

From: [James, Adrian](#)
To: [NDE](#)
Cc: [REDACTED]
Subject: Consultation Response
Date: 15 November 2019 11:00:28
Attachments: [NDF Consultation Response Letter 2019.pdf](#)
[Detailed NDF consultation response 2019.pdf](#)

Bore da,

Please find attached our response to the consultation on your proposed Draft NDF.

Kind regards, Adrian

Adrian James

[Arweinydd Tîm Cynllunio, Tirwedd, Ynni a Datgarboneiddio](#) / Planning, Landscape, Energy and
Decarbonisation Team Leader

[Cyfoeth Naturiol Cymru](#) / Natural Resources Wales

[REDACTED]

[REDACTED]

Gwefan / Website: www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

[Siaradwr Cymraeg](#)

Neil Hemington,
Welsh Government Planning Division
Cathays Park

15th November 2019

Dear Sir/ Madam,

Consultation on Draft National Development Framework (WG 38167)

We welcome the opportunity to respond to the above consultation. The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. In the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW is also an advisor to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

Natural Resources Wales welcome the National Development Framework and supports its role in establishing a national framework and process to think about the long term impacts of the decisions we make today. This is particularly relevant given the need to identify solutions to the challenge of climate and environment emergency, moving towards a sustainable pattern of development and land management in the long term.

Our main comments on the draft NPS are in relation to:

- In response to the Climate Emergency Declaration in Wales it would be appropriate to review the extent to which the sector policies fully reflect and embed the carbon budgets set out in Prosperity for All: A Low Carbon Wales. The NDF could also be more directional in encouraging the behaviour change required across the development and infrastructure sectors if Wales is to move towards a sustainable pattern of development and land use in Wales.
- We welcome the provision in Policy 8 to ensure the enhancement of biodiversity and ecosystem resilience through the national level of strategic planning. We consider such a commitment and approach elevates the important contribution the planning system can make in responding to the recent [climate and biodiversity](#)

[emergency declaration](#) by the Welsh Government. We would welcome the opportunity to work with you in exploring how Area Statements and information held by us can help support the effective delivery of this policy.

- We welcome the Welsh Government's aspiration of delivering a national forest as set out in Policy 9 of the draft NDF. We see it as an opportunity to create a valuable new asset for supporting biodiversity and delivering wider ecosystem services for the nation's benefit. You are aware that we are already working with Welsh Government on the proposed national forest, and look forward to taking this forward with you.
- We welcome the recognised importance of green infrastructure throughout the NDF, and the provision in policy 8 to strategically plan for maximising opportunities from green infrastructure and nature-based solutions. This approach is consistent with the priorities set out in the Natural Resource Policy and is an essential component of place-making in supporting the resilience of the environment and communities.
- We welcome the aspirations to support renewable energy deployment through the NDF, and the intention to steer development to areas of lower environmental risk through Policy 10 of the draft NDF. However, we are concerned that the effective delivery of this policy may be hindered if certain 'Priority Areas' for large-scale renewable energy schemes are not supported by national grid infrastructure. It would be useful for the NDF to set out the Welsh Government's ambition for this infrastructure, and its ambition for how public land in Wales can support decarbonising the Welsh economy through woodland creation, peatland restoration, as well renewable energy deployment.
- The effective delivery of policies 8, 9 and 10 of the Draft NDF will also depend on alignment and integration with the outcome of the Sustainable Farming and Our Land consultation to ensure an integrated framework for development planning and land management in Wales. Such a framework would also help inform any response required in Wales following potential loss of EU Structural Funds and EU CAP funding.
- We are generally supportive of a spatial strategy which steers development to areas which are supported by sustainable travel infrastructure to help reduce need to travel, particularly by private car. We also welcome the clear statement that *"Sustainable growth will involve setting an ambitious strategy for achieving biodiversity and green infrastructure enhancement in our urban areas. Effective and innovative nature-based solutions to the challenges of urban form, design and density will be required in order to reap the well-being rewards of living and working in exemplar, future-resilient settlements"*. However, we are also aware that the identified main areas of growth also include or in close proximity locally sensitive environmental considerations including; areas of flood risk, statutory nature

conservation designations, protected landscapes, water bodies that are under pressure. Whilst we recognise that their management alongside development will be subject to national planning policy and guidance, we highlight these matters in our detailed comments as key considerations for the effective delivery of the policies set out in Chapter 5 of the Draft NDF. To this effect it would be helpful to clarify in the NDF the interface with the policy framework established by PPW 10.

Our detailed response to your consultation questions are included in the supporting consultation form.

We trust that our advice will be useful to you. If you have any queries in relation to our detailed response, please contact Keith Davies, Land and Sea Manager in the first instance at: [REDACTED]

Yours sincerely,

[REDACTED]

Ceri Davies

Executive Director of Evidence, Policy & Permitting

Consultation Response Form

Your name	Ceri Davies
Your address	Tŷ Cambria Cambria House 29 Newport Road Cardiff CF24 0TP
Preferred contact details (email/phone/post)	<div></div>
Organisation (if applicable)	Natural Resources Wales

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

We welcome the recognition of the importance of accessible green and open spaces to place-making.

Outcome 2

Whilst we welcome the intent to support job opportunities and community services, we are concerned that an emphasis has been placed on finding a "balance" between development and preserving the character of rural Wales, rather than emphasising an aim to achieve the delivery of high-quality development, that is reflective of local character which supports jobs, and retains rural areas as attractive places to live and work.

Outcome 3

We welcome the aim to build on the strengths of the "*distinct underlying characteristics*" of different parts of Wales. However, distinct environmental characteristics are an essential part of that and should be recognised as contributing "*to achieve greater prosperity and well-being*". We recommend it should be reflected in the text supporting this outcome.

Outcome 7

We welcome the aim to achieve low environmental impact and low emissions transport provision.

Outcome 9

We welcome the recognition of the important contribution of nature-based solutions. As indicated in our response to Planning Policy Wales (edition 10) consultation, we envisage that to support a culture change in approach, nature-based solutions should be promoted in national planning policy as the preferred approach within planning decisions, and scheme promoters should demonstrate why nature-based solutions are not taken forward within relevant schemes.

Outcome 11

We welcome the inclusion of an outcome on decarbonisation, but we also recommend that this or a separate new outcome recognises an objective to adapt to climate change.

The marine environment

We welcome the clarity around the relationship between the NDF and Welsh National Marine Plan set out in the introduction and within the 'Model of NDF influence' diagram. Coastal issues, and the importance of the marine and coastal area to the different regions especially in relation to flood risk and coastal change, are helpfully articulated throughout the document. This highlights the significance of ensuring that regulatory and planning processes interact effectively over the land sea interface and we would like to see further clarity over exactly how this will be achieved. Some of this can only be developed over time as our experience with these new planning processes grows. However, we suggest that the text supporting policies within the NDF with specific relevance to the marine area (for example Policies 8; 13; 20; 22; 25) would benefit from referencing the WNMP as a specific consideration in delivering these policies through the development of Strategic and Local Development Plans.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" 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:

We are generally supportive of a spatial strategy which steers development to areas which are supported by sustainable travel infrastructure to help reduce need to travel, particularly by private car.

We also welcome the clear statement that *“Sustainable growth will involve setting an ambitious strategy for achieving biodiversity and green infrastructure enhancement in our urban areas. Effective and innovative nature-based solutions to the challenges of urban form, design and density will be required in order to reap the well-being rewards of living and working in exemplar, future-resilient settlements”*. We consider this statement recognises the important role of green infrastructure and nature-based solutions to place-making and improving the resilience of communities, and justifiably reflects the need to plan strategically for their provision. However, we are also aware that the identified main areas of growth also include or near locally sensitive environmental considerations including; areas of flood risk, statutory nature conservation designations, protected landscapes, water bodies that are under pressure. Whilst we recognise that their management alongside development will be subject to national planning policy and guidance, we highlight these matters here so as to highlight what we believe are key considerations for the effective delivery of the policies set out in Chapter 5 of the Draft NDF. Cross-reference to the policy framework provided by PPW 10 would help provide clarity and certainty.

Summarised matters are identified immediately below, but we provide more details in response to the relevant policies in Chapter 5 of the Draft NDF.

Flood risk

The three main areas identified in the Draft NDF as the focus for urban growth all have current flood risk challenges, which are likely to increase with climate change. Growth in these areas must be done so appropriately and in line with PPW 10, TAN15, Shoreline Management Plans and the National Flood & Coastal Erosion Risk Management Strategy (FCERM) Strategy so as not to expose more people to flood risks. Expansion of these areas may also require a national overview of flood defence infrastructure and its integrity, whilst recognising that new defences should not be a means to enable new development.

Designated landscapes

The spatial strategy map on page 25 indicates that the National Growth area in south East Wales overlaps with the Brecon Beacons National Park. This may be an oversight when developing the map, but we recommend it should be amended to demonstrate that this National Growth Area does not include a designated landscape.

Policy 1 – Sustainable Urban Growth

Whilst we generally agree with the broad aims of the policy, we advise that “places are well planned and have strategies for ensuring our needs and demands are met and managed in a sustainable way *for now and in the future*”.

Policy 2 – Supporting Urban Centres

We welcome the recognition of urban green infrastructure as a key means to make dense urban development liveable. We note the commitment to develop further guidance. We would welcome the opportunity to support you on developing such guidance which would help planning authorities on how to maximise the ecosystem services delivered by urban green infrastructure to ensure it is of the right quality, in the right place, and of the right size.

Policy 3 – Public investment, Public buildings and Publicly Owned Land

The supporting text suggests this Policy is limited to major-trip generating developments, and therefore does not extend to the NRW managed estate. We would welcome confirmation whether this is a correct interpretation of how the policy is to be applied.

Policy 4 - Supporting Rural Communities

There is a direct read across to the intention underpinning this policy with the outcome of the Sustainable Farming and our Land Consultation. The potential loss of EU Cap Funding and EU Structural Funds will potentially have significant implications for land management and development planning with consequential impacts on the economic, social, environmental and cultural wellbeing of communities. This will require a national framework to plan and manage future development planning and land management.

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 checked="" type="checkbox"/>

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

We recommend that the policy is amended so the final sentence reads "... they should identify sustainable sites for affordable housing led developments that is supported by adequate and appropriate green infrastructure..."

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?

We are supportive of the delivery of appropriately located and designed telecom infrastructure and recognise that the identification of Mobile Action Zones will help to focus attention within areas where there is demand but with little or no coverage.

It is likely that Mobile Action Zones will be primarily rural in location which may 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 inappropriate siting decisions, and multiple schemes within a single location leading to a 'clutter' appearance of development.

We suggest that urban and rural siting and design guidance will be useful to support the delivery of this policy, such as that provided in the Scottish Government's Planning Advice Note PAN62, which contains many examples of sensitive siting and design practice. We would welcome further discussion on this matter.

We also suggest the final sentence of the policy is amended to read "...*presumption in favour, provided adverse landscape impacts and visual intrusion have been minimised to an acceptable level.*" to encourage scheme proponents to carefully consider how any landscape and visual effects at the earliest stage of decision-making on location and design, and explore opportunities for sharing infrastructure.

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	Don't know	No opinion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 rollout of charging infrastructure for ultra-low emission vehicles?

This policy and its intention is supported. It will help move towards delivery of the WG decarbonisation targets. NRW is currently working nationally with WG, WLGA and the WG Energy Service, and the PSB's locally, to help ensure a coordinated approach to the deployment of EV infrastructure in appropriate locations.

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>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience

We welcome Policy 8 and Welsh Government's intention to ensure the enhancement of biodiversity and ecosystem resilience through the national level of strategic planning. We consider such a commitment and approach elevates the important contribution the planning system can make in responding to the recent [climate and biodiversity emergency declaration](#) by the Welsh Government.

NRW has a range of datasets that could be used to help inform the process of identifying key areas for safeguarding. These include datasets on habitat connectivity, ecological resilience and ecosystem services.

The process of identifying the key areas for safeguarding is nevertheless likely to be complex even at a strategic level. Most areas in Wales already play a role or have the potential to play a greater role in the delivery of ecosystem services and/ or support biodiversity. Decisions will therefore have to be made about which ecosystem services and/or types of habitats/ biodiversity are most important. SoNaRR may be able to provide a steer, but the final decision about what is most important is effectively a policy decision and one that needs to take account of the regional context, as not all ecosystems will be equally important in all areas.

As part of this process, we consider it key to not just consider what is already there, but also the potential for areas to provide more biodiversity/ benefits. It's this second aspect that we believe to be particularly challenging and we would welcome the opportunity to discuss with WG how we could explore this further.

We would also suggest that if areas for safeguarding are identified at the national level, that the role of Area Statements in refining these should be considered further. Topics such as habitat connectivity and ecosystem service opportunities are highly complex and local authorities are likely to benefit from help in refining this further at the local scale.

Supporting Strategic Green Infrastructure

We welcome the increased focus on biodiversity enhancement, which we consider to be key to ensuring development in Wales is sustainable. We would like to make WG aware that NRW has already undertaken a mapping exercise to identify key areas for improving the connectivity between protected areas. This data is available on the [Lle](#) portal and could be used to form part of the evidence base for identifying areas that should be safeguarded. We would however stress that important areas for improving biodiversity and ecosystem services are also likely to exist outside of the protected areas network, and additional work is therefore likely to be required at the regional, strategic and/ or local level of plan-making.

We welcome the definition of safeguarding that is used by Welsh Government, as it encourages the idea that development and the environment can work together. It is however important to recognise that different approaches to safeguarding may be required, depending on the habitat(s)/ ecosystem service(s) that are being maintained or enhanced. This could range, for example, from strict protection of a semi-natural ancient woodland, to a more dispersed general effort to safeguard a wide number of species across a wider area by incorporating GI solutions alongside development. It would be beneficial if the local authorities could consider which approach(es) are relevant and specify this as part of their GIA and/ or LDP.

Strategic green infrastructure mapping

We would welcome clarification on what is covered by the “national biodiversity themes” and whether this includes NRW’s work on mapping ecosystem services. We would like to stress that both NRW’s habitat connectivity maps and ecosystem service maps set out opportunities and that not everything that is covered by these maps necessarily requires protection. A certain level of interpretation will therefore need to be applied to these maps, taking into account the local context, including local pressures and opportunities. Area Statements should help to provide the context for this, but the current wording could be interpreted as local authorities needing to have regard to both the “national biodiversity themes” and the Area Statements. This section may therefore benefit from some clarification on what local authorities are expected to consider.

Shoreline Management Plans

We consider that Policy 8 would benefit from specific reference to Shoreline Management Policies which provide an important context and evidence base for delivering green infrastructure approaches at the coast.

Policy 9 – National Forest

We welcome the Welsh Government’s aspiration of delivering a national forest. We see it as an opportunity to create a valuable new asset for supporting biodiversity and delivering wider ecosystem services for the nation’s benefit.

In delivering NRW’s [2019/20 Remit](#) Letter we are working with Welsh Government to develop proposals for a National Forest. We agree that an asset such as a national

Please see also our comment above in relation to the need for a national framework to integrate development planning and land management.

[illegible]

- 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?

We welcome the inclusion of policies within the NDF which are aimed to help deliver the Welsh Government's decarbonisation agenda, whilst aiming to steer large scale wind and solar energy schemes (under Policy 10) to areas of lower environmental risk to protect our most valuable environmental features.

We are broadly supportive of the principle behind Policy 10 as it is consistent with an approach which aims to strategically steer the right development to the right place.

We note Policy 10 is also intended to "build the case" for new or reinforced grid infrastructure and consider this a sensible approach to overcome an existing challenge. However, we do have concerns that the provision under Policy 11 to enable large-scale schemes outside Priority Areas potentially undermines this objective as there is a likelihood that scheme proponents will consider areas currently supported by adequate grid infrastructure as more attractive locations to invest thereby overlooking any Priority Areas that are not currently supported by grid infrastructure. This risks undermining the "case" for grid investment in these locations.

We therefore advise that to help deliver Policy 10, the NDF should include greater reference to Welsh Government's strategic aspirations and support for locating new grid infrastructure that is reflective of the Welsh Government's view of expected future electricity usage.

It is not clear why allowing development outside the Priority Areas undermines the case for new grid inside Priority Areas. Grid networks are linear features between different locations. Developments outside priority areas would be likely to improve connectivity to Priority Areas by creating more options for points of connection rather than undermine.

Additionally, whilst we recognise that the NDF can only address energy infrastructure that is devolved, we believe it would be useful for the NDF to recognise non-devolved energy aspirations together with the potential contribution of marine renewables to achieving renewable energy and decarbonisation targets in Wales. For instance, new offshore wind and wave and tidal energy has the potential to deliver a very significant amount of low carbon energy that would contribute significantly to WG decarbonation needs. Furthermore, it would be useful for the NDF to set out what intention the Welsh Government has in identifying the energy mix it considers necessary to deliver its targets for renewable energy, the extent to which identified Priority Areas will contribute towards meeting targets for renewable energy, and how future iterations of the NDF may identify opportunities for other large-scale technologies.

Notwithstanding the above, we set out recommended common amendments to Policies 10 and 11 immediately below, as well as further policy specific recommendations.

Policies 10 & 11 - Wind and Solar energy within and outside Priority Areas

Ecosystem Services

We welcome the direction provided in these policies for planning applications to demonstrate how local, social economic and environmental benefits are maximised. To help in this, we recommend that the supporting text to these policies indicate that applicants would be expected to refer to how their identified benefits have been informed by and is reflective of risks and opportunities as identified in Area Statements, and is consistent with Policy 8 of the NDF.

Carbon stores

Large scale wind energy schemes may be located in areas where the soils are an important carbon store and therefore make an important contribution towards the Welsh Government's decarbonisation agenda. We have commissioned mapping which indicates areas where this valuable ecosystem service is provided and can share this with you. To maintain the function of these soils as carbon stores, we recommend that an additional criterion is added to Policies 10 and 11 which steers development away from areas which are important for their ecosystem service as a carbon store, and advocates the need to microsite turbines accordingly.

Access

It is currently unclear what direction is provided in the final two sentences of both policies. For improved clarity we recommend that they are amended to read *"Planning applications will be expected to demonstrate potential effects, and suitable mitigation measures, associated with identified access to the site for construction and maintenance purposes, and associated grid infrastructure. Applications will also be expected to detail proposals for the lifetime of development including the construction, operational, and decommissioning phases of development. This should detail how all infrastructure will be removed as soon as their use ceases, and the appropriate after-use of the site"*.

Policy 10 – Wind and Solar Energy in Priority Areas

Designated Landscapes

We welcome a criterion in Policy 10 which seeks to minimise adverse impacts on the settings of National Parks and AONBs. However, some developments within Priority Areas could also have adverse impacts on the purposes of designated landscapes,

because of their location, layout or design. To help ensure Policy 10 is consistent with the legislative protection afforded to protected landscapes, we recommend that the third criterion to which the Policy refers should be the need to avoid adverse impacts on “*National Parks and Areas of Outstanding Natural Beauty, and to minimise adverse effects on their settings*”.

Statutory Nature Conservation Designations

We are generally supportive of identifying areas where large scale wind and solar energy schemes can be located where the risk of significant adverse impacts on Wales’s most important environmental features are lower, as this can help steer the right development to the right locations. We are aware that the Draft NDF Priority Areas currently include a number of SSSIs and European nature conservation designations. There is a risk that Priority Areas are considered as locations where relevant energy schemes will be permissible in any location within the boundary of Priority Area, which can lead to conflict at the project stage.

The supporting text to Draft NDF Policy 10 mitigates this risk somewhat by indicating “Not all of the area within the Priority Areas for solar and wind energy is suitable for the generation of renewable energy”. However, whilst it states that “*Natura sites within the Priority Area are excluded*”, it omits highlighting that schemes outside N2K sites could also have an adverse effect on the designated features of these protected sites. Such potential for adverse effects are recognised in the *Wales NDF – Implications for the Natura 2000 network of priority areas of solar and wind Energy development across Wales – HRA Report*. Similarly, it omits recognising that the notifiable features of SSSIs can be adversely affected by schemes within or outside of the boundaries of these protected sites.

Therefore, instead of seeking to “minimise adverse impacts” on nature conservation sites. Policy 10 should be amended to ensure consistency with paragraph 6.4.14 of Planning Policy Wales (edition 10) which requires that “... development should be refused where there are adverse impacts on the features for which a site has been designated”.

Additionally, to ensure the clarity of the potential limitations for development within Priority Areas, we recommend that the supporting text to Policy is amended to insert as new third sentence: “Decision-makers should also steer development away from locations which could incur adverse effects on the features for which European sites are designated, or the features for which SSSIs are notified.

Guidance

We note and welcome the intention to develop further guidance to support this policy and would welcome the opportunity to contribute to this as we are conscious that the spatial policy will have implications for how impacts and acceptability should be considered.

Whilst not limited to landscape and visual impact considerations, we suggest any new guidance could encompass:

- Wind and solar landscape and visual effects guidance;
- Place-specific siting and design guidance providing strategic scale landscape analysis to assist in locational decision-making, identifying key views, gateways, corridors, landmarks etc
- Inter-visibility mapping for Designated Landscapes; (e.g. as undertaken for Shropshire Hills AONB)
- Standing guidance on landscape sensitivity assessment (which NRW is preparing)
- A reference to Landmap and other relevant existing baseline landscape resources.

The above list is not intended to be exhaustive. We would welcome the opportunity to discuss this with you, as well which other environmental interest may be supported by guidance.

Given the intention to give PAREs definite boundaries, it is probable that their exact alignment may be contested. We suggest that the final boundaries are supported by refinement and/or publishing information which allows users to understand the boundary alignment 'on the ground'. We would welcome the opportunity to discuss this further with you.

Commencement of Policy 10

There are a number of proposals for large-scale onshore wind energy schemes currently being prepared which are located outside of the Priority Areas, but within TAN8 SSA boundaries or within a 5km buffer. A number of these projects are partially on Welsh Government-owned land, or have agreed access rights across Welsh-Government owned land. In particular, NRW has recently tendered the development rights to the Alwen in North Wales and the Bryn in South Wales. Both of which only partially fall within a proposed Priority Area. The Bryn is largely outside of the Priority Area 14. These projects are likely to enter the planning system during the next three years. However, the current NDF proposals introduce uncertainty as to how these areas will be considered. We therefore recommend that Welsh Government clarifies at its earliest opportunity the timetable for when Policy 10 will come into effect so that developers can plan accordingly.

Policy 11 – Wind and Solar Energy Outside of Priority Areas

Designated Landscapes

We welcome a criterion in Policy 11 which seeks to avoid unacceptable adverse effects on the settings of National parks and AONBs. However, due to their location, layout or design, such schemes could also have adverse impacts on the purposes of

designated landscapes. We therefore recommend that the third criterion of Policy 11 is amended to read: “*National Parks, Areas of Outstanding Natural Beauty and their settings*”.

Our comments on guidance for Policy 10 therefore also relate to Policy 11 in most respects.

Adverse effects

Whilst we welcome the requirement that there are no “*unacceptable adverse effects on identified features*” from schemes, we are aware that different actors within the planning system may have different views as to what constitutes an unacceptable effect. It would be useful therefore for the NDF to indicate in supporting text to the policy how Planning Policy Wales and any other national guidance should be considered to understand what may be considered unacceptable.

Policy 12 - Wind and Solar in National Parks and AONBs

We welcome Policy 12 and its intent to protect the purposes and special qualities from potential adverse effects. However, please see our comments above to Policies 10 and 11 on recommended changes to the policies to protect designated landscapes from potential adverse effects incurred by schemes outside protected landscapes.

Policy 13 - Other Renewable Energy Developments

We consider this an appropriate approach for such schemes. However, in delivering the Welsh Government’s Energy Atlas, we consider it useful if this iteration of the NDF indicates any intention by the Government to identify priority areas for other large-scale technologies, and how this may be informed by Area Statements.

Policy 14 - Priority Areas for District Heat Networks & Policy 15 – Masterplanning for District Heat Networks

We welcome the intention to identifying Priority Areas for district heat networks (DHN) and the requirement to masterplan for DHN as part of larger scale development. Almost half of the energy consumed in Wales is heat. Arguably therefore, decarbonising heat is the biggest challenge in the energy sector, and heat networks is a way forward in addressing this.

Many criteria influence the development of heat networks: building density, regeneration areas and coordination with other networks. Therefore, integration of the Energy Masterplan with the urban planning framework is encouraging as it can bring forward long-term, sustainable heat network

infrastructure projects, and we would welcome the opportunity to support you in this work.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We generally welcome the direction provided in Policy 16 to support Strategic Development plans help shape regional development, and collaboratively consider and address/ support wider than local matters.

In particular, we welcome the direction provided on ecological networks, the sustainable management of natural resources, and green corridors. Whilst we also welcome the reference to landscape considerations, we advise that greater clarity is given to what is meant by 'nationally important landscapes'.

We also welcome the provision for strategic plans to establish green belts. However, we consider (as stated in our response to the consultation on Planning Policy Wales (Edition 10)) that there is an opportunity to review the currently narrow purposes of Green Belts to encompass wider benefits such spaces can provide to residents of nearby settlements and therefore managed appropriately through the designation of Green Belts. We consider the introduction of the NDF provides a further opportunity to review Green Belt purposes and would welcome further discussion on this matter.

It may also be useful to clarify whether strategic plans should, in identifying spatial areas for renewable energy, focus on certain technologies or all technologies that can be appropriately accommodated within their administrative areas, and whether

they should focus exclusively on identifying spatial areas for schemes with a generating capacity of up to 10MW.

We'd welcome the opportunity to discuss these matters with you further.

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.

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 17 – Wrexham and Deeside, & Policy 18 – North Wales Coastal Settlements

We generally welcome policies 17 and 18 which will focus growth on previously developed areas with established transport networks. This provides opportunities to redevelop brownfield sites and focus development within existing conurbations in order to minimise impacts on environmental interests beyond. It also presents opportunities to integrate transport decarbonisation into strategic proposals.

Flood risk

However, Policies 17 and 18 recognises that flooding from rivers and the sea is a major issue across the region, and flood risk will have specific implications for the delivery of growth for the Wrexham and Deeside Area. Information from the latest Preliminary Flood Risk Assessment show that various communities along the North Wales Coast (Rhyl, Kinmel Bay, Prestatyn, Towyn, Abergele, Porthmadog, Pwllheli

and Fairbourne) and the Deeside area (Queensferry – Sandycroft – Manor Lane, Lache, Garden City & Deeside Industrial Estate, and Connah’s Quay & Shotton) are identified as areas within Wales that have the most significant flood risks (from all flood risk sources). This should also be recognised in the NDF, as well as an explicit acknowledgement that there may be areas within the Deeside and Wrexham growth Focus Area that may not be suitable for directing new development because of significant existing and future flood risk.

We have concerns that the stated requirement in the Draft NDF that “*Strategic decisions on flood management and related investment must be co-ordinated with decisions to direct development to growth areas*” might conflict with the stated aim within Planning Policy Wales (edition 10) that “*Government resources for flood and coastal defences are directed at protecting existing developments and are not available to provide defences in anticipation of future development*” (para. 6.6.23), and that of the Welsh Government’s National Flood & Coastal Erosion Risk Management Strategy (draft) which states that schemes “*should not be required to defend new homes or make land safe for development*”.

We consider greater clarification should be provided in the NDF to ensure that there is an avoidance on directing new development to areas where flood risk management investment will subsequently be required. Additionally, any framework for coordinating flood management investment with proposals in the NDF and/ or strategic/ local development plans should be clarified.

Management of natural resources

We welcome the confirmation on page 49 that “*the management of natural resources and flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure*”. There are a number of environmental interests that may be potentially affected by the growth proposed in Policies 17 and 18, and we consider the Strategic or Local Development Plan is well-placed to plan for mitigating those impacts. This includes potential impacts on The River Dee/Dee Estuary which supports nationally and internationally important habitats and species and is designated as a Water Protection Zone, as well as impacts on protected species.

The Wrexham and Deeside area support populations of great crested newt of national and international importance (as European Protected Species and as features of Special Areas of Conservation). Approaches are therefore required that integrate the objectives of future development and species conservation. The development and application of favourable conservation status focused spatial conservation modelling can be used to inform the implementation of a joined-up approach to future land use change and species conservation in the long term.

Water Quality

Development in these focused growth areas must consider the balance required for the demands in water supply and the water quality standards required by the many environmental designations in the Dee catchment. In ensuring the water quality standards; the impact of development on the current sewage network/treatment infrastructure must be considered. The sewage treatment infrastructure may require upgrading to meet demand otherwise the current capacity must be used as a guide to influence the suitable areas for development. It would therefore be prudent for Policy 17 or its supporting text to recognise the need for local and strategic development plans to ensure appropriate consideration of water resources within the Dee catchment.

Policy 19 – Green Belts in North Wales

Whilst we are generally supportive of this policy we consider (as stated in our response to the consultation on Planning Policy Wales (Edition 10)) that there is an opportunity to review the purposes of Green Belts to help ensure that the multiple benefits they provide to residents of nearby settlements are recognised and managed appropriately through the designation of Green Belts.

Significant areas parts of the indicative Green Belt as shown in the Draft NDF form part of the River Dee floodplain. Designating this area as Green Belt may help reduce the likelihood of new development proposals coming forward in flood risk areas. However, it is worth exploring how the delivery of such ecosystem services are formally recognised in the purpose of green belts.

Policy 20 – Port of Holyhead

This policy in the NDF should advocate that new marine development at the port will be expected to provide marine habitat enhancement wherever feasible to reflect local circumstances e.g. benthic habitat enhancement measures, nesting provision for black guillemots.

As well as “maximise the opportunities it provides to support growth across the region” we consider the NDF should also require schemes, and strategic and local development plans to plan for potential impacts associated with growth e.g. ensure future foul drainage capacity; ensure avoidance of adverse impact statutory nature conservation designations (consistent with paragraph 6.4.14 of Planning Policy Wales) ; avoiding the introduction or spread of marine non-native invasive species (e.g. *Didemnum vexillum*, Carpet Sea-squirt) by the use of adequate biosecurity policies; avoid adverse impact on the special qualities of designated landscapes; and adequately assess, and mitigate against, flood risk for the life-time of development.

Policy 21 – Transport Links to North West England

Improvements to transport links to North West England provide an opportunity to explore improvements network resilience to climate change which should be explored together with opportunities for green infrastructure creation or enhancement.

We are generally supportive for a North Wales Metro as it provides potential to reduce dependency on travel by car, reduce traffic flows on the A55 and other key roads thereby potentially reducing traffic emissions and adverse air quality impacts along these routes.

Policy 22 – North West Wales and Energy

We welcome the clarity provided in the policy that *“in determining any application for nuclear energy generation stations in this region, consideration should be given to the need for further non-renewable energy generation... their impacts on the natural and historic environment...”*. We note the stated requirement in page 54 *“that long-term impact these large-scale developments can have on sensitive areas and the surrounding environment”* will need to be balanced against economic benefits, we recommend that the NDF sets an expectation that proposed schemes will be expected to demonstrate how environmental benefits are maximised in contributing to place-making.

Large-scale infrastructure projects such as described here can generate significant indirect pressures in the wider area e.g. housing demand, which the NDF should recognise and give direction to local and regional plan-makers on how they should be considered to minimise adverse environmental effects.

In light of its inclusion in the NDF, further consideration should be given to revising wider national policy and guidance to give greater clarity as to how large-scale nuclear generation stations should be considered against flood risk. Clarity on the interface between the NDF, National Policy Statements, and Technical Advice Note 15 would be useful in this regard. As well as direction on location of such schemes, advice should be provided on how effects are considered for the life-time of a scheme, and for potential impacts of failure of protection measures such as breaches in flood defences, or blockages on structures due to debris or structural failure.

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 – Swansea Bay and Llanelli and Policy 24 – Regional Centres

These areas include areas of flood risk, statutory nature conservation sites and/or proximate to protected landscapes which will need to be carefully considered at regional and local development plan level consistent with Planning Policy Wales and relevant Technical Advice Notes (TANs).

Policy 25 – Haven Waterway

We recommend that the policy should explicitly emphasise a requirement to seek social, economic and environmental benefits from any growth to address challenges within the area e.g. contaminated land.

Policy 26 – Swansea Bay Metro

We welcome the requirement of new transport corridors to explore green infrastructure opportunities. However, we would recommend that this requirement should also extend activities involving improvements to existing corridors to help address existing challenges within those places which can be managed through Green infrastructure and in so doing deliver nature-based solutions priority within the Natural Resources Policy.

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.

We welcome the clarity that "Housing, economic growth and connectivity infrastructure should be co-ordinated and planned on the basis of the whole region" to reflect and address current pressures e.g. around Cardiff. We welcome the recognition that "the management of natural resources, flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure." We advise that this should extend to the strategic planning for green infrastructure to support the resilience of settlements, businesses and grey infrastructure in each of the 3 proposed NDF regions. We also agree that "Decarbonising society and responding to the threats of climate change should be central to all regional planning."

The south east region is part of the River Severn and the Western Wales River Basin Districts (RBDs). The 2015 WFD classification results for the water bodies in the Welsh section of the Severn RBD indicated that 43% of the water bodies were achieving good or better status, in the Western Wales RBD, 38% of water bodies were achieving good or better status. The 2018 WFD Interim Classification data is now available at <https://waterwatchwales.naturalresourceswales.gov.uk/en/>.

We advise that the NDF could make specific reference to the potential limitations on development due to deteriorating water quality in the area and emphasise the need to maximise opportunities for new development to help address existing water quality problems.

The area denoted for future growth includes areas of flood risk, and therefore new development should be directed to appropriate locations in line with TAN15 and Planning Policy Wales.

Policy 28 – Newport

We note reference to "significant brownfield development opportunities" in Newport. However, the deliverability of growth across Newport's brownfield sites are limited due to flood risk, particularly for highly vulnerable development such as housing. Many new development proposals in these areas cannot be designed to manage the risks and consequences of flooding in line with national planning policy when climate

change allowance is considered. Whilst these matters are probably better assessed at regional and/ or local development level, we would not want the NDF to be seen to indicate an expectation that cannot be delivered.

Policy 29 - Heads of the Valleys

Whilst supportive of the policy intention to “*increase prosperity and address social inequalities*” we are concerned that the current text of the policy fails to recognise the potential for effective green infrastructure planning and investment to support these aims. As stated on the Draft NDF, the Valleys have “*one of the most distinctive settlement patterns in the UK*” which to a significant degree is reflective of 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 this recognition in the policy wording.

Policy 30 - Green Belts

Whilst we are generally supportive of this policy, we consider (as stated in our response to the consultation on Planning Policy Wales (Edition 10)) that there is an opportunity to review the purposes of Green Belts to help ensure that the multiple benefits they provide to residents of nearby settlements are recognised and managed appropriately through the designation of Green Belts.

Policy 33 - Valleys Regional Park

We welcome a policy on the Valleys Regional Park in the NDF given its potential to support a host of settlements within the south east region. However, whilst we welcome the direction provided to embed its principles into planning frameworks of LDPs, and to “maximise opportunities for new development”, we advise that greater reference is made to the nature of schemes that should be supported and the benefits to be ensured through LDPs.

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.

Please see our separate response to this consultation.

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?

Please see our separate response to this consultation.

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?

We have no comments on any effects from the NDF on the Welsh language.

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.

We have no comments on effects from the NDF on the Welsh 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?

16. Are you...?

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