

**From:** [Joy Sisley](#)  
**To:** [NDE](#)  
**Subject:** Response to the Draft National Development Framework  
**Date:** 15 November 2019 18:57:45  
**Attachments:** [Joy Sisley draft NDF response.pdf](#)

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I attach my response to the draft National Development Framework.

I would be grateful if you would acknowledge receipt.

Kind regards,

Joy Sisley

Joy Sisley

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## DRAFT NATIONAL DEVELOPMENT FRAMEWORK CONSULTATION RESPONSE

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Summary: The use of “landscape” in the draft NDF is conceptually limiting and its application to spatial strategies is damaging. I strongly advocate a democratic and collective use of “landscape” that empowers people to make decisions about development at a local level. Such an approach would be consistent with the goals of the Well Being of Future Generations Act, which the NDF is supposed to interpret as a spatial plan.

The structure of the consultation document does not provide for a detailed consideration of the relationship between Outcome 9, individual policies, and an overarching concept of landscape expressed in the NDF. In my view, the limited conceptualisation of “landscape” and its application to the various policies constitutes a major flaw in the NDF that undermines its commitment to biodiversity, the goals of the Well Being of Future Generations Act (2015) and “sustainable development”, insofar as it is rather narrowly defined as “foster[ing] a stable or growing population to ensure a healthy natural environment and economic and social stability” (p22). Moreover the application of this limited conceptualisation of landscape to policy areas in the NDF results in politically unacceptable outcomes, most notably in rural areas.

Landscapes are described variously in the NDF as “living” (p12), “dramatic” (p14) “important” (p24), “outstanding” (p54), or “high quality” (p60) and valued for their visual and scenic quality as “some of the best in the world” (p12). They are also described as a “natural resource” and an “asset” (p21) or in other terms, its **use value**.

The concept of landscape as a “resource” is enshrined in NRW’s definition of landscape:<sup>1</sup>

“We understand landscapes as place-based environmental settings:

- whose character results from the actions and interactions of natural resources and cultural factors;

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<sup>1</sup> <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/landscape/?lang=en>

- that provide the landscape-scale integrating context for the sustainable management of natural resources;
- that provide multiple well-being benefits for people

This particular understanding of landscape is guided by the European Landscape Convention, within the context of:

- The sustainable management of natural resources, within the context of the Environment (Wales) Act 2016; and well-being, within the context of the Well-being of Future Generations Act (Wales) 2015

Gerber and Hess (2017) comment that the conceptualisation of Landscape as a resource gained international recognition when it was adopted by the European Landscape Convention (Council of Europe 2000), which asserts that landscape “constitutes a resource favourable to economic activity and whose protection, management and planning can contribute to job creation”.<sup>2</sup>

Outcome 9 of the draft NDF states (p21):

“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.”

Outside of areas such as National Parks and AONBs, which are to be protected from adverse landscape and visual impacts through inappropriate development (Policies 10-12), the rest of Wales’ landscapes are reduced to natural resources that are available to be exploited for their mineral, agricultural, forestry, water and wind assets to serve our economy. “We depend on high quality natural resources to fuel our industries, provide our food, clean air and water and create jobs and wealth.” (p12) In this context landscape is variously described as “productive countryside” (p22)

Turning to Policy Group 10: Mid and South West Wales (policies 23-26), I note from the table showing the relationship of NDF Policies and Outcomes that Outcome 9 is not applied even to the rural landscapes of Powys. This appears to be because:

- The region must play its role in decarbonising society and support the realisation of renewable energy.
- The region’s minerals and aggregates play an important role in supporting development across Wales and England. (p24)

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<sup>2</sup> Gerber Jean-David & Hess Gérald (2017) “From landscape resources to landscape commons: focussing on the non-utility values of landscape”, International Journal of the Commons, Vol. 11, no 2 2017, p 708–732

Notwithstanding the fact that :

“Development plans and decisions on planning applications should provide a positive framework to support growth and ensure that communities across all parts of the region are able to **benefit from their landscapes, natural and historic environment**, heritage assets and visitor attractions to support and grow their economies” (p60 – my emphasis), but this presumably refers only to National Parks and AONBs.

This intrinsic use of “landscape” as a “natural resource” throughout the draft NDF justifies the claim to ‘acceptance of landscape change’ that is politically unacceptable to communities in mid-Wales. It should be noted, the people of mid-Wales have consistently fought the imposition of major developments to appropriate its “natural resources”, water and wind, to supply England. The Welsh Government has apparently not learned from this history of opposition in rural Wales.

The Campaign for the Protection of Rural Wales (CPRW), claims “landscape belongs to everyone”. In other words, it is a common good that people enjoy not only for its scenic qualities but also for the intrinsic value of its unique geography and history that has shaped our national consciousness and forms our identity. Recently, I have had the privilege of twice acting as one of the judges for the Montgomeryshire Village Award, jointly sponsored by the CPRW and Morris Marshall Poole. The communities I visited are cohesive and inclusive; the people who live in these communities are enterprising and mutually supportive. They have a strong pride of place and deep sense of belonging that is unique to the rural landscapes of mid Wales. In addition, my experience of campaigning under the banner of Montgomeryshire Against Pylons reinforces the view that people living in these communities fully understand their collective ‘ownership’ of and responsibility for ALL the landscapes in our region.

This particular communal view underpins the *raison d’être* of the Campaign for the Protection of Rural Wales:

“Since 1928, CPRW has been standing up for the people and places of rural Wales and protecting our unique landscapes. From defending wild spaces from destructive development to creating sustainable rural communities, we are passionate about creating a countryside, which works for everyone.”<sup>3</sup>

Redefining landscape as a “common good” would be consistent with the goals of the Well Being Act in which its extensive use as a resource for extracting wind to fuel future electricity supply has no place. It follows that jurisdiction over development that involves significant landscape change should rest exclusively in the hands of host communities. Understanding our landscapes as a common good would “empower people to be co-proprietarians and co-stewards of their commons” (Gerber and Hess p724).

Unfortunately, I believe this is beyond the imagination and political will of the current Welsh Government.

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<sup>3</sup> <https://cprw.org.uk>