

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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?

Don't know

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with most of them

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

The Geological Society (GSL) is the UK's learned and professional body for geoscience and a major international Earth science publisher with about 12,000 Fellows (members) worldwide. The Fellowship encompasses those working in industry, academia, regulatory agencies and government with a broad range of perspectives on policy-relevant science, and the Society is a leading communicator of this science to government bodies, those in education, and other non-technical audiences. We are not best placed to respond to all of the questions outlined in the consultation but have instead responded on sections of the framework as they relate to geodiversity and the protection of geological sites. For a relatively small country such as Wales, the variety of rocks, minerals, landforms and natural processes is tremendously varied. This geodiversity undoubtedly puts Wales on a global footing. But it is important to remember that Wales has been a key player in the development of Earth sciences for nearly two centuries. The Cambrian, Ordovician and Silurian periods were defined by pioneering Victorian geologists while studying the rocks of Wales. Even the Welsh place names such as Llandovery, Llanvirn and Arenig are terms used around the world to represent specific periods in geological time. The geology of Wales maintains a global relevance attracting university departments from around the world in order to train geologists and undertake research. The rich mineral wealth that once drove the industrial revolution in Wales has left a rich legacy of industrial history, which together with the fantastic geodiversity, is now an important asset in many parts of Wales. Development of planning policy and future priorities presents a significant opportunity to outline the value of geodiversity and geological features and its important role in environmental processes as part planning regulation. A truly holistic approach to the environment is the key to sustainable environmental management. Geological features and geodiversity play an active role in environmental processes, providing key resources and services, and supporting others and so its explicit inclusion in the framework documents should be consistent throughout. Geology acts as a first-order control on ecosystem services and is inextricably linked to the atmosphere, biosphere and hydrosphere. It is imperative that the abiotic elements of ecosystems are not undervalued in comparison with biotic elements; and that the significance of geology and geodiversity and its interactions with the atmosphere, biosphere and hydrosphere, are fully recognised. There is concern among members of the community that reference to the value of geodiversity is well not described in the NDF supporting documents. In practice, it is likely this will result in a lack of uptake from planners and practitioners when the NDF becomes a working document. This is the experience of some of our members during the development of earlier environmental policies and those pertaining to the devolved nations: where important detail is left out of the main bill, this results in a perceived lack of emphasis such that the geological component is ultimately overlooked when the various aspects of the bill are applied. On that basis, the 'Outcomes' and supporting text where we would recommend that the wording is strengthened are as follows: Supporting text: • Chapter 2 o Page 12. The introduction to this chapter skirts around geodiversity when discussing natural resources, landscape and industrial legacy but doesn't actually use the term. We would recommend inclusion of the word 'geodiversity'. o Page 15. In the third paragraph when discussing nature conservation sites, we would suggest adding something on geological sites: □ 'Wales has a rich variety of nature conservation sites, protecting our geological heritage and a diverse range of important and unique habitats and protected species.' Outcomes: We would recommend that two of the outcomes be changed to include reference to geodiversity. See suggested wording below: • Outcome 9 Wales' natural resources, including its minerals, coast, water, forests, geodiversity 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 livable. • Outcome 10 The variety of flora, fauna and geological features found across Wales make Wales a special place. Biodiversity and geodiversity underpin 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 recognise the importance of our geodiversity and 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.

2. Spatial Strategy (policies 1 - 4)

Q3. 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)							X
Rural areas (Policy 4)							X

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

No Response

3. Affordable Housing (policy 5)

Q5. 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?

No opinion

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No opinion

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

No opinion

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

No Response

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No opinion

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

Q12. 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	Don't know	No opinion
Large scale wind and solar developments							X
District heat networks							X
							X

Q13. 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?

No Response

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

No opinion

9. North Wales (policies 17-22)

Q15. 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?

No opinion

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

Q16. 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?

No opinion

11. South East Wales (policies 27-33)

Q17. 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?

No opinion

Q18. 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.

No Response

12. Integrated Sustainability Appraisal

Q19. 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.

No Response

13. Habitats Regulations Assessment

Q20. 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?

No Response

14. Welsh Language

Q21. 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?

No Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

No Response

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Florence Bullough
Organisation (if applicable)	The Geological Society
Preferred contact details (email/phone/post)	<div></div>

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response