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[WWF Cymru NDF Consultation Response Submitted.pdf](#)

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Dear Planning Team,  
Please find attached a consultation response from WWF Cymru.  
Please get in touch if you have any queries.  
Thanks,  
Alex



**Alexander Phillips | Policy & Advocacy | WWF-Cymru**

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15 November 2019

Dear NDF Team,

WWF Cymru welcomes this opportunity to respond to the National Development Framework (NDF) 2020-2040 consultation. WWF Cymru have an interest in the development of the NDF following our previous work on the development of the Well-being of Future Generations (Wales) Act 2015 (WFGA); the Planning (Wales) Act 2015; and the Environment (Wales) Act 2016 (EWA). Since their development we have been engaging with their implementation. This included a response to last year's NDF "issues, options and preferred options" consultation.

In that response we raised concerns that the preferred option did not sufficiently deliver for the environment. Due to the perilous state of our natural resources and ecosystems (as identified by NRW's State of Natural Resources Report 2016), and the relationship between the environment and other aspects of sustainability, we argued that insufficient environmental action jeopardises the obtainment of national well-being. While it was welcome to see some action included as a theme within the preferred option, we were concerned that its scope was too limited to deliver the level of change required to faithfully deliver SMNR.

Given that Welsh Government has declared a climate and nature emergency in the months following that consultation it is all the more urgent that the final NDF is sufficiently strong to drive an emergency response across the Welsh planning system. While the version currently under consultation represents an improvement on what has been made available previously, beneath the more positive language in the opening sections of the document - where it is framed as a response to the climate emergency - it appears that improvements are marginal and risk being largely superficial. We are concerned that the flaws previously identified remain.

This is particularly disappointing given that throughout the NDF development process there has been significant support demonstrated for it to give a greater focus towards the sustainable management of Wales' natural resources (as expressed in Alternative Option 4 - A spatial strategy focussed on the sustainable management of Wales's natural resources). It appears that despite the support expressed for such a focus the current version still does not

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sufficiently deliver upon it, with the most recent version of the ISA finding that “mixed impacts were identified” for the ISA Objectives relating to SMNR factors such as the natural environment; greenhouse emissions; air quality; water; and biodiversity.

We are also concerned about the apparent lack of connection to the National Resources Policy. While natural resources are referred to at various points in the NDF, there appears to be only one reference to the NRP, and while its three national priorities can be implied from several of the policies the linkages are not sufficiently explicit to demonstrate good integrated governance.

### **NDF Outcomes and their relationship with NDF Policies**

We welcome the draft NDF Outcomes and consider them to be a fair reflection of the Wales we are collectively trying to create. We particularly welcome the inclusion of Outcomes 9-11 which speak to the improving the state of the environment and responding to climate change. This is because we recognise that climate change and the decline in biodiversity is both a global challenge and the most significant issue Wales faces.

Addressing this issue is our greatest responsibility when considering the legacy we leave for future generations, and we are therefore concerned that despite these positive Outcomes, the policies in the NDF appear insufficient to achieve them from an environmental perspective.

This is because a significant number of NDF policies, when assessed against ISA Objectives, have been scored as having either a negative or neutral short, medium and long effect on those Objectives which relate to the environment. This is a clear contrast to how those same policies have been scored against ISA Objectives which relate to economic and social outcomes. This suggests that the NDF considers it acceptable to contain policies which have a negative impact on the environment (and by extension those NDF Outcomes), but still benefit the economy and society. This is concerning given that the environment underpins both society and the economy. This characterisation extends to the assessment of the cumulative, synergistic and secondary effects where uncertainty is being used to generate and excuse a mixed result.

### **It is not acceptable to respond to the climate and ecological emergency with a set of long-term policies which negatively impact upon the environment.**

In response to these criticisms it is noted that the Welsh Government’s response has been to refer to lower level documents such as Planning Policy Wales and Technical Advice Notes for more detailed responses to environmental concerns. This suggests that while the NDF is there to “set the direction for development in Wales”, the environment is not seen by Government as a substantial part of that direction (when compared to other aspects of sustainability) and is instead something which can be addressed at a lower level once that direction has been set. It is once again difficult to see how this constitutes an effective response to the climate and ecological emergency.

More generally, the Policy set it not sufficiently clear regarding how the strategic and regional policies interact. For example, the narrative suggests a large degree of autonomy in how local decision makers interpret and apply policies (this is added to by the current absence of the Strategic Development Plans (SDP)). We are concerned that regionally specific policies will become the focus of local decision makers and their delivery prioritised above the strategic [nationwide] policies. For illustration, how does Policy 27 for Cardiff interact with Policy 8 given the potential conflict between a ‘growth’ focus for the city and the

need to restore biodiversity and ecosystem resilience<sup>1</sup>? The consultation does not explain this. If the answer for this is that Cardiff Council or the relevant SDP will decide that then the NDF has failed in its purpose to set a coherent direction for policy for Wales. More clear guidance is needed on how decision makers are meant to apply potentially competing policies, so the strategic ones are not compromised to achieve those which are regionally specific.

This same is true of regional policies such as the growth of Cardiff Airport (Policy 32) and the capacity increases at the Port of Holyhead (Policy 20). Both of these policies judged to have significant negative effects in the long term by the ISA due to the likelihood of them increasing GHG emissions. To address this the NDF (and/or associated guidance) needs to be clearer about how these policies work alongside the national policies to ensure that developments deliver the net biodiversity benefit ambition of PPW. One approach to this could be to set a clear limit for the expansions proposed, or clearly states that these expansions must be demonstrate not to have a negative affect on biodiversity and ecosystem resilience.

As a final point we are concerned that the NDF has little to say about the rate of change required over time and how responses should be prioritised. All we know is that this is the direction towards 2040. What does success look like in that period, how much by when is sufficient? Furthermore, there is no recognition that investments made now will save money over the long term. For example, the 2006 Stern report estimated that the cost of the UK not tackling climate change would equate to up to 14% of UK GDP in 2050 when wider health impacts are included. This suggests that a focus on an adequate response to the climate and ecological emergency in the early period of the NDF will have long term benefits which will lessen the impact of other issues later in the framework's life.

### **Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience**

Biodiversity and ecosystem resilience have been principally limited to Policy 8 of the NDF. There is some positive language and intent in this policy and its supportive narrative which we strongly support, however we remain concerned that a safeguarding and reactive interventions approach alone will be insufficient to reverse the decline in biodiversity.

As recognised in the NDF, connectivity is a vital part of restoration and resilience. While identifying and safeguarding key locations and then inserting green infrastructure into development proposals is welcome, this approach still reduces interventions to being reactive to future development proposals.

Instead, and in response to the climate and ecological emergency we face, Wales needs a more proactive approach and for this to be articulate in the NDF. Planning authorities should be required and supported by government policy to identify areas where connectivity has already been lost and to identify proactive interventions to restore it. Making these interventions should not be limited to future development proposals. These proactive interventions (both local and regional) should be prioritised in line with the conclusions of Area Statements and our natural and urban environments proactively reshaped (via Green Infrastructure and other Nature Based Solutions) to improve connectivity – thus improving biodiversity and ecosystem resilience.

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<sup>1</sup> Policy 27 only makes passing reference to how natural resources need to inform strategic decisions on growth and infrastructure locations in tandem with a regional approach. This creates the potential for Cardiff to dispense with serious attempts to deliver Policy 8 and instead work with regional partners to effectively off-set it in surrounding areas. This would in effect mean that Cardiff itself is not delivering on Policy 8. This would be unacceptable as all areas of Wales need to respond to the climate and ecological emergency we face.

One avenue to do this would be to adopt an eco-town model where green infrastructure is proactively used to reshape the existing built environment to deliver biodiversity benefit. The housing policies in the NDF do not embrace this potential as an avenue for sustainable investment. They should be changed to do so.

This concern aside we welcome the decision to further identify and develop areas for habitat creation. Yet to do so it is vital that our existing designated sites are sufficiently protected and restored to favourable condition and that action is taken alongside this to improve priority species. As drafted the NDF omits this. Such sites and species are vital biodiversity assets which are as important as any landscape asset. The NDF should reflect this. To do so we would support the NDF recognising designated sites (such as SSSIs) through having a specific policy to restore and maintain them. Furthermore, we would also support and encourage the NDF to include priority species within the national ecological networks referred to in Policy 8.

Furthermore, given that Version 10 of Planning Policy Wales introduced the concept of 'net biodiversity benefit' it is concerning that this is not replicated in the NDF. For Wales' new planning framework to work it needs to be consistent. We therefore recommend that the language and content of the NDF is strengthened to be at least as strong as PPW, and to clearly articulate the requirement to deliver net biodiversity benefit, rather than just 'biodiversity enhancement'.

A final point on biodiversity is that the planning system has proven to be ineffective at considering cumulative impact. This has expressed itself most notably in the expansion of poultry units across areas such as Powys. The cumulative impact of these developments is having an adverse effect on local pollution levels and the quality of local river systems. For biodiversity and ecosystem health to be improved the system needs to change and the cumulative impact (regardless of the size of the development) needs to become a material consideration in all planning decisions. This should be recognised in the NDF alongside PPW and supportive TANs.

### **Renewable Energy Policies**

WWF Cymru continues to welcome Welsh Government's commitment to renewable energy as part of its response to climate change. The NDF as drafted does give us some concern with regard to the consideration given to designated sites within the Priority Areas set aside for future renewables development.

While we appreciate it is not the intent of government to permit applications on such sites, the NDF must ensure that it does not weaken protections for such sites in the level of consideration they are given. We argue that considerations of such sites should not be in the same category as landscape concerns given that the status of designated sites has a material impact on the condition of biodiversity and ecosystem health in a given area.

### **Conclusion**

In summary we remain concerned that despite the positive supporting narrative within the NDF, a deeper analysis shows that the environment is still a relatively low priority when compared with societal and economic gain.

This is counterproductive given that the environment underpins both of these, and that restoring ecosystem resilience has long term benefits which include making it easier and cheaper to address societal and economic issues.

As a response to the climate and ecological emergency the NDF is inadequate, with specific policies within it – such as supporting growth of Cardiff Airport and a Cruise Ship Terminal at Holyhead – are likely to make the problem even worse. Wales needs a proactive response to tackling this emergency which focuses on achieving ecosystem resilience and biodiversity restoration. The NDF, in its current state, will not achieve this in our view. In response we have used this response to identify a series of alternative approaches and adjustments which would act to strengthen the NDF policies and provide greater clarity for those interpreting them.