

Date: 01 November 2019
Our ref:
Your ref:



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Dear Sir / Madam

Consultation on the Draft Wales National Development Framework

Natural England welcomes the opportunity to comment on the above consultation. As the Government's advisor in England on the natural environment, our purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England advises on the environmental aspects of sustainable development and engages with the planning system as a statutory consultee for development plans, Environmental Impact Assessments, Strategic Environmental Assessment, Nationally Significant Infrastructure Projects and where planning applications are likely to impact upon our particular interests including protected habitats, Sites of Special Scientific Interest and designated landscapes.

Our response below is focussed on the cross border impacts of the proposals on England. We have not completed the questionnaire as we do not wish to comment on other aspects of the draft National Development Framework.

We note the proposals for large scale renewable energy generation (policies 10-13) and the commitment to avoid large scale development in protected landscapes and internationally designated habitats. In developing these proposals, we would welcome consideration of Areas of Outstanding Natural Beauty (AONBs) located within England, particularly the Shropshire Hills AONB, which may be impacted by renewable energy areas 5 and 6 and any associated infrastructure for connecting to the national grid.

For Policy 13, the supporting Habitats Regulations Assessment states that tidal generation projects should consider avoidance and mitigation approaches including avoiding known designated sites (such as Marine Special Protection Areas, Marine Conservation Zones or European Marine Sites) when considering locations for potential new marine energy projects. We would welcome a stronger commitment to avoid protected areas and designated sites that aligns with the level of protection set out in the National Planning Policy Framework (NPPF) for England – in particular, paragraphs 172 (designated landscapes), 175 (Sites of Special Scientific Interest) and 177 (European sites). Opportunities for delivering biodiversity and wider environmental gains should also be encouraged, as set out in the NPPF.

We consider that a clear commitment within the framework to cross border dialogue on the impacts and consideration of impacts will help to foster closer working and identify opportunities for furthering the natural environment in both England and Wales.

If you have any questions regarding our response please contact
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Yours faithfully



Jonathan Burney
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Natural England