

From: [Bosley, Colette](#)
To: [NDE](#)
Subject: NDF consultation response on behalf of the WLG
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[WLG - draft-national-development-framework-response-form_final WLG.doc](#)

Please see attached NDF consultation response on behalf of the Wales Landscape Group (WLG)

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Monlife Logo plus strapline



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The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

Consultation Response Form

Your name	Colette Bosley
Your address	Wales Landscape Group (WLG)
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	A collective response from Public Sector mainly Local Authority) Landscape officers

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

Outcome 1 (digitally and physically well-connected)

Support – especially for development to be “*well located in relation to accessible green and open spaces*”

Recommend amendment

Outcome 2 (rural areas)

Qualified support - the requirement for “*a balance to be found between development for job opportunities within preserving the character of rural Wales...*” will rely on there being high quality, sensitively designed development.

Outcome 3 (regional approach)

Support the principal but we consider the NDF is light on spatial detail, despite its regions.

We welcome building on the strengths of the “*distinct underlying characteristics*” of different parts of Wales. However, distinct environmental characteristics are an essential part of that and need reflecting “*to achieve greater prosperity and well-being*”. While LDPs would cover the local detail, there remains a huge scale gap to bridge from the NDF. Bridging might be assisted with reference to some of the national environmental datasets used in NRW’s Area Statements and, in particular as an

integrating spatial concept, their [National Landscape Character Areas](#).

Outcome 4 (Welsh language)

Support - but we should recognise environmental influences on language and culture too

There are many place-based and environmental connections between the Welsh language and the landscapes of Wales. We suggest there needs to be reference to the environment, as it has a strong influence on shaping our culture and way of life over time, in different ways, in different places.

Outcome 5 (Cities and large towns as magnets)

We must also create the environmental capacity if cities and towns are to grow sustainably. A pro-active rather than follow-up approach to creating the Green Infrastructure is needed.

We welcome recognition that growing larger towns and cities requires investment in urban design and green infrastructure. But to be sustainable we need to shift our planning focus for strategic parts of the green infrastructure to pro-active work to create the settings within which development can then be fitted. Techniques such as master-planning and advance woodland planting ahead of individual development proposals, as we have seen in the past in some of our business parks and new towns, ought to be used. This would be a significant change from current practice, and programmes and projects for strategic green infrastructure creation are likely to be needed in parallel to what is achieved within the confines of individual development proposals.

Outcome 6 (forward thinking, positive attitude to economic development)

For sustainability, the forward-thinking positive attitude needs to be matched with a similar attitude to green infrastructure creation.

We welcome reference to culture, heritage & environment playing a positive modern role. Developers should understand this means that we need high quality, sensitively designed development to come forward.

Outcome 7 – (travel and active travel with low environmental impact)

Active travel on foot and bicycle brings multiple benefits for the environment and well-being. In landscape terms, there is an opportunity to design a more ‘human-scale’ network of routes, in more tranquil settings

Outcome 9 – (Natural resources supporting a range of activities) and Outcome 10 (Biodiversity resilience)

We welcome both 9 and 10. We think that overall 9 is focused on ecosystem services whereas Outcome 10 is focused on biodiversity - but some text contradicts this: e.g. 9 refers to ‘*value in their own right*’ and 10 refers to ‘*valuing multiple benefits*’. It would help to clarify these two more distinctly.

Outcome 11 (climate change)

Given the climate emergency, there is a case for promoting this outcome to be No. 1.

Otherwise it might be seen as No. 11 on a list of top ten!

It's wording also needs to reflect that addressing climate change is far wider than just decarbonisation.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Chapter 4 - Spatial Strategy

The NDF is clearly taking a national and outward looking approach towards spatial growth recognising the opportunities and connections beyond borders. Clarity is required on what spatial growth will look like beyond these focus areas.

In many ways the Green Belt offers the perfect solution to protecting and ensuring high quality development in those areas where the Cardiff Capital Region and Great Western Cities (Cardiff, Newport and Bristol) will put significant pressure on these

Effect of growth increasing pressure on surrounding countryside

Large scale growth in urban areas has adverse implications for many aspects of our environment and can increase pressure on rural landscapes when more people become more mobile. In particular, Designated Landscapes such as Brecon Beacons National Park and Gower AONB are in close proximity and would need to become more resilient to this. Page 24 '*in areas designated for their landscape or ecological importance, protection against inappropriate development remains in place*' may not be sufficient unless sensitive pro-active planning to increase their resilience accompanies.

For example, more active travel provision and park and ride facilities for visitors.

The spatial strategy map

- **Should National Growth Areas really overlap with Designated Landscapes?** Perhaps it is just a graphic issue around the edges, but it could be taken as a conflict of purpose.
- **Should there be a big spatial strategy 'hole' for The Cambrian Mountains?** It is neither a growth area nor a Designated Landscape. Is the NDF intending to be neutral for such places, and if so, is that missing an opportunity to clarify the direction of national planning vision for them?
- **Include** the A465 heads of the valleys and links to M5 as a strategic connection with regional connectivity an area of growth along the entire linear route Neath / Swansea to Monmouth / Ross . This is important for growth planning and economic opportunities for Monmouthshire as a south midlands tourism and transport gateway.

Policy 1 (sustainable Urban growth)

Conflicts in practice between 'compact' towns and 'higher density' development, and providing green infrastructure.

Higher density creates tensions with providing adequate space for Green Infrastructure including gardens, parks, open spaces and street trees. There would be a conflict if in practice that means infilling gardens or not providing the necessary scale of green areas within a development. For example, in 2013, in Wales, just 1% of all urban tree cover (a principal component of urban green infrastructure) was found in areas of high-density housing, often being those areas experiencing the highest levels of deprivation. Private residential gardens make up 35% of Wales' urban areas, providing 20% of all our towns' tree canopy, being 29% of all urban trees. (Figures from [NRW's urban tree canopy cover assessment](#), p64). Their report showed that 159 of Wales' 220 towns lost canopy cover between 2006 and 2013, including 7000 large trees and 20 hectares of urban woodland. Policy measures that actively reverse such trends are needed if we are to use Green Infrastructure effectively to mitigate climate change effects in urban areas.

The dilemma for urban trees and greenspace is illustrated by 2 pictures below from the newly published [National Design Guide for England](#) (Oct 2019). The Letchworth Garden City image illustrates what can be achieved through well-planned and designed development to provide plenty of urban greenspace (including garden space) showing the ability of forest size trees to be abundant at maturity. This is in stark contrast to the other image, being a new housing area in Didcot, which is more typical of modern development, where the built environment housing density is just too compact to ever mature like Letchworth, and it is likely to remain as a bleak and hard looking place for most residents for ever. This is despite generous open park areas being included nearby, which few would be able to see or experience directly from their home and daily living, in contrast to Letchworth.



The desire for “compact” towns and cities organised around urban centres will make achieving meaningful ‘place- making’ very difficult as green spaces are critical to the delivery multifunctional place making benefits – such as health and wellbeing opportunities, recreational play, protecting and maximising biodiversity benefits and connectivity, supporting Suds management and of particular growing significance climate change mitigation and adaption.

Policy 1 needs to explicitly state that Green Infrastructure and Place-making will need to be part of this solution in supporting sustainable Urban Growth. See below:

Recommend amendment

Policy 1 – Sustainable Urban Growth

Policy 1 – Sustainable Urban Growth

“Urban growth should *embrace a place making approach* supporting towns and cities orientated around urban centres and integrated public transport *with* active travel networks *and green infrastructure embedded solutions.*”

Higher density and mixed use development *that embrace a place-making approach with strong green infrastructure solutions* on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.

Recommend amendment

Policy 2 – Supporting Urban Centres

“Incorporating *green infrastructure*, in particular will require innovative design solutions to deliver wider well-being benefits.”

Needs to make reference to Climate change mitigation and adaption measures looking at

opportunities for retrofitting suds and GI to help tackle issues such as flooding etc.

Policy 3 (public investment)

Strategic urban green infrastructure provision is likely to require some public investment as some will be needed beyond the confines of individual development proposals.

There are some examples of this in central Scotland.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

There is a need to ensure that standards of Place-making and Green Infrastructure are fully embraced in the delivery of these outputs.

Design of affordable housing schemes should require the same well designed environment and level of GI as private developments.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

Policy 6 (Mobile action zones)

"A presumption in favour of new mobile telecommunications infrastructure" with "no significant

adverse landscape impacts” will require emphasis on sensitive siting and design – which requires judgement against suitable planning guidance.

- We assume the identification of Mobile Action Zones relates to ‘not spots’ so would not involve input of environmental constraints.
- We assume that ‘not spots’ are often likely to be rural, remote areas, which might be characterised by a lack of development and remote or tranquil landscape characteristics. Careful siting and design of mobile telecommunications apparatus will be needed to avoid a rash of clutter arising.
- We suggest that some urban and rural siting and design guidance will be required, along the lines of that provided in the Scottish Government’s Planning Advice Note PAN62, which contains many examples of sensitive siting and design practice.
- We then suggest the policy may be more practical if reworded to a “*presumption in favour, provided adverse landscape impacts and visual intrusion have been minimised*”.
- There is a need to require pre-application discussions with stakeholders on the network planning and individual applications, including where there is scope for shared solutions to avoid multiple different masts within the same area.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Policy 7 (Ultra Low emission vehicles)

New physical infrastructure has potential to result in a rash of clutter.

This would be especially the case in historic settlements, and in popular places in rural areas including Designated Landscapes.

Some siting and design guidance would help to plan to overcome this risk – especially if done at the outset of roll-out and most efficiently done once for Wales.

Location and installation of new charging points for low emission vehicles should be designed to avoid degradation of existing tree cover.

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>



Policy 8 (biodiversity enhancement and ecosystem resilience)

Whilst we welcome the strengthen of this policy we are concerned that Green infrastructure is being confined to just biodiversity enhancement and ecosystem resilience. Policy 8 should be about supporting Strategic Green Infrastructure - it needs to embrace all its components not just one element.

Recommend rewording this to refer to title of:

“National Strategic Framework for supporting Green Infrastructure “

To support Green Infrastructure functions that will deliver : Landscape setting and quality of place, Biodiversity enhancement and ecosystem resilience, Green space provision with active travel and recreational connectivity, sustainable energy use, local food production, flood attenuation, SuDS and water resource management.

We welcome this and the emphasis on “*Supporting Strategic Green Infrastructure*” but would welcome more reference to cultural services within the urban context

- The policy needs to emphasise that multiple human well-being benefits that are a key consideration in urban green infrastructure.
- Identifying “areas” and “opportunities” are likely to be insufficient in itself unless they are followed by programmes and projects to implement that strategic green infrastructure creation or enhancement that would not easily arise from the confines of individual developments. For example, it would be unreasonable to wait many years to complete a linking strategic cycleway connection simply because no one has yet put forward an adjacent development application.
- Area Statements may provide a good starting point for considering green infrastructure issues spatially, but they will not provide all the answers and local knowledge and creative design will also be required to recognise opportunities and create solutions.

GI needs to be delivered on site in accordance with the approved Planning drawings, not just seen as a mechanism to achieve planning permission and then disregarded on site.

GI on brownfield sites, including smaller developments or infill sites, needs to be planned into the design from the outset, rather than being completely omitted or fitted into any limited remaining space once the building footprint has been determined. Cumulatively brownfield developments in urban areas have a critical impact on ability to deliver the required green infrastructure to mitigate climate change.

Need to ensure that the aspirations of policies 1&2 do not conflict with the delivery of Policy 8. For example development of brownfield sites can lead to the loss of GI in the pursuit of delivering more

compact towns. The allocation of m2 /hectares of GI per dwelling through GI guidance will help address these unintended consequences.

Policy 9 (National Forest)

We welcome recognition of a national forest but are not clear from the NDF what form this might be, or where.

- A form of 'landscape-scale' planting that was identifiable as the National Forest could express spatially in many ways.
- We would welcome the opportunity for such a forest to have multiple purposes and benefits, including for green infrastructure (as stated) and also well-being.
- Landscape specialists would welcome the opportunity to be engaged as WG explore what forms, functions and geographical areas such a forest could have. They would bring skills and evidence from landscape assessment, design and management, combined with their expert local knowledge of the different landscapes of Wales.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Policy 10 (Wind and Solar PAREs)

Policy 11 (Wind and Solar Outside PAREs)

Policy 12 (Wind and Solar in National Parks and AONBs)

We acknowledge the ambitious task to decarbonise energy generation and the traffic-light spatial approach to national spatial policy.

We strongly welcome Policy 12.

We recognise that Policies 10 and 11 place much emphasis on a developer's site search and development design process, for which we strongly advocate further guidance to help steer them to minimise landscape and visual effects. We understand that WG is commissioning such guidance and would welcome opportunity to contribute to both the scope and detail of this.

We anticipate cumulative landscape and visual effects, given the spatial choice for developers and their likelihood to cluster in the easiest to develop areas.

- We recognise the scale of development envisaged is such that many significant landscape and visual effects will result. While we balance that with the urgent need to decarbonise energy generation, we recognise the challenge of gaining public support for acceptance of such a scale of landscape change.
- We observe the spatial pattern of PAREs differs from that of the SSAs they would replace. PAREs are much larger, many covering areas of enclosed farmland or lowland where there may be local residential amenity issues to address. In contrast, SSAs tended to occupy open, rolling upland plateau areas with afforestation, away from where people lived. As many of our uplands are valued for their remote, undeveloped or tranquil characteristics they tend to have more 'high' or 'outstanding evaluations' in LANDMAP's Visual and Sensory Aspect. We note this was one of the sieve layers used in the ARUP work to identify the PAREs.
- The scale of mapping of PAREs within the NDF document as presented, does not assist other consultees with providing meaningful comment on their boundary locations.
- We strongly advise that PAREs on their own will provide insufficient steer to developers in their site selection and design process, and that further guidance or tools will be required in order to mitigate and minimise significant landscape and visual effects. Such guidance or tools could include:
 - Wind and solar landscape and visual effects guidance, possibly signposting to SNH work;
 - Place-specific siting and design guidance providing strategic scale landscape analysis to assist in site choices, identifying key views, gateways, corridors, land marks etc
 - Inter-visibility mapping for Designated Landscapes – to be done once for Wales. This might be similar to the example done by Natural England for Shropshire Hills AONB, which Natural Resources Wales has previously highlighted to WG
 - Technical guidance on the process of landscape sensitivity assessment
 - Listing LANDMAP and other existing baseline landscape resources that may assist.
- Policy 11 would be stronger if the third bullet should state "National Parks, AONBs and their settings" (not just settings) in order to capture impacts from outside their designation that could affect their statutory purposes and special qualities. This is especially important as the ARUP mapping showed that it would be very difficult to protect Designated landscapes from development appearing in their visible setting.
- There is a need for landscape to be included in potential compensation and enhancement proposals related to PAREs and for the NDF to identify that early involvement (pre-

application) is needed on landscape, for development coming forward in PAREs. This is because the biggest form of mitigation for such development is to find the most appropriate sites.

- The scale of development envisaged and strong policy direction for accepting landscape change requires a reappraisal of the role of landscape specialists in the public sector when they make comments on development proposals. Traditional approaches have tended to focus on responding to development proposals and highlighting their significant landscape and visual effects. That will now need reconciling with policies that by default accept such landscape and visual effects, especially when combined with PPW10 para. 5.9.17. Their focus may need to shift more to 'where' rather than 'if' developments are acceptable, and therefore shift more to early involvement at site search stages of development. Some guidance to this effect would be needed so that both developers and planners understand this shift in focus.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

Policy 16 (Strategic Policies for Regional Planning)

We welcome recognition of green belts, green corridors & nationally important landscapes.

We are unclear what "nationally important landscapes" refers to in this context ? needs clarification.

We note identification of spatial areas for renewable energy – and assume this refers to smaller scale developments than considered in PAREs. This should be clarified.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Policy 18 (North Wales Coastal Settlements)

The coastal arc is not all built up

Describing “*Welsh Government supports*” Caernarfon to Deeside as a “*built up coastal arc*” may wrongly imply the entire area is envisaged as to be built up. A caveat is needed in the wording to recognise there are also rural areas and green wedges within this arc that would not be built up.

Policy 20 (Port of Holyhead)

The relationship of Holyhead to the AONB is important to consider in new development

- Reference to future development being “*not constrained or compromised*” needs to be balanced with the statutory duty to protect the purposes of the nearby Area of Outstanding Natural Beauty. There have been various large development proposals in recent years around the fringes of Holyhead and AONB indicating this is a real risk and that a strategic planning approach is needed here.

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Policy 23 (Growth in Swansea Bay, Llanelli & Regional Centres)

Potential adverse landscape impacts, including on Gower AONB

- The Gower AONB is particularly close and accessible from Swansea.
- Green infrastructure would be helpful to mention, given that transport and digital infrastructure is mentioned.

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Concern is raised about the extent of the national growth area proposed in the SE leading to unintended consequences. (see comments in relation to Policies 1, 2 and 3 which are relevant here).

Policy 28 (newport)

Growing GI to accommodate settlement growth

- If Cardiff is reaching its physical limits and growth is identified for Newport then there is a risk for adverse landscape impacts for Newport e.g. on Gwent Levels Registered Historic Landscape. (see comments on green belt regarding unintended consequences.)
- Significant settlement growth will require a significant scale of new green infrastructure to provide the necessary levels of benefit. A pro-actively planned approach where significant growth is expected, would allow for green infrastructure opportunities to be recognised and created in anticipation of future development.

Policy 29 (Heads of the Valleys)

The landscapes of the heads of South Wales Valleys are not just urban

- The policy text is strongly development orientated, which is understandable due to the urban nature of the valleys.
- However, equally, the land between the valleys is often highly undeveloped and of steep wooded or upland character. As stated, the Valleys have "*one of the most distinctive settlement patterns in the UK*". That distinctiveness comes to a significant degree from the landscape character, whose topography has constrained transport routes and urban development from the hillsides and mountain tops. This legacy provides a great opportunity

for generous green infrastructure and for good integration between the city region and the adjacent Brecon Beacons National Park to the north. We would welcome reference to this landscape context in the policy wording.

Policy 30 (Green Belts)

We would welcome more guidance on the criteria for developing, and purpose of new Green Belts, and their relationship to SMNR. It is noted that the purpose is set out in PPW10 however clarification as to the possibility of any development in the green belt would be helpful – it is suggested that this could be limited to minor development which embraced high standards of place- making and GI.

Distribution of the Green Belt should consider potential unintended consequences leading to potential development pressure in sensitive areas such as Gwent Levels or even Wye Valley AONB.

It is strongly recommended that the Green Belt be redistributed to include and cover the whole of the Gwent Levels along the Historic Landscape designation helping protect this vulnerable historical and ecological landscape which comes under significant development pressure due to its location along the M4 corridor.

An option would be to consider the establishment of a Regional Park structure, along the lines of the VRP. This would sit alongside the designation of the area as Green belt – this would have the benefit of sustaining a management structure, which enabled sustained awareness raising, focused management project development sustaining the legacy of the Living levels project to be branded Destination Living Levels.

Other areas that would benefit from Green belt protection would be the rural areas of Vale of Glamorgan and the Heritage Coast to prevent the spread of urban sprawl and give greater protection to our coastal landscapes – the latter it is noted have been highlighted in the Marine Area Profiles.

Page 63: The greenbelt and national growth areas make sense but will need a robust with well informed SDF to support them. They should be underpinned by the values of ecosystem services. Eg don't build on valuable (ecosystem and £) agricultural land if you can develop more affordable development on reclaimed brownfield lower 'value' land .

Policy 33 (Valleys Regional Park)

We would welcome clarification on what sort of 'Park' this would be, and it's relationship with Policy 29.

Concern that the VRP boundaries are exclusive and not inclusive – this will be likely to impact funding opportunities that can deliver meaningful outcomes that support regeneration improve well-being and partnership working across the wider south wales area. Recommend the policy identifies the value of buffer zones to the VRP and the significance of collaborative working with shared benefits.

Comments in relation to Policy 29 also apply to Policy 33.

- We tend to associate 'park' with restful green places designed or managed for quiet escape

from hectic urban life.

- We hope that a Valleys Regional Park would be designed and managed to generously provide such benefits

Using the undeveloped land between the valleys, the Valleys Regional Park has potential for an impressive scale of strategic green Infrastructure.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

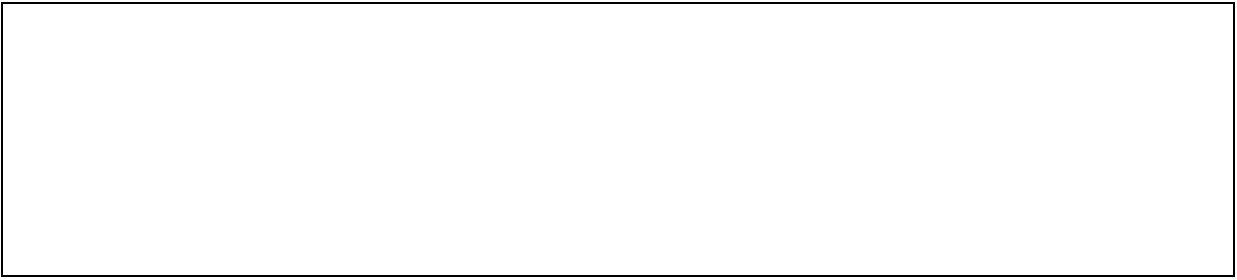
15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Page 15 : Challenges and Opportunities . Incorporate reference to Green / Blue infrastructure and the relationship with sustainable development and design. Possibly sat within paragraph 3 . “Wales has a rich.....

Page 20: Include ref to Output 11 at the forefront to match the vision in Mark Drakeford’s introduction

The regional interconnectivity at the Heads of the Valleys has not been identified
The A449/A40 also provides a key regional route linking to the M50. This needs to be picked up in the plan.



16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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