planning authorities to extent settlement boundaries as needed. Welsh speaking communities in many places retain strong links with rural and agricultural sectors; P4RA1, with flexible boundaries in rural places could enable business development and job creation but offers no certainty. The do-nothing approach would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	See Objective 3.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			<p>Policy P1 facilitates the development of new major employment locations in town and city centres where they would be likely to have excellent access to customers and employees of all ages. The range of developments cited, including office and commercial activities, would be expected to help diversify economies and could provide opportunities for third sector growth. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure in these locations (including digital infrastructure) and thereby supporting sustainable economic growth. Policy P1 seeks to ensure that developments of a significant scale are approved outside of town and city centres only in exceptional circumstances, which limits the potential for such development to enhance or diversify rural economies, although this could be countered to some extent by Policy P4. These would be direct effects of Policy P1 that would be likely to grow over time.</p> <p>A policy that generates liveable urban areas should generate work opportunities, which could help to retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language's traditional strongholds.</p> <p>P1 and P2 are aimed at promoting urban centres and therefore has a neutral impact on rural areas. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue</p>							

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
		<p>would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of business and economic needs. This could encourage diversification of rural economies, such as agriculture, forestry, SMEs, micro businesses and the development of digital connectivity. A positive statement which recognises the value of the rural economy and the need to maintain it. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. This policy provides opportunities to create opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion by recognising that the futures of sustainable rural communities are best planned at the regional and local level.</p> <p>P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local needs. Flexible boundaries in rural places could enable business development and job creation but offers no certainty. Requiring local planning authorities to operate flexible settlement boundaries will not give them sufficient autonomy and is not consistent with the proposed approach to regional planning. The do nothing alternative would conform with baseline trends.</p>								
5	To contribute towards the future well-being of the Welsh language		P1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
<p>P1 and P2 looks to generate liveable urban areas, this should generate work opportunities, which helps retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language’s traditional strongholds. The alternatives of P1RA1 and P2RA1 would be likely to conform with baseline trends.</p>										

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
		P4 is a positive statement which recognises the value of the rural economy and the need to maintain it. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. P4RA1 - Flexible boundaries in rural places could enable development including new homes but offers no certainty.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	See Objective 3.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			Policies P1 and P2 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements for employees, customers and local people. This would contribute to the current trend of falling GHG emissions and improve air quality. This would help to increase access to active travel options and improve healthy lifestyle choices. Concentrating development in urban centres could also increase the viability of improving sustainable design as well the potential generation of energy from systems such as combined heat and power networks. This would be a direct effect of Policy P1 that would grow over time as increasing numbers of new development are situated in accessible locations. The alternative to this, P1RA1 and P2RA2, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and renewable energy generation. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternative would conform with baseline trends.							
7	To contribute to		P1	Scale:	T/P:	Cert:	ST	MT	LT	Adapting to



Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
	the reduction and management of flood risk			Nat	T	L	0	+	+	increasing levels of flood risk in Wales could be afforded greater focus in the NDF, particularly with regards to development in and around urban areas where there is extensive flood risk. P1 and P2 could potentially explicitly state that development that avoids land at risk of flooding, or avoids exacerbating flood risk in other locations, would be particularly encouraged.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		The prevalence of flood risk depends on local circumstances and on the specific location of new development. In line with planning law and Welsh Government flood risk management policies, it is expected that residential development would be situated away from flood risk land with which it is incompatible. It is recognised that certain, less vulnerable types of development can still occur in some flood risk areas. Generally speaking, urban areas are more likely to already be protected by flood defence schemes and so focussing development here, as P1 and P2 would do, could help to reduce the risk of flooding for new development. Development would also be less likely to result in the loss of greenfield land or above ground vegetation that helps to reduce surface run-off rates and subsequently flood risk, such as upslope woodland. There is a high degree of uncertainty in this and it should also be noted that some of the larger urban areas in Wales including Cardiff, Swansea, Newport and Deeside have large local areas of land at a medium to high risk of flooding. The alternative of ‘do nothing’ would not result in this direct positive effect and would be likely to conform with baseline declining trends. Policy P4 and its alternatives would be unlikely to have a discernible impact on flooding.								
8	To create opportunities to encourage the protection and improvement of air quality		P1	Scale: Nat	T/P: P	Cert: M	ST +/-	MT +/-	LT +/-	See Objective 3 – high-quality, safe and attractive walking and cycling routes would help to reduce air pollution associated with transport.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: P	Cert: M	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P4	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
				Nat	T	M	+	+	+	Policy P1 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development's adverse impact on air quality and also to protect site users from existing pollution. Access to green space and the consideration of green infrastructure could be key to minimising these potential effects and should be specifically designed with this in mind, to help to reduce geographical inequalities.
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
		P1 and P2 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements (i.e. walking, cycling and public transport) for employees, customers and local people. This would contribute towards the trend of gradually improving air quality due to a reduction in emissions associated with road traffic and congestion. This would be a direct effect of Policy P1 that would grow over time as increasing numbers of new development are situated in accessible locations. On the other hand, areas of existing poor air quality notably occur in urban areas and adjacent to busy roads and comprise particulate matter (PM) and nitrogen dioxide concentrations. P1 would lead to additional development and traffic movements in these locations, which could make achieving air quality improvement targets more difficult whilst exposing new people to health-damaging pollutants. The alternative to this, P1RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and low-emission design and development. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternative would conform with baseline trends.								
9	To create opportunities to		P1	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	No recommendations.

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
	protect and enhance the quality and quantity of water features and resources		P1RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P2	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P2RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Concentrating development in urban areas, as per P1 and P2, could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focussing development in urban areas, including the potential increased viability of efficient and effective water recycling measures in these areas. Whilst it is expected that new development would only be permitted where there is appropriate capacity available in the local sewerage system, there is some degree of risk that P1 and P2 would contribute to increased pressure on urban sewer systems. Should any systems be rendered over-capacity, this would pose a pollution risk to local water bodies. The do-nothing approach would not result in these direct positive impacts and would be likely to conform with baseline trends. P4 and its alternatives would be unlikely to have a discernible impact on water quality and resources.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	There is an opportunity to ensure links to rural and P4 could be strengthened to include reference to inclusive infrastructure and connections.re isolated communities are
			P1RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
			P2	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P4RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations	
				Nat	T	M	+	+	+	made to improve inclusive access to goods, facilities and services	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			<p>P1 and P2 would be likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet people’s needs. They would reduce dependency on the private car and improve access to services and facilities for all. By providing development in sustainable and accessible urban locations this should ensure increased access to goods and services for local people, including for children and young people. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth, creating healthier lifestyle choices. This policy is aimed at promoting urban centres and therefore not applicable to rural areas.</p> <p>P1RA1 and P2RA1, the do-nothing approaches, would not result in opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the opportunity for all, including children and young people in urban areas to sustainably access goods and services. The do-nothing approach would be likely to conform with baseline trends.</p> <p>P4 looks to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services. The supporting text also recognises the importance of inclusive access within rural communities to facilities and services, which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of enabling children and young people to access goods and services within these areas.</p>								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P4RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		

Policy Grouping 1											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>							Recommendations
		<p>P1 and P2, through the provision of improved public transport and access to facilities including active travel and green infrastructure, will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access for all members of the community.</p> <p>P1RA1 and P2RA1 would not result in opportunities being provided to locate development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the ability of all, including children and young people, in urban areas to sustainably access goods and services; therefore, it would likely exacerbate social cohesion and equality. The do-nothing approach would be likely to conform with baseline trends.</p> <p>P4 recognises the needs of rural communities should be met this will encompass all members of society, this will improve well-being in communities and help to reduce loneliness and inequality. The policy approach could result in benefits in terms of enabling children and young people to access services within these areas, creating opportunities for improvements to social cohesion and equality.</p> <p>P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in the alternative there is little certainty involved in the assessment of these. Does not reflect the proposed approach to regional planning.</p> <p>The do-nothing approach would be likely to conform with baseline trends.</p>									
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.	
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++		
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
			P4RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-		
<p>Good planning and a commitment to quality urban design can accommodate higher densities in town and city centres without undermining quality of life. P1 and P2 may help to enable planning authorities across Wales to provide enough new housing that satisfies local housing needs. This direct positive effect would be likely to grow in magnitude over time.</p>											

Policy Grouping 1											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>							Recommendations
		The alternative to this P1RA1 of having no policy would be likely to conform with baseline trends. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of satisfying housing need. This should assist in ensuring the consideration of the provision of appropriate services at a regional and local level. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. On the other hand, P4RA1 could enable more flexibility on a regional level in order to deliver new homes. This is not reflective of the proposed approach to regional planning. It is uncertain how housing needs could be satisfied under a do nothing alternative.									
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	PPW (December 2018) seeks to ensure that high-density and significant scale development in town and city centres enhances existing townscape character and setting and, through high-quality design measures, considerate layout and potentially vernacular architecture, should protect and enhance townscape character and increase the accessibility of places and networks for people	
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +		
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -		
		P1 and P2 would help to ensure that higher density and significant developments are situated within town and city centres across Wales. This would be expected to help ensure development is largely in-keeping with the local character and setting, whilst avoiding adverse impacts of large-scale development in more rural or countryside locations with distinct natural characters. This would help to maintain areas of tranquillity and minimise light and noise pollution in rural areas. In some locations, the high density or significant scale development could pose a risk to distinct townscape characters without close consideration of the design and layout of the development. This would be a direct effect of P1 and P2. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely									

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
		to be in conformity with the baseline. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternative would conform with baseline trends. P4 has the potential to deliver accessible and inclusive townscapes.								and nature within our townscapes.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	High-density and significant scale development in town and city centres should seek to pay close consideration to the setting of any nearby heritage assets through high-quality design, considerate layout and potentially vernacular architecture. This should be implemented through PPW. However, the potential for heritage and culture led regeneration should be recognised here.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P1 and P2 would be likely to contribute towards an increasing quantity of high-density and major developments taking place in town and city centres. These centres are often host to sensitive heritage assets such as Listed Buildings and Conservation Areas and can have a rich historic character. New development here therefore poses a risk to the setting of these sensitive assets. However, the new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site, in-comparison to its current impact, on the setting of any nearby assets. The policy could improve access and understanding of these assets. these effects would however be likely to be direct. P1 would also help to direct new development away from greenfield land or relatively rural locations which can often have a high historic value or be set within sensitive historic landscapes. These effects would be likely to be direct. There is an opportunity for heritage and culture led regeneration that could be recognised here which would be well connected through the improvements to infrastructures and this would contribute towards the protection and enhancement of the historic environment. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so it is largely uncertain where high-density							



Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
		development would be situated. Impacts on cultural heritage are therefore also uncertain. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternative would conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P1	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	See Objective 14.
			P1RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P2	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P2RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
		<p>Policy P1. There is an opportunity for culture and heritage led regeneration within urban centres which would be well connected through the improvements to infrastructures and this would contribute towards the promotion of welsh culture.</p> <p>Policy P1RA1 would be unlikely to have a discernible impact on Welsh culture.</p> <p>Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance and this could help to preserve and take advantage of local Welsh culture assets and features. The policies in this section have the potential to increase access to and understanding of the cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text.</p> <p>P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. P4RA2. Requiring local planning authorities to operate flexible settlement boundaries will not give them sufficient autonomy and is not consistent with Welsh Government's approach to regional planning.</p> <p>The do nothing alternative would conform with baseline trends.</p>								

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	These policies could potentially seek to ensure that biodiversity in urban areas and on settlement boundaries is protected and enhanced. Biodiversity value and green infrastructure within urban sites should be protected to help establish and enhance the coherency of ecological networks that extend throughout urban areas and into the countryside in order to enable the free movement of wildlife and to avoid sensitive species or habitats being isolated in islands away from nature.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P1 and P2 would help to ensure that high-density and major new developments are situated in urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. Policy P1 would therefore help to ensure that high-density and large-scale development taking place across Wales is less likely to adversely affect sensitive species, habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. This would be an indirect effect of P1 and P2. Potential opportunity for urban Green Infrastructure provision through improved access to walking and cycling networks, the effect of this will however depend on its implementation. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely to be in conformity with the baseline. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including local biodiversity assets and features. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and constraints. Flexible boundaries could potentially pose a risk to biodiversity in rural areas and so would require careful management. The do nothing alternative would conform with baseline trends.							
17	To create opportunities for		P1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>4</sup>						Recommendations
the sustainable management and use of natural resources, taking into account their benefits and intrinsic value			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			<p>Developments in town and city centre locations would be likely to have good access to opportunities for using recycled materials, for remediating contaminated land, for using brownfield land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. These direct effects of P1 and P2 would be likely to grow over time as increasing quantities of development situate in town and city locations. The no-policy alternative would not result in these benefits to natural resources and would be likely to conform with baseline trends.</p> <p>Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including protecting the most ecologically or agriculturally valuable land and maximising opportunities for reusing materials. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and constraints. Flexible boundaries could potentially pose a risk to valuable soils and previously undeveloped in rural areas and so would require careful management. The do nothing alternative would conform with baseline trends.</p>							

Table B-31: Policies and reasonable alternatives in Policy Grouping 2

Policy Grouping 2	
<b>P3 - Public Investment, Public Buildings and Publicly Owned Land</b>	Welsh Government investments and land holdings will support the delivery of sustainable places. We will work with all public landowners and investors to ensure that new development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport. Strategic and Local Development Plans should review publicly owned land, both redundant and in current use, to identify potential sites for development and re-development, including for mixed use and affordable housing developments that will support the creation of sustainable places.
<b>P3RA1 Apply policy to all agencies and all land-users</b>	This option would apply the policy to all agencies and land-users and not just public landowners and investors.
<b>P3RA2 Apply policy only to newly available sites</b>	This option would apply the policy to new development only and not to the re-development of sites.
<b>P3RA3 Do Nothing</b>	Do not have a policy.
<p>The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.</p>	

Table B-32: Appraisal of Policy Grouping 2

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all		P3	<b>Scale:</b> Nat	<b>T/P:</b> T	<b>Cert:</b> H	<b>ST</b> +	<b>MT</b> +	<b>LT</b> ++	No recommendations.
			P3RA1	<b>Scale:</b> Nat	<b>T/P:</b> T	<b>Cert:</b> L	<b>ST</b> +	<b>MT</b> ++	<b>LT</b> ++	

<sup>5</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>					Recommendations	
	sectors of society to help to improve opportunities for life		P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 looks to create sustainable places which includes the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. In the long term, by supporting the public sector releasing land for development in accessible urban locations, this could result in the release of land for education which is readily accessible to all including children and young people in urban areas, including higher education institutions such as colleges. In turn, this would result improvements in educational attainment. This is dependent on those land holdings being released for education opportunities where it may not have otherwise under this Policy. PR3A1, would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	The opportunity to require Green Infrastructure and active travel provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy to increase healthy lifestyle choices.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 through the delivery of key public buildings and facilities in accessible locations will increase access by sustainable modes for everyone which should result in positive health benefits for all and reduce inequalities. The supporting text recognises the need for smaller developments and facilities in accessible locations outside of city and towns centres where they are needed to meet the needs of the community. The development and redevelopment of these sites brings an opportunity to improve connections through green infrastructure and active travel infrastructure, improving healthier lifestyle choices, bringing physical and mental health benefits. The NDF recognises that smaller developments such as GP surgeries and schools may be more appropriate in accessible locations outside of city and town centres which could include rural areas							

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
		<p>would have a positive effect and help to reduce inequalities.</p> <p>PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p> <p>P3RA3, the do-nothing approach, would conform with baseline trends.</p>								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			<p>Policy P3 would help to ensure that new development is located in town and city centres. Where this development provides employment opportunities, including during the construction and operation phases, it would help to enhance economic inclusion by providing these employment opportunities at locations that are highly accessible for local people via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. This promotes healthy lifestyle choices, can improve air quality and broadens opportunities to access jobs. Situating new development in these locations would also contribute towards the development of Wales' city regions. These would be direct effects of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of developments are encouraged to situate in town and city centres.</p> <p>P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p> <p>There are clear geographical differences in employment activity in Wales with pockets of higher than average deprivation in the South Wales valleys and in some North Wales coastal towns. It is unclear the extent to which P3 or its alternatives would help to combat this deprivation, given that most new development would be directed towards urban locations.</p> <p>P3RA3, the do-nothing approach, would conform with baseline trends.</p>							

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 encourages the delivery of new development in town and city centre locations where they would be likely to have excellent access to customers and employees and has the potential to increase third sector opportunities to support this growth. The location of new development here would be likely to help deliver physical infrastructure in these locations (including digital infrastructure) and thereby support sustainable economic growth. Overall Policy P3 would be likely to have a positive impact on ISA Objective 4, that increases in magnitude over time as increasing quantities of development are encouraged to be situated in city and town centres, however this is tempered somewhat by the Policy also limiting the potential for new development to enhance or diversify rural economies – this would be countered to some extent by Policy P3, which encourages rural diversification. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.							
5	To contribute towards the future well-being of the Welsh language		P3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			It is considered that policy P3 and its alternatives will have no impact or effect on the Welsh language.							
6	To create opportunities		P3	Scale:	T/P:	Cert:	ST	MT	LT	No



Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>					Recommendations	
	within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design			Nat	T	H	+	+	++	recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 is concerned with sustainable places and, whilst there is some uncertainty over what this necessarily entails, it is considered to be likely that such development would have a relatively low carbon footprint. Policy P3 would help to ensure that new development is situated in locations that facilitate more sustainable and efficient movements for local people, including by walking, cycling and public transport. This would contribute to Wales’ current trend of falling GHG emissions associated with road vehicles. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P3	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		The prevalence of flood risk depends on local circumstances and on the specific location of new development, although in line with the Welsh Government’s policy on flood risk management it is expected that development vulnerable to flood risk would not be situated in an area of flood risk with which it is incompatible. Generally speaking however, urban areas are more likely to already be protected by flood defence schemes and so focussing development here, as per P3, P3RA1 and P3RA2, could help to reduce the risk of flooding faced by new development. There is a high degree of uncertainty in this. The provision of green infrastructure e.g. suds can also help to ensure flood								

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
		resilience in development. The alternative of ‘do nothing’ would not result in this direct positive effect and would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P3 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development's adverse impact on air quality and also to protect site users from existing pollution.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		<p>Policy P3 is concerned with sustainable places and, whilst there is some uncertainty over what this necessarily entails, it is considered to be likely that such development would adopt relatively low-emission construction and design techniques. Policy P3 would help to ensure that new development is situated in locations that facilitate higher rates of movement via walking, cycling and public transport. This would contribute towards a reduction in emissions associated with traffic and congestion. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. Areas in Wales of existing poor air quality, and where there are currently air quality improvement targets, are commonly in town and city centre areas. By encouraging new development to be situated in these locations, Policy P3 could potentially make achieving air quality improvement targets more difficult in some cases. However, this is likely preferable to situating new development in countryside locations and introducing air pollutants into areas of good air quality.</p> <p>P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p> <p>P3RA3, the do-nothing approach, would conform with baseline trends.</p>								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P3	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be
			P3RA1	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P3RA2	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
				Reg	P	H	0	0	-	incorporated into the supporting text for the policy.
		<p>Concentrating development in urban areas could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focussing development in urban area, such as due to more efficient and effective water recycling measures in these areas. There could potentially be a risk that the level of development policy P3 would encourage in urban locations could place additional pressure on the capacity of sewage systems, although it is expected that development would typically only be permitted where there is adequate capacity.</p> <p>PR3A1, would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p> <p>P3RA3, the do-nothing approach, would conform with baseline trends.</p>								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations
			P3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		<p>Policy P3 is likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet needs of everyone. It would reduce dependency on the private car and improve access to services and facilities for all. Depending on the location of the sites it is likely to have less of a positive impact for rural and isolated area as it has an urban focus however it does look to link to public transport networks. It would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth and increasing healthier lifestyle choices.</p> <p>The NDF recognises that smaller developments such as GP surgeries and schools may be more appropriate in accessible locations outside of city and town centres which could include rural areas and have positive benefits and reduce inequality of access to services.</p> <p>P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but</p>								

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
		with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 through the provision of improved public transport and access to facilities including active travel and green infrastructure will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access. This impact, depending on the locations of the sites is likely to be less positive for rural and more isolated communities however it does look to link to public transport networks. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 would enable the use of Welsh Government investments and land holdings to support the delivery of sustainable places. Much of this land is in an accessible location where they are well suited to meet the needs of local people. Policy P3 could therefore make a meaningful contribution								

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
		<p>towards freeing up land throughout Wales for new development for sustainable places, and this would help to ensure that the varied housing needs across Wales can be met. This would likely result in improvements in terms of ensuring everyone, including children and young people have access to adequate housing, helping to reduce poverty and inequality. This depends on if the land holdings are used for the purpose of residential development, about which there is some uncertainty. This would be a direct effect of the policy that would be likely to increase in magnitude over time as more and more public land is utilised for new housing developments.</p> <p>P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p> <p>P3RA3, the do-nothing approach, would conform with baseline trends.</p>								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P3	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	P3 could potentially refer to sustainable place-making principles for new development on Government land holdings. However, this is included within PPW.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
		<p>Policy P3 would help to ensure that new development is situated within town and city centres across Wales, this would help to maintain areas of tranquillity and minimise light and noise pollution in rural areas. This would be expected to help ensure development is largely in-keeping with the local character and setting (i.e. not introducing hard-standing or the built form into rural or countryside areas). In some locations, the new development could pose a risk to the local townscape character without close consideration of the design and layout of the development. This may particularly be the case where the Government's land holdings are currently in use by buildings that make a major contribution towards the local character, such as hospitals, council offices, travel hubs or colleges. These would be direct effects of Policy P3.</p> <p>P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty.</p> <p>P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.</p>								

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
		P3RA3, the do-nothing approach, would conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P3	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-	See Objective 13.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P3RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
		Policy P3 would be likely to contribute towards an increasing quantity of new development taking place in town and city centres. These centres are often host to sensitive heritage assets such as Listed Buildings and Conservation Areas and can have a rich historic character. New development here therefore poses a risk to the setting of these sensitive assets. This may be a particular risk where the Government's land holdings are in use by historic buildings or buildings of a distinct character, such as old hospitals, universities, schools or transport hubs. On the other hand, the new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site in-comparison with its current impact on the setting of nearby assets or the local historic character. These would be direct effects of Policy P3. Policy P3 could help to improve access and understanding of these assets. Indirect effects could also result through improved public transport from these urban centres has the potential to improve access to heritage assets in more rural areas. PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>						Recommendations
			P3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		Supporting text to Policy P3 sets out that the policy applies to major trip-generating developments, such as sports stadia, cultural venues and exhibition spaces, which have the potential to drive regeneration and often rely on public funding. This could lead to significant benefits against this Objective, although this effect is only one of a wide range of other possibilities, so is uncertain and dependent on implementation. PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P3	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
		Policy P3 would help to ensure that new development is situated in predominantly urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. There is a potential opportunity for Green Infrastructure provision through improved access to walking and cycling networks, this will depend on implementation. P3 refers to ‘the delivery of sustainable places’ on Government land holdings. This is defined in PPW. Policy P3 would therefore help to ensure that new development taking place across Wales is less likely to adversely affect sensitive species, habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. This would be an indirect effect of Policy P3. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3 with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude.								



Policy Grouping 2											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>5</sup>							Recommendations
		P3RA3, the do-nothing approach, would conform with baseline trends.									
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++		
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++		
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
			Developments in town and city centre locations and on land owned by the Government would provide opportunities for redeveloping brownfield land. These sites would also be likely to have good access to opportunities for using recycled materials, for remediating contaminated land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. These direct effects of Policy P3 would be likely to grow over time as increasing quantities of development situated in town and city locations. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3 with less certainty. PR3A2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. PR3A3, the do-nothing approach, would conform with baseline trends.								

Table B-33: Policies and reasonable alternatives in Policy Grouping 3

Policy Grouping 3	
<b>P5 - Delivering Affordable Homes</b>	<p>The Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised.</p> <p>Strategic and Local Development Plans should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, they should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.</p>
<b>P5RA1 – Do nothing</b>	Do not have a policy.
<p>The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.</p>	

Table B-34: Appraisal of Policy Grouping 3

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P5	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P5RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P5 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								

<sup>6</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>						Recommendations
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P5	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P5 The provision of good quality housing for all, meeting local needs will have multiple health benefits including for older people. The policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales being able to access a good quality homes, including children and young people. Ensuring children and young people have access to a good quality home should contribute to improvements in their health and well-being and a reduction in health inequalities across Wales. Increased access to affordable housing led development in sustainable locations ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will contribute an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. The policy will help facilitate delivery of housing to rural areas. The alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	The sustainability of sites for development should be a primary consideration over where to situate new homes delivered to satisfy local needs.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
		P5 seeks to ensure that affordable housing is delivered to satisfy identified local needs. It is expected that this would lead to affordable homes being situated in locations that enable residents to access employment opportunities, thus leading to a major positive impact in enhancing economic inclusion. The alternative to this approach (P5RA1) of not having the policy would not have as significant an effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
		P5 would be likely to provide a boost to local productivity and to help diversify the local economy by better enabling people at the lower end of the income scale to live nearer to employment opportunities. Increased access to affordable housing led development ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will create opportunities for sustainable economic growth, diversity and business								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>					Recommendations	
		competitiveness. The policy will help facilitate delivery of affordable housing to rural areas. The alternative to this approach (P5RA1) of not having the policy would not have this direct positive effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P5	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P5 the development of an increased supply of affordable housing will directly support people in all communities, including Welsh speaking communities. P5RA1 The alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P5	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P5 seeks to encourage and support the development of affordable homes. The delivery of new homes would be expected to make achieving GHG emissions reduction targets more difficult due to both the construction phase and the occupation phase. New residents would be likely to consume materials and energy, as well as to drive vehicles, that leads to the emission of GHG gases. Development may also result in the loss of green infrastructure elements that currently help to store carbon, although it could alternatively help to increase the presence of green infrastructure at brownfield locations. It is unclear the extent to which affordable housing would adopt sustainable construction methods. It is also unclear if, because the location of new affordable housing would be based on local needs for affordable housing, the extent to which the sustainability of the location (including access to public transport modes) would be a consideration. The alternative to this approach of not having the policy would instead be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P5	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	The NDF could explicitly refer to the need to avoid delivering affordable homes in the floodplain or on land at a degree of flood risk with
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		P5 seeks to encourage and support the development of affordable homes. The impact of this on flood risk is largely dependent on the location of new development, which is largely uncertain beyond the fact that it would be situated in accordance with identified local needs. The alternative to this approach of not having the policy (P5RA1) would be likely to conform with								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>						Recommendations
		baseline trends.								which the development type is incompatible.
8	To create opportunities to encourage the protection and improvement of air quality		P5	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P5 seeks to encourage and support the development of affordable homes. The delivery of new homes would be expected to make achieving air quality improvement targets more difficult due to both the construction phase and the occupation phase. New residents would be likely to consume materials and energy, as well as to drive vehicles, that leads to some degree of air pollution. Development may also result in the loss of green infrastructure elements that currently help to filter air pollutants, although it could alternatively help to increase the presence of green infrastructure at brownfield locations. It is unclear the extent to which affordable housing would adopt sustainable construction methods. It is also unclear if, because the location of new affordable housing would be based on local needs for affordable housing, the extent to which the sustainability of the location (including access to public transport modes) would be a consideration. The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P5	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		P5 seeks to encourage and support the development of affordable homes. New residents would be likely to increase local rates of water consumption. Development may also result in the loss of green infrastructure elements that currently help to filter protect natural water bodies including from the potential pollution impacts of construction. The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P5	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		The policy will help facilitate delivery of affordable housing in areas where there is a local need, including rural areas. Over time this could help to ensure that people of all backgrounds are can live in homes that have access to existing communities, services and amenities although there is some uncertainty over this due to the unknown precise locations of development.								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>						Recommendations
		The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
		<p>P5 - Increased access to affordable housing led development ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will create opportunities within which an improvement in social cohesion and equality can be achieved. The policy will help facilitate delivery of affordable housing to rural areas. This policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales being able to access a good quality home, including children and young people. Ensuring access to a good quality home should contribute to improvements in social cohesion and equality, with less disproportionate conditions in terms of the types of accommodation.</p> <p>The alternative to this approach of not having the policy (P5RA1) would not have this direct positive effect and would instead be likely to conform with baseline trends</p>								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P5	Scale: Reg	T/P: T	Cert: H	ST ++	ST ++	ST ++	See Objective 3..
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
		<p>P5 would make a major contribution towards ensuring that there is an adequate provision of affordable housing across Wales in locations where it is needed (with local needs determined by appropriate evidence bases). The policy will therefore directly provide opportunities for the provision of good quality, safe, affordable housing that meets identified needs for families, including for children and young people. The policy will help facilitate delivery of affordable housing to rural areas. The alternative approach to this of not having a policy (P5RA1) would see a continued reliance on market housing development to deliver a proportion of affordable housing. This would be expected to conform with baseline trends.</p>								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		<p>The impact of new affordable housing on the local landscape or townscape largely depends on the precise location of development, its type, design and layout in relation to the local character. Where new development is situated on brownfield land there is an opportunity to enhance the site's impact on</p>								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>					Recommendations	
		local character. Development on greenfield risks removing existing open space and replacing green areas with the built form and avoiding adverse impacts on local character as a result of this would be difficult to achieve in all cases. Overall it is considered that the new development poses a risk of altering the character and current distinctiveness of areas in Wales where the development is situated, particularly where such development is delivered in rural locations. The alternative to this approach would mean that development would be left to accord with PPW and LDPs but would not be managed in the more strategic manner enabled by the NDF. This development would instead be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
		The impact of new affordable housing on historic areas or assets largely depends on the precise location of development as well as its type, design and layout in relation to the surrounding built form or rural area. Where new development is situated on brownfield land there is an opportunity to enhance the site's impact on the setting of nearby heritage assets, such as by redeveloping a derelict site. Development on greenfield risks removing existing open space and replacing green areas with the built form and avoiding adverse impacts on the setting of sensitive heritage assets as a result of this would be difficult to achieve in all cases. Overall it is considered that the new development poses a risk of altering the setting of heritage assets and historic environments near where affordable housing development is situated. Impacts in rural locations have the potential to be more severe, due to the general discordance of built form with countryside areas, but as heritage assets are typically more numerous in urban locations development in towns and cities could pose a risk to the setting of a greater number of assets than development in rural areas. The alternative to this approach of not having the policy would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P5	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P5RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P5 and its alternative would not be expected to have a discernible impact on Welsh culture.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		The development of new affordable housing in Wales could potentially pose a risk to biodiversity and								



Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>6</sup>						Recommendations
		geodiversity, particularly when it is on previously undeveloped land and the the development would result in the loss of a greenfield, soils and above-ground vegetation. New development could lead to a reduction ecological connectivity, particularly if it is situatd in rural locations and given that the policy seeks to support new affordable housing in accordance with identified needs it is considered to be likely that some of the affordable homes would be in rural areas. The alternative to this approach of not having the policy (P5RA1) would mean development would be left to accord with PPW and LDPs but would not be managed in the more strategic manner enabled by the NDF. Development would instead be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P5 would encourage and support the provision of new affordable homes. The construction and occupation of these homes would be likely to necessitate the consumption of natural resources to some extent, including through materials used in construction and resources consumed by new residents. The alternative to this approach of not having the policy (P5RA1) would instead be likely to conform with baseline trends.							

Table B-35: Policies and reasonable alternatives in Policy Grouping 4

Policy Grouping 4	
<b>P6 - Planning in Mobile Action Zones</b>	In Mobile Action Zones, local planning authorities and telecommunications operators will work together to increase mobile coverage collaboratively identifying suitable sites and buildings for new equipment and infrastructure. Considerable weight will be given for the need to increase mobile phone coverage, along with its associated economic benefits. Accordingly, there is a presumption in favour for new mobile telecommunications infrastructure, provided that there are no significant adverse landscape impacts.
<b>P6RA1 – Do Nothing</b>	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-36: Appraisal of Policy Grouping 4

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P6	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>L</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>++</b>	Spatial implications of the Policy are relatively uncertain. P6 could potentially include a map or a more detailed spatial element that sets out priority areas where digital infrastructure would
			P6RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>+</b>	
		P6 – Increasing digital connectivity across Wales will open up opportunities for people to access education, training and skills digitally. This is a particular benefit for more isolated and rural communities. This could enable children and young people to be more easily able to access learning opportunities and improve digital literacy levels through technology. Such a Policy could therefore have a positive impact on supporting improvements to educational attainment in the long term. P6RA1 the do-nothing approach would conform with baseline trends, which may lead to restrictive								

<sup>7</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
		policies being put on mobile telecommunications infrastructure, to the disadvantage of some communities and the economy. .								be strongly encouraged, in accordance with areas most at need
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P6	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		<p>P6 – increasing digital connectivity across Wales will open up opportunities for increased access to digital health services, where available and opportunities to work remotely could increase employment opportunities which would bring wider health benefits such as improving air quality through reduce commuting trips, reducing poverty through increasing prosperity for all. This is a particular benefit for more isolated and rural communities. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology.</p> <p>This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and in particular rural areas.</p> <p>P6RA1 the do-nothing approach would conform with baseline trends.</p>								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 1.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		<p>P6 Identifying Mobile Action Zones so that mobile coverage can be increased in areas of most need would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. This would be likely to contribute towards an improvement in the quality and diversity of employment opportunities on offer to local people in these areas. Opportunities to work remotely could increase employment opportunities for all, in particular benefits for isolated and rural communities. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking</p>								

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
		communities P6RA1 would see no such policy being adopted and it is unlikely that mobile communications would significantly improve much in these areas. This do-nothing approach would therefore be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 1.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P6 Identifying Mobile Action Zones so that mobile coverage can be increased in areas of most need would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. Benefits would be particularly noticeable for rural businesses, particularly SMEs, by opening up new markets and increasing productivity. It will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to the creation of opportunities for sustainable economic growth, diversity and business competitiveness in rural areas. Increasing digital connections could also provide opportunities for the third sector. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: P	Cert: H	ST 0	MT 0	LT +	
		P6. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities The do-nothing approach would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P6RA1	Scale: Nat	T/P: P	Cert: H	ST 0	MT 0	LT +	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
	encourage energy efficient and sustainable design	P6 Enhanced mobile communications can enable people in these areas to carry out more of their actions and interactions, that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce GHG emissions associated with the transport sector. The do-nothing approach (P6RA1) would therefore be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.							
8	To create opportunities to encourage the protection and improvement of air quality		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Enhanced mobile communications can enable people in these areas to carry out more of their actions and interactions that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce air pollution associated with the transport sector and result in health benefits, increasing cumulatively over the long term, as working and travel habits change. The do-nothing approach would therefore be likely to conform with baseline trends.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P6	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P6 Increasing digital connectivity across Wales will open up opportunities for increased access to facilities and services such as health services, where available, reduce the reliance on the private car for everyone. This is a particular benefit for more isolated and rural communities. It is considered the policy would create opportunities for the improved connectivity of communities and sustainable							

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>					Recommendations	
		access to goods and services including for children and young people. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P6	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P6 Increasing digital connectivity can help to reduce loneliness and isolation, reduce the need to travel to work and improve community cohesion. It can help people to live more independent lives and reduce inequalities throughout Wales. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology. In this regard, it is considered the policy would reduce inequalities in terms of digital communication and would therefore create opportunities for improvements in social cohesion and equality. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can create the opportunities within which an improvement in social cohesion and equality can be achieved in rural areas. The do-nothing approach would be likely to conform with baseline trends.							
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P6 The enhancement of mobile communications in areas of greatest need could help to ensure that local people in these areas are able to live good quality lives at home. It would also enable them to carry out a wider range of actions online or over the phone, which could reduce the risk of isolation for some people and permit more affordable lifestyles for others. The do-nothing alternative (P6RA1) would not provide these indirect benefits and would be likely to conform with baseline trends.							
13	To create opportunities for the protection and enhancement of the local		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	The provision of new mobile
			P6RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
	distinctiveness of our landscapes, townscapes and seascapes			Nat	T	M	0	0	-	communications infrastructure should be carefully managed and located to help ensure adverse impacts on the local character are avoided.
		P6 There is a risk that the delivery of new infrastructure required for enhancing mobile communications could potentially have an adverse impact on character, such as mobile phone masts which are relatively tall and in rural or open locations can be discordant with the surrounding area. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	The provision of new mobile communications infrastructure should be carefully managed and located to help ensure adverse impacts on the setting of heritage assets or historic areas are avoided.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P6 There is a risk that the delivery of new infrastructure required for enhancing mobile communications could potentially have an adverse impact on character, such as mobile phone masts which are relatively tall and in rural or open locations can be discordant with the surrounding area. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		Increasing digital connectivity can increase access to digitally available cultural resources. However P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective directly.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								



Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>7</sup>						Recommendations
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								

Table B-36: Policies and reasonable alternatives in Policy Grouping 5

Policy Grouping 5	
<b>P7 – Ultra Low Emission Vehicles</b>	The Welsh Government supports the increasing use of ultra low emission vehicles. We will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.
<b>P7RA1 – Identify the locations for a network of rapid charging points</b>	This option would set out the locations for a network of rapid charging points across Wales to enable longer distance travel by electric vehicles.
<b>P7RA 2– Do Nothing</b>	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-37: Appraisal of Policy Grouping 5

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be unlikely to have a discernible impact on this ISA Objective.								
2	To contribute to an improvement in physical, mental and social health		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P7RA1	Scale:	T/P:	Cert:	ST	MT	LT	

<sup>8</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
	and well-being for all, including contributing towards a reduction in health inequalities across Wales			Nat	P	M	+	+	++	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			<p>P7 This Policy aims to support the uptake of ultra-low emission vehicles in Wales through the rolling out of electric vehicle charging infrastructure. Such a Policy encouraging the use of electronically powered cars rather than those powered by petrol or diesel would support tackling climate change and air quality. Therefore, in the long term, this Policy could reduce reliance on the private car and support improvements in health including for children and young people across Wales. Promoting the decarbonisation of transport and the uptake of low emission vehicles will have a positive effect on rural areas. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and rural areas</p> <p>P7RA1 aims to support the uptake of ultra-low emission vehicles in Wales through the rolling out of electric vehicle charging infrastructure. Such a Policy Alternative encouraging the use of electronically powered cars rather than those powered by petrol or diesel would support tackling climate change and air quality. Therefore, in the long term, this Policy Alternative could support improvements in health across Wales, albeit not with a high level of direct impact. A network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles.</p> <p>The do-nothing scenario (P7RA2) would be likely to conform with baseline trends.</p>							
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P7	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			<p>The provision of electric car charging points throughout Wales, as per P7, could help to ensure people in Wales can travel from place to place including places of employment via sustainable transport modes, although there is some uncertainty over how many charging points would be delivered and where these would be and the benefits in terms of economic inclusion are likely to be negligible in the medium and short-term. The market would in all probability not prioritise rural areas for recharging provision, therefore there would be uncertain effects in rural areas. P7RA1 would ensure that such locations are identified, which could provide further certainty over these benefits.</p>							

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
		The do-nothing approach (P7RA2) would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P7	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
		P7 and its alternatives could help to ensure that future economic development and economic growth in Wales is sustainable by encouraging more sustainable travel modes. There is greater certainty of this for P7RA1 than for P7. Promoting the decarbonisation of transport and the uptake of low emission vehicles will have a positive effect on rural areas. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas, therefore there would be uncertain effects in rural areas. The do-nothing scenario would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
		P7 and P7RA1 would help encourage Wales' transition towards a more sustainable and low-carbon transport sector. P7RA1 provides greater certainty over this taking place. The do-nothing approach would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
8	To create opportunities to encourage the protection and improvement of air quality		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
		P7 and P7RA1 would help encourage Wales' transition towards a more sustainable and low-emission transport sector. P7RA1 provides greater certainty over this taking place. The do-nothing approach would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P7	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P7 Promoting the decarbonisation of transport and the uptake of low emission vehicles will bring benefits to communities across wales through potentially improving access to goods and services through more sustainable methods. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas, therefore there would be uncertain effects in rural areas. Under P7RA1, a network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles. It could create opportunities for the improved connectivity of communities and sustainable								

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
		access to basic goods, services and amenities for all groups including those in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P7	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P7 Promoting the decarbonisation of transport and the uptake of low emission vehicles will bring benefits to communities across wales through potentially improving access to goods and services through more sustainable methods which can help to reduce inequalities. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. Under P7RA1, a network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles. It could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups including those in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
14	To create opportunities		P7	Scale:	T/P:	Cert:	ST	MT	LT	No

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>8</sup>						Recommendations
	for the protection, conservation and enhancement of the historic environment, historic assets and their settings			n/a	n/a	H	0	0	0	recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.							
15	To create the opportunities for the protection and promotion of Welsh culture		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			By facilitating a shift towards electric vehicles, P7 and P7RA1 would help to reduce rates of atmospheric nitrogen deposition associated with the transport sector in Wales. It could lead to a carbon reduction rural areas and also increased provision for ULEVs for those living in rural areas. This would eventually help to alleviate harm to sensitive habitats caused by atmospheric nitrogen deposition. This indirect positive impact would be likely to be minor and only discernible in the long-term. The alternative approach of no policy would not contribute towards the shift towards reduced pollution and would instead be likely to conform with baseline trends.							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.							



Table B-38: Policies and reasonable alternatives in Policy Grouping 6

Policy Grouping 6	
<b>P8 - Strategic framework for biodiversity enhancement and ecosystem resilience</b>	<p>To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify: -</p> <ul style="list-style-type: none"> <li>- areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and</li> <li>- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.</li> </ul> <p>Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide.</p> <p>In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.</p>
<b>P8RA1 – Use GI Mapping to identify and prioritise more site-specific national scale places and networks which require protection or enhancement</b>	This option would identify sites and networks which require protection and or enhancement throughout Wales.
<b>P8RA2 – Direct local authorities to take specific actions through their development plans</b>	This option would set a policy direction to lower tier plans to take specific actions to increase the resilience of ecological networks and services.
<b>P8RA3 – Do Nothing</b>	Do not have a policy.
<b>P9 - National forest for Wales</b>	The Welsh Government is committed to developing a national forest, and will identify appropriate delivery sites and mechanisms to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.
<b>P9RA1 – Require Development to contribute to woodland planting targets</b>	This option would set a woodland planting target for Wales and require development to contribute towards achieving this.
<b>P9RA2 – Do Nothing</b>	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement,	

consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.

Table B-39: Appraisal of Policy Grouping 6

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to education facilities, leading to minor positive benefits in the medium and longer term against this objective. P8, P9, P8RA1, P8RA2 and P9RA1 would enhance opportunities for people across Wales to learn about wildlife and nature, leading to minor positive benefits in the medium and longer term against this objective. P8RA3 and P9RA2, the do-nothing approaches, would be likely to conform with baseline trends.										
2	To contribute to an improvement in physical, mental and social		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	

<sup>9</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
	health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to improved physical and mental well-being through enhanced access to health facilities, as well as improved access to green space and potential for improvements to air quality. P8, P9, P8RA1, P8RA2 and P9RA1 would enhance opportunities for people across Wales to access a diverse range of natural and semi-natural habitats. This would be expected to provide major physical and mental health benefits for people. Do-nothing approaches would be likely to conform with baseline trends.							
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the diversity,										

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
		quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the diversity, quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. This could also increase benefits for the third sector. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.							
5	To contribute towards the future well-being of the Welsh language		P8	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P8RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P8, P9 and their alternatives would be expected to result in no discernible impact on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	Where Green Infrastructure elements in urban locations are used to support sustainable growth, ecological connectivity, social equality and public well-being, wording could be included in the supporting text to emphasise that coherent and well-manged GI networks in urban locations can provide essential ecosystem services beyond well-being of local people, including facilitating higher rates of low-emission transport (walking and cycling), alleviating flood risk, capturing and storing carbon, filtering air and removing pollutants, protecting below ground natural resources and
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including capturing and storing carbon and this would be likely to be protected and enhanced through these policies. The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.								

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
										protecting and enhancing the local townscape character as well as the setting of nearby heritage assets.
7	To contribute to the reduction and management of flood risk		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6. The new forest proposed in P9 could be strategically located in order to maximise its flood risk alleviation ecosystem service value, for example by ensuring some of the forest covers upland areas or is in an active floodplain.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P9	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		The creation of new, and the protection and enhancement of existing, natural environment structures as is proposed in P8, P8RA1, P8RA2, P9 and P9RA1 could help to provide effective and nature-based flood risk alleviation benefits. This depends on location of these elements in relation to flood risk, but overall it is considered to be likely that these policies would help to provide sustainable flood risk management benefits across Wales. A new National Forest would be likely to provide benefits towards flood risk alleviation, particularly if the forest is partially upslope. P9RA1 may lead to a wider distribution of new tree-planting than the new National Forest, which may increase the certainty and distribution of flood risk alleviation benefits from new tree planting. Do-nothing approaches would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		<p>P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including filtering air and removing pollutants and this would be likely to be protected and enhanced through these policies leading to improvements for human health.</p> <p>The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.</p>								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		<p>Above-ground and below-ground biomass and soils can play an essential role in helping to protect and potentially enhance the quality of natural waters as a result of the natural filtering processes they provide for above and below ground water flow. P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help preserve this function resulting in health benefits.</p> <p>Do-nothing approaches would be likely to conform with baseline trends.</p>								
10	To create		P8	Scale:	T/P:	Cert:	ST	MT	LT	No



Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
	opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups			Nat	T	M	0	+	+	recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to education facilities. P9 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.							
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide opportunities for everyone including children and young people to have access to good quality and clean environments and to pursue living standards that meet their physical and mental needs due to the provision of high quality natural and semi-natural environments.							

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
		The do-nothing alternatives would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P8	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P8RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
None of these policies, or their reasonable alternatives, would be expected to lead to discernible impacts on the delivery of housing.										
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
P8, P8RA1, P9 and P9RA1 would be expected to lead to major positive impacts on the character of landscapes and townscapes across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and enhanced. These are typically visually attractive elements that positively influence the character of the										

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
		<p>surrounding area.</p> <p>The provision of a new National Forest (P9) would be likely to make a major positive, distinctive and high-quality change to the character of the area within which it is set. The alternative to this, encouraging higher rates of tree planting across Wales instead of focussing in one location, would be likely to provide minor positive benefits to the character of landscapes and townscapes across Wales.</p> <p>The do-nothing approaches would be likely to conform with baseline trends.</p>								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			<p>P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to lead to major positive impacts on the setting of heritage assets and historic areas across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and enhanced. These are typically visually attractive elements that positively influence the setting of assets and areas.</p> <p>The provision of a new National Forest (P9) would be likely to make a major positive, distinctive and high-quality change to the setting of any nearby heritage features, although this would require careful positioning of the forest to avoid affected the setting of any heritage assets and potentially diminishing their accessibility. The alternative to this, encouraging higher rates of tree planting across Wales instead of focussing in one location, would be likely to provide minor positive benefits to the setting of assets and features across Wales. There is a high degree of uncertainty behind the identified effects as it largely depends on the distribution of heritage assets and features in relation to the natural environment elements created, protected or enhanced. The do-nothing approaches would be likely to conform with baseline trends.</p>							
15	To create the opportunities for		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>						Recommendations
	the protection and promotion of Welsh culture		P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			The sustainable land-uses proposed in P8 P8RA1, P8RA2, P9 and P9RA1 would be expected to help create opportunities for recognising, promoting and enhancing Welsh culture. These policies and alternatives would encourage higher rates of people in Wales exploring the outdoors and taking experience the traditional places and traditions of Wales. Do-nothing approaches would be expected to conform with baseline trends.							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	Establishing, protecting and enhancing a coherent ecological network across Wales that incorporates a diverse range of habitats, and is connected with GI networks in urban areas as well as the potential new National Forest, would be best achieved with well-coordinated management at various levels,
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to lead to major positive impacts on the protection and enhancement of biodiversity in Wales. P8 would help to ensure that ecological networks remain coherent and connected across Wales, thereby better enabling the free movement of species and reducing the risk of isolated islands of habitats of species being ‘cut off from nature’.										

Policy Grouping 6											
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>							Recommendations
				<p>P8RA1 would specify in the NDF which sites require immediate action. This would be likely to provide similar benefits to biodiversity as P8 but could perhaps provide greater certainty over them taking place. The strategic level at which the NDF operates may be an advantageous scale at which to identify sites for protection or enhancement as it would enable joined up thinking across the country.</p> <p>P8RA2 would see lower tier plans taking specific actions to increase the resilience of ecological networks and services. Local planning authorities may be best placed to make informed choices about how best to tackle bespoke local issues related to local ecological networks, habitats and species. However, it could lead difficulties in ensuring there is joined up thinking across Wales in protecting and enhancing a coherent ecological network.</p> <p>The provision of strategic GI networks throughout urban locations would be an effective means of enabling wildlife to move freely into, throughout and beyond urban areas and to avoid towns and cities becoming ‘dead zones’ in terms of nature. It would also reduce the disruptive impact urban areas can have on ecological connectivity and the distances between habitats. The alternative to this of delivering grey infrastructure instead would be likely to have no biodiversity value and would conform with baseline trends.</p> <p>Delivering a new National Forest would be expected to establish an area in Wales that is of significant biodiversity value and which can be effectively managed to maximise on this. The alternative of encouraging higher rates of tree planting across Wales would also be of high biodiversity value, but certainly to a lower magnitude, although this value would be distributed across all of Wales and could contribute towards improve ecological connectivity.</p> <p>Do nothing approaches would be expected to conform with baseline trends.</p>							including the national and strategic level, the regional level and local level, to ensure that there is a coherency in the approach across Wales whilst regional and local bespoke needs are taken into consideration. Development should also seek to be in accordance with outcomes of the separate HRA process.
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.	
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		

Policy Grouping 6					
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>9</sup>	Recommendations
		The sustainable land-uses proposed in P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to help protect and enhance the natural resources belowground, including ecologically and agriculturally valuable soils, from the impacts of development. Using this land for these purposes would also reduce the consumption of materials for construction whilst they would not generate any waste. Do-nothing approaches would be likely to conform with baseline trends.			

*Table B-40: Policies and reasonable alternatives in Policy Grouping 7*

## Policy Grouping 7

### P10 – Wind and solar energy in Priority Areas

The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change.

When determining planning applications for large scale onshore wind and solar energy development in Priority Areas, significant weight will be given to the proposal's contribution to reducing Wales' greenhouse gas emissions and meeting our decarbonisation and renewable energy targets.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been minimised:

- landscape and visual impacts;
- cumulative impacts;
- the setting of National Parks and Areas of Outstanding Natural Beauty;
- visual dominance, shadow flicker, reflected light or noise impacts;
- electromagnetic disturbance to existing communications systems; and
- the following identified protected assets:
  - archaeological, architectural or historic assets;
  - nature conservation sites and species;
  - natural resources or reserves.

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.

### P11 – Wind and Solar Energy Outside of Priority Areas

Outside of the Priority Areas for Solar and Wind, planning applications for large scale wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:

- landscape and visual impacts;
- cumulative impacts;
- the setting of National Parks and Areas of Outstanding Natural Beauty;
- visual dominance, shadow flicker, reflected light or noise impacts;
- electromagnetic disturbance to existing communications systems; and
- the following identified protected assets:
  - archaeological, architectural or historic assets;
  - nature conservation sites and species;
  - natural resources or reserves.

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.



## Policy Grouping 7

<b>P12 - Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty</b>	Large scale on-shore wind and solar energy development is not acceptable within National Parks and Areas of Outstanding Natural Beauty.
<b>P13 – Other Renewable Energy Developments</b>	Proposals for other large scale renewable energy generation will be determined in accordance with the criteria of Policy P11.
<b>P10/11/12/13RA1 – Identify the best locations for other renewable and low carbon technologies such as hydropower or biomass</b>	This option would widen the policy to identify locations for other renewable and low carbon technologies such as hydropower and biomass.
<b>P10/11/12/13RA2 – Apply policy to all scales of renewable and low carbon development</b>	This option would apply the policy to all scales of renewable energy and low carbon development and not just those above 10MW.
<b>P10/11/12/13RA3 – Let the market decide</b>	This option would provide a framework for the market to develop renewable energy and low carbon technologies in the strongest market areas.
<b>P10/11/12/13RA4 – Do Nothing</b>	Do not have a policy.
<b>P14 – Priority Areas for District Heat Networks</b>	Within Priority Areas for District Heat Networks, planning authorities should identify opportunities for District Heat Networks and ensure they are integrated within new and existing development.
<b>P14RA1 – Promote the energy efficiency and sustainable design of individual buildings</b>	This option would promote the energy efficiency and sustainable design of buildings.
<b>P14RA2 – Require district heating networks in certain locations and for certain forms of development</b>	This option would set specific criteria for district heating networks to be delivered.
<b>P14RA3 – Do Nothing</b>	Do not have a policy.
<b>P15 Master planning For District Heat Networks</b>	Large scale, mixed used development should, where feasible, have a District Heat Network. Planning applications for such development should prepare an Energy Masterplan to establish whether a District Heat Network is the most effective energy supply option and, for feasible projects, a plan for its implementation.
<b>P15RA1 – Requirement for a District Heat Network</b>	This option would require that all developments of a certain scale, type and/or in a defined area require a district heat network.
<b>P15RA2 – Do Nothing</b>	Do not have a policy
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them	

## Policy Grouping 7

and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.

Table B-41: Appraisal of Policy Grouping 7

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>10</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P10	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA3	Scale:	T/P:	Cert:	ST	MT	LT	

<sup>10</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
				n/a	n/a	n/a	0	0	0		
			P15	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
		These policies would be expected to result in no discernible impacts on this ISA Objective.									
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P10	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.	
			P11	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			P12	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
			P13	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
				n/a	n/a	H	0	0	0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			<p>P10, P11 and P13 look to provide policies for which the overall objectives are to facilitate renewable energy, reduce carbon emissions and tackle climate change should help to address overall improvements in health and well-being for communities across Wales, including for children and young people and P12 would retain tranquillity in these areas which provide mental health benefits.</p> <p>P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). P14RA1 could also have a similar effect, but of a slightly lower magnitude. The do-nothing approach would be likely to conform with baseline trends.</p> <p>P12 would prevent wind and solar energy generation in National Parks. This could help to preserve the distinctiveness and quality of National Parks in Wales which could help to protect their ability to provide people across Wales with access to the outdoors and natural habitats (beneficial to physical and mental well-being).</p> <p>P14, P14RA1, P14RA3, P15, P15RA1 and P15RA2 would be unlikely to have a discernible effect on this.</p>								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	It is recommended that P10/11/12/13 could be considered in greater detail, widening the policy to include locations for other renewable and low carbon technologies such as hydropower or biomass. It is noted that developments under 10MW will be identified by local planning authorities in their renewable energy	
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +		
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	assessments. It is suggested that district heating might also be better addressed at a more local level. Ways in which developers might be able to demonstrate the economic benefits to local communities from schemes could be highlighted in the text, to enable implementation.
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.' Policies P10, P11 and P13 state that 'planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...' This could lead to positive effects against this objective, although the significance of the potential employment opportunities is unclear. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). P12, P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See recommendations under objective 3.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
			P10/11/12/13RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.' Policies P10, P11 and P13 state that 'planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...' This could lead to positive effects against this objective, although the significance of the potential employment opportunities is unclear. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). P14RA1 could also have a similar effect, but of a slightly lower magnitude. The do-nothing approach would be likely to conform with baseline trends. P12, P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with							
5	To contribute towards the future well-being of the Welsh language		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with baseline trends. All other policies would be expected to result in no discernible impact on this Objective. P14, P15 and their alternatives would result in no discernible impacts on this ISA Objective.								
			6	To create opportunities within which greenhouse gas emissions can		P10	Scale: Nat	T/P: T	Cert: M		ST +
P11	Scale: Nat	T/P: T				Cert: M	ST +	MT +	LT +		



Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
be reduced and limited and encourage energy efficient and sustainable design			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	district heating (P14 and P15) and the associated reasonable alternatives might be better addressed at a more local level.
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			Policies P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to reduce greenhouse gas emissions. Supporting text states that there is a presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. Similarly, reasonable alternatives as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to beneficial effects, although these are likely to have an impact of lower significance in themselves. Cumulatively, however, effects could also be significant in the longer term.							

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>10</sup>						Recommendations
		P14 and P15, as well as their alternatives, could facilitate a more efficient management of heat in Districts across Wales. P12 would have no discernible impact on this Objective. Do-nothing approaches would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P10	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/1 3RA3	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/1 3RA4	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
It is unclear if the developments cited in Policies P10, P11 and P13 as well as their alternatives, would be situated in areas of flood risk or would alter flood risk elsewhere as this is determined by the precise location										

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
		of the development in relation to development characteristics. P12, P14 and P15 and their alternatives would have no discernible impacts on this Objective. It is considered that there is unlikely to be a direct link between the policies in this grouping and flood risk.								
8	To create opportunities to encourage the protection and improvement of air quality		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT +	LT ++	
			P10/11/12/1 3RA4	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
Policies P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to improve air quality. Supporting text states that there is										

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>10</sup>						Recommendations
			a presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to beneficial effects, although these are likely to have an impact of lower significance in themselves. Cumulatively, however, effects could also be significant in the longer term. P12, P14 and P15 would be expected to have no discernible impacts on this ISA Objective.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
		Renewable energy based around hydroelectricity, which could be facilitated through P13, could potentially pose a risk to water quality as well as hydromorphology where it is located and this may make achieving Water Framework Directive targets more difficult. It is uncertain the extent to which these policies would encourage and facilitate hydroelectric power stations and where these would be located in relation to natural waters. All other policies and alternatives would be expected to result in no discernible impacts on this Objective.									
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.	
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
				n/a	n/a	H	0	0	0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			It is considered that there is unlikely to be a direct link between the policies in this grouping and this ISA Objective.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P10	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +	No recommendations.	
			P11	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P10/11/12/1 3RA1	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P10/11/12/1 3RA2	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P10/11/12/1 3RA3	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>10</sup>						Recommendations
			Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.' Policies P10, P11 and P13 state that 'planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...' This could lead to positive effects against this objective. P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to similar benefits. It is considered that there is unlikely to be a direct link between all other policies and this ISA Objective.							
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 7												
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations	
				n/a	n/a	H	0	0	0			
		It is considered that there is unlikely to be a direct link between the policies in this grouping and affordable housing provision.										
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P10	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development. Policy 12 - the policy could be strengthened to include impacts from developments near to the boundary of these areas – in supporting text. Policy P14 could include text to ensure that the design of District Heat Networks is reflective of local character, as far as possible, as part of the criteria for their development within urban areas. If one of the alternative policies were pursued,		
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P12	Scale: Local	T/P: P	Cert: M	ST +	MT +	LT +			
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P10/11/12/1 3RA1	Scale: Local	T/P: P	Cert: M	ST -	MT -	LT -			
			P10/11/12/1 3RA2	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -			
			P10/11/12/1 3RA3	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -			
			P10/11/12/1 3RA4	Scale: Nat	T/P: P	Cert: L	ST 0	MT 0	LT -			
			P14	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P14RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P14RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P14RA3	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P15	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P15RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P15RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0			
			P10 has identified Priority Areas for Renewable Energy. The policy includes measures to ensure that landscape and visual impacts are minimised. This suggests that there is likely to be an accepted degree of									



Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>10</sup>						Recommendations
		<p>landscape change, likely mitigated to some extent by the focus on less sensitive landscape areas. Supporting text to the chapter states that there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. However, 'large scale wind and solar renewable energy development can be visually prominent.' A strategic Landscape and Visual Impact Assessment has been undertaken and the Priority Areas for Renewable Energy are considered to be the most appropriate locations to accommodate landscape change. There is, therefore, an acceptance of landscape change in these areas. However, the design and micro siting of proposals must minimise the landscape and visual impact.'</p> <p>P12 would help to protect sensitive landscapes in National Parks.</p> <p>Outside of these areas Policy 11 and P13 are predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are 'no adverse impacts' by way of (<i>inter alia</i>): landscape and visual...' it also seeks to prevent large scale onshore wind and solar energy development within National Parks and Areas of Outstanding Natural Beauty, which is essentially already required by the existing landscape designations. Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.'</p> <p>Widening the policies, through P10/11/12/13RA1, could lead to negative landscape effects, particularly in the long term, and the unplanned cumulative impacts of the schemes could be significant. A similar effect is predicted for alternative P10/11/12/13RA12 and P10/11/12/13RA13. Do nothing approaches would be likely to conform with the baseline.</p>								these should provide robust wording with regards to visual controls as is provided in the preferred policies.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P10	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	See recommendations for objective 13.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: Local	T/P: P	Cert: M	ST +	MT +	LT +	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/13RA1	Scale: Local	T/P: P	Cert: M	ST -	MT -	LT -	
			P10/11/12/13RA2	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	
			P10/11/12/13RA3	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
			P10/11/12/13RA4	Scale: Nat	T/P: P	Cert: L	ST 0	MT 0	LT -		
			P14	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
<p>P10 has identified Priority Areas for Renewable Energy. The policy includes measures to ensure that visual impacts and other impacts on protected archaeological, architectural or historic assets are minimised. This may mean that some negative effects for historic assets and their settings remain, although their minimisation could reduce significance. Supporting text to the chapter states that there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. However, ‘it is accepted that large scale renewable energy development can be visually prominent.’ There is to some extent an acceptance of landscape change in these areas and this could subsequently involve visual impacts on the historic environment including historic landscapes. The design and micro siting of proposals could help to minimise impacts on local heritage assets such as nearby Listed Buildings but cumulative impacts on historic environments at the landscape-scale may be difficult to avoid.</p> <p>P12 would help to protect sensitive heritage assets and historic areas in National Parks.</p> <p>Outside of these areas Policy 11 and P13 are predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no unacceptable adverse impacts’ by way of (<i>inter alia</i>): landscape and visual; and the protected assets of archaeological, architectural or historic assets. It also seeks to prevent large scale onshore wind and solar energy development within National Parks and Areas of Outstanding Natural Beauty and in so doing would help to avoid impacts on any historic landscapes in these areas. This could lead to minor positive effects, as it is creating a protective principle against development in these areas of important heritage value. It should be noted that there are a</p>											

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
		lot of registered historical landscapes outside National Parks and AONBs, but these are assumed to be included under the phrase ‘historical assets’ in the policy. Supporting text to the chapter states that ‘large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.’ Policy 11 and P13 state that ‘planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...’ This could lead to positive effects against this objective. through P10/11/12/13RA1, could lead to negative effects on the historic environment, particularly in the long term, and the unplanned cumulative impacts of the schemes could be significant. A similar effect is predicted for alternative P10/11/12/13RA12 and P10/11/12/13RA13. Do nothing approaches would be likely to conform with the baseline. P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
15	To create the opportunities for the protection and promotion of Welsh culture		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
				n/a	n/a	H	0	0	0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
		It is considered that there is unlikely to be a direct link between the policies in this grouping and Welsh culture, however there may be indirect links and e.g. cultural value of landscapes, and these policies require developments to maximise social and environmental benefits, which could have a positive benefit for communities.									
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P10	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	See Objective 13.	
			P11	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-		
			P12	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +		
			P13	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-		
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-		
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-		
			P10/11/12/1 3RA3	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>					Recommendations
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			<p>P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to improve air quality, which could have beneficial effects against this objective. Supporting text states that there is a presumption in favour of large-scale on-shore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. There is a potential for negative effects on biodiversity assets, as P10 seeks that impacts on nature conservation sites and species are ‘minimised’. However, outside of these areas P11 and P13 is predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no adverse impacts’ by way of (<i>inter alia</i>) nature conservation sites and species. P10/11/12/13RA1, P10/11/12/13RA2, and P10/11/12/13RA3 could lead to similar impacts. The do-nothing alternatives would be likely to conform with the baseline. P12 could create non-significant benefits for biodiversity in these areas.</p> <p>P14, P15 and their alternatives would be expected to result in no discernible impacts on this Objective. It should be noted that the HRA of the NDF has, as of June 2019, ruled out an LSE on any European site as a result of any policy in the NDF. Adverse effects of P10, P11 and their alternaives would therefore be expected to be minor and discernible but insignificant.</p>							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P10	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/13RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT -	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>10</sup>						Recommendations
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
<p>P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to energy generation overall, with the target of 70 per cent of electricity generation to be generated from renewable energy by 2030. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. P10/11/12/13RA1, P10/11/12/13RA1 and P10/11/12/13RA1 would have similar benefits. The do-nothing alternative would conform with baseline trends.</p> <p>P12, P14, P15 and their alternatives would have no discernible impacts on this Objective.</p>											

*Table B-42: Policies and reasonable alternatives in Policy Grouping 8*

## Policy Grouping 8

<b>P16 – Strategic Policies for Regional Planning</b>	<p>Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent LDPs):-</p> <ul style="list-style-type: none"> <li>- a spatial strategy;</li> <li>- a settlement hierarchy;</li> <li>- the housing provision and requirement;</li> <li>- the gypsy and traveller need;</li> <li>- the employment provision;</li> <li>- the spatial areas for strategic housing and employment growth, renewable energy and the identification of green belts, green corridors and nationally important landscapes;</li> <li>- the location of key services, transport and connectivity infrastructure;</li> <li>- a framework for the sustainable management of natural resources and cultural assets;</li> <li>- ecological networks and opportunities for protecting or enhancing the connectivity of these networks; and</li> <li>- a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal.</li> </ul> <p>The Welsh Government requires Strategic Development Plans to come forward in each of the three regions to deliver the requirements of this Policy.</p>
<b>P16RA1 – Mandatory list of policy issues</b>	This option would require regional planning to be undertaken and to cover the policy issues identified.
<b>P16RA2 – Longer or shorter list of policy issues</b>	This option would expand or reduce the topics covered within the policy.
<b>P16RA3 - Approach to Regional Planning</b>	The Welsh Government expects regional plans to come forward in each of the three regions to deliver the requirements of Policy P3.
<b>P16RA4 - Mandatory footprint for regional planning</b>	This option would require regional planning to be undertaken and would set a footprint indicating which areas must produce a SDP and which must produce a Joint LDP.
<b>P16RA5 - Specify which authorities should work together</b>	This option would require regional planning to be undertaken and would specify which authorities must work together.
<b>P16RA6 – Do Nothing</b>	Do not have a policy.
<p>The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.</p>	



Table B-43: Appraisal of Policy Grouping 8

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P16	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	Provide clarity on skills and training, in particular related to economic growth could widen term employment provision
			P16RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
		Policy P16 the areas listed for inclusion in a regional level plan covers key services which could include education and skills facilities for all. The list specifies employment provision which again for sustainable economic growth should encompass education, training and skills but this is not clear. The Policy would support effective cross boundary provision of services such as housing and employment and, consequently, other linked services such as the provision of education opportunities. This could result in limited benefits in terms of children and young people across regions being able to access education establishments, resulting in increased attainment. Notwithstanding this, it is recognised the planning system at a regional level cannot directly influence the establishment of education services which is the responsibility of education authorities. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities								

<sup>11</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P16	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	The policy refers to green belts and corridors but it is unclear whether or not this would encompass green infrastructure in its widest definition. This relationship with GI could be clarified in the supporting text.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			<p>P16 the policy embeds placemaking and looks to deliver key services which will include health facilities and services. The list of topics encompasses a wide variety of determinants of health through placemaking including connectivity, employment, housing provision, natural resources which all can contribute positively to health and well-being for everyone when planned positively. Planning authorities will be able to determine what is best for their rural areas in terms of mental health and social well-being and will not be working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically. The policy specifies that the need for gypsy and travellers should be established which will have appositve impact on the health and well-being of the gypsy and traveller community. The policy would support effective cross boundary provision of services (such as housing and employment) and consideration of environmental issues (such as green belts and corridors) through the planning system. This should result in benefits in terms of sustainably locating services across regions, leading to associated health benefits and reducing</p>							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>inequalities, including for children and young people. The policy could be strengthened to include green infrastructure elements not just green corridors.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA4 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	The supporting text could clarify the definition of ‘connectivity infrastructure’- it is proposed this should include a wide definition including digital, green, active travel etc. to maximise benefits.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			<p>Policy P16 would help to ensure that regional plans are prepared across Wales and that these plans provide for an adequate quantity of employment land to satisfy the anticipated or desired jobs growth in the region. Both Policies would therefore make a direct major contribution towards improving employment opportunities across Wales for all working ages. Through embedding placemaking into the policy this would ensure growth is sustainable for all members of society and would have a positive impact on sustainable growth. It is unclear however if ‘connectivity infrastructure’ includes</p>							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>digital connectivity, this should be clarified in the supporting text.</p> <p>Regional planning may permit a more holistic overview of the relationships between housing, travel, employment delivery and could have a modest positive impact if pattern of development takes language considerations into account. It would also enable rural issues to be looked at holistically. P16RA1, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			<p>It is expected that the employment provision delivered through regional plans, as set out in Policy P16, would make a major and direct contribution towards delivering significant economic growth and the diversification of regional economies throughout Wales including addressing rural issues holistically. It also creates a framework to enable third sector activities to grow focusing around well-</p>							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>connected areas of growth. Regional planning could have a modest positive impact if pattern of development takes language considerations into account.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
5	To contribute towards the future well-being of the Welsh language		P16	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No Recommendations
			P16RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA4	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA5	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA6	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		<p>P16 settlement hierarchies and strategies for distributing growth can support the Welsh language. This policy encourages the creation of regional plans setting growth strategies. The nature of these regional plans may have a positive or negative effect on use of the Welsh language. Planning authorities will be able to determine what is best for their rural areas in contributing towards the future well-being of the Welsh language by not be working in isolation but across local authorities in a collaborative approach, looking at rural issues in a holistic manner.</p>								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
				<p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>						
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
				<p>It is expected that regional planning detailed in Policy P16, would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. Policy P16 also requires regional plans to consider spatial areas for renewable energy generation. Policy P16 would therefore be likely to directly and positively contribute towards lowering GHG emissions from the transport sector as well as an increase in the amount of renewable energy generated.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same</p>						

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P16	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	It is recommended that regional development plans are encouraged to collaborate with NRW to maximise flood risk management benefits.
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		It is considered to be likely that the regional planning detailed in Policy P16, would enable local planning authorities to adopt a strategic approach to directing new development away from land at risk of flooding. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
8	To create opportunities to encourage the protection and improvement of air quality		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		It is expected that regional planning detailed in Policy P16 would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. Policies P16 would therefore be likely to directly and positively contribute towards reducing air pollution from the transport sector. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	It is recommended that regional plans collaborate with NRW and water companies to ensure sustainable management and use of water resources I the
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale:	T/P:	Cert:	ST	MT	LT	



Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
				Nat	T	H	+	+	+	region.
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST	MT	LT	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST	MT	LT	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		It is considered to be likely that the regional planning detailed in Policy P16, would enable local planning authorities to adopt a strategic approach to directing new development away from locations where the development would pose a major risk to the quality or quantity of natural waterbodies. A regional planning approach could also permit studying growth on a catchment basis, which would assist with better understanding how development cumulatively interacts with catchments and affects water supply. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P16	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	No recommendations.
				+	++	++				
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
				+	++	++				
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
				+	+	++				
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
	+	++	++							
P16RA4	Scale: Nat	T/P: T	Cert: M	ST	MT	LT				
	+	++	++							
P16RA5	Scale: Nat	T/P: T	Cert: M	ST	MT	LT				
	+	+	++							
P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT	LT				
	+	+	+							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>Policy P16 looks to deliver accessible, inclusive growth for all. With placemaking as a central principle. This would have a positive benefit to the connectivity and access for all to goods, services and facilities. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring children and young people have access to services such as retail, open space and employment alongside provision of homes.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			Policy P16 with placemaking as a central principle this will help to reduce inequalities and benefit							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>social cohesion. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring children and young people have equal access to services and therefore improvements in social cohesion and equality for these groups across Wales.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.</p>								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			<p>The regional planning detailed in Policy P16, would enable local planning authorities to ensure that regional housing needs can be satisfied. This would be a major and direct positive impact on this ISA Objective. The provision of good quality housing will help to reduce inequalities and has wider health</p>							

Policy Grouping 8										
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		<p>benefits. Planning on a regional basis could result in positives in terms of ensuring families, including children and young people, across Wales have access to good quality and affordable housing. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, by creating opportunities for the provision of good quality, safe, affordable housing by not be working in isolation but across local authorities in a collaborative approach, addressing rural issues in a holistic manner.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.</p> <p>A regional planning approach could enable a more strategic overview of housing market areas, including where they cross over between different counties, as well as a more holistic overview of employment and travel patterns in relation to homes. It may also help to ensure that housing delivery is cognisant of cross-border housing and employment markets in England, where relevant.</p> <p>P16RA2 and P16RA3 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-thing scenario(P16RA6) would be likely to conform with baseline trends.</p>								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>The regional planning detailed in Policy P16, would enable local planning authorities to help ensure that new development is located appropriately, away from distinct or sensitive landscapes with which it would discord, including Wales’s five highly sensitive AONBs and National Parks. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier.</p> <p>Regional level planning is also an effective means of avoiding adverse cumulative impacts on sensitive but unprotected landscapes caused by small scale developments in-combination. The high-level development plans would enable a strategic approach to ensuring new development is directed from the identification of green belts and green corridors would help to protect sensitive and distinctive natural landscapes in many places. These would be direct and positive impacts on this ISA Objective.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-thing scenario (P16RA6) would be likely to conform with baseline trends.</p>								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		The regional planning detailed in Policy P16, would enable local planning authorities to help ensure								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		that new development is located appropriately, away from highly sensitive heritage assets or historic areas that it could potentially have an adverse impact on. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier. Regional planning may also offer a more strategic, holistic and effective means of preventing adverse cumulative effects on historic areas and historic landscapes caused by multiple small-scale developments in-combination. This would be a direct positive impact on this ISA Objective. P16RA1, P16RA3, P16RA4 and P163RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P3RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			The regional planning detailed in Policy P16, would enable local planning authorities to situate new development in appropriate locations, such as based on the type, scale and density of locations. The placemaking principle will ensure sustainable growth and help to promote welsh culture. This would be expected to better enable planning authorities to protect and promote Welsh culture on a regional scale. This would be a direct positive impact on this ISA Objective. Planning authorities will be able to							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>determine what is best for their rural areas by creating opportunities for the protection and promotion of Welsh culture by not be working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.</p> <p>P16RA5 and P16RA6 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-thing scenario (P16RA6) would be likely to conform with baseline trends.</p>								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	Policy P16 currently advises that regional plans should identify green belts and green corridors. It is unclear if the intention is for regional plans to identify existing green corridors, or to identify and seek to establish new green corridors. In order to try and protect and enhance the connectivity of ecological networks across Wales, Policy P16 could potentially refer to ecological networks on the whole, such as wording to the effect of ‘identification of
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		<p>The regional planning detailed in Policy P16, would enable local planning authorities to direct new development away from areas of high biodiversity value or sensitive designations. The regional plans would also be expected to ‘identify green belts (and) corridors’, which would help to protect biodiversity rich areas as well as connectivity of ecological networks. Regional planning would also be a good way of identifying, evaluating and mitigating potential cumulative impacts of development on ecological networks and wildlife corridors, as well as Natura 2000 sites, such as through habitat fragmentation. The placemaking principle will ensure increase accessibility to natural green spaces,</p>								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>						Recommendations
		<p>maximising health and well-being benefits. The regional level of planning would also permit a close study of the impacts of development on water resources on the catchment scale, which bears significance for habitats and species across Wales reliant on water or sensitive to changes in the water table. These would be direct positive impacts on this ISA Objective.</p> <p>All reasonable alternative options would enforce or mandate local authorities to adopt regional planning. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.</p> <p>P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policies P16 but would provide greater certainty over these effects taking place.</p> <p>P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.</p> <p>The do-thing scenario (P16RA6) would be likely to conform with baseline trends.</p>								ecological networks and opportunities for protecting or enhancing the connectivity of these networks'. The policy could encourage collaboration with NRW during the preparation of regional plans and to link with area statements to incorporate SMNR priorities.
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	The policy could be strengthened to include reference to pollution.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			<p>The regional planning detailed in Policy P16, seeks to ensure there is a co-ordinated framework for circular economies, including waste treatment and disposal. Although this policy addresses waste treatment and disposal it does not address wider pollution issues which would have an impact on human health and the environment. This is addressed within PPW but could be strengthened here.</p> <p>It is expected that planning on a regional scale would also facilitate effective and strategic approaches to making use of brownfield land, remediating contaminated land and avoiding</p>							



Policy Grouping 8					
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>11</sup>	Recommendations
		developing on agricultural or ecologically important soils. These would be direct effects of policy P16 that increase in magnitude as regional plans are prepared, adopted and take effect. All reasonable alternative options would enforce or mandate local authorities to adopt regional planning. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.			

*Table B-45: Policies and reasonable alternatives in Policy Grouping 9*

## Policy Grouping 9

<b>P17 Wrexham and Deeside</b>	<p>The Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. Wrexham and Deeside's role within the North region and the wider cross-border areas of Cheshire West and Chester and Liverpool City Region should be maintained and enhanced.</p> <p>Strategic and Local Development Plans across the region should recognise Wrexham and Deeside as the focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Wrexham and Deeside's regional role.</p> <p>The Welsh Government will work with cross border authorities to promote Wrexham and Deeside's strategic role and ensure key investment decisions support Wrexham and Deeside and the wider region.</p>
<b>P17RA1 – Name alternative growth focus</b>	This option focusses on the whole of north Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another.
<b>P17RA2 – Do Nothing</b>	Do not have a policy.
<b>P18 - North Wales Coastal Settlements</b>	<p>The Welsh Government supports the built up coastal arc from Caernarfon to Deeside as the focus for managed growth, reflecting this area's important sub-regional role supporting the primary growth area set of Wrexham and Deeside.</p> <p>Strategic and Local Development Plans across the region should recognise the role of this corridor as a focus for housing, employment and key services.</p>
<b>P18RA1 – Name alternative growth focus</b>	This option focusses on the whole of north Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another.
<b>P18RA2 – Do Nothing</b>	Do not have a policy
<b>P19: Green Belts in North Wales</b>	The Welsh Government supports the role of Strategic Development Plans identifying and establishing green belts to manage urban form and growth in North Wales, particularly around Wrexham and Deeside. The Strategic Development Plans should consider the relationship of any new green belts with the green belt in Cheshire West and Chester.
<b>P19RA1 – Directly identify the green belt</b>	This option would directly allocate a green belt within the north wales region.
<b>P19RA2 – Promote green wedge or other policy interventions</b>	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in North Wales.
<b>P19RA3 – Do Nothing</b>	Do not have a policy.
<b>P20: Port of Holyhead</b>	<p>The Welsh Government will work with port operators, local authorities and investors to support the development of the port and facilitate new investment in order to ensure that its strategic gateway role is maintained and enhanced.</p> <p>Investment to improve the Port's capacity to accommodate cruise ships is supported.</p> <p>New development around the Port should be carefully managed to ensure that future expansion and change at the Port is not constrained or compromised.</p>
<b>P20RA1 – Facilitate Port</b>	This option would specify the development of other ports within Wales.

<b>Policy Grouping 9</b>	
<b>development elsewhere</b>	
<b>P20RA2 – Do Nothing</b>	Do not have a policy.
<b>P21: Transport Links to North West England</b>	The Welsh Government will work with local and regional authorities in north Wales and north west England to ensure transport investments, including in the North Wales Metro, strengthen cross-border transport links. Strategic and Local Development Plans should support improved transport links between north Wales, Chester, Liverpool and Manchester and plan growth to maximise the potential opportunities arising from better regional connectivity.
<b>P21RA1 – Focus only on connections within Wales</b>	This option would focus on transport investments and improved transport links to maximise the potential opportunities arising from better connections within Wales.
<b>P21RA2 – Do Nothing</b>	Do not have a policy.
<b>P22: North West Wales and Energy</b>	<p>The Welsh Government supports North West Wales as a location for new energy development and investment. New energy-related development should support local and regional communities; provide jobs and investment in training and skills; and work with universities and businesses across the region and North West England, to co-ordinate and maximise new investment to support the wider region.</p> <p>In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales' energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region.</p>
<b>P22RA1 – Identify larger or smaller area</b>	This option would specify a larger or small area around Anglesey for new energy development and investment.
<b>P22RA2 – Do Nothing</b>	Do not have a policy.
<p>The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.</p>	

Table B-46: Appraisal of Policy Grouping 9

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P21RA1	Scale:	T/P:	Cert:	ST	MT	LT	

<sup>12</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>					Recommendations	
				Nat	T	M	+	+	+	
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		<p>Policy P17, P18, P20 and P21: focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities and increased connectivity. Promoting the largest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. As well as development at Holyhead Port facility should result in children and young people within the area being better placed to potentially access education opportunities, including for higher education, and therefore resulting educational attainment.</p> <p>P22 This Policy identifies Anglesey as broadly suitable for energy developments. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and skills benefits that such development could offer would increase access to skills and training for adults and young people but may have limited benefits in terms of encouraging educational attainment for children.</p> <p>Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains.</p> <p>The do-nothing approaches would be likely to conform with baseline trends. P19 would be unlikely to have a discernible impact on this ISA Objective.</p>								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Supporting text should provide clarity on the definition of connectivity infrastructure. Policy P17 could be strengthened to include facilities and services.
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations
health inequalities across Wales				Reg	T	H	0	+	+		
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +		
			P19	Scale: Reg	T/P: P	Cert: n/a	ST +	MT +	LT ++		
			P19RA1	Scale: Reg	T/P: P	Cert: n/a	ST +	MT +	LT ++		
			P19RA2	Scale: Reg	T/P: T	Cert: n/a	ST +	MT +	LT +		
			P19RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +		
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++		
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +		
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
			P21RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +		
			P17, P18, P20, P21 and P22: focus of growth for the region would bring many benefits for all members of society including reducing inequality and poverty through increasing employment and has the potential to support healthy lifestyle choices through well connected places including rural areas, providing services and facilities to a wider area which would achieve multiple health benefits. P17 could be strengthened to include facilities and services. The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
3	To create opportunities for an increase in employment across the country and promote economic inclusion			<p>which will have physical and mental health and well-being benefits.</p> <p>Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. Ensuring people are better connected to access services. this would lead to improvements in health and well-being and reducing inequalities for all including children and young people in the area.</p> <p>P22 Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus contributing to decreasing health inequality in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have limited benefits in terms of improvements in health and well-being and reducing inequalities for children and young people in the area.</p> <p>P19 the provision of a green belt retain open spaces around identified urban areas which either currently or potentially would have access for recreation would continue to provide physical and mental health benefits for everyone.</p> <p>Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. Focusing only on connections within wales will not draw wider benefits of connectivity with England and this would be artificially constraining connections.</p> <p>P19RA1 Directly identifying the green belt would not fit with the proposed approach to regional planning.</p> <p>P19RA2 has potential positive and negative effects depending on type and scale of growth in the area.</p> <p>The do-nothing approaches would be likely to conform with baseline trends.</p>						
			P17	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	Between Policies P17 and P22, there could potentially be a reference to ensuring strong interactions between North West Wales and North East England in terms of job markets.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations
			P19	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	economic areas in the region, it is important that smaller areas that interlink within this region are not forgotten. It may be appropriate to ensure that there is a robust evidence base for determining which urban areas will benefit from the significant investment.	
			P19RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0		
			P19RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0		
			P19RA3	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0		
			P20	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++		
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +		
			P21	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++		
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +		
			P22	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++		
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +		
			<p>Policies P17, P18, P20, P21 and P22 would each be expected to make a major contribution towards increasing employment opportunities in the northern region of Wales for all working ages and in rural areas. These would be in the strategic area of Wrexham and Deeside and at the Port of Holyhead. Deeside has relatively high levels of deprivation and focussing new development here would positively affect efforts to reduce inequality. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from NW heartland areas, to remain in Wales.</p> <p>Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should result in young people in particular within the area being better placed to access employment opportunities. P18</p>								



Policy Grouping 9				
ISA Objective	Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>	Recommendations
			<p>would help to develop and attract investment and this would be likely to improve economic inclusion and reduce deprivation in these areas. Creating economic opportunities for an increase in employment across the region and promoting economic inclusion.</p> <p>Policy P21 would help to ensure that inclusive transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced, which would be expected to lead to greater economic inclusion for people in the region. Improved connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration and would have a potential mix of positive and negative impacts on the Welsh language depending on implementation. The increases transport links should result in communities including children and young people within the area being better placed to potentially access services, including potential employment opportunities Policy P22 would help to encourage the provision of new jobs and investment in training and skills in Anglesey, which would be likely to lead to major beneficial impacts in terms of improving employment prospects for all working ages, opportunities to learn new skills and reducing deprivation, particularly as the closure of the old Wylfa power station was the loss of a major local employer. New jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity. Promoting economic inclusion in rural areas. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P22 specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities.</p> <p>There are various small towns along the north-coast of Wales with relatively high rates of deprivation and each policy would be likely to help combat this by boosting and improving the range of employment opportunities on offer and making them more accessible to local people.</p> <p>Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. P17RA2 could generate increased opportunities for the Welsh language but starting from a lower base than Wrexham/Deeside increases the risk to the Welsh language.</p> <p>Holyhead Port is an established port that caters to services nowhere else in Wales is able to. Should P20 facilitate development elsewhere, it would be unlikely to maximise potential gains If development is not at Holyhead then it is likely to take place in England. This could lead to out-migration as people seek work and a potential negative impact on the Welsh language. P21RA1 by focussing on internal links could help the north Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts for the Welsh language. Should improvements to transport (P21) focus on connections within Wales, it would conflict with the clear economic links between areas of North Wales and north west England and miss out on</p>	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		<p>opportunities for economic development and would be artificially constraining connections which are already made.</p> <p>Anglesey Energy is an established brand. If P23 were to focus on a larger or smaller area it would be unlikely to maximise on potential gains. The effect of P22RA1 would depend on the degree of change. The further the area goes from the language heartlands, the more likely the effect could be negative</p> <p>Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective.</p> <p>Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. The do nothing approaches (P17RA2, P18RA2, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P17	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	See Objective 3.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA3	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P20	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P20RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9									
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>					Recommendations
				Nat	T	L	0	+	+
			P21	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	H	+	++	++
			P21RA1	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	L	+	+	+
			P21RA2	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	L	0	+	+
			P22	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	H	+	++	++
			P22RA1	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	L	+	+	+
			P22RA2	Scale:	T/P:	Cert:	ST	MT	LT
				Nat	T	L	0	+	+
<p>Policies P17, P18, P20, P21 and P22 would each be expected to make a major contribution towards encouraging economic growth, economic diversification and enhanced business competitiveness in the northern regions of Wales. These policies could provide opportunities for the third sector to support the growth and benefit from improved connections. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from the north Wales heartland areas, to remain in Wales. These would be in the strategic area of Wrexham and Deeside (P17) and at the Port of Holyhead (P20). Policy P21 would help to ensure that transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced including increasing access to and from rural areas, which would be expected to facilitate economic growth and more competitive businesses in the region Improved connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration ,this could result in a potential mix of positive and negative impacts on the Welsh language which will be dependent on the implementation at the lower tier. Policy P22 would help to encourage the provision of training and skills in Anglesey which would enable economic diversification and more competitive businesses having a positive effect on a rural area, supporting local and regional communities with jobs, investments and training and skills and thus promoting sustainable economic growth, diversity and business competitiveness in rural area. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P19, and its reasonable alternatives, are focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective.</p> <p>Each alternative to policies P17, P18, P20, P21 and P22 would be expected to result in effects of a lower magnitude as they would be unlikely to maximise potential economic gains. Each reasonable alternative is also considered to involve a greater degree of uncertainty of effect. P20RA1 - If development is not at Holyhead then it is likely to take place in England. This could lead to out-migration as people seek work and could have a</p>									

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		negative impact on the Welsh language. P21RA1, focussing on internal links could help N Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts including the Welsh language. P22RA1, Effect would depend on degree of change. The further the area goes from the language heartlands, the more likely the effect could be negative The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends. P17RA2 Could generate increased opportunities for the Welsh language but starting from lower base than Wrexham/Deeside increases the risk to the Welsh language.								
5	To contribute towards the future well-being of the Welsh language		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST -/+	MT -/+	LT -/+	
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P21	Scale: Reg	T/P: T	Cert: H	ST -/+	MT -/+	LT -/+	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations	
			P21RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?		
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +		
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?		
			P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0		
			<p>Policy P17, P18 and P17RA1 looks to deliver an increase in economic opportunities within north Wales, this would offer greater opportunities for Welsh speakers, especially those from North Wales heartland areas and provide opportunities for them, to remain in Wales.</p> <p>P17RA2, doing nothing could generate increased opportunities but starting from lower base than Wrexham/Deeside increases the risk to the Welsh language.</p> <p>Policy P20 looks to deliver an increase in economic opportunities within north Wales, this would offer greater opportunities for Welsh speakers, especially those from North Wales heartland areas and provide opportunities for them, to remain in Wales.</p> <p>P20RA1, if development is not at Holyhead then it is likely to take place in England. This could lead to out-migration as people seek work and a potential negative impact on the Welsh language.</p> <p>Policy P21 looks to improve connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration. This would lead to a potential mix of positive and negative impacts on the Welsh language.</p> <p>P21RA1, focussing on internal links could help N Wales economy, but could limit the opportunities for growth and new jobs, with knock on negative impacts to the Welsh language.</p> <p>Policy P22, new jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity, having a positive impact on the Welsh language.</p> <p>P22RA1, the effect of this policy would depend on degree of change. The further the area goes from the language heartlands, the more likely the effect on the Welsh language could be negative.</p> <p>Policy alternatives P18RA2, P19RA3, P20RA2, P21RA2, P22RA2 would be likely to conform with baseline trends.</p> <p>Policy P19 and its alternatives would have no impact on the Welsh language.</p>								
6	To create opportunities within which		P17	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	Opportunities to enhance public transport modes in	
			P17RA1	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 9									
ISA Objective	Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design			Nat	P	H	-	-	-	the Wrexham and Deeside region should be sought out and maximised through these policies.  There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality.
		P17RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
		P18	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
		P18RA1	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
		P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
		P19	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
		P19RA1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
		P19RA2	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	
		P19RA3	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
		P20	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT --	
		P20RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT --	
		P20RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
		P21	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
		P21RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	
		P21RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
		P22	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	
		P22RA1	Scale: Nat	T/P: P	Cert: L	ST +	MT ++	LT ++	
		P22RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		<p>P17 and P18 encourage significant scales of growth in the Wrexham and Deeside, or the north of Wales, strategic area. It is uncertain how energy efficient such development would be; and it is considered to be likely that such growth would lead to some degree of increase in energy consumption and GHG emissions in the region that increases over time as more development takes place here. This is particular the case due to the relatively high car reliance in the region. This could conflict with Wales’ current trend of declining GHG emissions.</p> <p>P19 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural carbon sink that help to alleviate GHG emissions in the area.</p> <p>P20 would contribute towards an increase in the capacity of Holyhead Port to accommodate cruise ships. This expansion would be likely to increase energy consumption and GHG emissions at the port, particularly as cruise ships are significant emitters of GHG emissions. This direct effect would increase in magnitude over time as the capacity for cruise ships increases grows over time.</p> <p>Policy P21 seeks to support improvements in transport infrastructure between North Wales, Chester, Liverpool and Manchester. It is unclear what types of infrastructure would be supported in particularly, but it is considered to be likely that these improvements would contribute towards an increase in road transport in the region and a subsequent increase with the associated GHG emissions. Public transport and low-emission travel modes are also likely to be improved and this could help to limit GHG emission increases to some extent. This direct effect would be likely to grow over time.</p> <p>The energy sector at Anglesey supported in Policy P22 includes nationally important generation of low-carbon energy, including tidal and nuclear. The region would be likely to make a major contribution towards low-carbon energy for Wales and Policy P22 contributes towards this. Over time this the energy generated here would be likely to make a major contribution towards low-carbon energy in Wales.</p> <p>The reasonable alternatives identified for P17, P20 and P21 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P6 would be expected to result in the same minor benefits as P19 in terms of providing areas of natural carbon sink. Alternatives to P22 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective.</p> <p>The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>								
7	To contribute to the reduction and management of flood risk		P17	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	P17, P20, P21 and P22 could seek to ensure that new development is not situated on the active floodplain. Proposals should be required to
			P17RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations
				Reg	T	L	?	?	?	ensure that development would not worsen flood risk in other locations. The enhancement of GI through new development is an opportunities to minimise local flood risk further. Careful consideration should be given to the impacts of climate change in determining the distribution and extent of flood risk.	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -		
			P19	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +		
			P19RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +		
			P19RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +		
			P19RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P20	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P21	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P22	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P22RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			There are some extensive swathes of Flood Zones 2 and 3, associated with the River Dee, in the Deeside and Wrexham region. There is also land at risk of flooding in the area of the Port of Holyhead where P20 would seek to encourage new development. It is uncertain if development delivered as a result of P17, P20 or their alternatives would coincide with this land at risk of flooding or if such development would result in the loss of								



Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		greenfield elements that help to alleviate flood risk. The identification and safeguarding of green belts and green corridors (P19) would help to preserve natural flood defence benefits provided by the vegetation. Transport and energy focussed development supported by P21 and P22 could potentially be situated on land at risk of flooding given the presence of extensive flood risk areas in North Wales. However, this is largely dependent on the precise location of development in relation to flood risk areas, which is currently unknown. Given the impacts of climate change in exacerbating flood risk it cannot be ruled out that P21 and P22 would lead to new transport or energy related development being situated on the active floodplain (which could alter the risk of flooding in other locations). Do-nothing approaches would be likely to conform with baseline trends in terms of development and flooding.								
8	To create opportunities to encourage the protection and improvement of air quality		P17	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	See Objective 6.
			P17RA1	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P18RA1	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
			P19RA1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
			P19RA2	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	
			P19RA3	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P20	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT --	
			P20RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT --	
			P20RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9									
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>					Recommendations
				Nat	P	L	0	+	+
			P21	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -
			P21RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -
			P21RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +
			P22	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++
			P22RA1	Scale: Nat	T/P: P	Cert: L	ST +	MT ++	LT ++
			P22RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +
<p>P17 and P18 encourage significant scales of growth in the Wrexham and Deeside strategic area, or north Wales. It is considered to be likely that such growth would lead to some degree of increase in air pollution emissions in the region that increases over time as more development takes place here. This could conflict with Wales’ current trend of improving air quality. The focused growth has the potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation</p> <p>P19 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural air filtering.</p> <p>P20 would contribute towards an increase in the capacity of Holyhead Port to accommodate cruise ships. This expansion would be likely to increase air pollution at the port, particularly as cruise ships (as well as the trucks, coaches and other vehicles entering the town as a result of cruise ships) are significant sources of pollution. This direct effect would increase in magnitude over time as the capacity for cruise ships increases grows over time.</p> <p>Policy P21 seeks to support improvements in transport infrastructure between North Wales, Chester, Liverpool and Manchester. It is unclear what types of infrastructure would be supported in particular, but it is considered to be likely that these improvements would contribute towards an increase in road transport in the region and a subsequent increase with the associated pollution emissions. Public transport and low-emission travel modes are also likely to be improved and this could help to limit pollution increases to some extent. This direct effect would be likely to grow over time.</p> <p>The energy sector at Anglesey supported in Policy P22 includes nationally important generation of low-emission energy, including tidal and nuclear. The region would be likely to make a major contribution towards low-emission energy for Wales and Policy P22 contributes towards this. Over time this the energy generated here would be likely to make a major contribution towards low-carbon energy in Wales. At the same time, there is a</p>									

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		risk that further development here would increase the number of vehicles in regular use in the region to service the power stations and this could limit improvements to the local carbon footprint. There is potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation The reasonable alternatives identified for P17, P20 and P21 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P19 would be expected to result in the same minor benefits as P19 in terms of providing areas of natural air filtering, but with less certainty. Alternatives to P22 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective. The do nothing approaches (P17RA2, P18RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P17	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P17RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -	
			P19	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P19RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P19RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P19RA3	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P20	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT --	
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P20RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
				n/a	n/a	H	0	0	0	
			P21	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			<p>P17, P18 and P21, as well as their reasonable alternatives, would be expected to result in no discernible impact on water quality and resources.</p> <p>The economy in Deeside is largely based around the coastal industry. The economy in Holyhead is based around power stations (including nuclear), which need to be near the coast. In each case there could be a risk of pollution or contamination of nearby waters. Given that much of the coastal water in the region is designated as a SAC or SPA, it is particularly important that water quality is protected. Development in these locations could also lead to an increase in the consumption of water used for power generation.</p> <p>P19 would help to protect greenfield land, which currently plays an important role in preserving water quality through natural filtration processes. P19RA1 and P19RA2 would have the same effect but with a greater level of uncertainty and potentially to a lower magnitude due to less high-quality or less appropriate land being designated as green belt, corridor or wedge.</p> <p>Investment and development at the Port would increase the capacity for cruise ships. These ships are notable sources of pollution and so P20 would pose a risk to the quality of waters here. The alternative approach of focussing on a different port would be likely to have a similar direct effect but with less certainty.</p> <p>The do nothing approaches (P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P17 could be strengthened to include facilities and services.
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
for all groups		P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
		P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -		
		P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
		P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
		P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
		P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
		P20	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
		P20RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
		P20RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
		P21	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++		
		P21RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++		
		P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
		P22	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
		P22RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
		P22RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
		P17 and P18 look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. The policy could be strengthened to include reference to facilities and services. P19 has the potential to improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring for all. These benefits would depend on implementation.								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
			<p>Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective.</p> <p>Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective.</p> <p>P20 The policy has the potential to improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring. These benefits would be dependent on the implementation. Such a policy could result in the providing of access to goods and services which could have benefits for children and young people within the local area; for example, educational opportunities and employment opportunities for young people.</p> <p>P21 – The policy looks to increase connectivity this will increase connectivity in the region and increase access to facilities and services for all. Improved transport links to north west England will mean there are opportunities to improve accessibility across the region and in particular rural areas with an increase in public transport provision, access to jobs, services and social infrastructure. This should result in everyone, including children and young people within the area being better placed to potentially access services, including potential employment opportunities for young people.</p> <p>P22 – Depending on the implementation this policy has the potential to increase inclusive access including active travel and green infrastructure which would enable healthier lifestyle choice to be made. Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities.</p> <p>Each alternative to policies P17, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. P21 improvements to the connections are unlikely to be planned and managed with a view on the long-term</p> <p>The do-nothing approaches would be likely to conform with baseline trends.</p>							
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P17 could be strengthened to include reference to connections to
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P18	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9													
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations		
				Reg	T	H	+	+	++	facilities and services. P21 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.			
			P18RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT				
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST	MT	LT				
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST	MT	LT				
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST	MT	LT				
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST	MT	LT				
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST	MT	LT				
			P20	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			P20RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT				
			P20RA2	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			P21	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			P21RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT				
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			P22	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			P22RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT				
			P22RA2	Scale: Reg	T/P: T	Cert: H	ST	MT	LT				
			Policy P17 and P18: through the growth and increasing access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment. The policy could be strengthened to include reference to connections to facilities and services. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within										

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
		<p>that area to sustainable transport and connectivity infrastructure. This should result in creating opportunities within the area for improvements in social cohesion and equality for children and young people. Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective.</p> <p>Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. P20, the investment and growth of the port would bring with it health and well-being benefits for the surround area and potentially the region.</p> <p>P21, the investment in connections across the region would improve inclusive access to facilities and services, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. Improved transport links to north west England will mean there are opportunities to improve accessibility across the region and in particular rural areas with an increase in public transport provision, access to jobs, services and social infrastructure. This Policy looks to provide improved planning for transport provision within North Wales and in particular to North West England. This should result in everyone, including children and young people within the area being better placed to potentially access services, resulting in potential improvements in social cohesion and equality.</p> <p>P22, through the growth there is a potential to increase access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment, barrier free and inclusive and benefit rural communities. Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas.</p> <p>Each alternative to policies P17, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains.</p> <p>The do-nothing approaches would be likely to conform with baseline trends.</p>								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P17	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++	No recommendations.
			P17RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++	
			P18RA1	Scale:	T/P:	Cert:	ST	MT	LT	



Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations
				Nat	T	H	++	++	++		
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -		
			P19	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA3	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P20	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P20RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P21	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P21RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P22	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P22RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
P17 and P18 would be likely to help ensure that there is significant residential development in the Wrexham and Deeside or north Wales region to meet the needs of the region. Given that this region is the most populous in northern Wales, P17 would make a major contribution towards satisfying housing needs for a large number of people. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area, including housing, to sustainable transport and connectivity infrastructure. This should result in families, including children and young people, being more readily able to											

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
			access suitable, affordable housing in sustainable locations across the area. The cross-border nature of housing needs in the region of North-East Wales would be likely to be a key consideration in regional growth proposals here. Alternatives to P17 would also help to satisfy housing needs but, as they would be focussed on areas other than Wrexham/Deeside and whilst there are key areas outside of Wrexham and Deeside, it is uncertain the extent to which housing needs could be satisfied by focussing elsewhere or what the impacts would be. Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. These are key areas of population P19, P20, P21 and P22, and their reasonable alternatives, would be expected to result in no discernible impacts on this ISA Objective. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	Given the sensitive nature and national significance of Anglesey AONB, the policy for development at Anglesey could potentially include wording that refers to ensuring the AONB is protected or enhanced by development in the region.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT -	LT -	
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P20	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
				Nat	T	M	-	-	-	
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			<p>P17 and P18 would facilitate significant levels of growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the character of natural landscapes to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth would be near smaller settlements – although the approach of focussing in already developed areas would help to ensure significant adverse effects are avoided. This could potentially pose a risk to sensitive landscapes such as Snowdonia National Park, Clwydian Range AONB or the Anglesey AONB that extends along Anglesey’s coastline. This policy has the potential to deliver accessible and inclusive townscapes, the benefits of this would however be dependent on implementation.</p> <p>P19 and its alternatives would help to protect greenfield land from development, which would be expected to make a positive contribution towards protecting rural landscapes. The policy would retain tranquil areas and has the potential to achieve both physical and mental health and well-being benefits.</p> <p>P20, P21 and P22 would facilitate new development in relatively rural locations and could be expected to have minor adverse effects on local landscape character. Their reasonable alternatives would also be likely to result in this direct effect.</p> <p>The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>							
14	To create opportunities for		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	The opportunity and benefits of heritage

Policy Grouping 9									
ISA Objective	Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
the protection, conservation and enhancement of the historic environment, historic assets and their settings		P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	led regeneration could be recognised in the supporting text.
		P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
		P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
		P18R2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
		P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
		P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
		P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
		P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
		P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
		P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
		P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
		P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
		P22RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
				Nat	T	L	0	0	+	
		<p>P17 and P18 would facilitate significant levels of growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the historic character of areas throughout the region, as well as on the setting of sensitive heritage assets to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth would be near smaller settlements – although the approach of focussing in already developed areas would help to ensure significant adverse effects are avoided. P17, P18, P19, P20, P21 and P22 have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text.</p> <p>P19 and its alternatives would help to protect greenfield land from development, which would be expected to make a positive contribution towards protecting the character of historic areas and setting of assets as well as historic landscapes.</p> <p>P20, P21 and P22 would facilitate new development in relatively rural locations and could be expected to have minor adverse effects on the setting of sensitive heritage assets. Their reasonable alternatives would also be likely to result in this direct effect.</p> <p>The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>								
15	To create the opportunities for the protection and promotion of Welsh culture		P17	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.
			P17RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P18	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P19	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	<p>Development In the north-west of Wales would be likely to attract more people to the region. This is unlikely to benefit Welsh culture greatly, although it could enhance access to local Welsh cultural features and activities, but it could potentially pose a risk to Welsh culture as a result of dilution.</p> <p>P17, P18, P19, P20, P21 and P22 have the potential to increase access to cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text.</p> <p>P22 could provide tourists from further afield, such as Europe, with greater access to areas in North Wales, better enabling the region to take advantage of the Welsh culture on offer here. P22RA1 would have the same effect but to a lesser magnitude. P19 could help to protect and enhance important historic landscapes or regions that facilitate traditional Welsh cultural activities.</p> <p>The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>
			P20	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P21	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
16	To create opportunities for the conservation and		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	Where policies support focus on regional level growth, the policies could
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>						Recommendations
enhancement of biodiversity and geodiversity			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	encourage collaboration of the regional planning with NRW to maximise opportunities for protecting and enhancing biodiversity and SMNR principles.	
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -		
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -		
			P18RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	Where transport links are invested in and strengthened through P21, careful consideration to the impacts of these links on the coherency of the local ecological network should be provided for and transport links that are barriers to the free movement of wildlife in countryside areas should be avoided or mitigated.	
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++		
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++		
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
Policies P17, P18, P20, P21 and P22 would facilitate large quantities of new development that pose a risk to											

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects <sup>12</sup>						Recommendations
				<p>areas of high biodiversity value and sensitive biodiversity designations. This could include both marine, coastal and terrestrial designations such as SACs and SPAs associated with the River Dee and Estuary, Snowdonia, or Anglesey coastline. It is likely that many adverse effects on these sensitive and internationally important designations would be cumulative effects caused by numerous developments in-combination. The power station at Anglesey and potential dredging at Holyhead are particular threats to sensitive coastal and marine species. Reasonable alternatives for each of these policies would be likely to have the same effect.</p> <p>P19 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P19RA1 and P19RA2 by not enabled local authorities to determine which land to designate for this purpose.</p> <p>The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p> <p>It should be noted that the HRA of the draft NDF has ruled out any LSEs on any European sites as a result of the NDF. The ISA has subsequently identified minor, discernible and insignificant effects on biodiversity.</p>						
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	It is recommended that development supported through these policies is encouraged or required to minimise uses of non-renewable resources and to minimise the generation of waste sent to landfill.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	



Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects <sup>12</sup>					Recommendations
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			<p>Policies P17, P18, P20, P21 and P22 would facilitate large quantities of new development that would be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have the same effect, although focusing on existing developed areas could help to increase opportunities for developing on brownfield land.</p> <p>P19 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P19RA1 and P19RA2 by not enabled local authorities to determine which land to designate for this purpose.</p> <p>The do nothing approaches (P18RA1, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.</p>							

Table B-47: Policies and reasonable alternatives in Policy Grouping 10

Policy Grouping 10	
<b>P23 – Swansea Bay and Llanelli</b>	Swansea Bay and Llanelli will be the main focus for regional scale growth and investment. Regional and local development plans should recognise Swansea Bay and Llanelli as the focus for strategic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from their strategic regional role. The Welsh Government will promote Swansea Bay and Llanelli's strategic role and ensure key investment decisions support it and the wider region.
<b>P23RA1 – Name alternative growth focus</b>	This option would set an alternative focus for growth within the region.
<b>P23RA2 – Do Nothing</b>	Do not have a policy.
<b>P24 – Regional Centres</b>	The towns of Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four Haven Towns will be the focus for managed growth, reflecting their important sub-regional functions. Strategic and Local Development Plans should recognise the roles of these settlements as being a focus for housing, employment and key services within their wider areas and consider how they continue as a focal point for sub-regional growth
<b>P24RA1 – Do Nothing</b>	Do not have a policy.
<b>P25 – Haven Waterway</b>	The Welsh Government supports continued operation and future development at Haven Waterway. Strategic and Local Development Plans should support its growth and seek to maximise the benefits it provides to the region and Wales. The Welsh Government will work with operators, local authorities and investors to support and facilitate appropriate new development.
<b>P25RA1 – Facilitate Port development elsewhere</b>	This option would support the growth of ports elsewhere in Wales.
<b>P25RA2 – Do Nothing</b>	Do not have a policy.
<b>P26 – Swansea Bay Metro</b>	The Welsh Government supports the development of the Swansea Bay Metro and will work with agencies to enable its delivery. Strategic and Local Development Plans should support the scheme and plan growth to maximise the potential opportunities arising from better regional connectivity.
<b>P26RA1 – Focus on working with existing infrastructure</b>	This option would only focus on existing infrastructure to maximise better regional connectivity.
<b>P26RA2 – Do Nothing</b>	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement,	

consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.

Table B-48: Appraisal of Policy Grouping 10

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P26	Scale: Reg	T/P: P	Cert: M	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: M	ST 0	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	

<sup>13</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		<p>P23 and P24, focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities to support this growth and increased connectivity for all. Such an approach could result in benefits in terms of enabling children and young people to access education services within these areas, leading to improvements in educational attainment.</p> <p>P25 The investment into the port has the potential to increase skills and training for all in this area to support the growth of the port. Such development could provide opportunities for young people in terms of developing their skills through employment or apprenticeships, leading to resulting improvements in educational attainment.</p> <p>P26 The policy would improve connections and deliver inclusive access for all to education facilities.</p> <p>Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.</p>								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Supporting text should clarify the definition of connectivity infrastructure.  Policy P23 could be strengthened to include facilities and services.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P26	Scale: Reg	T/P: P	Cert: M	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: M	ST 0	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		<p>P23 and P24 - The focus of growth for the region would bring many benefits for all members of society including the reduction in inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area for all. Such an approach could result in benefits in terms of increasing access services, leading to improvements in health and well-being and reducing inequalities for all. This policy could be strengthened to include facilities and services.</p> <p>P25 The investment in the port would bring many benefits for all members of society including reducing inequality and poverty through economic growth and employment and has the potential to support healthy lifestyle choices through well connected places, this will depend on implementation. Concentrating development in areas that reduces pressure to develop in rural areas.</p> <p>P26 The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities for healthier lifestyle choices including access to the natural environment, jobs and facilities which will have physical and mental health and well-being benefits for all. This could also lead to better access for children and young people to services, which would facilitate improvements in their health and well-being. Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.</p>								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P26RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10									
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>					Recommendations
			P26RA2	Reg	T	L	+	++	++
				Scale:	T/P:	Cert:	ST	MT	LT
				Reg	T	M	+	+	+
<p>P23 and P24 would make a major contribution towards increasing employment opportunities for all working ages and economic inclusion in the most populous and economically important areas of west- and mid- Wales. Alternatives to this would bring economic benefits but potentially to a lesser extent and with less certainty. The do-nothing scenario would prevent these benefits from being realised and employment growth, economic inclusion and impacts on deprivation would be likely to conform with baseline trends. Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. This Policy will support the development of the most urban parts of Mid and West Wales as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of enabling young people in particular to access employment opportunities. P23RA1 Increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P23RA2, there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P10.</p> <p>Policy P24 includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. This Policy will support the development of certain settlements in Mid and West Wales as a focus for managed growth; linking services within these areas including housing and employment. Such an approach could result in benefits in terms of enabling young people in particular access employment opportunities.</p> <p>The do nothing alternative would conform with baseline trends.</p> <p>P25 would help to ensure the Haven Waterway continues to develop and attract investment and this would be likely to contribute to improving economic inclusion and reducing deprivation. This growth would in turn provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas creating opportunities for an increase in employment across the region and promoting economic inclusion. Development at the Haven Waterway could facilitate access to employment for some young people in particular at this strategically important location. The area is a nationally important employment region that offers a diverse range of employment opportunities and skills learning whilst supporting existing skills in the area being already focussed around the port. The investment at the port would bring many benefits for all members of society including reducing inequality and poverty through employment. An alternative of focussing on a different port would be likely to bring similar benefits but of a lower magnitude. There is uncertainty behind this as it is unclear if the different port would be in this region or elsewhere. The do-nothing scenario would conform with baseline trends.</p>									

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		Investing in the Swansea Metro, as per P26, would help to enhance regional connectivity and to promote greater economic inclusivity, particularly for the more employment deprived communities around Swansea. This is highly likely to lead to better access for children and young people to services, possibly including to potential employment opportunities. Focusing on existing infrastructure would have similar effects but to a lesser magnitude. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and an increase in employment across the country and promote economic inclusion. Policy P26 would increase opportunities to access employment through accessible and inclusive connections. Any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language. P26RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on the existing infrastructure will not benefit rural areas in the same way the Swansea Metro could providing limited public transport provision to rural areas. The do-nothing scenario would be likely to conform with the baseline.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 10				
ISA Objective	Future Baseline	Policy/option	Summary of Effects <sup>13</sup>	Recommendations
			<p>P23 and P24 would make a major contribution towards increasing economic development and diversification in the most populous and economically important areas of west- and mid- Wales. Alternatives to this would bring economic benefits but to a less extent. Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. P23RA1, increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P23RA2.there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P23.</p> <p>P24 this policy includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. P24RA1 a dispersed approach at this scale would mean fewer opportunities to develop or maintain important centres for jobs, culture and social activities.</p> <p>Policies P23, P24, P25 and P26 could provide opportunities for the third sector to support the growth and benefit from improved connections.</p> <p>The do-nothing scenario would prevent these benefits from being realised and employment growth would conform with baseline trends.</p> <p>P25 would help to ensure the Haven Waterway continues to develop and attract investment. The area is a nationally important economic region that hosts a diverse range of competitive businesses. P25 would help to ensure businesses here can continue to successfully compete and diversify. An alternative of focussing on a different port would be likely to bring similar benefits but of a lower magnitude. This policy would help to provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas to create opportunities for sustainable economic growth, diversity and competitiveness an increase in employment across the country and promote economic inclusion. There is uncertainty here as it is unclear if the different port would be in the same region or elsewhere. The do-nothing scenario would conform with baseline trends.</p> <p>Investing in the Swansea Metro, as per P26, would help businesses in the region to be better connected and more able to be competitive. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion.</p> <p>P26. Following on from P23, any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language P26RA1 a failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on existing infrastructure would have similar effects as improved infrastructure is a key element for attracting new investment, but potentially to a lesser magnitude than P26. The do-nothing scenario would be likely to conform with the baseline.</p>	



Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
5	To contribute towards the future well-being of the Welsh language		P23	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P25	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
<p>P23 Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities.</p> <p>P23RA1: Increased development opportunities across mid and south west Wales could support communities with high number and proportion of Welsh speakers, though detailed distribution details would be set in regional development plans. P23RA2: There would be less potential to develop a critical mass of Welsh speaking communities if the strategy focussed on less populated areas, especially those away from the heartland areas in the Neath and Swansea valleys. The do-nothing alternative approaches would be likely to conform with baseline trends.</p> <p>P24. This policy includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect.</p> <p>P25: Very little link between the economic prospects of the Haven waterway and the well-being of the Welsh language. P26: Following on from P23, any development to improve connectivity in Swansea Bay area could</p>										

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		have low level benefit for the well-being of the Welsh language. P26RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P23	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	These policies, or their supporting text, could potentially seek to encourage a greater uptake of sustainable transport modes such as by seeking to focus new investment on railway or bus routes. Policies could also encourage the use of low-carbon materials for construction and to use renewable energy.  Should an alternative port be focussed on through P25, the Government could seek to ensure that energy generation here is equally focussed on renewable sources of energy.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P23 and P24 and their alternatives would facilitate significant new development that increase GHG emissions. Under P23 and P24 this development would be in more sustainable locations that enable greater rates of efficient and low-emission movements for local people than the do-nothing scenarios, which would conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P25 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that consumes energy and results in GHG emissions. However, the area is a nationally important region for energy generation, including tidal and wind. Further development here would be expected to help boost the local supply of renewable energy. An alternative of focussing on a different port would be likely to also result in extra GHG emissions whilst it is uncertain if it would lead to additional							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		renewable energy generation. The do-nothing scenario would conform with baseline trends. P26 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards falling GHG emissions. The alternatives of focussing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.								
7	To contribute to the reduction and management of flood risk		P23	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	Policies could specifically refer to the need to direct development away from land at risk of flooding sequentially, particularly land at a degree of flood risk with which the development type is incompatible in line with Welsh Government flood risk management policy.
			P23RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P24	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P25	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P26	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			There are areas of flood risk, including Flood Zones 2 and 3, in the Swansea Bay and Llanelli region as well as Haven Waterway. It is unclear where the alternative locations for focus would be in the alternatives to P23 and P25. Development here could potentially situate new residents or businesses on land at risk of flooding. Focusing on existing towns and settlements through P24 and its alternative could help to increase the number of people and businesses benefitting from existing flood defence schemes.							
8	To create opportunities to encourage the		P23	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	No recommendations.
			P23RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
protection and improvement of air quality				Nat	T	L	-	-	-	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
<p>P23, P24 and their alternatives would facilitate significant new development that exacerbates air pollution, they may be opportunities to improve air quality through development but the benefits would be dependent on their implementation. Under P23 this development would be in more sustainable locations that enable greater rates of efficient and low-emission movements for local people than the do-nothing scenario, which would conform with baseline trends. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality.</p> <p>P25 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that causes air pollution. However, the area is a nationally important region for energy generation, including tidal and wind. Further investment here would be expected to help boost the local supply of low-emission energy. An alternative of focussing on a different port would be likely to also result in extra air pollution whilst it is uncertain if it would lead to additional low-emission energy generation. The do-nothing scenario would conform with baseline trends.</p> <p>P26 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards improving air quality. The alternatives of focussing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.</p>										

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P23	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	Appropriate sewage capacity of development should be ensured prior to development in coastal areas.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P24	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			Development at Swansea Bay, Haven Waterway and Aberystwyth would pose a risk to the quality of coastal waters. These waters are typically Natura 2000 designations and so are particularly sensitive to quality changes. It is unclear what the sewage capacity is in these regions. P23, P24, P26 and their alternatives would be unlikely to have a discernible impact on water quality and resources. Further investment and development at the Haven Waterway through P25 could pose a risk to the quality of water here due to an increase in movements of polluting ships on the water as well as surface water runoff picking up pollutants or contaminants, including during construction and operation of development. The alternative of focussing on a different port would, uncertainly, be likely to have a similar effect. The do-nothing scenario would conform with baseline trends.							
10	To create opportunities for the improved		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policies P23 and P24 could be strengthened to
			P23RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
connectivity of communities and sustainable access to basic goods, services and amenities for all groups				Reg	T	H	+	+	+	include reference to connections to facilities and services. Policy P25 could be strengthened to include reference to inclusive infrastructure and connections.
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			Policy P23 and P24: The policies look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. P25: The policy has the potential to improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring for all. Including young people at this strategically important location It would reduce development pressure on rural areas. These benefits would be dependent on the implementation. P26: The policy looks to increase connectivity this will increase connectivity in the region and increase access to facilities and services for all to enable them to have better opportunities which arise from better regional and provides opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.							
11	To create the		P23	Scale:	T/P:	Cert:	ST	MT	LT	Policies P23 and

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
opportunities within which an improvement in social cohesion and equality can be achieved				Reg	T	H	+	+	++	P24 could be strengthened to include reference to connections to facilities and services. Policy P26 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.
			P23RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			Policy P23 and P24: through the growth and increasing access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment. Such an approach could result in benefits in terms of improving access to services and therefore creating opportunities for improvements to social cohesion and equality for children and young people. The policy could be strengthened to include reference to connections to facilities and services. P25: The investment and growth of the port would bring with it health and social benefits for the surround area and potentially the region. P26: The investment in connections across the region would improve inclusive access to facilities and services for all including those in rural communities, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. This could lead to notable improvements in access for children and young people to a wider range of services and other communities which were not as easy to access before. This should create opportunities for improvements to social cohesion and equality for children and young people in the area							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Does not reflect the proposed approach to regional planning. The do-nothing approaches would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P24	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P25	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P25RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P23 and P24 would help to ensure significant new residential development is situated near the most populous regions in west and mid Wales. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. Alternatives to this would also contribute towards satisfying housing needs but in less populated areas in locations more isolated from key services. It is uncertain how much new housing would take place in the region and where it would do so under the do-nothing scenario, but with less impetus than new development. The Haven Waterway area is the location of a large number of homes and residential areas. Further investment and development here could facilitate the provision of a significant quantity of new homes and open up new land for potential residential development. provides supply chains and infrastructure to rural areas							



Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		concentrating development in the correct location without increasing pressure to develop in rural areas providing opportunities for the provision of good quality, safe, affordable housing that meets identified needs The alternative to P25 of focussing on a different port could provide similar benefits, but unlikely of the same magnitude and it is uncertain which alternative port would be the focus of this or where in Wales it would be. It is uncertain how housing provision in the region would progress over time. P26 and its alternatives would be unlikely to have a discernible effect on the provision of housing.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Where revising settlement boundaries is permitted, careful consideration to sensitive landscapes and seascapes or biodiversity assets or designations would be required to avoid adverse effects.
			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P23, P24 and their alternatives would result in significant quantities of new development that poses a risk to landscape and seascape character. There could potentially be a risk to National Parks, such as the Pembrokeshire Coast or the Brecon Beacons, as well as the Gower AONB. The do-nothing scenario would conform with trends. P25 would lead to new investment and development at the Haven Waterway region, which could result in adverse impacts on the local character of landscapes and seascapes. However, it would help to ensure that such development is in proximity to existing similar land-uses. Focusing on an alternative port would have							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		similar effects, but with a higher degree of uncertainty. The do-nothing scenario would ultimately conform with baseline trends. The Swansea Metro development, invested in through P26, could alter the character of natural landscapes in some locations. The alternative of focussing on existing infrastructure would be likely to avoid this but would instead mostly conform with baseline trends – as would the do-nothing scenario. P23, P24, P25 and P26 have the potential to deliver accessible and inclusive townscapes.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Where development in regional or local plans is designed to meet the needs of rural communities whilst responding to 'local circumstances', these 'local circumstances' should include the local range of historic assets and areas to ensure they are appropriately accounted for when determining the quantity of growth the area can support.  P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text
			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P23, P24 and their alternatives would result in significant quantities of new development that pose a risk to the setting of heritage assets and historic areas in large settlements of the region, such as the extensive range of Scheduled Ancient Monuments and Listed Buildings in the region. The do-nothing scenario would conform with trends. The policies in this section have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P25 would lead to new investment and development at the Haven Waterway region, which could potentially							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
		alter the setting of local heritage assets or historic areas. Given that such development would be in proximity to existing similar land-uses, these impacts would be minor. Conversely, such development may also be an opportunity to redevelop brownfield sites or enhance their impact on the setting of nearby assets. Focusing on an alternative port could have similar effects, but this is uncertain and depends on the distribution of heritage assets. The do-nothing scenario would ultimately conform with baseline trends. P26 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
15	To create the opportunities for the protection and promotion of Welsh culture		P23	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text
			P23RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P23RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P24	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P24RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
	P23, P24, P25 and their alternatives would be unlikely to have a discernible impact on Welsh culture. By enhancing regional connectivity, P26 could help the region to take advantage of its local culture and attract visitors from further afield, including rural areas. The alternative of focussing on existing infrastructure would have similar benefits but of a lesser magnitude. The do-nothing scenario would be likely to conform with the baseline.									
16	To create opportunities for		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Development near coastal and marine

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>						Recommendations
	the conservation and enhancement of biodiversity and geodiversity		P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	areas should be required to incorporate appropriate avoidance and mitigation measures to prevent adverse impacts on sensitive habitats, species and designations. The Government should seek to only support development here that would not pose a significant risk to Natura 2000 sites. Flexible boundaries could potentially pose a risk to biodiversity in rural areas and so would require careful management. Development in urban locations should incorporate GI comprised of a diverse range of nature species to help enhance local biodiversity.
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
		P23, P24 and their alternatives would result in significant quantities of new development that pose a risk to biodiversity. The do-nothing scenario would conform with trends. New development and investment at Waterway Haven could potentially pose a risk to Pembrokeshire Marine Special Protection Area due to impacts on water quality. Development at other ports, as per the alternative to P25, could also impact on a sensitive biodiversity designation but this is uncertain. The do-nothing alternative would be likely to conform with baseline trends. New development associated with the Swansea Metro, invested in through P26, could potentially have a minor adverse impact on areas of sensitive biodiversity value as well as regional ecological connectivity. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Policies could encourage development to
			P23RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>13</sup>					Recommendations	
management and use of natural resources, taking into account their benefits and intrinsic value				Reg	T	L	-	-	-	incorporate low-carbon techniques and materials during construction as well as to use renewable energy.
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25	Scale: Reg	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P25RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
<p>P23 and P24 would facilitate large quantities of new development that would be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have the same effect. The do-nothing scenarios would conform with trends.</p> <p>P25 would lead to new development at Waterway Haven, at which there is considered to be good opportunities for development on brownfield land. However, new development would require the consumption of natural resources and would be likely to increase local generation of waste. Focussing on a different port would be likely to have similarly mixed effects, but with less certainty. The do-nothing scenario would be likely to conform with trends.</p> <p>New development associated with the Swansea Metro, invested in through P26, would require the consumption of resources and would generate waste, particularly during construction. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends.</p>										

*Table B-49: Policies and reasonable alternatives in Policy Grouping 11*

## Policy Grouping 11

<b>P27 – Cardiff</b>	Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night-time economy and finance. The Welsh Government supports regional development which addresses the opportunities and challenges arising from Cardiff's geographic location and its functions as a Capital City. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage.
<b>P27RA1</b>	This option focusses growth within Cardiff.
<b>P27RA2 – Do Nothing</b>	Do not have a policy.
<b>P28 – Newport</b>	The Welsh Government supports Newport as the focus for regional growth and investment and wishes to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the City. Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. Development in the wider region should be carefully managed to support Newport's growth and, provide a focus for regional planning. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.
<b>P28RA1 – Name alternative growth focus</b>	This option would set an alternative focus for growth within the region.
<b>P28RA2 – Do Nothing</b>	Do not have a policy.
<b>P29 – The Heads of the Valleys</b>	The Welsh Government supports co-ordinated regeneration and investment in the Heads of the Valleys area to increase prosperity and address social inequalities. The Welsh Government will work with local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing issues in the Heads of the Valleys area. Strategic and Local Development Plans across the full region must identify how they can support, both directly and through a joined-up regional approach, the Heads of the Valleys area to deliver greater prosperity, support regeneration and improve well-being.
<b>P29RA1 – Name alternative growth focus</b>	This option would set an alternative focus for growth within the region.
<b>P29RA2 – Do Nothing</b>	Do not have a policy.
<b>P30 – Green Belts in South East Wales</b>	The Welsh Government requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region. Regional plans should consider the relationship of any new green belts with the green belt around Bristol.
<b>P30RA1- Directly identify the green belt</b>	This option would directly allocate a green belt within the North Wales region.
<b>P30RA2 – Promote green wedge or other policy interventions</b>	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in South East Wales.
<b>P30RA3 – Do Nothing</b>	Do not have a policy.

## Policy Grouping 11

<b>P31 – Growth in sustainable transit orientated settlements</b>	Development and growth in the region should be focussed in places with good active travel and public transport connectivity. Land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development. Strategic and Local Development Plans should plan growth to maximise the potential opportunities arising from better regional connectivity. The Welsh Government supports the development of the South Wales Metro and will work with agencies to enable its delivery.
<b>P31RA1 – Focus on working with existing infrastructure</b>	This option would only focus on existing infrastructure to maximise better regional connectivity.
<b>P31RA2 – Do Nothing</b>	Do not have a policy.
<b>P32 – Cardiff Airport</b>	The Welsh Government supports the growth and development of Cardiff Airport. Proposals to expand the capacity of the airport to provide new and improved airport facilities and passenger services; and to improve transport links to the airport are supported. Improvements to accessibility are supported and should prioritise a modal shift from the private car to sustainable transport modes including public transport. Development of land adjacent to Cardiff Airport and which is part of the Enterprise Zone is supported where it supports the functions of the airport. New development around the airport should be carefully managed to ensure that future expansion and change at the airport is not constrained.
<b>P32RA1 - Restrict growth</b>	This option would restrict the growth of Cardiff airport.
<b>P32RA2 – Do Nothing</b>	Do not have a policy
<b>P33 – Valleys Regional Park</b>	The Welsh Government supports the establishment of the Valleys Regional Park. Strategic and Local Development Plans should embed its principles into their planning frameworks. The Welsh Government will work with local authorities, the third sector and key partners to support the Valleys Regional Park and maximise opportunities for new development.
<b>P33RA1- Focus regeneration on other areas of Wales</b>	This option would set an alternative focus for regeneration within the region
<b>P33RA2 – Do Nothing</b>	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	



Table B-50: Appraisal of Policy Grouping 11

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects <sup>14</sup>						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	P31 could be strengthened to include access by a range of sustainable transport modes not just public transport
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P27RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT 0	
			P31	Scale:	T/P:	Cert:	ST	MT	LT	

<sup>14</sup> To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

			<b>Reg</b>	<b>T</b>	<b>H</b>	<b>+</b>	<b>+</b>	<b>+</b>
		P31RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
		P31RA2	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>
		P32	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
		P32RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
		P32RA2	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>
		P33	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
		P33RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
		P33RA2	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>
		<p>P27 - Retaining and extending the role of Cardiff as the primary national centre for culture, sport, leisure, media, the night-time economy and finance would be expected to help ensure that education facilities in the city, including primary and secondary schooling as well as universities, can continue to offer high-quality education opportunities in accessible locations for the large population in the immediate area. The alternative to this, P27RA1, would lead to a more focussed growth in Cardiff, which could help to ensure that new educational facilities and capacity are delivered sooner. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends.</p> <p>P28, focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities to support this growth and increased connectivity. This could result in benefits in terms of enabling children and young people to access education services within this area, leading to improvements in educational attainment.</p> <p>P31 The policy would improve connections and deliver inclusive access for all to education facilities and could facilitate improvements in educational attainment for the local area.</p> <p>P32 The enterprise zone currently contains proposals for an education campus to increase skills and training which would have a positive benefit it is considered this policy would support improvements in educational attainment for young people. This alongside improving transport connections to this area could improve access for all. The policy could be strengthened to include access by a range of sustainable transport modes not just public transport. P32RA1 would restrict growth of the airport and so would be unlikely to support the delivery of new educational facilities in the airport campus.</p> <p>P29 The policy has the potential to increase access to skills and education, this could result in benefits in terms of improving the social conditions in the Area. This could enable children and young people to better</p>						

		access education services within this Area, leading to improvements in educational attainment. Achieving these benefits would depend on the detail at the lower tier. P33 The delivery of the Valleys Regional Park prospectus recognises the need to develop skills to deliver the project, this will therefore have a positive impact on access to skills and education. Supporting this could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide education opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in educational attainment. Each alternative to policies P28, P31, P29 and P33 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	P28 could be strengthened to include facilities and services. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. P31 could be strengthened to include access by a range of sustainable transport modes not just public transport.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT +	LT ++	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT ++	LT ++	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	

P31RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +
P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +
P32	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-
P32RA1	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-
P32RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +
P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++
P33RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +
P33RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +

The focus on growth in Cardiff through P27 could help to combat inequality and poverty by encouraging greater rates of employment. People in Cardiff have excellent access to a range of necessary health services and facilities – P27 would help to see this benefit continue. The alternative, P27RA1, would focus new growth in Cardiff and this could help to ensure new health services and increased capacity are provided for in Cardiff sooner. It is uncertain if delivering more growth in Cardiff could lead to some unintended health impacts as a result of a denser population, greater traffic and more limited access to natural habitats for people. The do-nothing alternative would be likely to conform with baseline trends.

P28 The focus of growth for the region would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. This policy could be strengthened to include facilities and services. This Policy will support the development of Newport as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of enabling children and young people to access new services within this area, contributing to an improvement in health and well-being.

P28RA1 – could be less impact to P28 depending on implementation, wouldn't support the commitment to the development of Newport. The outcomes of locating development in a named alternative growth focus for a particular area are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from the provision of new services which contribute to improvements in health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned go forward.

P28RA2 - Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends.

	<p>P30 – The provision of a green belt retain open spaces around identified urban areas which either currently or potentially would have access for recreation would continue to provide physical and mental health benefits. A policy on green belts in south east Wales will ensure key services and infrastructure support existing built up areas and will be taken on a regional basis ensuring they are located in the most accessible and sustainable locations supporting actions to address inequality and deprivation and thus contributing in a reduction in health inequality in rural areas. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits green belts would bring for the area.</p> <p>P30RA1 – Same as P30 benefits would be stronger in the identified area. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits green belts would bring for the area.</p> <p>P30RA2 - Same as P30 depending on implementation. Other green belt related policy interventions such as green wedges should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits such interventions would bring for the area.</p> <p>P30RA3 – potential positive and negative effects depending on type and scale of growth in the area.</p> <p>P31 - The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities which will have physical and mental health and well-being benefits. The south Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity including contributing towards a reduction in health inequalities across Wales. Supporting the development of the South Wales Metro should ensure better connectivity across the South Wales Region. This could lead to better access for children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities.</p> <p>P31 RA1 - Focusing on the existing infrastructure will not benefit rural areas in the same way the south Wales Metro could providing limited public transport provision to rural areas. A focus on developing existing infrastructure should ensure better connectivity across the South Wales Region. This could lead to better access for children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities.</p> <p>P32 The policy looks to improve connectivity to the area but this does not currently include active travel options. The policy could be strengthened to include access by a range of sustainable transport modes including active travel and not just public transport. This would increase healthier lifestyle choices. The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty. Increasing flights at the airport would have a detrimental impact on air quality.</p> <p>P32RA1 A restricted growth policy would undermine the Welsh Government's policy aspiration for</p>	
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	<p>developing a nationally strategic transport hub and will not greatly assist to contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities.</p> <p>P29 – The policy looks to increase prosperity and reduce inequalities this will have a significant positive impact on the health of the communities within this area. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The natural environment bring many health benefits both physically and mentally. This policy will contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales by supporting coordinated regeneration and investment in the area to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the Heads of the Valleys Area could result in benefits in terms of improving the social conditions in the Area, leading to improvements in health and well-being for its children and young people.</p> <p>P29RA1 – could be less impact to P29 depending on implementation, wouldn't support the commitment to the development of the northern part of the region. An alternative growth focus would have a similar affect to a do nothing policy; prosperity in the area will stagnate and the social inequalities which are currently in the area will persist, having a detrimental effect on rural areas and wont contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. The outcomes of locating development in a named alternative growth focus for a particular area are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from improvements to their health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned go forward.</p> <p>P29RA2- Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends.</p> <p>P33 – The Park would bring opportunities for recreation, increasing access to natural environment, improving well-being embracing cultural identity which will bring with them many health benefits and providing more opportunities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. Supporting the Government's ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in their health and well-being.</p> <p>P33RA1 – could be less impact to P17 depending on implementation, wouldn't support the commitment to the development of the Valleys Regional Park. The outcomes of focusing regeneration on other areas of Wales are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from improvements to their health and well-being. Further, it is unclear if this</p>	
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		approach would result in benefits from the status quo if opportunities remained as planned go forward. P33RA2 - Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. A do-nothing policy may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration while contributing to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. Do nothing approaches of P31RA2 and P32RA2 would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST ++	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P28RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P29RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P31RA2	Scale:	T/P:	Cert:	ST	MT	LT	

		<b>Reg</b>	<b>T</b>	<b>L</b>	<b>0</b>	<b>0</b>	<b>+</b>
	P32	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Nat</b>	<b>T</b>	<b>H</b>	<b>+</b>	<b>++</b>	<b>++</b>
	P32RA1	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Nat</b>	<b>T</b>	<b>M</b>	<b>0</b>	<b>0</b>	<b>+</b>
	P32RA2	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Nat</b>	<b>T</b>	<b>M</b>	<b>0</b>	<b>+</b>	<b>+</b>
	P33	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Reg</b>	<b>T</b>	<b>H</b>	<b>+</b>	<b>+</b>	<b>++</b>
	P33RA1	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Reg</b>	<b>T</b>	<b>M</b>	<b>+</b>	<b>+</b>	<b>+</b>
	P33RA2	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>
		<b>Reg</b>	<b>T</b>	<b>L</b>	<b>0</b>	<b>0</b>	<b>+</b>

The retention of Cardiff's existing role through P27 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the employment market in Cardiff. Jobs here are highly accessible for people across the city, as well as those in its immediate region. P27RA1 would focus new growth in Cardiff, and so would be likely to deliver similar economic and employment benefits as P27 but potentially of a higher-magnitude and sooner. P27RA1 would potentially lead to new economic development taking place in Cardiff as opposed to alternative locations in the region, which could potentially limit economic growth in those areas. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends.

P28 would encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance for employment, this policy would be likely to lead to major positive impacts on this ISA Objective over time and to significantly enhance economic inclusion for local people, including those in the most deprived areas and children and young people. The growth and connections can provide benefits for all members of society and in rural areas. Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport.

P30 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective.

P31 would see the Government help to ensure that new development takes place in proximity to sustainable transport modes. This would help to enhance regional connectivity and economic inclusion for all working age ranges. This policy would increase opportunities to access employment through accessible and



	<p>inclusive connections. any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education</p> <p>P31RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. A focus on existing infrastructure (P31RA1) would have similar direct impacts on this ISA Objective but to a lower magnitude.</p> <p>P32 enforces the Government's commitment to the expansion of Cardiff Airport in order to provide new airport and passenger facilities as well as transport connectivity. Wales' airports are gateways into and out of Wales for people and trade and help to establish Wales' position as an attractive and competitive place to invest, work and live. P27 would therefore be likely to help ensure that businesses and economies in Wales can compete and succeed in national and international markets, therefore better enabling them to offer more stable and high-quality employment opportunities to people in Wales. The expansion and development of the airport would also help to enhance the range and quality of employment opportunities on offer at the airport and in its vicinity, which could include employment for young people (for example, through apprenticeships). The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty.</p> <p>P32RA1 would see the expansion of Cardiff Airport being restricted, and so future economic development and jobs growth associated with its expansion would also be restricted.</p> <p>P32RA2 The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable.</p> <p>P29 would encourage greater prosperity in the Heads of the Valleys area. The proposed investment would be likely to help address unemployment issues in a region of relatively high levels of deprivation. This policy looks to reduce inequalities and increase prosperity for all members of the community. A focus on the Heads of the Valleys could bring renewal and jobs in an area in need of these opportunities. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. P29RA1, which would focus on an unconfirmed alternative location, would be likely to lead to similar benefits for this ISA Objective but to a lesser magnitude with greater uncertainty. Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services and could have a negative impact on the Welsh language.</p> <p>P33 and its alternatives are focussed on a Valleys Regional Park. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help create opportunities for an increase in employment across the country and promote economic inclusion for all. The Valleys Regional Park would be likely to support more empowered communities with greater stewardship over their natural assets and subsequent employment opportunities. The alternative approach of focussing on a different area of Wales (P33RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location.</p> <p>Policy P30 is focussed on green belts in south Wales will ensure key services and infrastructure support</p>	
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		existing built up areas and will be taken on a regional basis ensuring they are located in the most accessible and sustainable locations supporting actions to address inequality and deprivation and thus promote economic inclusion in rural areas. And could provide opportunities for young people within the local area to access associated employment opportunities.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST ++	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P28RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P29RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P31RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
P32	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++				

P32RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +
P32RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +
P33	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++
P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
P33RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +

The retention of Cardiff's role through P27 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the economy in Cardiff. P27RA1 would focus new growth in Cardiff, and so would be likely to deliver similar economic and employment benefits as P27 but potentially of a higher-magnitude and sooner, but potentially in a more focussed location in Cardiff at the expense of a wider area. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends.

P28 would encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance to the region's economy, this policy would be likely to lead to major positive impacts on this ISA Objective over time. Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport.

Policies P28 & P31 could provide opportunities for the third sector to support the growth and benefit from improved connections.

P28RA2 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport. As with P28 effects are unpredictable though likely to be very small, as the region has few, if any, traditional 'welsh speaking communities'

P30 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective.

P31 would see the Government help to ensure the development of South Wales Metro. This would help to enhance business competitiveness. Any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education. The South Wales Metro can provide the basis for connectivity across the region and this include

	<p>the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion.</p> <p>A focus on existing infrastructure (P31RA1) would have similar direct impacts on this ISA Objective but to a lower magnitude. A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown.</p> <p>P32 enforces the Government's commitment to the expansion of Cardiff Airport in order to provide new airport and passenger facilities as well as transport connectivity. Wales' airports are gateways into and out of Wales for people and trade and help to establish Wales' position as an attractive and competitive place to invest, work and live. P32 would therefore be likely to help ensure that businesses and economies in Wales can compete and succeed in national and international markets. The growth of the airport and enterprise zone could deliver opportunities for the third sector to help support this growth. The expansion and development of the airport's Enterprise Zone would also help to enhance innovation and commercial opportunities at the airport and in its vicinity.</p> <p>P32RA1 would see the expansion of Cardiff Airport being restricted, and so future economic development associated with its expansion would also be restricted.</p> <p>The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable</p> <p>P29 would encourage greater prosperity in the Heads of the Valleys area and would have significant positive effects for the third sector which it directly references to support the growth and development in this area. The proposed investment would be likely to help facilitate economic growth. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. will create opportunities for sustainable economic growth, diversity and business competitiveness by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas.</p> <p>P29RA1, which would focus on an unconfirmed alternative location, would be likely to lead to similar benefits for this ISA Objective but to a lesser magnitude with greater uncertainty. Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services</p> <p>P33: A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help create opportunities for sustainable economic growth, diversity and business competitiveness. The Valleys Regional Park would be likely to support more empowered communities with greater stewardship over their natural assets and subsequent economic benefits in the region based around a sustainable industry.</p> <p>The policy would however have significant positive effects for the third sector which it directly references to support the delivery of the Park. The alternative approach of focussing on a different area of Wales</p>	
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		(P33RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location. The do-nothing scenarios would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +/-	LT +/-	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT ?	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P31RA1	Scale: Reg	T/P: T	Cert: H	ST ?	MT ?	LT ?	
			P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P32	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P32RA1	Scale:	T/P:	Cert:	ST	MT	LT	

				n/a	n/a	n/a	0	0	0	
			P32RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P33	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P33RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			<p>P27, P27RA1 and P28: Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 as with P28, effects are unpredictable though likely to be very small, as the region has few, if any, traditional 'Welsh speaking communities.' Culture and media play an important role in attracting members of younger age groups to an area, including Welsh speakers to the city and its region.</p> <p>P30, P32 and their alternatives are unlikely to have a discernible impact on this ISA Objective.</p> <p>P31 any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education</p> <p>P31RA1: A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown.</p> <p>P29 A focus on the Heads of the Valleys could bring renewal and jobs in an area in need of these opportunities. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area</p> <p>P30RA1: Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services</p> <p>P33 and P33RA1 It is unclear how the establishment of a park could impact on jobs and on Welsh speaking communities.</p> <p>The do-nothing scenarios would be likely to conform with baseline trends.</p>							
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable		P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	No recommendations.
			P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	
			P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P28RA1	Scale:	T/P:	Cert:	ST	MT	LT	

design		<b>Nat</b>	<b>P</b>	<b>M</b>	<b>-</b>	<b>-</b>	<b>-</b>
	P28RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>+</b>
	P29	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>-</b>	<b>MT</b> <b>-</b>	<b>LT</b> <b>-</b>
	P29RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>-</b>	<b>MT</b> <b>-</b>	<b>LT</b> <b>-</b>
	P29RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>+</b>
	P30	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P30RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P30RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P30RA3	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P31	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>++</b>
	P31RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P31RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P32	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>-</b>	<b>MT</b> <b>--</b>	<b>LT</b> <b>--</b>
	P32RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P32RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>-</b>	<b>LT</b> <b>-</b>
	P33	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P33RA1	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
	P33RA2	<b>Scale:</b> <b>Nat</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>
Policies P27, P28, P29 and their alternatives would be likely to lead to higher levels of economic growth that leads to an increase in energy consumption and GHG emissions. Development focussed in and around Cardiff and Newport would enable relatively low-emission and sustainable transport for businesses and local							

		<p>people due to the existing provision of sustainable transport modes here and the relatively short distances between people, services and areas of employment. Focussing development in more rural locations may require less sustainable lifestyles with higher carbon footprints for new residents.</p> <p>P30, P33 and their alternatives would help to protect areas of natural carbon sink.</p> <p>P31 would help to ensure people in Wales have good access to sustainable transport modes which would support the decarbonisation of transport. The alternative of focussing on existing infrastructure would have a similar effect but to a lesser magnitude (depending on what these other location options would be, which is currently uncertain).</p> <p>The do-nothing scenarios would be likely to conform with baseline trends.</p> <p>P32 would see the expansion of Cardiff Airport and its services being developed. It is expected that this would lead to a net increase in the quantity and regularity of planes flying in and out of Cardiff. Air travel is a significant source of GHG emissions, and the expansion of the airport would discord with Wales' transition to a low-carbon transport sector. It is considered to be likely that over time the increase in air travel would result in a major adverse effect on efforts to reduce Wales' contribution to the causes of climate change. This would be mitigated to a very limited extent by the airport's efforts to encourage higher rates of public transport use for those travelling to and from the airport.</p> <p>P32RA1 would see the expansion of the airport being restricted. This would limit any increases in air travel into and out of Wales and would subsequently help to limit GHG emissions associated with Wales' transport sector. This approach may also enable improvements to alternatives of air travel, such as ports or rail travel, which are lower-emission forms of travel in comparison with air travel. However, restricting growth of the airport could potentially lead to local people travelling across the border into England to access airports further afield for air travel.</p> <p>The do-nothing scenario would neither restrict nor support expansion of Cardiff Airport. It is considered to be likely that air travel at the airport would increase at a slower and steadier rate than under P32.</p>								
7	To contribute to the reduction and management of flood risk		P27	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	Development in areas of flood risk should not only be expected to conform with WG flood risk management policy through careful selection of sites for development and types of development considered to be compatible with these locations, but could also be encouraged to incorporate natural
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P27RA2	Scale: n/a	T/P: n/a	Cert: M	ST 0	MT -	LT -	
			P28	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P28RA2	Scale: n/a	T/P: n/a	Cert: M	ST 0	MT -	LT -	
			P29	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	



	P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	flood risk alleviation design measures such as green infrastructure elements and permeable surfaces, as well as SUDS.
	P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
	P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
	P32	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P32RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P33	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P33RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
	<p>P31 and its alternatives would be expected to result in no discernible impacts on flood risk.</p> <p>P27, P27RA1, P28, P28RA1, P29 and P29RA1 would encourage new development in regions of Wales with a broad extent of Flood Zones 2 and 3. There is a risk that new development could be situated on land at risk of flooding. It is assumed that, in line with Welsh Government policy on flood risk management, that development would not take place in areas of flood risk with which the development type is incompatible. It should also be noted that development in Cardiff and Newport would be likely to benefit from existing flood defence schemes. However, there is a risk that the development and growth in these areas would lead to the loss of greenfields (comprised of infiltrating vegetation and permeable soils that help to reduce flood risk) and could potentially expose businesses or neighbourhoods to flood risk or could alter the extent and distribution of flood risk in the region. Climate change will be likely to exacerbate this issue over the coming</p>							

		years. Policies and alternatives related to the green belt and a new Regional Park (P30 and P33) could help to enhance the local extent of above ground vegetation and GI, which provides a natural flood risk alleviation service. P32 and its alternatives would not be expected to have a discernible impact on this ISA Objective. Whilst there are areas of Flood Zones 2 and 3 north and south of the airport associated with Kenson River as well as the coast, there is considered to be adequate land not at risk of flooding that could accommodate growth and expansion of the airport.																																																																																																											
8	To create opportunities to encourage the protection and improvement of air quality		<table><tr><td>P27</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P28</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P29</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P30</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P30RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P30RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P30RA3</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P31</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST +</td><td>MT +</td><td>LT ++</td></tr><tr><td>P31RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST +</td><td>MT +</td><td>LT +</td></tr></table>	P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P30	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P30RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P30RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P30RA3	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P31	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	There is a potential to strengthen P27, P28 and P29 to focus the connectivity on low carbon options to improve air quality.
P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -																																																																																																							
P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -																																																																																																							
P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +																																																																																																							
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P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +																																																																																																							
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P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +																																																																																																							

			P31RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	<p>Policies P27, P28, P29 and their alternatives would be likely to lead to higher levels of economic growth that may lead to an increase in air pollution due to associated increases in traffic and resources consumption. Development in and around Cardiff and Newport (P27, P27RA1, P28, P28RA1) would enable relatively low-emission and sustainable transport for businesses and local people due to the provision of sustainable transport options here and the proximity of services, people and jobs. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality.</p> <p>P30, P33 and their alternatives would help to protect areas of natural air filtering.</p> <p>P31 would help to enhance access to sustainable transport modes which would support a movement towards low-emission movements and travel for local people. The alternative of focussing on existing infrastructure would have a similar effect but to a lesser magnitude.</p> <p>The do-nothing scenarios would be likely to conform with baseline trends.</p> <p>P32 would see the expansion of Cardiff Airport and its services being expanded and developed. It is expected that this would lead to a major adverse impact on air quality in Wales. Air travel is a significant source of air pollution and the expansion of the airport would discord with Wales' transition towards improved air quality. This would be mitigated to a very limited extent by the airport's efforts to encourage higher rates of public transport use for those travelling to and from the airport.</p> <p>P32RA1 would see the expansion of the airport being restricted. This would limit any increases in air travel into and out of Wales and would subsequently help to limit air pollution associated with Wales' transport sector.</p> <p>The do-nothing scenario would neither restrict nor support expansion of Cardiff Airport. It is considered to be likely that air travel at the airport would increase at a slower and steadier rate than under P32.</p>
			P32	Scale:	T/P:	Cert:	ST -	MT --	LT --	
			P32RA1	Scale:	T/P:	Cert:	ST 0	MT +	LT +	
			P32RA2	Scale:	T/P:	Cert:	ST 0	MT -	LT -	
			P33	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	
			P33RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	
			P33RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	
9	To create opportunities to protect and		P28	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	During the selection of locations for development in Cardiff
			P28RA1	Scale:	T/P:	Cert:	ST	MT	LT	

enhance the quality and quantity of water features and resources			Reg	T	L	-	-	-	and Newport, careful consideration should be giving to the potential impacts on natural waterbodies including the Severn Estuary. Development should be encouraged or required to adopt precautionary measures to minimise the risk of contamination or pollution. Should any natural waters be within or adjacent to sites, development should seek to enhance the quality of this water in order to help meet Water Framework Directive Requirements. New homes and businesses built in these regions should incorporate water efficiency measures to better enable people and businesses to minimise their water consumption. Development should only be permitted where adequate capacity in the local sewerage system is evident.
	P28RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	0	0	-		
	P28	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	0	-	-		
	P28RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	-	-	-		
	P28RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	0	0	-		
	P29	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P29RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P29RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P30	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	+	+	+		
	P30RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	+	+	+		
	P30RA2	Scale:	T/P:	Cert:	ST	MT	LT		
	Reg	T	L	+	+	+			
P30RA3	Scale:	T/P:	Cert:	ST	MT	LT			
	Reg	T	L	0	0	-			
P31	Scale:	T/P:	Cert:	ST	MT	LT			
	n/a	n/a	H	0	0	0			
P31RA1	Scale:	T/P:	Cert:	ST	MT	LT			
	n/a	n/a	H	0	0	0			
P31RA2	Scale:	T/P:	Cert:	ST	MT	LT			
	n/a	n/a	H	0	0	0			
P32	Scale:	T/P:	Cert:	ST	MT	LT			
	Reg	T	L	?	?	?			
P32RA1	Scale:	T/P:	Cert:	ST	MT	LT			
	Reg	T	L	?	?	?			
P32RA2	Scale:	T/P:	Cert:	ST	MT	LT			
	n/a	n/a	H	0	0	0			
P33	Scale:	T/P:	Cert:	ST	MT	LT			
	Reg	T	L	+	+	+			
P33RA1	Scale:	T/P:	Cert:	ST	MT	LT			

				<b>Reg</b>	<b>T</b>	<b>L</b>	<b>+</b>	<b>+</b>	<b>+</b>		
			P33RA2	<b>Scale: Reg</b>	<b>T/P: T</b>	<b>Cert: L</b>	<b>ST 0</b>	<b>MT 0</b>	<b>LT -</b>		
		<p>P27 would see Cardiff retain its current role and so would be likely to conform with baseline trends in the region, with a steady increase in water consumption. P27RA1 would focus new growth in Cardiff and would be likely to lead to an increase in water consumption. It is unclear if focussed growth in Cardiff could potentially risk the sewage system become near- or over-capacity. The do-nothing approach would be likely to conform with baseline trends.</p> <p>P28 would focus new growth in Newport and would be likely to lead to an increase in water consumption. It is unclear if focussed growth in Newport could potentially risk the sewage system become near- or over-capacity. Newport sits on the River Usk and new development could potentially expose the river to an increased risk of water quality impacts, although focussing growth in the urban region of Newport may be an effective means of reducing the quantity of new development in the countryside and in previously undeveloped locations where the potential impacts on natural waterbodies may be greater (the same potential positive impact can be said for P27).</p> <p>P28RA1 would focus growth in an alternative location in the region. This growth would also be likely to increase the consumption of water, although whether the local sewage system could become near- or over-capacity is uncertain and it is also uncertain as to whether the alternative location could be in proximity to natural waters where there is a risk of pollution and contamination. The do-nothing approach would be likely to conform with baseline trends.</p> <p>Development in the Cardiff and Newport regions (P27, P27RA1, P28, P28RA1) could potentially pose a risk to water quality in the Severn Estuary.</p> <p>P29, P31 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.</p> <p>P30 and its alternatives would help to protect green belt land, whilst P33 would encourage the establishing of a new regional park, which could help to protect the quality of natural waterbodies due to the ecosystem services provided by above-ground vegetation and healthy soils.</p> <p>P32 It is uncertain if the growth and development of the airport could pose a risk to the quality of waters along the coast, which is approximately 500m south of the airport. Construction and operation of development could pose a contamination or pollution risk to waters there.</p>									
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P27	<b>Scale: Reg</b>	<b>T/P: T</b>	<b>Cert: H</b>	<b>ST +</b>	<b>MT +</b>	<b>LT ++</b>	P28 could be strengthened to include reference to connections to facilities and services.  P31 -The supporting text to the	
			P27RA1	<b>Scale: Reg</b>	<b>T/P: T</b>	<b>Cert: M</b>	<b>ST +</b>	<b>MT +</b>	<b>LT +</b>		
			P27RA2	<b>Scale: Reg</b>	<b>T/P: T</b>	<b>Cert: M</b>	<b>ST 0</b>	<b>MT 0</b>	<b>LT -</b>		
			P28	<b>Scale: Reg</b>	<b>T/P: T</b>	<b>Cert: H</b>	<b>ST +</b>	<b>MT +</b>	<b>LT ++</b>		
			P28RA1	<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>		

				<b>Reg</b>	<b>T</b>	<b>M</b>	<b>+</b>	<b>+</b>	<b>+</b>	policy recognises the role of the Metro in increasing connections in this area this could be recognised within the policy through a variety of metro and active travel opportunities which would bring about many health benefits.
			P28RA2	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>-</b>	
			P29	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>P</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>++</b>	
			P29RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>	
			P29RA2	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>-</b>	
			P30	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>n/a</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>	
			P30RA1	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>n/a</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>	
			P30RA2	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>n/a</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>	
			P30RA3	<b>Scale:</b> <b>n/a</b>	<b>T/P:</b> <b>n/a</b>	<b>Cert:</b> <b>n/a</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>0</b>	
			P31	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>++</b>	
			P31RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>H</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>	
			P31RA2	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>-</b>	
			P32	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>n/a</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>	
			P32RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>L</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>+</b>	
			P32RA2	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>-</b>	
			P33	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>++</b>	
			P33RA1	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>+</b>	<b>MT</b> <b>+</b>	<b>LT</b> <b>+</b>	
			P33RA2	<b>Scale:</b> <b>Reg</b>	<b>T/P:</b> <b>T</b>	<b>Cert:</b> <b>M</b>	<b>ST</b> <b>0</b>	<b>MT</b> <b>0</b>	<b>LT</b> <b>-</b>	
Policy P27, P38RA1 and P28: The policies look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. Such an approach could result in benefits in terms of enabling children and										

		<p>young people within the area to access goods and services. The policy could be strengthened to include reference to facilities and services.</p> <p>P28RA1 could be less impact than P28 depending on implementation, wouldn't support the commitment to the development of Newport.</p> <p>P28RA3 Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends.</p> <p>P29 as well as its alternatives, would not be expected to have a discernible impact on this ISA Objective.</p> <p>P31 will increase connectivity for people and enhance their access to facilities and services for all. The South Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and provides opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups.</p> <p>P32 looks to improve transport connectivity including public transport, this would improve connectivity to the area for everyone and looks to reduce the reliance on the private car.</p> <p>P32RA1 would see the expansion of Cardiff Airport being restricted, and so future improvements to connectivity associated with its expansion would also be restricted.</p> <p>The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable.</p> <p>P29 &amp; P33: The supporting text to the policy recognises the role of the Metro in increasing connections in this area this could be recognised within the policy through a variety of metro and active travel inclusive opportunities which would bring about many health benefits. P30 will create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups.</p> <p>P30RA2 and P33RA1 could be less impact than P30 and P33 depending on implementation, wouldn't support the commitment to the development of the northern part of the region.</p> <p>Do nothing approaches would be likely to conform with baseline trends.</p>								
11	To create the opportunities within which an improvement in social cohesion and equality can		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	P27 and P28 could be strengthened to include reference to connections to facilities and services. P31 there are
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	

be achieved			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P30	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT ++	
			P29	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P29RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P31RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P32	Scale: Reg	T/P: T	Cert: n/a	ST +	MT +	LT +	
			P32RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	



	<p>Policy P27, P27RA1 and P28 – Through the growth and increasing access and connections in this area this has the opportunity to increase social cohesion and create a positive built environment. The policy could be strengthened to include reference to connections to facilities and services. This Policy will support the development of Newport as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of providing services which enable improvements in social cohesion and equality for children and young people within the area.</p> <p>P28RA1 – could be less impact to P28 depending on implementation, wouldn't support the commitment to the development of Newport.</p> <p>P28RA2 - Doing nothing may not maximise the opportunities</p> <p>P31 - The investment in connections across the region would improve inclusive access to facilities and services, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. The South Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and provides opportunities within which an improvement in social cohesion and equality can be achieved. Focussing development in proximity to sustainable transport options should help to ensure people of all backgrounds have equal access to services, places and amenities. Supporting the development of the South Wales Metro should ensure better connectivity across the South Wales Region. This could lead to notable improvements in access for children and young people to a wider range of services and other communities which were not as easy to access before. This should create opportunities for improvements to social cohesion and equality for children and young people in the area.</p> <p>P31RA1 would be likely to have similar benefits to P31, but by simply focussing on existing infrastructure these benefits would be of a lower magnitude with potentially less certainty.</p> <p>P32 – The policy growth of Cardiff airport would increase opportunities for jobs and through connected infrastructure this would be accessible for all and help to reduce inequality.</p> <p>P32RA1 would see the expansion of Cardiff Airport being restricted, and so future improvements to connectivity associated with its expansion would also be restricted and therefore its potential to reduce inequality.</p> <p>The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable.</p> <p>P29 The policy looks to increase prosperity and reduce inequalities this will have a significant positive impact on the health of the communities within this area. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The natural environment bring many health benefits both physically and mentally. This will create the opportunities within which an improvement in social cohesion and equality can be achieved by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the Heads of the Valleys Area could result in benefits in terms of improving the social and economic conditions in the Area, fostering the</p>	
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		<p>conditions to support improvements to social cohesion and equality for children and young people.</p> <p>P33 The Park would bring opportunities for recreation, increasing access to natural environment, improving well-being embracing cultural identity which will bring with them many health benefits and providing more opportunities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will create the opportunities within which an improvement in social cohesion and equality can be achieved. Supporting the Government's ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could foster the conditions to support improvements to social cohesion and equality for children and young people.</p> <p>P30RA1 and P33RA1 could be less impact to P30 and P33 depending on implementation, wouldn't support the commitment to the development of the northern part of the region.</p> <p>P30 would be unlikely to have a discernible impact on this ISA Objective.</p> <p>Do-nothing approaches would be likely to conform with baseline trends.</p>																																																																																						
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		<table><tr><td>P27</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: H</td><td>ST ++</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P27RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST +</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P27RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: L</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr><tr><td>P28</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: H</td><td>ST ++</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P28RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST +</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P28RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: L</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr><tr><td>P29</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: H</td><td>ST ++</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P29RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST +</td><td>MT ++</td><td>LT ++</td></tr><tr><td>P29RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: L</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr><tr><td>P30</td><td>Scale: n/a</td><td>T/P: n/a</td><td>Cert: H</td><td>ST 0</td><td>MT 0</td><td>LT 0</td></tr><tr><td>P30RA1</td><td>Scale: n/a</td><td>T/P: n/a</td><td>Cert: H</td><td>ST 0</td><td>MT 0</td><td>LT 0</td></tr><tr><td>P30RA2</td><td>Scale: n/a</td><td>T/P: n/a</td><td>Cert: H</td><td>ST 0</td><td>MT 0</td><td>LT 0</td></tr></table>	P27	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++	P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	P28	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++	P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	P28RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	P29	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++	P29RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	P29RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
P27	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++																																																																																		
P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++																																																																																		
P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -																																																																																		
P28	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++																																																																																		
P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++																																																																																		
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P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0																																																																																		

			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P32	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P32RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P32RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P33	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P33RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P33RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			<p>P27, P28 and their alternatives (P27RA1 and P28RA1) would be expected to help encourage significant housing growth in the strategically important Newport region. Such an approach could result in benefits in terms of providing good quality, affordable housing which meets local needs, including for children and young people, within the local area. P29 could help to ensure there is housing growth in the Heads of the Valleys region. It would create opportunities for the provision of good quality, safe, affordable housing that meets identified needs by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. The alternatives of focusing on alternative locations could encourage housing growth in unconfirmed areas. P30, P31, P32 and P33 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.</p> <p>The do-nothing scenarios would conform with baseline trends.</p>							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes,		P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P32 and its supporting text could potentially include wording that sets out a commitment to ensuring that the expansion and development at the
			P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P28	Scale:	T/P:	Cert:	ST	MT	LT	

townscapes and seascapes			Reg	T	M	-	-	-	airport would adopt place-making principles that protect and enhance the character of the surrounding area and the setting of heritage assets. P31 has the potential to deliver accessible and inclusive townscapes.
		P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
		P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
		P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
		P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
		P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
		P30RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
		P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
		P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
		P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P32	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
		P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
		P33RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
		P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which							

		<p>would help to protect and enhance the landscape character. Their alternatives would be likely to have similar benefits, although there is greater uncertainty over their location.</p> <p>P27, P27RA1, P28, P28RA1 and P29 would lead to new growth and development that could adversely impact landscape and townscape character depending on the type of development and its location. It is likely that this development would typically be in and around existing urban areas and the built form, and so could be in-keeping with the surrounding character. Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the surrounding character if these sites are in a derelict or run-down condition. P27, P27RA1 and P28 may provide more opportunities for developing in existing built up areas and using previously developed land. There is greater uncertainty over the location of development under P28RA1. P27RA1 would be likely to lead to more growth and development than P27 and this could have impacts on the local character, such as by increased density of developments or settlement boundary extensions into the countryside. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on landscape character. This policy has the potential to deliver accessible and inclusive townscapes.</p> <p>P31 and P31RA1 would see transport infrastructure enhanced which could also alter the local landscape character depending on the design and scale of the transport infrastructure, however there is potential to deliver accessible and inclusive townscapes.</p> <p>Do-nothing scenarios, wherein future development is less managed through the NDF and less focussed in certain areas as these policies propose, and it would therefore be likely to conform with baseline trends.</p> <p>P32 Cardiff Airport sits between the A4226 and the settlement of Rhoose, but it is largely rural and countryside in character to the east of the airport and on the other side of the A4226. Expansion of the Airport and new development here could potentially result in an adverse effect on the surrounding landscapes.</p> <p>P32RA1 would help to reduce the risk of this taking place. The do-nothing approach would be likely to conform with baseline trends.</p>								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P28 The opportunity and benefits of heritage led regeneration could be recognised in the supporting text. P27 see objective 13.
			P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	

	P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
	P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
	P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++
	P30RA2	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++
	P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
	P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
	P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P32	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -
	P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT +
	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +
<p>P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which could help to protect and enhance the setting of historic areas and heritage assets. Their alternatives would be likely to have similar benefits, although there is greater uncertainty over their location.</p> <p>P27, P27RA1, P28, P28RA1 and P29 would lead to new growth and development that could adversely impact the setting of historic areas and heritage assets depending on the type of development and its location. It is likely that this development would typically be in and around existing urban areas and the built</p>							

		<p>form, and so could be in-keeping with the surrounding character and thus have minimal impacts on setting. P27, P27RA1 and P28 may provide more opportunities for developing in existing built up areas and using previously developed land due to their focus on Newport and Cardiff. There is greater uncertainty over the location of development under P28RA1. P27RA1 would be likely to lead to more growth and development than P27 and this could have impacts on the setting of nearby heritage assets or historic environments, such as by increased density of developments or taller buildings altering views.</p> <p>Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the setting of historic areas or assets if these sites are in a derelict or run-down condition. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on the setting of Listed Buildings and SAMS. This policy has the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P31 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets. P32 A range of Grade II and Grade II* Listed Buildings are near the airport, including at Rhoose, Fonmon Castle and Porthkerry. The expansion of the airport could potentially pose a risk to the setting of these sensitive heritage assets. P32RA1 would help to minimise this risk. Under the do-nothing approach of not having a policy, it is considered to be likely that the airport would ultimately expand over time a slower and steadier rate, thus still posing a risk to nearby heritage assets. The do-nothing approach would be likely to conform with baseline trends.</p> <p>Do-nothing scenarios would conform with baseline trends.</p>								
15	To create the opportunities for the protection and promotion of Welsh culture		P27	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P28 The opportunity and benefits of heritage led regeneration could be recognised in the supporting text or added to the Spatial Strategy as an overarching principle.
			P27RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P27RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT 0	

			P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
			P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
			P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
			P31	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P32	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
			P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P27, P28, P29 and P30 and their alternatives would not be expected to have a discernible impact on this ISA Objective.						
			P31 and P31RA1 would help to enhance connectivity via sustainable modes of transport, which could enable the area to take more advantage of local Welsh cultural assets in attracting visitors.						
			P33 would see a new Regional Park that will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities. A Valleys Regional Park will help create the opportunities for the protection and promotion of Welsh culture.						
			The do-nothing for P31 and P33 would conform with baseline trends. For P33 this may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration to create the opportunities for the protection and promotion of Welsh culture						



		Policies P28, P29, P30 and P33 have the potential to increase access to and understanding of the cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text. P32 It is expected that expanding the airport could potentially enhance opportunities for international visitors to access and appreciate Welsh cultural and heritage assets and activities, although this minor positive effect is very uncertain. P32RA1 would limit this benefit, not maximising the economic impact of one of Wales' most strategic transport hubs and economic drivers, whilst the do-nothing approach would be likely to conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P32 Cardiff Airport would adopt best-practice to incorporate Green Infrastructure into the development that is not only visually attractive and leaves a positive impression on new visitors to Wales but is also of a high biodiversity value and makes a meaningful contribution towards habitat connectivity.
			P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P30RA2	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	

	P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
	P32	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
	P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
	P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
<p>P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which could help to protect and enhance important areas of biodiversity value as well as to enhance local ecological connectivity by establishing, protecting and enhancing wildlife corridors. They could also help to protect and enhance important land functionally linked with nearby designations, such as the various SACs coincident with the Brecon Beacons, although it should be noted that the HRA of the Draft NDF ruled out an LSE on these EU sites. P33 and P30 would also help to protect any geodiversity assets in these locations. P27, P28, P29 and their first alternatives would lead to new growth and development that could adversely impact nearby biodiversity designations through a variety of impact pathways, such as increased public access associated disturbances, increased atmospheric nitrogen deposition caused by new traffic or losses of functionally linked land. As much of the new development would be situated on previously undeveloped land, the losses of greenfield and open space could reduce habitat connectivity without concerted efforts to ensure that high quality GI is incorporated into new developments and that space is provided for wildlife to move void of disturbances from humans. Focussing development in Cardiff and Newport through P27, P27RA1 and P28 could help to direct development away from sensitive countryside areas, although brownfield sites can also be of significant biodiversity value and both urban areas are in proximity to European designations at the estuary. There is greater uncertainty of the location of development under P28RA1 but it is likely to be in a more rural location than Newport and impacts on wildlife, geodiversity and ecological connectivity could be more severe.</p> <p>P31 and P31RA1 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets.</p> <p>Do-nothing scenarios would conform with baseline trends.</p> <p>P32 Development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield land around the airport being developed upon. This could pose a risk to any priority species or habitats relying on this land. Within approximately 1km of the airport are several SSSIs, including Barry Woodlands, Cliff Wood</p>							

		– Golden Stair and East Aberthaw Coast. Expansion of the airport could potentially pose a risk to these SSSIS, such as by loss of functionally linked land, an increase in air pollution or an increase in public access associated disturbances. Given the airport's location, which is relatively rural, further development here could introduce a barrier to the movement of wildlife and reduce habitat connectivity. P32RA1 would help to limit the risk posed to nearby areas of biodiversity value. The do-nothing scenario would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	No recommendations.
			P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P30	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	
			P30RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	
			P30RA2	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	
			P30RA3	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P31	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	
			P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	
			P31RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	

			P32	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P33	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -
			P33RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -
			P33RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			P27	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P27RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			<p>P27, P28, P31 and P29, as well as their alternatives, would encourage new development that would be likely to require the consumption of natural resources and require using up previously undeveloped land. Focussing development in Cardiff and Newport, through P27, P27RA1 and P28, would be likely to provide good opportunities for utilising previously developed land. P27RA1 would likely require greater land uptake than P27, given its focus on growth. P28RA1 would see development located away from Newport. Whilst uncertain, it is likely that it would be situated in more rural locations where there are less brownfield opportunities and a greater uptake of previously undeveloped land could be expected.</p> <p>P30 and its alternatives would help to protect Green Belt land, whilst P33 would establish a new Regional Park, and both policies would thus help to protect valuable soils in these protected and previously undeveloped locations whilst not generating waste or consuming natural resources.</p> <p>The do-nothing approaches would conform with baseline trends.</p> <p>P32 Development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield land around the airport being developed upon. This development would be expected to require the consumption of natural resources for the construction phase. An increase in locally operating businesses and passengers flying into and out of Cardiff would be likely to lead to a net increase in the generation of waste here.</p> <p>P32RA1 would help to limit these direct adverse effects. The do-nothing scenario would be likely to conform with baseline trends.</p>						

## Cumulative Effects Assessment

Table B-51: Cumulative effects assessment of all draft NDF policies in-combination

Cumulative Effects Assessment								
ISA Objective	Future Baseline	Summary of Effects						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		<b>Scale:</b> Nat	<b>T/P:</b> T	<b>Cert:</b> H	<b>ST</b> +	<b>MT</b> +	<b>LT</b> ++
		<p>The NDF would be expected to positively contribute towards the objective of encouraging and supporting improvements in educational attainment for all people in Wales. These direct and indirect positive effects would, cumulatively, be likely to become significant over time primarily as a result of the likely improvements to existing educational facilities and their enhanced connectivity.</p> <p>Various policies in the NDF, such as P26 or P21, would lead to improvements to the connectivity of existing educational facilities by encouraging investment in transport infrastructure and this should help to ensure people of all backgrounds can access high-quality learning opportunities. Various other policies, such as P1, would be expected to help ensure that new essential services like schools are situated within urban areas where they would be likely to be highly accessible for people in and around these urban areas.</p> <p>A larger number of policies proposed in the NDF would lead to new economic and commercial development and this would benefit the range of education and skills learning on offer in Wales. For example, P17, P20 and P21 would focus new economic development in certain regions in Wales, within which benefits to local services and transport infrastructure would be likely.</p> <p>Improvements to digital infrastructure, which is particularly likely as a result of P6, would better facilitate the learning of new knowledge and skills that equips people for thriving in the modern technical world. It would also enable schools to adopt high-quality learning methods and provide improved opportunities for distance learning. It is unclear if, in some cases, for the focus on encouraging and supporting types of development in particular regions of Wales could result in other regions of Wales missing out on improvements to education facilities and the local transport network.</p>						<p>Where the NDF seeks to encourage and support new employment opportunities, greater emphasis could be placed on those that also offer skills learning and education services.</p> <p>Where the NDF encourages investment and development of Wales' transport network and infrastructure, emphasis could be placed on the need for safe and convenient walking and cycling routes, ideally integrated into coherent green infrastructure networks, that enhance the accessibility of education facilities via sustainable transport modes.</p>
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		<b>Scale:</b> Nat	<b>T/P:</b> T	<b>Cert:</b> L	<b>ST</b> +	<b>MT</b> +	<b>LT</b> ++
		<p>The NDF would be expected to lead to long-term significant positive impacts on the objective of improving physical, mental and social health and wellbeing in Wales.</p> <p>Various policies would encourage significant levels of new growth and development in regions across Wales, such as policies P17, P20, P21 and P22 that would encourage and facilitate major new growth in north-Wales. New growth and development can provide benefits to the physical and mental health and wellbeing for all members of society as a result of new employment opportunities reducing inequality and poverty and more improved transport infrastructure improving people's access to services, facilities and the natural environment. The NDF would be likely to provide these health benefits to people in both urban and rural areas throughout Wales.</p> <p>Where policies would encourage the delivery of new housing in Wales, such as policy P5, this would also be highly likely to provide significant benefits to health and wellbeing, including for older people, due to the prominent</p>						No recommendations

		role the quality of one's living environment plays in determining their physical and mental health. Other policies proposed in the NDF would also have more indirect positive impacts on this objective, such as P6 where enhancements to Wales' digital connectivity would be encouraged with subsequent benefits to digital health services being likely. Policies P8 and P9 would help to ensure that opportunities for the provision of green infrastructure in new developments in Wales are maximised. Access to open spaces and a diverse range of natural or semi-natural habitats is crucial to ensuring good physical and mental wellbeing of all people, and so such policies would be likely to make a major contribution towards this ISA Objective over time. Green infrastructure also plays an important role in improving air quality in Wales, particularly in urban areas where, for example, tree canopies filter out air pollutants associated with the local transport sector. Incorporating green infrastructure into new developments in Wales would help to improve air quality with likely benefits to local people's physical health a consequence.							
3	To create opportunities for an increase in employment across the country and promote economic inclusion		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations
		The NDF would be expected to make a major positive contribution towards the creation of new employment opportunities in Wales and improving economic inclusion by enhancing the accessibility of key employment areas. Various policies proposed in the NDF focus on encouraging new development and growth for regions across Wales, including in locations that are highly accessible for people most in need as well as those in more rural locations. For example, the support for regional plans through P4 and P16 would enable regional strategies that are better placed to tackle regional problems and to promote economic inclusion at the regional level. A range of policies, such as P3, encourage new development in urban or central locations where it would be likely to be highly accessible for large numbers of people, including via sustainable transport modes. This is true for Policies P27 and P28, which focus on Cardiff and Newport respectively, as well as P23 and P24 which focus on the most populous areas in mid- and west-Wales, and it is expected that new economic development delivered in these cities would be highly accessible for a large number of people. However, there is some uncertainty over whether focussing on these urban areas would reduce improvements to the employment offering in more rural locations.							
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations
		Th NDF would be expected to make a major positive contribution towards encouraging sustainable economic growth across Wales, primarily as a result of encouraging new development in various regions across Wales, including economic and commercial development as well as improvements to key infrastructure elements, that should help to ensure businesses in Wales are viable and can successfully compete in regional, national and international markets. Improvements to digital infrastructure, through P6, will help to ensure businesses can operate effectively in the digital world with likely improvements to operational efficiency and greater access to international markets. Improvements to transport infrastructure, which is encouraged in a range of NDF policies including P26 where support is provided to the development of the Swansea Bay Metro, should help to better enable more efficient movements of employees and commercial operations, whilst also better connecting businesses with their customers and opening up new markets. Some policies specifically encourage new growth and development, much of which would likely be commercial floorspace that provides opportunities for a diverse range of new businesses to start-up and compete. Where policies encourage greater rates of renewable energy generation or uptake, it is expected that this would							

		contribute towards more sustainable energy consumption of businesses and economies in Wales. A secondary positive impact on regional and national economies in Wales is the protection provided to cultural and natural assets, such as ecological networks being protected in policies P8 and P9, or the regional valley proposed in P33, which would be likely to provide a boost to the tourism sector whilst also enhancing the attractiveness and vitality of areas in Wales and subsequently encouraging higher footfall rates in central areas. The commitment to expanding Cardiff airport, through P32, could lead to major positive effects on the economy in Wales, not just in Cardiff, by improving the accessibility of Wales for international tourists and customers.						
5	To contribute towards the future well-being of the Welsh language	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	No recommendations
		Proposals in the NDF would be expected to cumulatively make an overall positive contribution towards the future well-being of the Welsh language. New economic development and growth, whilst potentially posing a risk of weakening existing Welsh-speaking communities such as by introducing large numbers of non-Welsh speaking people to the community, is also an opportunity to grow local rates of Welsh speaking through employment and education opportunities. Policy P5 would encourage a significant increase in the provision of affordable housing in Wales which would help to protect the long-term future of communities throughout Wales, including Welsh-speaking communities.						
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	The NDF could seek to specifically encourage and facilitate development that is carbon neutral.
		Policies in the NDF would result in a range of different impacts on GHG emissions in Wales and the type and quantity of energy being consumed. In the short-term, there may be a balance between both positive and negative impacts against this ISA Objective but it is considered to be likely that over time, and in the long-term, the significant levels of growth and development supported by various policies in the NDF would lead to a major net increase in energy consumption in Wales and this would make achieving GHG emission reduction targets more difficult. Policies such as P1 that encourage new employment, housing and strategic development to be situated in urban areas or existing settlements would help to ensure that this new development is relatively sustainable by enabling more efficient and low-emission movements for people (i.e. they are in closer proximity to essential services and have good access to public transport modes). The provision of green infrastructure in developments, and the protection and enhancement of greenfields and natural habitats, would help to protect important carbon sinks throughout Wales, including above-ground vegetation and soils. Policy P7 supports the uptake of low-emission vehicles, which, in-combination with policies such as P26 and P31 that seek to enhance public transport modes, would help to ensure that the transport sector in Wales can continue to transition to one with a lower carbon footprint. Policies P22 and P25 specifically encourages greater generation of renewable energy at Anglesey and the Haven Waterway and this may help to reduce GHG emissions associated with the energy sector in Wales. However, overall the NDF seeks to encourage, support and facilitate significant levels of new economic, residential and strategic development. A secondary impact of the construction, occupation and operation phases of this development across Wales could be a major increase in energy consumption, although this will be mitigated to some extent by the increase proportion of energy that is renewable sourced. There could also be a major increase in car use due to economic and population growth, although this is mitigated to some extent by the focus on development in regions with good public transport options and the underlying trend of vehicles becoming increasingly low-emission.						



7	To contribute to the reduction and management of flood risk		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	Where the NDF encourages the provision of green infrastructure in strategic developments, it could include reference to the importance of GI and permeable surfaces in attenuating flood risk and this should be factored into the decision-making over what GI would be appropriate to include in developments.
<p>Impact of the NDF on flood risk are mixed because it is largely dependent on the precise location of new development in relation to land at risk of flooding.</p> <p>In general, it is expected that development would conform with planning law and avoid land at a level of flood risk with which the type of development would be incompatible. It is also likely that much of the new development in Wales supported by the NDF would be situated in urban locations or existing settlements where it can benefit from existing flood defence schemes in line with emerging policy in TAN15.</p> <p>There is a risk that development in some locations would lead to a loss of above ground vegetation and permeable soils, replacing it with hard standing and impermeable surfaces, that alters the extent and distribution of ground and surface water flooding.</p>									
8	To create opportunities to encourage the protection and improvement of air quality		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
<p>Similar to GHG emissions, policies in the NDF would result in a range of different impacts on air pollution in Wales. In the short-term, there may be a balance between both positive and negative impacts against this ISA Objective but it is considered to be likely that over time, and in the long-term, the significant levels of growth and development supported by various policies in the NDF would lead to a minor negative impact on efforts to improve air quality in Wales and could make air quality improvement target more difficult in some locations.</p> <p>Policies such as P1 that encourage new employment, housing and strategic development to be situated in urban areas or existing settlements would help to ensure that this new development is relatively sustainable by enabling more efficient and low-emission movements for people (i.e. they are in closer proximity to essential services and have good access to public transport modes).</p> <p>The provision of green infrastructure in developments, and the protection and enhancement of greenfields and natural habitats, would help to protect the important air filtering service provided by above-ground vegetation. Policy P7 supports the uptake of low-emission vehicles, which, in-combination with policies such as P26 and P31 that seek to enhance public transport modes, would help to ensure that the transport sector in Wales can continue to transition to one involving less pollution. Policies P22 and P25 specifically encourage greater generation of renewable energy at Anglesey and the Haven Waterway and this may help to reduce air pollution associated with the energy sector in Wales.</p> <p>However, overall the NDF seeks to encourage, support and facilitate significant levels of new economic, residential and strategic development. A secondary impact of the construction, occupation and operation phases of this development across Wales there could also be a major increase in car use due to economic and population growth, although this is mitigated to some extent by the focus on development in regions with good public transport options and the underlying trend of vehicles becoming increasingly low-emission.</p>									
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
<p>Impacts of the NDF on the ISA Objective of creating opportunities for protecting and enhancing the quality and quantity of water features and resources in Wales are likely to be mixed, with both minor positive and minor negative impacts expected from different policies.</p> <p>It is considered to be likely that the significant growth and development encouraged in the NDF would result in an increase in water consumption for new homes and new businesses. However, the locations targeted for this development are predominantly urban, such as P27 and P28 focussing on Cardiff and Newport or P5 targeting more generally on 'sustainable locations'. It is expected that development in these locations would be unlikely to</p>									



		pose a major risk to the quality of natural waterbodies such as rivers, lakes or the coast in-comparison with development taking place in more rural locations. New development could place extra pressure on the capacity of sewers which in turn could potentially pose a risk to water quality. Where new policies would be likely to lead to an increase in the extent and cover of green infrastructure and vegetation in Wales, such as at the regional park supported through P33 or the continued protection of Green Belt land in P30, the protection and improvement of water quality of local waterbodies is considered to be likely due to the important role vegetation and soil plays in the water cycle.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		Scale: Nat	T/P: T	Cert: L	ST ++	MT ++	LT ++	

		would support residential development in rural communities. P5 would make a major contribution in the long-term towards ensuring that there is an adequate supply of affordable housing in Wales.							
1 3	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		<b>Scale: Nat</b>	<b>T/P: T</b>	<b>Cert: L</b>	<b>ST +/-</b>	<b>MT +/-</b>	<b>LT +/-</b>	No recommendations
		<p>The likely impacts of the NDF on landscapes and townscapes in Wales is largely mixed as it can depend on the precise location of proposed land-uses in relation to the surrounding landscape or townscape. Generally speaking, policies such as P1, P2, P27 or P28 that focus new development in urban areas or existing large settlements would help to ensure that new development is situated within and adjacent to existing built form. This could help to avoid potential impacts of development on natural landscapes in the countryside whilst also providing opportunities for enhancing townscapes by revitalising brownfield sites. Additionally, policies that would protect or enhance green infrastructure or greenfield land, such as P8, P9, P30, P33, would help to protect and enhance the local character and visual attractiveness of nearby townscapes or landscapes.</p> <p>However, a range of policies encourage and support significant levels of new development and there is a risk that in some cases this development would alter the local townscape or landscape character and distinctiveness. Development on the coast, such as is proposed at ports including the Port of Holyhead or Swansea Bay, could potentially alter long distance coastal views. Development in rural locations, as is encouraged through P4, poses a risk to the more natural and distinctive landscapes often found here as well as the character of the rural settlement. Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted.</p>							
1 4	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		<b>Scale: Nat</b>	<b>T/P: T</b>	<b>Cert: L</b>	<b>ST +/-</b>	<b>MT +/-</b>	<b>LT +/-</b>	No recommendations
		<p>Similarly with potential impacts on townscapes, the impacts on cultural heritage assets and historic areas throughout Wales as a result of policies proposed in the NDF are largely mixed, although unlikely to be significant overall. Generally speaking, policies such as P1, P2, P27 or P28 that focus new development in urban areas or existing large settlements would help to ensure that new development is situated within and adjacent to existing built form. This could help to avoid potential impacts of development on the setting of heritage assets in rural areas whilst also providing opportunities for enhancing townscapes by revitalising brownfield sites. However, urban locations are typically home to a greater number of historic assets than countryside areas and, although new development within existing built-up areas is unlikely to have a significant impact, there is a risk of some degree of alteration to the setting of historic assets here.</p> <p>Policies that would protect or enhance green infrastructure or greenfield land, such as P8, P9, P30, P33, would help to protect and enhance the setting of historic assets and areas throughout Wales.</p> <p>Development on the coast, such as is proposed at ports including the Port of Holyhead or Swansea Bay, could potentially alter long distance coastal views which are in some locations a significant facet of nearby historic assets. Development in rural locations, as is encouraged through P4, poses a risk to the setting of any nearby heritage assets or historic areas as it would be difficult to ensure all new development in these locations conforms with the local character. Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted.</p>							
1	To create the		<b>Scale:</b>	<b>T/P:</b>	<b>Cert:</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>	No recommendations

5	opportunities for the protection and promotion of Welsh culture		Nat	T	L	+	+	+	
		<p>The NDF would be expected to lead to an overall positive impact on the protection and promotion of Welsh culture. Approximately half the policies appraised would be anticipated to lead to negligible effects on this Objective, but the majority of the other half were recorded as having likely positive effects.</p> <p>Various policies would be likely to help protect, enhance and increase the sustainability of cultural places, activities and assets in Wales. For example, the support for regional plans through P4 and P16 would be likely to help ensure that regionally identified needs for rural communities are provided for and this could help to preserve and take advantage of local Welsh culture features and assets. P3 seeks to ensure that Welsh Government investment and land holdings support the delivery of sustainable places, including for major trip-generating developments such as sports stadia and cultural venues. P3 would therefore be likely to help enhance the sustainability of places and buildings that are integral to culture in Wales. P8 and P9 would lead to the protection or creation of biodiversity assets and features, such as the National forest proposed in P9. The countryside and natural environment in Wales is a key facet of its identity and culture and P8 and P9 would help to advance this. In addition to protecting, enhancing and increasing the sustainability of cultural places, activities and assets in Wales, various policies in the NDF would be likely to help improve their accessibility for local, national and international visitors. P3 could provide tourists from further afield, including Europe, with improved access to north Wales whilst P32, which would support the growth of Cardiff Airport, could improve access into south Wales for international tourists. Other policies that would see public transport modes being improved, such as P31 and the South Wales Metro, would also be likely to help improve the accessibility of cultural places, assets and activities.</p>							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
		<p>The NDF would be expected to lead to both positive and negative impacts on the ISA Objective of creating opportunities for the conservation and enhancement of biodiversity and geodiversity.</p> <p>A range of policies would be likely to help ensure that biodiversity features and ecological networks are protected and enhanced. Cumulatively, there could be significant positive impacts. A range of policies refer to encouraging sustainable development, such as P1 and P2, and it is assumed that this includes a sustainable approach to managing biodiversity and geodiversity in the vicinity of such development. More significantly, P8 sets out a strategic framework for biodiversity enhancement and ecosystem resilience whilst P9 proposes a new national forest for Wales. A coherent ecological network across Wales is essential to enabling the free movement of wildlife and avoiding isolated islands of habitats and species being 'cut off from nature'. A new national forest would be likely to be a region of significant biodiversity value that provides suitable habitat for a diverse range of protected species. A new Valleys Regional Park is proposed in P33 and this could have similar benefits to this ISA Objective as P9. P19 and P30 support the identification and establishing of Green Belt land. Green Belt land can often be of relatively high biodiversity and geodiversity value and can constitute a significant portion of ecological networks. Supporting Green Belt designations would help to conserve this value.</p> <p>However, a number of policies proposed in the NDF were recorded as being likely to lead to adverse impacts on biodiversity and geodiversity in Wales, primarily as a result of the significant growth and development they encourage and support. This can be seen in the appraisals for Policies P20 – P27 as well as P31 and P32. For example, some policies seek to encourage development and investment at ports and coastal areas in Wales, such as P25 which supports new development and investment at Waterway Haven, and this poses a risk to the highly sensitive biodiversity designations found along much of Wales' coastline, such as the Pembrokeshire Marine SPA near Haven Waterway. Where new development is supported and invested in, there is a subsequent risk to the conservation status of nearby biodiversity assets as a result of, for example, increases in visitor pressure due to</p>							Where policies propose, support or encourage new development or growth of existing developments, the policy would include wording that seeks to provide protection for biodiversity and wildlife. To ensure that biodiversity is not just conserved but overall enhanced, these policies should provide strong wording that states that the determination of planning applications would take into consideration any adverse impacts on biodiversity, and these cannot be outweighed by social or economic gains, as well as any foreseen enhancements to local biodiversity.

		the delivery of new homes and jobs or improved transport links; increased atmospheric nitrogen deposition associated with increased car usage; direct loss of habitats or functionally linked land where development takes place; increased water resource consumption leading to water table alterations; and/or increased risk of pollution or contamination of waterbodies. Some of the policies recorded as being likely to have adverse impacts on biodiversity include wording that specifically refers to how the impacts of development on the natural and historic environment will be considered during the determination of planning applications. For example, P22 supports new locations for energy development in North West Wales but also states that <i>‘In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales’ energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region.’</i> Where policies specifically refer to the consideration of the natural environment like this, it could help to avoid significant adverse impacts on biodiversity. However, such wording is unlikely to avoid adverse impacts on biodiversity in all cases, such as those caused by the loss of greenfield land to new energy projects. It also appears that adverse impacts on biodiversity (and the historic environment) would be weighed against the economic benefits of development and as such there is an inherent acceptance of adverse impacts on biodiversity.							
1 7	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		The NDF would be expected to lead to both positive and negative impacts on the ISA Objective of creating opportunities for the sustainable management and use of natural resources in Wales. Several policies seek to ensure that future development in Wales is sustainable, such as policies P1 and P2, and this would be expected to incorporate a sustainable approach to the management and use of natural resources. P10 and P11 would contribute towards an increasing supply of wind and solar energy in Wales, which should help to increase the sustainability of the generation and consumption of energy resources in Wales. Other policies were recorded as being likely to lead an increased use of previously developed land in Wales and thereby enable a more efficient use of the land and soils resource. For example, P3 would be likely to enable developments in town and city centre locations on land owned by the Government, whilst P1 and P2 also facilitate urban development. Policies that seek to protect and enhance countryside locations or Green Belt land such as P19 and P30, or seek to establish new such biodiverse areas such as the national forest proposed in P9 or more coherent ecological networks as proposed in P8, would be highly likely to help contribute towards a sustainable management and use of the land and soil resource in Wales; not only by protecting it from being directly lost to, or harmed by, development but by also protecting and enhancing the above-ground vegetation cover which helps to improve the fertility and structure of these soils whilst also protecting them from erosion. The conservation and enhancement of vegetation and green infrastructure would also be likely to contribute towards a natural approach to improving air quality in Wales. However, many of the policies proposed in the NDF were recorded as being likely to lead to adverse impacts on natural resources. This is consistently due to the potential and likely impacts of development, including during the construction and operation phases, on natural resources including land, soils, air and water. Whilst the NDF typically encourages a sustainable management of natural resources, it is considered that some adverse impacts on natural resources as a result of development are unavoidable. For example, not all new development in Wales that is supported by the NDF would be on previously developed land, and so some degree of land loss can be expected. Within this previously developed land are likely to be soils that are of at least ecological value and potentially agricultural value. New development would also be likely to lead to some degree of air pollution during							

	<p>the construction phase and, depending on the type of development, also during its operation phase such as that caused by a local increase in car usage. A cumulative impact of all development supported and encourage by the NDF is also likely to be some degree of increase in the consumption of water, due to both the consumption by businesses as well as residential consumption. In addition to water consumption, there could be an increase in the risk and prevalence of pollution or contamination of waters. This is particularly the case where development is supported or encouraged in coastal areas and ports and where an increase cargo ship or barge activity is anticipated. Lastly, whilst the NDF seeks to encourage an increase in the proportion of Wales' energy generation and consumption that stems from renewable sources, it is unclear and potentially unlikely that this will match or exceed the likely increase in energy consumption associated with the significant levels of growth that the NDF seeks to support and encourage. This would potentially make achieving targets of reducing Wales' consumption of non-renewable energy more difficult.</p>	
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