



Llywodraeth Cymru
Welsh Government

INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK

Appraisal of Draft National Development Framework
Including Proposed Changes:
ISA Report (incorporating Environmental Report)

AUGUST 2020

Incorporating

EC HARRIS
BUILT ASSET
CONSULTANCY



Our first national development framework will when published be called '**Future Wales – The National Plan 2040**'. This assessment was prepared prior to publication and uses the name 'national development framework' and 'NDF' throughout. For clarification the references to the national development framework in this document are taken to mean **Future Wales – The National Plan 2040**.

VERSION CONTROL

Version	Date	Author	Checker	Changes
0.1	January 2020	Joseph Evans Sarah Tooby	David Hourd	Tracked Changes based on Consultation Responses
0.2	March 2020	Joseph Evans Sarah Tooby	David Hourd	Final version for client approval
0.3	June 2020	Joseph Evans Sarah Tooby	Sarah Tooby	Amendments to Policy P10
0.4	August 2020	Joseph Evans	David Hourd	Review in light of amendments to Policy P22 and the housing need

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ABBREVIATIONS

AA	Appropriate Assessment
AQMA	Air Quality Management Area
CRIA	Child Rights Impact Assessment
cSAC	Candidate Special Area of Conservation
DNS	Developments of National Significance
EA	Environment Agency
EC	European Council
EU	European Union
EqIA	Equalities Impact Assessment
FPI	Foundation Phase Indicator
GI	Green Infrastructure
GIS	Geographic Information Systems
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
ISA	Integrated Sustainability Appraisal
LDP	Local Development Plan
LSE	Likely Significant Effect
NDF	National Development Framework
NPPF	National Planning Policy Framework
NRP	Natural Resources Policy
NRW	Natural Resources Wales
NTS	Non-Technical Summary
PPW	Planning Policy Wales
pSPA	Potential Special Protection Area
SEA	Strategic Environmental Assessment
SA	Sustainability Appraisal
SMNR	Sustainable Management of Natural Resources

SoNaRR	State of Natural Resources Report
SPP	Statement of Public Participation
UK	United Kingdom
UNCRC	United Nations Convention on the Rights of the Child
WBFG Act	Well-Being of Future Generations Act (2015)
WHIASU	Welsh Health Impact Assessment Support Unit
WLIA	Welsh Language Impact Assessment

1 INTRODUCTION

1.1 What is the National Development Framework?

- 1.1.1 The Welsh Government is currently preparing a National Development Framework (NDF) to provide a spatial context for facilitating the delivery of development in Wales over the next 20 years. The NDF is an important part of the planning system in Wales. More information on the NDF and the planning system is available on the Welsh Government [website](#). The NDF will influence how communities develop over the next 20 years and it is important that we have a comprehensive understanding of the positive and negative effects this can have as we develop the NDF. To do this we have used an Integrated Sustainability Appraisal (ISA). This integrated approach to the appraisal has looked at the contribution the NDF can make to Wales' seven national well-being goals and embedded the principle of sustainable development at all stages, as set out in the Well-being of Future Generations (Wales) Act 2015¹. Section 1.3 provides further explanation of the relationship between the NDF, the ISA and the Well-being of Future Generations Act 2015, including how the seven well-being goals have been integrated into the ISA and how the 'ways of working' (see Table 1-2) have shaped the work to date. It also provides explanation of how the NDF fits with other Welsh Government strategies, including 'Prosperity for All'².
- 1.1.2 The NDF will be used to guide both public and private investment. Welsh Government's aim is to ensure investments and developments – whether large or small in scale - contribute to the broader ambitions of the Welsh Government and to the well-being of communities. A broad range of Government strategies and policies have helped shape the NDF including the Welsh National Marine Plan, the Transport Strategy and Prosperity for All: A Low Carbon Wales. The relationship is two-way, with the NDF taking strategic direction and providing a means of facilitating delivery and a framework for maximising the potential outcomes. Welsh Government will lead the way with their own investments, ensuring the Wales Infrastructure Investment Plan and Regional Economic Frameworks facilitate development which complements the NDF strategy.
- 1.1.3 The NDF should be read alongside Planning Policy Wales (PPW) and does not repeat PPW, which provides planning policy on an all-Wales basis. The NDF replaces the Wales Spatial Plan.

1.2 What is the Integrated Sustainability Appraisal?

- 1.2.1 This is an ISA Report (encompassing the requirements of the statutory Environmental Report under the Strategic Environmental Assessment Directive – see below) accompanying the Draft NDF Including Proposed Changes for consultation (ISA Stage D). The process leading up to the development of this ISA Report has run parallel with the preparation of the NDF, as presented in Figure 1-1. The ISA process has included assessments of the likely sustainability effects of options being considered for the NDF (including positive and negative effects), carried out at a high-level as a reflection of the strategic nature of the NDF. During this process, the ISA has recommended measures for mitigating or avoiding likely negative sustainability effects and for enhancing likely positive sustainability effects.
- 1.2.2 This assessment is reflective of the requirements of several pieces of legislation, including the European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (The Strategic Environmental Assessment (SEA) Directive)³, which was transposed directly into Welsh law through the SEA Regulations⁴. Section 3 of the Planning (Wales)

¹ <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

² Welsh Government, Prosperity for All: the national strategy, September 2017, available: <https://gov.wales/prosperity-all-national-strategy>

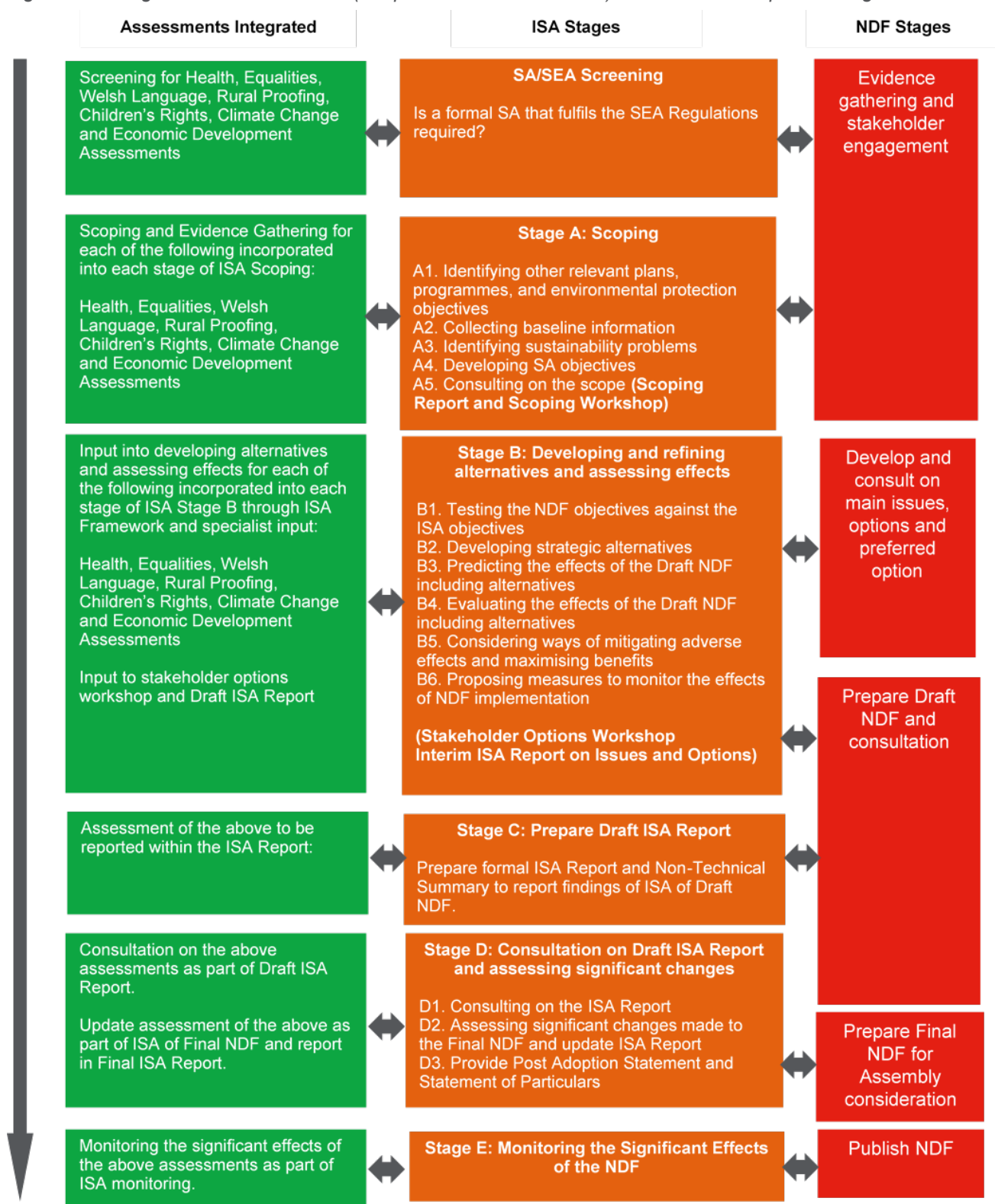
³ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

⁴ Environmental Assessment of Plans and Programmes (Wales) Regulations (SI 2004/1656 (W/170)) and in England, the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633)

Act 2015 amends Part 6 of the Planning and Compulsory Purchase Act 2004 and inserts new Sections 60, 60A, 60B and 60C on the preparation of an NDF for Wales. Section 60B (1) (b) specifically requires the Welsh Government to carry out an appraisal of the sustainability (known as a Sustainability Appraisal (SA)) of the policies in the NDF and this must incorporate the requirements of the SEA Regulations and consideration of effects on the Welsh language.

- 1.2.3 SA is an assessment of the economic, environmental, cultural and social effects of a plan, carried out from the outset of the plan-making process, to ensure that decisions are made that accord with sustainable development principles. SA is a systematic and iterative process that identifies and reports on the extent to which implementation of the plan will achieve the environmental, social, cultural and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these.
- 1.2.4 One of the 'ways of working' (see Table 1-2) that forms part of the sustainable development principle is the need to take an integrated approach to what we do. Given the nature and scope of the NDF we have sought to integrate our approach to the SA and SEA with other statutory and non-statutory assessments. This allows us to take a more rounded view of the sustainability implications and opportunities arising from the NDF. Figure 1-2 presents the additional impact assessments that have been incorporated into the ISA process.
- 1.2.5 The integration of these assessments has ensured that a collaborative approach is undertaken on different issues, sharing knowledge and recognising links between topics in a consistent and transparent manner. This provides a robust and thorough mechanism for identifying issues and opportunities, assessing effects including cumulative and indirect effects, and undertaking monitoring in a holistic manner. Further explanation with regards to how these appraisal processes were 'screened in' to the ISA, as well as how they have been integrated into the ISA Framework of objectives and decision aiding questions, can be found in Chapter 2.

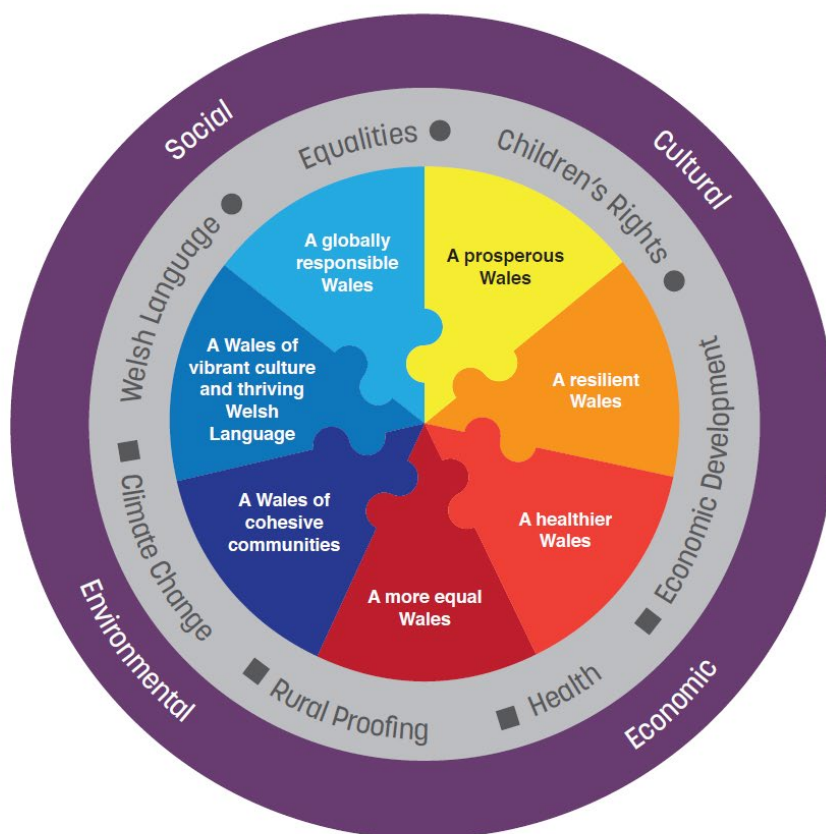
Figure 1-1: Stages in the ISA Process (adapted from ODPM 2005⁵) and NDF Development Stages



⁵ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

Figure 1-2: Impact assessments to be integrated alongside SA/SEA

Integrated Impact Assessments



Key:

- Government
- Statutory
- Well-being Goals
- Integrated Impact Assessments
- Sustainable Development Components

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Purpose of this ISA Report

- 1.2.6 This ISA Report represents Stage D of the ISA process. The stages of the ISA process are reproduced in Figure 1-1. The purpose of this report is to explain the iterative assessment process and how this has shaped the NDF from inception to the most recent version. It presents the potential positive and negative effects of the Draft NDF Including Proposed Changes, to inform the consultation process.
- 1.2.7 It is noted that the scope of the assessment of the NDF is based on the assessment framework of objectives, developed and refined at the ISA Scoping stage⁶ (see Appendices A and B). The

⁶ ISA Scoping report is available online at: <https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework> [Accessed 06.08.20]

assessment is high-level, reflecting the national remit of the NDF and its purpose. It is noted that the assessment has taken into account what the NDF could potentially achieve and its national scope. It, therefore, recognises the role and influence of other stakeholders, for example, education providers or health boards, in achieving common goals, albeit outside of the remit of the planning system. The assessment is reflective of the potential for the NDF to guide land-use planning on a national and regional scale and does not seek to provide specific localised design guidance, although its principles will need to be followed in the preparation of lower tier plans, which are required to be in general conformity with the NDF.

- 1.2.8 The assessment of the NDF demonstrates a transparent and robust decision-making process for developing the plan. The development of the ISA and NDF has been iterative, with regular discussions between the ISA and NDF teams. Recommendations have been made for improvements or alternatives, as appropriate. The collaborative process of working has included meetings and informal review stages to discuss the developing issues. The ISA process has therefore been able to provide the Welsh Government with accurate, robust and transparent information with regard to the sustainability of options (including individually and cumulatively) that has played a major role in the Government's decision-making about what to include in the NDF.

1.3 Legislative and non-legislative requirements

- 1.3.1 The ISA incorporates various impact assessments and accounts for the legislative requirements of:
- SA, as required by the Compulsory Purchase Act 2004⁷ as amended by Planning (Wales) Act 2015⁸, and as required by Planning Policy Wales 2018 (10th edition)⁹;
 - Strategic Environmental Assessment (SEA), as required by Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)¹⁰, the requirements of which are transposed into Welsh law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regs)¹¹;
 - Welsh Language (Wales) Measure 2011 and Standards;
 - Children's Rights Impact Assessment (CRIA), as required by the Rights of Children and Young Persons (Wales) Measure 2011¹²;
 - Equalities Impact Assessment (EqIA), as required by the Equalities Act (2010)¹³;
 - Well-being of Future Generations (WFG) Act (2015)¹⁴; and
 - Sustainable Management of Natural Resources (SMNR) and the Natural Resources Policy (NRP) as required by the Environment (Wales) Act (2016)¹⁵.
- 1.3.2 The ISA also accounts for the non-legislative requirements of assessments relating to Rural Proofing; Health Effects; Climate Change; and Economic Development.
- 1.3.3 A Habitat Regulations Assessment (HRA) has been carried out separately to the ISA. However, outcomes from the HRA process have been factored into the ISA where appropriate.

⁷ Available online at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed 06.08.20]

⁸ Available online at: <http://www.legislation.gov.uk/anaw/2015/4/contents/enacted> [Accessed 06.08.20]

⁹ Available online at: <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf> [Accessed 06.08.20]

¹⁰ Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 06.08.20]

¹¹ Available online at: <http://www.legislation.gov.uk/wsi/2004/1656/contents/made> [Accessed 06.08.20]

¹² Available online at: <http://www.legislation.gov.uk/mwa/2011/2/contents> [Accessed 06.08.20]

¹³ Available online at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 06.08.20];

¹⁴ Available online at: <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted> [Accessed 06.08.20]

¹⁵ Available online at: http://www.legislation.gov.uk/anaw/2016/3/pdfs/anaw_20160003_en.pdf [Accessed 06.08.20]

Well-Being of Future Generations (Wales) Act

- 1.3.4 The Well-being of Future Generations (Wales) Act 2015 (WBFG Act) seeks to directly place Wales on a sustainable path to improving well-being. The WBFG Act requires that public bodies carry out sustainable development which is defined as:
- “Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”***
- 1.3.5 The Planning (Wales) Act 2015 Section 2 sets out the definition of sustainable development for the planning system and directly refers to the definition in the WBFG Act.
- 1.3.6 Sustainable development is the process of improving well-being. It acknowledges that there are many things that determine a person’s quality of life (their well-being), and that these can all broadly be categorised as environmental, economic, social and cultural factors. These are captured in the well-being goals. This means that improving the quality of our environment, our economy, society and culture can improve the well-being of individuals and that of Wales as a whole. Rather than an end in itself, sustainable development is a way of doing things and the Act guides how public bodies should operate to achieve it.
- 1.3.7 The WBFG Act sets out seven well-being goals over the 20-year period, which the NDF will play an important role in contributing towards (see Table 1-1). These well-being goals are indivisible from each other and explain what is meant by the well-being of Wales. The well-being goals have been integral to the preparation of the Scoping Report and the ISA Framework (Table 1-5). The well-being goals have also been used to inform the review of the evidence, identify issues and structure the assessment Framework. The sustainable development principle defined by the Act is a fundamental part of how public bodies – including the Welsh Government – must operate. We must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs, by taking account of the sustainable development principle. The principle is made up of five ‘ways of working’ that public bodies are required to apply in order to maximise the contribution towards sustainable development. What these are, and how the ISA has adopted these ways of working to-date (through reference to the previous ISA reports and actions), is presented in Table 1-2.

Table 1-1: The seven Well-being Goals of the WBFG Act (2015)

Well-being Goal	Description
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
A resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

Well-being Goal	Description
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities.
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being

Table 1-2: Ways of Working and the ISA

Looking to the long term	
ISA Interim Report, April 2018	The Interim Report set out how the NDF Preferred Option and Objectives have been developed. The assessment of these against the ISA framework highlighted the more and less sustainable options over the 20-year plan period including aspects which are short, medium and long term. The Preferred Option and NDF Objectives have been shaped by the outcomes of these assessments.
Draft ISA Report, 2019	This Draft NDF ISA Report provided an appraisal of all policies in the NDF and predicted and evaluated the effect of them on each ISA Objective in the short, medium and long terms. For each Objective, the future trends of each Objective are also identified in terms of whether in the absence of the NDF the baseline is improving, declining or not changing. Appraisal results were provided to the Plan-making team at early stages, in order to inform the development of the NDF.
Draft NDF Including Proposed Changes, ISA Report, 2020	This 'Draft NDF Including Proposed Changes ISA Report' provides an updated appraisal of all policies in the plan and predicts and evaluates the impact of them on each ISA Objective in the short, medium and long terms, as was undertaken at the previous stage. For each Objective, the future trends of each Objective are also identified in terms of whether in the absence of the NDF the baseline is improving, declining or not changing. The outcomes of the appraisal have fed into the development of the NDF at this stage.
Taking an integrated approach	
ISA Interim Report, April 2018	The ISA Interim Report set out the findings of the assessment of the NDF Options and Objectives. The ISA Framework enabled an integrated approach to be taken to the assessment, highlighting synergies or conflicts between proposals, which have helped to shape the Preferred Option and the final set of NDF Objectives. The ISA Interim Report also included a compatibility assessment of the NDF Objectives, to ensure any conflicts or opportunities are highlighted at this early stage. The cross-government approach has continued with the ISA working group reviewing and providing technical comments on the assessment.
Draft ISA Report, 2019	This Draft NDF ISA Report set out the findings of the assessment of the draft NDF Outcomes, strategy and policies and their alternatives. The ISA Framework enabled an integrated approach to be taken to the assessment highlighting synergies or conflicts between proposals which have helped to shape the draft plan.
Draft NDF Including Proposed Changes, ISA Report, 2020	This 'Draft NDF Including Proposed Changes ISA Report' sets out the findings of the assessment of the current version of the NDF following consultation. This follows the approach taken at the Draft NDF stage. The ISA Framework enables an integrated approach to be taken to the assessment highlighting synergies or conflicts between proposals which have helped to shape the NDF. The review of the assessment has taken on board the consultation responses from a variety of stakeholders and changes have been made, where appropriate, ensuring an integrated approach has been undertaken to the various impact assessments.

Involving people	
ISA Interim Report, April 2018	The Interim Report, although not statutorily required, enables the story to be told of how the Preferred Option and Objectives have been developed, aiding understanding of the choices made which will assist the consultation process. The Interim Report was also subject to consultation alongside the NDF Issues, Options and Preferred Option Consultation Report and various engagement events were held to capture a range of views that were fed into the next stage of the NDF process.
Draft ISA Report, 2019	This Draft NDF ISA Report will be consulted on with the general public, statutory bodies and other relevant stakeholders. This helps to ensure that the ISA and NDF takes into consideration the interests of a diverse range of people reflective of Wales.
Draft NDF Including Proposed Changes, ISA Report, 2020	This 'Draft NDF Including Proposed Changes ISA report' has been informed by a wide range of involvement with stakeholders. This helps to ensure that the ISA and NDF takes into consideration the interests of a diverse range of people reflective of Wales.
Collaborating with others	
ISA Interim Report, April 2018	The Interim Report set out the findings of appraisals that were the result of a collaborative effort to prepare the ISA Framework. During the process of preparing the Interim Report, collaborative events including a workshop with the NDF team to discuss the developing issues, frequent meetings and informal review stages were held.
Draft ISA Report, 2019	This Draft NDF ISA Report further sets out the findings of appraisals that were the result of a collaborative effort to prepare the ISA Framework. Further collaborative efforts between the ISA team, the NDF team and other relevant people through meetings and discussions have been a consistent and recurring element of the process.
Draft NDF Including Proposed Changes, ISA Report, 2020	This 'Draft NDF Including Proposed Changes ISA Report' has been updated following consultation and follows the approach taken for the Draft NDF. There have been a range of collaborative efforts between the ISA team, the NDF team and other relevant people including Natural Resources Wales, other Welsh Government departments and stakeholders, through meetings and discussions have been a consistent and recurring element of the process.
Prevention	
ISA Interim Report, April 2018	The ISA Interim Report presents the various stages and drafts produced to get to the Preferred Option and final Objectives. The assessment sets out recommendations for improvements including addressing negative scores and maximising positive scores to ensure the Preferred Option is as sustainable as possible. This report is also subject to consultation to ensure all issues and opportunities are identified at this early stage in the development of the NDF.
Draft ISA Report, 2019	This Draft NDF ISA Report presents the appraisal findings for all options, and their reasonable alternatives, being considered for inclusion in the NDF. This has enabled the plan-making authority to select or modify options in order to avoid potentially negative effects.
Draft NDF Including Proposed Changes, ISA Report, 2020	This 'Draft NDF Including Proposed Changes ISA Report' has been updated following consultation and presents the appraisal findings for all Options, and their reasonable alternatives included in the NDF. This has enabled the plan-making authority to select or modify Options in order to avoid potentially negative effects.

Strategic Environmental Assessment

1.3.8 SEA, as required by the SEA Directive and the SEA Regulations (see Section 1.3.1), is a structured and systematic decision support process designed to help ensure that environmental aspects are considered effectively during Plan-making. The process is defined by set stages and tasks to be completed in order to satisfy the requirements of the SEA Directive. Table 1-3 sets out where these various requirements have been satisfied in this ISA Report that has accompanied the preparation of the NDF.

Table 1-3: Requirements for a SEA Environmental Report and where these have been completed

Question	Yes/No/Where
Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) Annex I - Information referred to in Article 5(1)	
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Yes. ISA Scoping Report & Section 2.1 and Section 3.3 of this report
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Yes. ISA Scoping Report & Section 2.3, Table 2.1 and Appendix B of this report
(c) the environmental characteristics of areas likely to be significantly affected;	Yes. ISA Scoping Report & Section 2.3 and Appendix B of this report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Yes. ISA Scoping Report & Section 2.3 and Appendix B of this report
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Yes. ISA Scoping Report & Section 2.1 and Appendix A of this report
(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Yes. Summarised in Section 3.4 and detailed in Appendix F of this report.
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Yes. Summarised in Section 2.7 and Section 3.1 and detailed in Appendices E and F of this report
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Yes. Section 3 of this Report.
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Yes. Table 3-6 of this Report.

Question	Yes/No/Where
(j) a non-technical summary of the information provided under the above headings.	Yes, published as separate document to this report.

Environment (Wales) Act

- 1.3.9 The Environment (Wales) Act 2016 introduces the Sustainable Management of Natural Resources (SMNR) and sets out a framework to achieve this as part of decision-making. The objective of the SMNR is *'using natural resources in a way and at a rate that... maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their needs and contribute to the achievement of the well-being goals.'* Planning Policy Wales translates the principles of SMNR into use for the planning system.
- 1.3.10 The requirements of the Environment Act including the priorities identified by the Natural Resource Policy (NRP) have been included in the ISA framework and will inform the development of the NDF. These have a focus on Welsh natural resources, with SoNaRR¹⁶ providing an assessment of the sustainable management of natural resources and the NRP seeking to set out the national priorities in relation to the sustainable management of natural resources in Wales.
- 1.3.11 The NDF through addressing social, economic, environmental and cultural issues and opportunities takes an all-embracing approach to sustainable development where decisions on short- and long-term needs and cost and benefits come together. The ISA helps to secure these outcomes through identifying where multiple benefits can be provided as part of the plan and avoiding or minimising negative effects.
- 1.3.12 The key features of the SMNR approach to which the planning system can contribute are:
- Improving the resilience of ecosystems and ecological networks;
 - Maintaining and enhancing biodiversity;
 - Maintaining and enhancing green infrastructure based on seeking multiple ecosystem benefits and solutions;
 - Ensuring resilient locational choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability;
 - Taking actions to move towards a more circular economy in Wales; and
 - Facilitating the move towards decarbonisation of the economy.
- 1.3.13 It is recognised how the translation of SMNR into the planning system is an integral part of the essential components of sustainable places, through encouraging approaches based on identifying and securing outcomes which deliver multiple ecosystem benefits. The NDF looks to address these key features and the ISA sets out how this is achieved.

Equalities

- 1.3.14 The screening work concluded that the NDF will have a potential impact on equalities and human rights. The nine protected characteristic groups as identified in the Equalities Act 2010 have been screened and the following groups have been screened in for further consideration in the assessment process—race, age, pregnancy and maternity, disability and sex. These protected

¹⁶ Available online at: <https://naturalresources.wales/evidence-and-data/research-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en> [Accessed 06.08.20]

characteristics have been incorporated in the objectives and decision aiding questions within the ISA Framework. For those protected characteristic groups screened out (gender reassignment, marriage and civil partnership, religion and belief and sexual orientation) it was considered at this stage they would not be affected by the NDF. The Statement of Public Participation (SPP) outlines the details of the consultation on the NDF and the approach to engagement. Protected characteristic groups have been engaged, to ensure their voices were heard in the development of the NDF.

- 1.3.15 The ISA Framework and associated decision aiding questions have ensured that the duties within the Equalities Act have been addressed as the NDF was assessed, recognising the direct and indirect effects the planning system can have on protected characteristic groups. This includes advancing and promoting equality of opportunity and good relations and wider community cohesion and seeking to create the conditions which assist in eliminating unlawful discrimination, harassment or victimisation through land use planning initiatives.
- 1.3.16 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on protected characteristic groups where appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.
- 1.3.17 Under the equality duty (set out in Section 149 of the Equality Act 2010), many public authorities, including the Welsh Government must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.
- 1.3.18 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Equalities	1, 2, 3, 4, 10, 11 and 12

Welsh Language

- 1.3.19 The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:
- What effect, if any, the NDF would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
 - How the NDF could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and
 - How the NDF could be developed so that it doesn't have or reduces any negative effects which the policy decision would have on opportunities for other persons to use the Welsh language or treating the Welsh language no less favourably than the English language.
- 1.3.20 Sections 60B (1) (b) and 60B (2) of the Planning and Compulsory Purchase Act 2004 requires the Welsh Government to carry out an appraisal of the sustainability of the policies in the NDF; this must include an assessment of the likely effects on the use of the Welsh language.
- 1.3.21 The screening work concluded that the NDF will have a potential impact on the Welsh language. Objectives encompassing Welsh language have therefore been incorporated into the ISA Framework. This will ensure opportunities to promote the Welsh language; facilitate its use; to safeguard its future; and see the language thrive, are considered and identified where possible through this work. The Welsh Government has a statutory obligation to fully consider the effects of its work on the Welsh language. The development of all policies, projects, research, legislation, grants,

and services must be accompanied by appropriate consideration to the Welsh language, Welsh speaking people and communities, this includes children and young people.

1.3.22 The Welsh Government must seek opportunities to promote the Welsh language and facilitate its use to safeguard its future and see the language thrive. A Welsh Language Impact Assessment (WLIA) is the process undertaken to ensure these duties are fulfilled. The NDF, as a long-term development plan for Wales, will contain policies and proposals with the potential to impact on the Welsh language, therefore a full WLIA will be required.

1.3.23 The ISA Framework and associated decision aiding questions ensure that effects on the Welsh language have been addressed as the NDF is assessed, recognising direct and indirect effects. Appendix F sets out this detailed assessment of the Draft NDF Including Proposed Changes and highlights predicted effects where appropriate. Due to the nature and scale of the NDF there are limited effects highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.24 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Welsh Language	3, 4 and 5

Children's Rights Impact Assessment

1.3.25 The duty placed on Welsh Ministers is to have due regard to the United Nations Convention on the Rights of the Child (UNCRC) when exercising any of their functions. The children's rights impact assessment is a tool that helps to demonstrate how the legal requirement is met by the Welsh Ministers.

1.3.26 The scoping work concluded that the NDF will have a potential impact on children's rights. The Articles within the UNCRC have been reviewed and the following articles have been identified as the most relevant at this stage – 6, 12, 23, 24, 27, 28, 30, 31 and 36. For these Articles and the 2016 recommendations made by the United Nations Committee on the Rights of the Child, the ISA Framework incorporates objectives covering these areas. The SPP outlines the details of the consultation on the NDF and the approach to engagement. Children and young people will continue to be engaged to ensure their voices are heard in the development of the NDF.

1.3.27 The ISA Framework and associated decision aiding questions ensure that the relevant articles within the UNCRC are addressed as the NDF is assessed, this will recognise direct and indirect effects the planning system can have on children and young people. It will help to ensure that the NDF positively affects children through, for instance, access to education, creating opportunities within which age inequality may be reduced, creating opportunities to ensure children can relax and play and join in a wide range of activities and creating opportunities for the built environment to be designed in a way that is accessible for all. The Welsh Language Impact Assessment considers how the NDF will impact on all members of society in learning and using the Welsh language, including children and young people. NDF policies are unlikely to have a significant effect, either positively or negatively, on young people and children's ability and right to learn and use the Welsh language.

1.3.28 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on children and young people where appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.29 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Children's Rights	1, 2, 3, 10, 11 and 12

Habitats Regulations Assessment

- 1.3.30 The European Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant effect upon a Natura 2000 site (Special Areas of Conservation (SAC), candidate Special Areas of Conservation (cSAC), Special Protection Areas (SPA)), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The Directive was transposed into UK law via the Habitats Regulations. The overarching process is referred to as Habitats Regulations Assessment (HRA). Proposed Special Protection Areas (pSPA) and Ramsar sites are also included as Natura 2000 sites for the purposes of HRA in government policy, but this is not covered within the law.
- 1.3.31 This ISA report does not satisfy the requirements of HRA. The HRA is a separate process, with reports publicly available. Appraisals carried out in the ISA are informed by outcomes of the HRA.

Non-Legislative Impact Assessments

Rural Proofing

- 1.3.32 The screening work concluded that the NDF will have a potential impact on rural communities. Therefore, objectives encompassing aspects of rural life such as access to services; broadband coverage and the economy have been incorporated into the ISA Framework. The ISA Framework and associated decision aiding questions have ensured that effects on rural communities, business etc. are addressed as the NDF is assessed, - recognising direct and indirect effects the planning system can have on these areas. It will help to ensure any potential impact on rural areas and communities are addressed.
- 1.3.33 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on rural areas as appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.
- 1.3.34 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Rural Proofing	2, 3, 4, 5, 10, 11, 12, 13, 16 and 17

Climate Change

- 1.3.35 The screening work concluded that the NDF will have a potential impact on climate change. Objectives encompassing climate change have been incorporated into the ISA Framework to ensure the causes and consequences of climate change are considered and identified where possible through this work.
- 1.3.36 The ISA Framework and associated decision aiding questions ensure that effects on climate change, including adaptation, mitigation and resilience are addressed as the NDF is assessed, recognising direct and indirect effects the planning system can have on these areas.

1.3.37 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on climate change as appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.38 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Climate Change	2, 3, 4, 6, 7, 8, 9, 10, 13, 16 and 17

Health

1.3.39 The screening work concluded that the NDF could have an effect on health. The assessment of health has been based on the broad, participatory and inclusive methodology as advocated in Wales and described in 'HIA: A Practical Guide' (WHIASU, 2012) and has used the wider determinants of health as a framework for discussion. The ISA Framework encompasses health objectives that reflect the Public Health Wales indicators.

1.3.40 The ISA Framework and associated decision aiding questions ensure that effects on health, including well-being, physical and mental health and wider determinants of health are addressed as the NDF is assessed, recognising direct and indirect effects the planning system can have on these areas.

1.3.41 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on health and well-being as appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.42 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Health	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17

Economic Development

1.3.43 The screening work concluded that the NDF will have a potential impact on the economy. Economic objectives have been incorporated into the ISA Framework to ensure issues and opportunities are considered and identified where possible through this work.

1.3.44 The ISA Framework and associated decision aiding questions ensure that effects on economic development, including increasing employment opportunities, promoting economic inclusion and sustainable economic growth, diversity and competitiveness as well as third sector opportunities are addressed as the NDF is assessed, recognising direct and indirect effects the planning system can have on these areas.

1.3.45 Appendix F sets out this detailed assessment of the Draft NDF including Proposed Changes and highlights effects both positive and negative on economic development as appropriate. Due to the nature and scale of the NDF there are limited effects highlighted, and further detail will be available in the lower tier plans and their accompanying assessments.

1.3.46 How and where in ISA various requirements have been met:

Impact Assessment	ISA Objectives
Economic Development	1, 3, 4, 6 and 17

1.4 The ISA and NDF processes

- 1.4.1 The ISA Process has followed that set out in Figure 1-1. The process can be seen as accounting for Stages A to Stage F, with Stage E (monitoring of effects) to proceed should the NDF be adopted.

Evidence Gathering, ISA Scoping and Stakeholder Engagement

- 1.4.2 The NDF preparation commenced with a process of evidence gathering and stakeholder engagement. This was initiated in winter 2016/17 with a call for evidence for the NDF including a call for projects. This was followed by a series of engagement events held at four locations nationally to help identify key spatial issues for the NDF. In parallel to this, the NDF was screened to determine if a formal SEA was required. The requirement was confirmed, and this formed the basis on which the ISA was developed.
- 1.4.3 In Spring 2017, further work was undertaken to identify issues for the NDF following the engagement events. At this stage initial ideas were developed for the potential NDF objectives and strategic options.
- 1.4.4 Stage A of the ISA (Scoping) also commenced at this time which included further evidence gathering and analysis of sustainability issues and opportunities which dovetailed into the NDF evidence. The draft Scoping Report for the ISA of the NDF was one of the first stages in engagement and collaboration for the NDF. Consultation on the draft Scoping Report was undertaken between 28 April and 21 July 2017. In addition, a workshop was held early May 2017 with stakeholders who represent the range of assessment processes to be integrated into the ISA. The ISA Scoping Report was issued to Natural Resources Wales and Cadw for comment. It was also sent to transboundary statutory consultees, notably the Environment Agency, Natural England and Historic England, for their comments; as well as wider stakeholders such as the Royal Society for the Protection of Birds (RSPB).
- 1.4.5 This work constituted Stage A, 'Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope', of Figure 1-1. This included the following five tasks:
- A1: Identifying other relevant policies, plans and programmes and ISA objectives;
 - A2: Collecting baseline information;
 - A3: Identifying sustainability issues and problems;
 - A4: Developing the ISA Framework; and
 - A5: Consulting on the scope of ISA.
- 1.4.6 The Final Scoping Report (April 2018)¹⁷ represents the initial stage of the ISA. It follows an integrated approach which has been shaped through engagement and involvement of stakeholders and follows the methodology set out in the published guidance¹⁸ seeking to:
- Set the scope and level of detail of the ISA;
 - Identify relevant plans, policies, programmes and initiatives that will inform the ISA process and the NDF;

¹⁷ ISA Scoping report is available online at: <https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework> [Accessed 06.08.20]

¹⁸ ODPN (2005) A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

- Identify relevant information about existing and predicted future social, economic, cultural and environmental conditions in Wales at a national scale;
- Identify key sustainability issues and opportunities; and
- Present a framework for the ISA, against which the NDF can be appraised.

1.4.7 Responses to the comments received, and how they have influenced the revisions to the ISA, are set out in the consultation report which is available [here](#)¹⁹.

Objectives and Options Development, Further Engagement, ISA and HRA Screening

- 1.4.8 Drawing upon the consultation feedback, work began in Summer/Autumn 2017 on further developing outline NDF Objectives and Strategic Options. This used all work that had been undertaken to-date including, for example, the evidence base, the engagement event and consultation records and the emerging ISA and HRA. An initial, high-level, HRA Screening was also undertaken at this time²⁰. The objectives and options were then used as part of the pre-event pack for the upcoming engagement on emerging objectives and options. The engagement events took place in October 2017 and the results were recorded.
- 1.4.9 In November 2017 the initial objectives and options were subject to ISA and the results of this were fed back to the NDF team to influence their further development. The next iteration of objectives and options were then further subject to ISA and Preliminary HRA Screening in winter 2017/18. These findings were documented in an Interim ISA Report²¹ that accompanied consultation on the Issues and Options and Preferred Option version²² of the NDF between 30 April 2018 and 23 July 2018. The ISA was further refined and amended in light of the consultation responses received.
- 1.4.10 This work constituted Stage B, 'Developing and Defining Options', of Figure 1-1. This included the following six tasks, the results of which are set out in detail in Appendices A and B with a proposed monitoring framework set out in Chapter 2:
- B1: Testing the plan objectives against the SA Objectives;
 - B2: Developing the plan options;
 - B3: Predicting the effects (including cumulative and secondary effects) of plan options and alternatives;
 - B4: Evaluating the effects (including cumulative and secondary effects) of plan options and alternatives;
 - B5: Consider ways of mitigating negative effects and maximising beneficial effects; and
 - B6: Proposing measures to monitor the significant effects of the plan's implementation.
- 1.4.11 In addition to the above, the Draft ISA Report also completed certain tasks of Stage B for the purpose of refining and defining policy options (see Appendices C, D and E). Further, the structure of the report itself was consulted upon with the wider consultees, as part of the iterative process of drafting.

¹⁹ <https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework> [Accessed 6.08.20]

²⁰ Preliminary HRA Screening Report available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-preliminary-hra-screening-report.pdf> [Accessed 06.08.20]

²¹ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

²² NDF Issues and Options consultation, available online at: <https://gov.wales/national-development-framework-issues-options-and-preferred-option> [Accessed 06.08.20]

Draft NDF Including Proposed Changes

- 1.4.12 Based on the above, the Draft NDF Including Proposed Changes has been produced in accordance with the five ways of working required by the Well-being of Future Generations Act. It has been a staged approach based on developing a series of realistic options and refining them to a preferred option, before moving on to a full draft plan. This work has been strongly influenced by public and stakeholder involvement and a cross-Government collaborative approach (see Chapter 2).
- 1.4.13 The purpose of this document is to provide a formal Draft ISA Report Including Proposed Changes that includes a Non-Technical Summary (NTS) and which satisfies the requirements of an 'Environmental Report' as required by the SEA Directive. This Report constitutes Stage D (see Figure 1-1) and documents the outcomes of Stages A, B and C of the SEA process.

Other Reports

- 1.4.14 The ISA Reports that have been prepared so far, and where they can be accessed, are set out in Table 1-4.

Table 1-4: Existing ISA Reports and where to find them

Existing ISA Reports	Where to find them
Integrated Sustainability Appraisal of the National Development Framework Scoping Report April 2017, Arcadis	Available online at: https://gov.wales/national-development-framework-integrated-sustainability-appraisal-report [Accessed 20.03.20]
Integrated Sustainability Appraisal of the National Development Framework Appraisal of Alternative and Preferred Options: ISA Interim Report April 2018, Arcadis	Available online at: https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf [Accessed 20.03.20]
Integrated Sustainability Appraisal of the National Development Framework Appraisal of Draft National Development Framework: ISA Report (incorporating Environmental Report) June 2019, Arcadis	Available online at: https://gov.wales/draft-national-development-framework [Accessed 20.03.20]

1.5 Summary of Habitats Regulations Assessment

- 1.5.1 A consideration of the likelihood of significant effects (also known as HRA screening) has been undertaken to determine if the NDF (either in isolation and/or in combination with other plans or projects) would have a likely significant effect on a Natura 2000 site, in terms of its conservation objectives and qualifying interests. The results of the HRA have been integrated into the ISA where appropriate (within the assessment of ISA Objective 16), as part of an iterative process. The designations of relevance to the HRA are presented in Figure 1 (Appendix B) Designated Nature Conservation Sites of the ISA Scoping Report²³

²³ Figure 1: Designated nature conservation sites, <https://gov.wales/sites/default/files/consultations/2018-01/170427-fig-001.pdf> [accessed 06.08.20]

- 1.5.2 The Preliminary HRA Screening Report (April 2018)²⁴ was consulted upon alongside the Interim ISA Report and the NDF Issues, Options and Preferred Option. The document provided a preliminary screening of the potential effects as a result of the types of policy/likely types of development that could occur as a result of the NDF Preferred Option. In some instances, it was possible to screen out an objective/sub-objective from further assessment. However, in most cases, the potential for a likely significant effect could not be determined at that stage and HRA screening was required of the policies and proposals of the NDF. An Appropriate Assessment was undertaken for those aspects of the NDF that were screened in as having potential for likely significant effects. The Appropriate Assessment is reported in the Final HRA Report (August 2020).
- 1.5.3 The HRA process has been as follows:
- Evidence Gathering: A Rules of Thumb document (Appendix A of the June 2019 HRA Report) provided advice to Welsh Government with regards to the requirements of the HRA and how this should influence initial drafting of the NDF. It was a guide to assist in development of objectives, policy and strategic locations.
 - Issues and Options and Draft Preferred Option: Review of objectives and the Issues and Options document providing verbal feedback to Welsh Government. Preliminary HRA Screening Report (April 2018) provided a high-level review of the draft NDF Preferred Option and recommendations to inform the on-going NDF policy development.
 - Draft NDF: HRA Report for the Draft NDF (June 2019) incorporating the in-combination assessment, together with the Screening assessment and an Appropriate Assessment of the draft policies.
 - This stage: Draft NDF Including Proposed Changes: Final HRA Report (August 2020) following consultation period, taking account of updates and consultation responses made to the NDF for final publication and adoption. This also includes the updated Appropriate Assessment.
- 1.5.4 In conclusion, whilst the HRA has made it clear that it is difficult at this very high-level stage of the development planning process in Wales to be clear about how Natura 2000/ Ramsar sites may or may not be affected by strategic policy decisions, it is important to note that the potential implications for Natura 2000/ Ramsar sites have been considered throughout the development of the Plan, such that early avoidance of the issues (and/or reduction of risk) has been a key element of the process when compiling the policies within the NDF. Firstly, it is important to note the legal requirement for lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites (through the Habitats Regulations (2017), PPW10 and TAN5) to undertake HRA. Secondly, the Appropriate Assessment sets out the type of impacts which could occur through implementation of the policies and identifies avoidance/mitigation measures which must be adhered to when producing lower-tier plans and projects to ensure no adverse impacts on Natura 2000/ Ramsar sites. Together, these two factors provide sufficient safeguarding to be able to confirm that no adverse effects on integrity are anticipated as a result of implementing the policies within the NDF (alone or in-combination).

1.6 How the ISA has been undertaken

Geographical Scope

- 1.6.1 The geographical scope of the ISA has been driven by the geographical scope of the NDF i.e. the whole of Wales and up to the mean low-water spring tide. The Welsh National Marine Plan sets the policy context from the mean high-water spring tide. The relationship between marine plans and land-use planning under the Marine Act²⁵, sees a shared overlap in the intertidal zone. The geographical scale of particular baseline issues means that they will relate closely to neighbouring England and potentially Ireland as well as with the marine environment. This also means that both terrestrial and marine effects are possible and will need to be considered.

²⁴ Assessment of Preferred Spatial Option: Preliminary HRA Screening Report <https://gov.wales/sites/default/files/consultations/2018-04/180430-preliminary-hra-screening-report.pdf> [accessed 16.08.20]

²⁵ The Marine and Coast Access Act 2019 (the Marine Act) <http://www.legislation.gov.uk/ukpga/2009/23/contents> (accessed 17.06.19)

Temporal Scope of the ISA

- 1.6.2 Whilst the NDF will be updated every five years, it is intended to apply until 2040 following publication in 2021. This timescale has been reflected in the ISA. If there are likely to be any sustainability effects of the NDF that would last longer than this, these have also been considered.

ISA Framework

- 1.6.3 A key output of the ISA Scoping Stage was the ISA Framework. Whilst the SEA Directive does not require the use of sustainability objectives, they are a recognised tool for undertaking ISA. The ISA Framework (Table 1-5) is the main assessment tool used during the ISA and comprises a series of 17 Objectives covering social, economic, cultural and environmental issues. These Objectives have been used to test the sustainability performance of the NDF. Each Objective links to the baseline information; key sustainability issues and opportunities in Wales; and other plans, programmes and strategies relevant to the NDF. These were established during the Scoping stage and subsequently form the basis of the assessment. An update to the PPP Review was undertaken as part of this stage of the ISA. However, no updates to the ISA Framework were required. As the baseline was largely based on SoNaRR prepared by Natural Resources Wales, the baseline has not been updated at this stage. The ISA Framework also incorporates the requirements of the other integrated assessments.
- 1.6.4 Annex 1(f) of the SEA Directive lists the following twelve topics that require consideration in any SEA, as well as the interrelationship between these topics.

SEA Directive (Annex 1) Requirements for environmental problems and topics to be considered during SEA

Information to be provided in SEA includes:

“(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC; ...

(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;...”

- 1.6.5 The topics listed in Annex 1(f) were carried through into the ISA Objectives set out in the ISA Framework (see Table 1-6). In some cases, several topics are incorporated into one ISA Objective, such as the topics of biodiversity, fauna and flora being incorporated into ISA Objective 16 ‘To create opportunities for the conservation and enhancement of biodiversity and geodiversity’. In other cases, ISA Objectives are more focussed on one particular SEA topic, such as ISA Objective 8 ‘To create opportunities to encourage the protection and improvement of air quality’, which is focussed on the topic of air quality. The topic of ‘material assets’ is varied and is considered to comprise all natural and built assets in Wales, such as transport infrastructure, built infrastructure and buildings. The varied elements of material assets come through in nearly all ISA Objectives. Where Annex 1(f) requires the ‘interrelationship between the above factors’, this is brought out in the cumulative and synergistic effects assessment in Chapter 2 as well as more generally in all assessments, such as where assessments identify the potential effects of development on air quality and the implications of this for human health or biodiversity (e.g. new development could lead to an increase in road traffic, which could worsen air quality, and this could have a potential adverse effect on human health and any nearby habitats sensitive to atmospheric nitrogen deposition).
- 1.6.6 The ISA Objectives go beyond the SEA topics to also factor in social and economic elements that are not a focus of the SEA Directive but are a key element of SA and other impact assessments, such as Welsh language.

- 1.6.7 The intention of the ISA is to enable the principles of sustainable development to be embedded into the NDF from the outset. The appraisal framework of objectives and decision aiding questions has been designed to embed the principles of sustainable development, in the context of what the NDF could potentially achieve. Each stage of the ISA has been undertaken using an iterative process, with feedback and communication between the NDF and ISA teams. This process enables the NDF to take a more sustainable direction in its development.
- 1.6.8 The basic principles of the approach to the appraisal are outlined in the Scoping Report (section 5.1) and are reflective of the requirements in the SEA Practical Guide (see footnote 5 in section 1.3). In summary, the appraisal would be primarily qualitative and undertaken by professional SA practitioners.
- 1.6.9 It is noted that the approach is reflective of the requirements of the SEA Regulations. Section 2.2 of the ISA Scoping Report provides detail of the statutory requirements for Equalities Impact Assessment; Welsh Language Impact Assessment; and Children's Rights Impact Assessment. The Welsh Government requirements for Health Impact Assessment; and assessments relating to Rural Proofing; Climate Change; and Economic Development, are also summarised.

Table 1-5: ISA Framework

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	• Encourage and support an increase in levels of participation and attainment in education for all members of society? • Encourage and support an improvement in access to lifelong learning opportunities? • Encourage and support an improvement in the provision of education and training facilities through land use planning initiatives?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language
2. To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	• Contribute towards an improvement in access to health and social care services especially in isolated/rural areas? • Contribute towards a reduction in health inequalities amongst different groups in the community including specifically children and older people? • Contribute towards healthy lifestyles and promote well-being including walking and cycling, through land use planning initiatives? • Contribute towards a reduction in levels of child poverty and fuel poverty? • Contribute towards improving access to natural green space, wildlife, open space including opportunities for play, leisure and recreation? • Contribute towards an increase in green infrastructure? • Create opportunities for communities to adapt to the risks to health from climate change?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities
3. To create opportunities for an increase in employment across the country and promote economic inclusion	• Create opportunities to increase employment across all working age ranges? • Create opportunities to improve physical access to jobs through land use planning initiatives? • Create opportunities for an increase in the number of people who are satisfied with their job? • Create opportunities for new investment and growth in the number of skilled workers? • Support opportunities for the development of city regions?	A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
4. To create opportunities for sustainable economic growth, diversity and business competitiveness	• Create opportunities for sustainable economic growth? • Create opportunities for diversification within the economy and encourage new business formation and inward investment? • Create opportunities for businesses who are innovation-active²⁶? • Create opportunities for and promote sustainable tourism, sensitively capitalising on environmental, cultural, heritage and leisure assets? • Create opportunities for enhancements to the rural economy and rural diversification (including agriculture, forestry, SMEs, micro businesses and the development of digital connectivity)? • Create opportunities to maintain and encourage third sector activities? • Create opportunities for businesses and infrastructure to become more resilient when facing the risks from climate change? • Help deliver physical infrastructure to support sustainable economic growth, including digital infrastructure and sustainable travel infrastructure?	A prosperous Wales A resilient Wales A more equal Wales A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
5. To contribute towards the future well-being of the Welsh Language	• Encourage an increase in the number of Welsh language speakers across Wales? • Encourage an increase in the proportion of Welsh language speakers who are fluent across Wales? • Encourage an increase in the number of people who speak Welsh daily and who can speak more than just a few words of Welsh?	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
6. To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	• Create opportunities to reduce greenhouse gas emissions from existing and new development? • Create opportunities to reduce greenhouse gas emissions from power generation, heavy industries and transport? • Create opportunities whereby sustainable design is required to be an integral part of new development? • Create opportunities to reduce the demand for energy and increase energy efficiency? • Create opportunities to increase the potential for the generation of low and zero carbon energy sources?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales

²⁶ As defined in the DBEIS community innovation survey

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
7. To contribute to the reduction and management of flood risk	- Contribute to the reduction and management and promote awareness of flood risk? - Encourage all new development to be climate change resilient? - Promote the benefits of green infrastructure, which can include sustainable flood risk management? - Create opportunities for communities in existing flood risk areas to become more resilient to flood risk? - Direct all new development away from areas of high flood risk?	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
8. To create opportunities to encourage the protection and improvement of air quality	- Create opportunities to improve and protect air quality? - Reduce the likelihood of new Air Quality Management Areas being required? - Create opportunities within which potential emissions from power generation, transport and heavy industry may be reduced? - Create opportunities to ensure that the most vulnerable communities are not disproportionately affected by poor air quality? - Create opportunities to ensure that sensitive habitats and water resources are not negatively affected by air pollution?	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
9. To create opportunities to protect and enhance the quality and quantity of water features and resources	- Create opportunities to protect and enhance ground and surface water quality and quantity? - Create opportunities to protect and enhance waterways as part of a wider green infrastructure network? - Create opportunities to protect and enhance coastal waters? - Create opportunities for the sustainable use of water resources in both domestic and industrial settings? - Create opportunities to reduce the risks from climate change to water resources and supply infrastructure? - Create opportunities for the protection and enhancement of the quality of water features and resources and support integrated decision making in the marine environment? - Support integrated decision making and collaboration across land and sea interfaces and boundaries?	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
10. To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	• Create opportunities for the provision of integrated and inclusive public transport services that meet people's needs? • Create opportunities for the provision of highways infrastructure (including walking and cycling routes) that meets people's needs, including business, commercial and personal use? • Create opportunities for the use of sustainable travel modes and encourage a reduction in dependence on the private car? • Create opportunities for an improvement in access to cultural and recreational facilities? • Create opportunities for the provision of new and improvement of existing digital connective infrastructure? • Create opportunities for the maintenance and improvement of access to essential services and facilities, particularly in rural areas? • Create opportunities to reduce the risks from climate change to transport infrastructure?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
11. To create the opportunities within which an improvement in social cohesion and equality can be achieved	• Create opportunities within which social cohesion and equality can be improved? • Create opportunities within which equalities based on background or circumstances can be improved? • Create opportunities within which gender inequality may be reduced? • Create opportunities within which age inequality may be reduced? • Create opportunities within which inequalities based on disability can be improved? • Create opportunities for children who have any kind of disability to lead full and independent lives? • Create opportunities for children to develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment? • Create opportunities to ensure children can live to a standard that is good enough to meet their physical and mental needs? • Create opportunities to ensure children have access to an education? • Create opportunities to ensure children can relax and play, and join in a wide range of activities? • Create opportunities for the development of strong, cohesive communities? • Create opportunities to reduce levels of crime and the fear of crime? • Create opportunities to improve the number of people satisfied with their neighbourhoods as a place to live? • Create opportunities for older and disabled people to participate in their communities and wider society? • Create opportunities to reduce loneliness amongst the community? • Create opportunities for the built environment to be designed in a way that is accessible for all?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
12. To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	• Create opportunities for the provision of sufficient accommodation to meet identified needs in all areas? • Create opportunities for the provision of good quality homes? • Create opportunities within which the availability of affordable housing should increase? • Create opportunities within which rural housing needs can be met? • Create opportunities within which levels of homelessness are reduced? • Create opportunities within which there is a reduction in the number of households in income poverty or material deprivation?	A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
13. To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	• Create opportunities for the protection and enhancement of areas of landscape and seascape character, distinctiveness, diversity and quality? • Create opportunities for the protection and enhancement of townscape character and quality including historic townscapes? • Create opportunities to promote sensitive, place-responsive design in all development/redevelopment? • Create opportunities to reduce noise and light pollution? • Create opportunities to maintain areas of tranquillity²⁷? • Create opportunities to encourage well designed and accessible places and networks for people and nature within our townscapes? • Create opportunities for landscapes to become more resilient to the effects of climate change?	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
14. To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	• Create opportunities for the protection, conservation and enhancement of designated and non-designated historic assets, as defined in the glossary? • Create opportunities to promote historic assets, so that there is greater access, understanding and enjoyment of these for all? • Create opportunities for heritage-led regeneration? • Create opportunities for the conservation and enhancement of Wales' historic landscapes?	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales

²⁷ Figure 7-1 in Appendix B of the Scoping Report November 2017

ISA Objectives	Decision aiding questions – Will the NDF...?	Well-being goal
15. To create the opportunities for the protection and promotion of Welsh culture	• Create opportunities within which Welsh culture can thrive, through land use planning initiatives? • Create opportunities for access to Wales' cultural and heritage assets and activities? • Recognise, protect, promote and enhance Welsh culture? • Create opportunities for cultural-led regeneration?	A prosperous Wales A more equal Wales A Wales of cohesive communities A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
16. To create opportunities for the conservation and enhancement of biodiversity and geodiversity	• Create opportunities for the establishment of more coherent and resilient ecological networks on land for the benefit of wildlife and people, and enhancement of ecosystems services? • Create opportunities to increase the extent and diversity of functioning ecosystems? • Create opportunities to increase the resilience and adaptability of ecosystems? • Create opportunities for the conservation and enhancement of designated and non-designated nature conservation sites, habitats and species? • Create opportunities for the conservation and enhancement of marine ecosystems? • Create opportunities for the conservation and enhancement of the quality of natural green space? • Create opportunities to protect, conserve and promote geodiversity so that that there is a greater access, understanding and enjoyment of it for all? • Create opportunities for species and habitats to adapt to changing climatic conditions?	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales
17. To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	• Create opportunities to use recycled and secondary materials in construction? • Create opportunities for the use of locally sourced sustainable materials? • Create opportunities to remediate contaminated land and prevention of further contamination? • Create opportunities to contribute to the sustainable management of farmland, forests, and the wider countryside? • Create opportunities to reduce hazardous waste? • Create opportunities within which soil quality can be maintained and/or enhanced? • Create opportunities to protect peatland? • Create opportunities to safeguard protected mineral resources? • Create opportunities to develop brownfield land where this is sustainable? • Create opportunities to increase the proportion of waste recycling and re-use? • Create opportunities to reduce the proportion and amount of waste sent to landfill? • Increase the resilience of ecosystems? • Improve the provision of nature-based solutions to improve air quality, adapt and mitigate climate change, manage flood risk, and improve health and well-being?	A prosperous Wales A resilient Wales A healthier Wales A Wales of cohesive communities A globally responsible Wales

Table 1-6: SEA Directive topics and main ISA objectives of relevance

SEA Directive Topic	Main ISA Objective(s)
Biodiversity	7, 9, 16 and 17
Population	1, 2, 3, 4, 5, 10, 11, 12 and 15
Human Health	1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16 and 17
Fauna	7, 9 and 16
Flora	7, 9 and 16
Soil	7, 9, 13, 16 and 17
Water	6, 7, 9, 16 and 17
Air	6, 8 and 10
Climatic Factors	2, 4, 6, 7, 8, 9, 10, 13, 16 and 17
Material Assets	3, 4, 6, 9, 12, 13, 14, 16 and 17
Cultural Heritage including architectural and archaeological heritage	5, 13, 14 and 15
Landscape	7, 13, 14 and 17

Table 1-7: Integrated impact assessments and main ISA objectives of relevance

Impact Assessment	Main ISA Objective(s)
Health	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17
Equalities	1, 2, 3, 4, 10, 11 and 12
Welsh Language	3, 4, 5
Rural Proofing	2, 3, 4, 5, 10, 11, 12, 13, 16 and 17
Children's Rights	1, 2, 3, 10, 11 and 12
Climate Change	2, 3, 4, 6, 7, 8, 9, 10, 13, 16 and 17
Economic Development	1, 3, 4, 6 and 17

Methodology

1.6.10 The approach adopted included the following steps (refer to Figure 1-1):

- B1: Testing the plan objectives against the SA Objectives;
- B2: Developing the plan options;
- B3: Predicting the effects (including cumulative and secondary effects) of plan options and alternatives;

- B4: Evaluating the effects (including cumulative and secondary effects) of plan options and alternatives;
- B5: Consider ways of mitigating negative effects and maximising beneficial effects; and
- B6: Proposing measures to monitor the significant effects of the plan's implementation.

1.6.11 Table 1-8 and Table 1-9 present the scoring method for each of the assessments presented in this report.

1.6.12 It is noted that the B1 assessments were not repeated at this stage of the ISA process, although the NDF objectives were refined to become 'outcomes'. An explanation of the relationship between the assessed NDF Objectives and the NDF Outcomes, the reasoning behind their evolution, and how further ISA is not necessary, is presented in Appendix C.

1.6.13 Table 1-8 presents the key for the assessment of the Draft NDF Policies and Reasonable Alternatives. This is the same approach to that taken for the Alternative Options and the Preferred Option, as presented in the Interim ISA Report²⁸. Used alongside the ISA Framework (Table 1-5), this enables the potentially significant sustainability effects, whether positive or negative, to be drawn out of the assessment, enabling a framework for recommendations to be made for improvements to the NDF at this stage. How these recommendations have been taken into account has also been identified. Table 1-9 provides a definition of terminology of types of effects that, alongside direct effects, have been considered in the assessment.

1.6.14 Our integrated approach to assessing the impact of the NDF brings together key assessments into a single appraisal framework. However, the approach is clear in that all potential significant effects will be set out within the assessments, including specific effects that relate to the specific assessment types. Set in the context of the seven well-being goals, the various areas for consideration cover the social, economic, environmental and cultural aspects of Wales now, and in the future. Tables 1-6 and 1-7 demonstrate how the requirements of the SEA Directive and the impact assessments have been included within the ISA Framework of objectives to be used to appraise the NDF.

Table 1-8: Assessment Key for NDF Draft Policies and Reasonable Alternatives

Scoring of Assessment	
++	Strong positive – likely to result in progress towards the objective (significant)
+	Minor positive – likely to result in very limited progress towards the objective
0	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative – likely to be to the very limited detriment of achieving the objective
--	Strong negative – likely to be to the limited detriment of achieving the objective (significant)

²⁸ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

Table 1-9: Definitions of Secondary, Cumulative and Synergistic Effects

Type of Effect	Definition
Secondary (or indirect)	Effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.

Source: A Practical Guide to the Strategic Environmental Assessment Directive, ODPM

2 PREVIOUS ITERATIONS OF ASSESSMENT

2.1 Relationship between the NDF and other Plans and Programmes

SEA Directive (Annex 1) Requirements for identifying other relevant plans

The identification of other relevant Plans should account for:

“(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; ...

(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation; ...”

2.1.1 It is important to remember that the NDF is a national-scale document so the other plans and programmes of relevance will primarily be national, UK or international-scale documents. The NDF will, in-turn, seek to influence sub-national level planning in Wales. The ISA Scoping Report identified an extensive list of relevant plans and programmes and how the NDF and ISA should account for these. Of particular importance are the following national documents which the NDF will work with and share common aims and objectives:

- Taking Wales Forward 2016-2021;
- Prosperity for All: The National Strategy;
- Prosperity for All: Economic Action Plan;
- Prosperity for All: A low Carbon Wales;
- The Natural Resources Policy for Wales, incorporating Sustainable Management of Natural Resources (SMNR) and ecosystem resilience principles; and
- The Welsh National Marine Plan²⁹.

2.1.2 The iterative nature of this work has ensured that new plans, policies and programmes which are published as the NDF develops can be taken into account. This may include for example Area Statements, which are to be produced by Natural Resources Wales. However, due to the scale of these documents, they may be more appropriate for consideration within regional or local level plans. The review of other plans, policies and programmes that are relevant to the NDF and its ISA are presented in Appendix A. The following documents have been included in this review since the scoping stage, which provide further guidance and evidence for certain themes of sustainable but have not resulted in any changes to the ISA Framework:

- Prosperity for all: a low carbon Wales (June 2019);
- Welsh National Marine Plan (November 2019);
- Summary Statistics for Economic Regions (August 2019);
- Renewable energy targets: evidence (July 2019);
- Independent review of affordable housing supply: report (May 2019);
- Estimates of housing need in Wales by tenure: 2018-based (June 2019); and
- A Railway for Wales Meeting the needs of future generations (2019).

²⁹ <https://gov.wales/marine-planning>

2.2 What the ISA has appraised to date

2.2.1 The ISA is an iterative process which involves appraisal and feedback to the plan-makers at numerous stages of the NDF's development. To date, the ISA has appraised the following:

Presented in the Interim ISA Report and summarised in this Draft ISA Report Including Proposed Changes:

- Analysis of Future Trends – this considers how the baseline trends for the topics covered by the ISA Objectives are likely to develop in the absence of an NDF. It gives a useful benchmark summary against which the appraisal of the NDF can be compared;
- The NDF Vision and Outcomes (previously called NDF Objectives) (including Reasonable Alternatives to these);
- Strategic Options (Reasonable Alternatives) for the Spatial Approach (four options and a benchmark/Do-Nothing option); and
- The NDF Preferred Option (the preferred Spatial Approach).

Presented in the Draft ISA Report and summarised in this ISA Report of the Draft NDF Including Proposed Changes:

- The Draft NDF (including Spatial Approach, Policies and their Reasonable Alternatives).

Presented in this ISA Report of the Draft NDF Including Proposed Changes:

- The Draft NDF Including Proposed Changes (including Policies and their Reasonable Alternatives).

2.3 Future trends

SEA Directive (Annex I) Requirements for baseline data and key sustainability issues

The requirement to identify sustainability problems and issues arises from the SEA Directive, where the Environmental Report required under the Directive should include:

“(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;

(c) the environmental characteristics of areas likely to be significantly affected;

(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EE...”

2.3.1 The ISA Scoping Report brought together a detailed analysis of the current state of the environment in Wales, characteristics of the environment likely to be significantly affected by the NDF as well as existing environmental problems relevant to the NDF.

2.3.2 Table 2-1 presents the likely evolution of the relevant aspects of the environment without the implementation of the NDF. These likely future trends of the environmental baseline are considered to be either static, improving or declining. Future trends were calculated based on an analysis of baseline data identified and compiled during the ISA Scoping stage and how these trends have changed over time for all of Wales. For example, the future baseline for the ISA Objective related to air quality is considered to be improving. This is primarily as a result of the historic decline in heavy industry in Wales and the subsequent reduction in the emissions of pollutants such as Nitrogen Dioxide and particulate matter. Whilst air quality in Wales has been improving overall there are still areas in Wales where air pollution is of poor quality, particularly where Air Quality Management Areas (AQMA) have been designated, and where concerted efforts are required to improve it.

Table 2-1: Future trends in Wales for each ISA Objective

ISA Objective		Future Baseline
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	Static
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	Improving
3	To create opportunities for an increase in employment across the country and promote economic inclusion	
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	
5	To contribute towards the future well-being of the Welsh Language	
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	
8	To create opportunities to encourage the protection and improvement of air quality	
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	Declining
15	To create the opportunities for the protection and promotion of Welsh culture	
7	To contribute to the reduction and management of flood risk	
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved	
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes	
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	

2.4 NDF Outcomes (including reasonable alternatives) (Task B.1)

- 2.4.1 Extensive consideration was given to the development of the NDF's Outcomes. These were developed originally during the preparation of the Preferred Strategy as the NDF Vision and Objectives. Following the publication of PPW10 and the consideration of the responses to the

Preferred Option Consultation, it was determined that a set of NDF Outcomes was the most appropriate way of establishing both a vision and objectives for the NDF.

2.4.2 The compatibility assessment of the original NDF objectives was undertaken in three iterations and is presented in the Interim ISA Report³⁰. The commentary provided in Table B-2 of the Interim ISA Report presents the iterative process of assessment, and how the ISA recommendations have been taken into account, where relevant. This demonstrates that the majority of the recommendations of the ISA have been incorporated into the NDF. This has included the following improvements, which will improve the potential for the NDF objectives to contribute to more sustainable development, compared to previous iterations:

- Strengthened consideration of landscape (NDF objective 6);
- NDF objectives shortened, simplified where necessary and given greater focus;
- Additional text added to objective 4 relating to population retention, to strengthen communities;
- Reference to marine planning has been included (NDF objective 6);
- Text added to include consideration of pollution (NDF objective 6);
- Improvement to the Welsh Language objective to include consideration of socioeconomic infrastructure of communities; and
- Additional NDF objective relating to cohesive communities added.

2.4.3 PPW10 was published in December 2018. One of the driving factors in the preparation of PPW10 was the importance of updating national planning policy to fully take account of the WBFG Act. Significant engagement and consultation events were undertaken in the preparation on PPW10 to help deliver this. PPW10 states:

“Key Planning Principles

2.13 The plan-led system underpins the delivery of sustainable places. To ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The 5 Key Principles (see Figure 3) represent a guiding vision for all development plans, including the NDF. These principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place.

2.14 These principles will enable the goals and five ways of working set out in the Well-being of Future Generations Act to be realised through land use planning. They provide the context and will act as a catalyst for the positive delivery of the planning system across Wales.”

and

“2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places.”

2.4.4 Consultation responses to the Preferred Option consultation questioned the need for the NDF to contain a vision and objectives. It was suggested that the WBFG Act and PPW (which was being revised at the time of the Preferred Option consultation) could provide the overarching vision and objectives for the NDF. The NDF, in seeking to develop its own vision and objectives, risked establishing different or competing goals and unintentionally could introduce a position at variance with the sustainable development duty of the WBFG Act.

2.4.5 The Welsh Government determined that in light of these issues, it was preferable for the NDF's proposed Vision and Objectives to be replaced by a single set of NDF Outcomes. The 5 Key

³⁰ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

Principles in PPW are the guiding vision for the NDF and the NDF Outcomes take forward the national outcomes set out in PPW to create an overarching set of Outcomes for the NDF.

- 2.4.6 Three alternatives were considered to this change. The first was to retain the vision and objectives as they were proposed in April 2018. For the reasons above, this was discounted. The second was to retain a vision and objectives but to amend them to be more aligned with the 5 Key principles and PPW national outcomes. This was considered unnecessarily complicated and risked creating confusion on the relationship between PPW's approach and the NDFs, particularly given PPW's clear advice on the approach to be taken. The third option was to have no overarching principles or outcomes or similar content in the NDF. It was considered important that the NDF should respond to the clear requirements set out in PPW. In the absence of NDF Outcomes, it would be difficult to establish what the NDF was trying to achieve, to take a 'whole plan' approach to policy issues, and to monitor the success of the NDF in the future.
- 2.4.7 Tables C-1 and C-2 of Appendix C demonstrate that the NDF Objectives and Outcomes align, and therefore a further compatibility assessment with the ISA Objectives is not necessary. An explanation of the relationship between the assessed NDF Objectives and the NDF Outcomes and the reasoning behind their evolution, is presented. The NDF Outcomes are also presented in Appendix C. It was concluded that, as they are similar in likely effects to those originally appraised, further assessment at this stage, in terms of the ISA, was unnecessary.

2.5 NDF Reasonable Alternatives (Task B.2)

SEA Directive requirements for considering reasonable alternatives

SEA Regulations Annex 1(h):

"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."

SEA Directive Art. 5(1):

"Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I."

- 2.5.1 For the purpose of satisfying the requirements of a SEA Environmental Report, it is necessary for the ISA report to identify and evaluate the environmental effects of proposals in the NDF, alongside the identification and evaluation of environmental effects of reasonable alternatives to these proposals. The purpose of using reasonable alternatives is to show that evidence has generated the proposed Plan rather than vice-versa.
- 2.5.2 Determining if an alternative is reasonable is typically an evaluative and qualitative assessment for the planning authority. SEA Guidance states that "only reasonable, realistic and relevant alternatives need to be put forward". The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Should an option be considered to be clearly so unreasonable that no reasonable person acting reasonably could have made it, then it is considered that it would not constitute a 'reasonable alternative'.

Spatial approach

- 2.5.3 The Interim ISA Report documents the appraisal of the NDF Alternative Options and Preferred Option. Four Alternative Options for the NDF were developed together with a Benchmark Option which comprises not producing an NDF. Each option was subject to ISA in November 2017. A full

description of the NDF Alternative Options can be found in Appendix D of the Interim ISA Report³¹. Each of the Alternative Options was structured as follows:

- Summary overview
- Why has this option been developed? (rationale on how the option is a Reasonable Alternative)
- Full overview: How would this option help meet the objectives?
- What are the key assumptions that support this option?
- What would Wales in 2040 look like?
- What did the October 2017 engagement say about this option?

2.5.4 In summary, these options were:

- Alternative Option 1 – An option focussing growth in the strongest market areas
- Alternative Option 2 – An option focussed on creating strong communities across all Wales
- Alternative Option 3 – An option to deliver decarbonisation and climate change objectives
- Alternative Option 4 – An option focussed on the sustainable management of Wales's natural resources
- Benchmark Option - Do Not Prepare the NDF

2.5.5 Appendix D also provides reasoning for why these options were carried forward or otherwise.

The 'Benchmark Option'

2.5.6 The NDF will replace the Wales Spatial Plan (WSP). It is important for the ISA to assess reasonable alternatives for the emerging NDF which contain various options including a 'do nothing/ business as usual' option – which includes the retention of the WSP. This will assess the implications and effects of the replacement of the WSP by the NDF as the SEA Directive requires that the relevant aspects of the current state of the environment and the likely evolution without the plan are considered, along with the environmental characteristics of areas that are likely to be significantly affected. Other aspects will also be considered as part of the 'do nothing' option, such as the outside influence of the National Health Service or the police force on health or crime level improvements for example, as the WSP does not act in isolation. However, the influence of planning will be the key consideration in the assessment.

Summary of Assessment of Alternative Options (November 2017)

2.5.7 Table 2-2 presents a summary of the assessment scores for each of the Alternative Options. The full assessment tables with commentary are presented in Appendix D.

Alternative Option 1

2.5.8 As can be seen from the summary table, Alternative Option 1 (an option focussing growth in the strongest market areas) performs the least well when assessed against the ISA objectives. Strong negative effects have been predicted against 3 of the ISA objectives (relating to health and well-being; social cohesion and equality; and the sustainable use of natural resources). No strong positive effects have been predicted for this option. The increase in prosperity across the strongest market areas could lead to an increase in inequality, between urban and more rural areas, and particularly existing areas of deprivation such as the Valleys and North Wales coast. The option is not driven by SMNR principles, therefore there is potential for development in the growth areas to be led by primarily economic goals leading to potentially negative effects. There are some benefits to this option, in that the option seeks to direct growth to the strongest market areas. This will create

³¹ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

opportunities to increase employment but is focused on identified growth areas rather than across every part of Wales. Therefore, it is unlikely to contribute to economic inclusion across the country. The option is, however, likely to lead to significant positive effects in relation to improving access to jobs in growth areas, increasing the number of people satisfied with their jobs, and creating opportunities for investment and growth and development of skills, particularly in relation to city regions.

Alternative Option 2

- 2.5.9 Alternative Option 2 (an option focussed on creating strong communities across all Wales) performed significantly better than Alternative Option 1, with strong positive effects predicted against six of the ISA objectives (relating to: education; health and well-being; air quality; connectivity of communities; social cohesion and equality; and the sustainable use of natural resources). The option focuses on a dispersed approach based on local need, which may reduce inequalities and lead to an increase in benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment that may have major beneficial effects. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change. No strong negative effects were predicted for this option.

Alternative Option 3

- 2.5.10 The assessment of Alternative Option 3 (an option to deliver decarbonisation and climate change objectives) also led to the prediction of strong positive effects against six of the ISA objectives (relating to health and well-being; energy efficiency and greenhouse gas emissions; climate change resilience; air quality; connectivity of communities and the sustainable use of natural resources). The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by, and build resilience to these. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects. The option also seeks to build climate change resilience into communities, businesses, and the natural environment. No strong negative effects were predicted for this option. Uncertainties with regard to this option have been predicted. The NDF will support major changes to urban form and development patterns, to contribute to the realisation of a low-carbon economy. What this means in terms of built development is unclear and could mean the development of increased housing and infrastructure in 'sustainable' locations, thereby potentially having a negative impact on landscape; noise and light pollution; areas of tranquillity and heritage assets. The option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments have potential for significant landscape (and townscape and seascape) and visual effects although this will depend on the design and location. Further, there is some uncertainty over whether the option might result in, cumulatively, negative effects on biodiversity/geodiversity; as many of the areas deemed suitable for renewable energy schemes could include undeveloped greenfield sites near to existing rural communities.

Alternative Option 4

- 2.5.11 Strong positive effects were predicted against seven of the ISA objectives in the assessment of Alternative Option 4 (an option focussed on the sustainable management of Wales's natural resources) (relating to energy efficiency and greenhouse gas emissions; climate change resilience; air quality; water quality; landscape and townscapes; biodiversity and geodiversity; and the sustainable use of natural resources). The option includes significant emphasis on the climate change resilience, based on the Environment (Wales) Act, which positions Wales as a low carbon, green economy, ready to adapt to the effects of climate change. The option would seek to deliver the SMNR principles, including the reduction of pollution, avoiding effects. It has a very strong focus on preserving the natural environment, despite also promoting a degree of rural development. It

recognises how the natural environment underpins economic sustainability and has a very strong focus on environmental protection.

Do Nothing

2.5.12 No strong effects were predicted for the 'do nothing' option. Although the WSP and other policies and strategies would continue to be in place without the NDF, trends, such as higher than average deprivation in the South Wales valleys and some North Wales coastal towns, are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF. Further, the potential to reduce greenhouse gas emissions and take a national approach to issues such as flood risk and environmental management, whilst accommodating new development and economic growth may not be achieved without strategic direction from the NDF.

Table 2-2: Summary of the Assessment of Alternative Options (November 2017)

ISA Objective	Alternative Option				
	1	2	3	4	5
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+/-	++	+	+/-	+
2. To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across	--	++	++	+	+
3. To create opportunities for an increase in employment across the country and promote economic inclusion	+	+	+	+/-	+/-
4. To promote sustainable economic growth, diversity and business competitiveness	+/-	+	+	-	+/-
5. To encourage the protection and promotion of the Welsh Language	+/-	+	+	+	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	-	+	++	++	+
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	-	+	++	++	+
8. To encourage the protection and improvement of air quality	-	++	++	++	+/-
9. To contribute to the protection and enhancement of the quality of water features and resources	+/-	+	+	++	+
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	+/-	++	++	+	+
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	--	++	+	+	+
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	+/-	+	+/-	-	+/-
13. To encourage the protection and enhancement of the local distinctiveness of our landscapes and towns	-	+/-	?	++	-
14. To encourage the conservation and enhancement of heritage assets	-	+	?	+	+

ISA Objective	Alternative Option				
	1	2	3	4	5
15. To encourage the protection and promotion of Welsh culture	+/-	+	+	+	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	+/-	+	+/-	++	+
17. To encourage the sustainable use of natural resources	--	++	++	++	+/-

Development of the Preferred Option

2.5.13 Following the assessment of the Alternative Options, the Welsh Government team refined the NDF Options, and developed a Preferred Option.

2.5.14 The Preferred Option was developed around five themes, reflective of Planning Policy Wales, Edition 10 (PPW):

- Placemaking;
- Distinctive & Natural Places;
- Productive & Enterprising Places;
- Active & Social Places; and
- Wales's Regions.

2.5.15 The Preferred Option was a hybrid option which seeks to incorporate many of the benefits of the alternative options. Table 2-3 sets out which elements of the Alternative Options were taken forward to the Preferred Option. As such, all of the proposed alternatives individually were rejected. None of the options were considered to be preferable alone as each demonstrated some negative outcomes to varying degrees and would not deliver the balanced sustainable development required. Therefore, the Welsh Government has sought to identify the most positive elements of each to contribute towards developing a preferred option. Alternative Option 1 was determined to be too limited socially and geographically in terms of potential positive outcomes. Strongest market areas would potentially do well, but these would be narrowly focused around the largest cities and towns only. Areas outside these settlements would not do well, inequality would potentially grow and there would be clear negative effects on people and the environment. Alternative Options 2, 3 and 4 were all considered better than Option 1 with clear positive effects. None of these options however was considered sufficiently positive in their own right and it was clear through the iterative process of considering the options, that combining elements from different Options would create a Preferred Option which would be more positive than any of the individual Options. The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative, and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options, have been considered in developing the Preferred Option. The Welsh Government response in Appendix D highlights the findings and how they shaped the Preferred Option. Consideration was given to the effects of each of the options against each of the ISA objectives.

Table 2-3: Summary of Elements Taken Forward to Preferred Option (Assessed February 2018)

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
1	2, 3, 5	The creation of more cohesive, equitable communities (P3, P2, PE9, AS1) The importance of social infrastructure in placemaking (P3, AS1) Reversing rural depopulation (R1, R2, R3, R4, PE6) Improvements in digital connectivity (PE3) Local community connectivity and reducing the need to travel (P2, AS4, R1, AS1) In response to the potential uncertainty in delivery, as identified by Arcadis, without the economic drivers and strengths that could be achieved under option 1(A Spatial Strategy focussing growth in the strongest market areas), the Preferred Option has a strong focus on supporting economic objectives (P3, PE5, PE6, PE7, PE9).
2	2, 3, 4, 5	Improving accessibility within rural communities and reversing population decline (P3, AS1, AS4, R4) Increasing access to the natural environment (P2, DN3, DN5) Sustainable communities, well designed and planned (P2, P3, AS1, AS4, R1) Adaption to risks from climate change / climate change resilience (P1, P2) Delivery of small-scale renewable energy (P2, PE2) Decarbonisation of the economy (P1, PE8) Utilising sustainable locations, improving connectivity and increasing Sustainable travel methods (P2, AS4) Focus on rural communities (P2, P3, R4, R5) Reduction in air, water, and other types of pollution (P1, P2, P3, DN2) An increase in green spaces (DN3, DN5) Improve the delivery of health services (P2, R3, R4)
3	1, 2, 3	Contribute to economic inclusion across the country (P1, P3, PE3, PE5, PE6, AS1) Improving access to jobs in growth areas (P1, PE4, PE5, PE6, PE7, AS1) City regions (PE5, PE6, AS1, R3) Opportunities for investment and growth (P1, PE1, PE3, PE4, PE5) Support specialisation and clusters in certain areas (R1, R5) Regional transport infrastructure (PE8, R3, R4)
4	2, 3	Supporting local economic diversity (P3, PE5, PE6, PE9, PE10, AS1, R1) Support for SMEs, third sector and micro businesses (P3, PE5, PE6, R1) Enhancements to the rural economy and rural diversification (P3, PE4, PE5, PE6, AS1, R1, R4, R5) Support for a sustainable economy and growth in sectors associated with this (P1, PE4, PE5, PE6, R1) The delivery of digital infrastructure and sustainable travel infrastructure (P3, PE8, AS4, R3, R4) In response to the potential to limit competitiveness and economic growth and investment identified by Arcadis by focusing on green growth and decarbonisation, the Preferred Option has a strong focus on supporting a range of growth and investment opportunities (R1, R3, R5, PE5, PE6, PE9)
5	2, 3, 4, 5	Strong focus on investment in local opportunities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) More sustainable communities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) Seeking to reverse rural de-population leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1, R4, R5)

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
6	2, 3, 4	Reducing harmful emissions (P1, P2, P3, DN2, DN5, PE8) Developing a sustainable pattern of living through sustainable design and locational choices (P1, P2, P3, DN2, AS1, R3, R4) Sustainable management of natural resources (P1, P3) Reducing the need to travel through sustainable located development (P1, P2, P3) Enabling local renewable energy schemes (P2, PE2) Reducing the need to travel (P2, P3, PE3, AS4)
7	3, 4	Sustainable management of flood risk (P1, P2, DN1, DN2, PE1, PE8) Anticipating and adapting to the risks from climate change (P1, P2, DN1, DN2, PE1, PE8) Sustainable management of natural resources (P1, P2, DN1, DN2, PE1, PE8) Building climate change resilience into communities, businesses, and the natural environment (P1, P2, DN1, DN2, PE1, PE8)
8	2, 3, 4	Reducing travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities (P1, P2, P3, DN2, PE8, R1) Reducing the need to travel (P1, P2, P3, AS1) Encouraging walking, cycling and working from home (P1, P2, P3, PE3, AS4) The development of community owned renewable energy initiatives (P1, P2, PE2)
9	2, 3, 4	Efficient use of water and the reduction of pollution (P2, P3, DN1, DN2) Preserving the natural environment which would include water quality and resources (P2, P3, DN1, DN2) Supporting SMNR principles (P3, DN1, DN2)
10	2, 3	Supporting active travel (P2, AS4) Reducing private car use (P1, PE3, AS1, R1) Ensuring jobs & services are accessed locally (P3, PE3, PE6, AS1, R1, R3, R4, R5) Providing social infrastructure in deprived communities (P2, P3, PE9, R1, R3, R4) Reversing rural population decline (PE3, PE6, AS1, R1, R4, R5) Ensuring connectivity between uses (AS1, R1, R3, R4) Prioritising walking, cycling, rail electrification & public transport (P2, PE8)
11	2, 3, 4	Reducing inequality (P2, P3, DN2, PE9, AS1, R1) Ensuring access for all to facilities, services & housing (P2, P3, PE3, AS1, R1) Focusing on supporting rural areas (P3, PE2, PE6, R4, R5) Reducing health inequalities (P1, P2, P3, DN, AS42, R4)
12	2	A focus on delivery across Wales (P2, P3, AS1, AS2, AS3, R2, R3, R4) Providing good quality, affordable housing to meet people's needs (P2, P3, AS1, AS2, AS3) The testing of the options identified concerns regarding delivery, larger scale house building, and meeting identified needs. Parts AS3 and R2 of the Preferred Option address these issues, seeking through the NDF to provide national and spatial direction for the delivery of housing across Wales.
13	4	Recognising the importance of the natural environment and landscapes (P1, P3, DN1, DN2, DN3, DN4, PE10) Enhancing natural environment and landscapes (P1, DN1, DN2, DN3, DN4, PE10) Recognising the importance of local facilities and spaces (P2, DN3, DN5, AS1)
14	2, 4	Recognising the importance culture and heritage (DN3, DN6, PE10) Recognising the importance of historic landscapes (DN3, DN6, PE10)

ISA Objective	Options which performed positively against this objective	Relevant aspects taken forward to the Preferred Option (Preferred Option reference shown in brackets)
		Recognising and considering the relationship between heritage and other objectives (e.g. energy) (DN3, DN6, PE10)
15	2, 3, 4	Ensuring a local focus (P3, DN6, PE6, R1, R3, R4) Improving access to cultural heritage assets and activities (P2, P3, DN5, DN6, AS1, AS4, R3, R4) Recognising the natural environment and landscape as a distinctive part of Welsh culture (DN1, DN3)
16	2, 4	Building resilience to ecosystems and habitats (P1, P2, P3, DN1, DN2, DN4) Prioritising natural resource implications (P1, P2, DN1, DN2, DN4)
17	2, 3, 4	Support for the principles of SMNR (P1, P2, DN1, DN2, DN3, PE1, PE4, R1) Support for nature-based solutions (P1, P2, DN1, DN2, DN5) Increasing resilience in ecosystems and habitats (P2, P3, DN2, DN4)

Assessment of the NDF Preferred Option (February 2018)

- 2.5.16 At this stage, the Preferred Option was assessed at a high level. Table 2-4 presents a summary of the findings of the assessment. The full assessment of the Preferred Option assessment can be found in Appendix D.
- 2.5.17 In summary, strong positive effects were predicted against six of the ISA objectives, with no strong negative effects predicted. Strong positive effects were predicted against ISA objectives 2 (health and well-being); 3 (employment); 4 (economic growth); 10 (connectivity of communities); 11 (social cohesion and equality); and 17 (sustainable use of natural resources).
- 2.5.18 The NDF Preferred Option sought to provide a strong policy framework, to ensure that health and well-being outcomes, for both current and future generations, were central to spatial decision making. The regional approach sought to recognise that disadvantaged and deprived communities are not disproportionately impacted by health inequalities and was predicted to lead to an increase in access to health and social care services, especially in rural areas. Added to this, the decarbonisation and climate change agenda sought to build national resilience to the effects of climate change, which was considered likely to lead to cumulative and long-term health and well-being benefits. The overarching 'Placemaking' theme as well as the Preferred Option more generally, included details relating to the determinants of community cohesion, which could include aspects such as the Welsh Language, housing need, connectivity and community facilities and services. The creation of opportunities for the improved connectivity of communities, resilience to climate change and sustainable access to facilities was a key theme of the Preferred Option and provided the basis of many of the strategic policies, leading to potential significant benefits.
- 2.5.19 'Sustainable Places' was the goal of the NDF. Connectivity and digital infrastructure were elements of this, which could increase physical access to employment opportunities for an increased number of communities across Wales. The overarching 'placemaking' theme also highlighted that economic inclusion was an important principle of the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. One of the key aims of the Preferred Option was that Wales would become prosperous and secure. A key element of this was the transition to a low carbon economy, which could bring opportunities that would create a wide range of benefits. The regional approach, including identifying city regions and growth deal areas, could lead to further economic benefits, providing a strategic focus for investment.

- 2.5.20 Decarbonisation and climate change were key foundations of the NDF, and aspects relating to this were integrated throughout the Preferred Option. Measures such as a transition to a low carbon economy (PE4), supporting the Welsh Government's strategic decarbonisation goals, were assessed as having the potential to lead to significant benefits. This could be compounded by the strong focus of the Preferred Option to improve the connectivity of communities through active travel measures (AS1, AS4, R3 and R4), the decarbonisation of transport (part of PE8), generation of energy from low carbon energy sources (PE1, PE2), and the implementation of green infrastructure measures (DN5) and other environmental enhancements (DN3 and DN4). However, the strategy also included a requirement for improvements to the existing and expansion of the national road network (AS5 and part of PE8), although to decrease congestion in the short or medium terms, in the long term, this was assessed as having the potential to lead to an increase in traffic volumes, leading to negative effects for greenhouse gas emissions and air quality, although this effect was predicted as uncertain. On balance, minor positive effects were predicted, particularly for local air quality, where road building may help to improve air quality within communities. Further, although 'high quality' housing is mentioned in the 'Placemaking' theme, this was not included within the strategic policies, which was predicted to leading to potential uncertainty in delivery of the decarbonisation agenda.
- 2.5.21 Policies included within the 'Distinctive & Natural Places' theme, included the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4) and facilitating green infrastructure (DN5). This was predicted to potentially leading to positive effects for landscape and ecology. However, again, the strategy also included a requirement for improvements to the existing and expansion of the national road network (AS5), although to decrease congestion in the short or medium terms, in the long term, this was predicted to have the potential to lead to an increase in traffic volumes, leading to negative effects, particularly in relation to noise pollution in South East Wales. This could be further exacerbated by Policy R3, relating to the development of city regions and growth areas, which could also have negative townscape effects. However, the green infrastructure policy (DN5) could reduce the effects to some degree. Further potential negative landscape effects were predicted as potentially resulting from nationally significant transport or renewable energy infrastructure projects. However, effects may be mitigated on a project level basis or through more specific planning policies. Policies relating to the development of more rural areas, such as R1, R2, and R4, were predicted to lead to negative effects against the areas of dark skies and tranquil areas.

Table 2-4: Summary of results of the appraisal of the Preferred Option carried out in February 2018

ISA Objective	Preferred Option
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+
2. To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across	++
3. To create opportunities for an increase in employment across the country and promote economic inclusion	++
4. To promote sustainable economic growth, diversity and business competitiveness	++
5. To encourage the protection and promotion of the Welsh Language	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	+/-
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	+

ISA Objective	Preferred Option
8. To encourage the protection and improvement of air quality	+
9. To contribute to the protection and enhancement of the quality of water features and resources	+
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	++
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	++
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	+
13. To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscape	+/-
14. To encourage the conservation and enhancement of heritage assets	+
15. To encourage the protection and promotion of Welsh culture	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	+/-
17. To encourage the sustainable use of natural resources	++

Recommendations

2.5.22 Although strong positive effects were predicted for social and economic indicators, it was considered through the ISA that the potential for the NDF to contribute to environmental sustainability in particular could be strengthened. In order to improve the potential for the Preferred Option to contribute towards the ISA objectives, a number of recommendations were made, which were considered by the Welsh Government. These recommendations and how they were considered are recorded in the appraisal table for the Preferred Option in Appendix D. Feedback from the ISA of the Preferred Option was then used to refine the final Preferred Option, which was consulted on alongside the Interim ISA Report (April 2018).

2.5.23 The following direct amendments were made for the final draft Preferred Option for :

- The goal of the Welsh Government of a million Welsh Speakers by 2050 has been included within the Preferred Option in the Place making section under 'Cohesive Communities & Welsh Language'
- Policy DN2 has been redrafted to incorporate avoidance of flood risk.

2.5.24 Table 2-9 sets out how the recommendations of the ISA of the Preferred Option have been taken into consideration.

2.5.25 Although recommendations were made against each ISA objective, it was considered that only the above two changes should be made at this stage of drafting the NDF. Reasons why some of the recommendations within the ISA may not have been appropriate include:

- The NDF should be read as a whole and the provisions to address the specific ISA recommendations are already covered elsewhere in the Preferred Option.
- The current stage provides a high-level overview of the NDF, setting out the key strategic objectives and a spatial direction for the preparation of the NDF. Some of the suggested changes are detailed in

nature and lend themselves to consideration at the next stage of the process, where detailed policy will be developed to deliver the NDF objectives.

- Following re-drafting of the Preferred Option for this consultation, the wording referred to in the ISA recommendation no longer exists or the recommendation is no longer relevant.

Development of the Draft NDF (May 2019)

- 2.5.26 In light of the consultation on the Preferred Option (alongside the Interim ISA Report), evidence, engagement and previous ISA work, the three overarching policies Decarbonisation & Climate Change, Health & Well-being and Cohesive Communities & Welsh Language were considered to be the key areas of focus in the preparation of the Draft NDF. The potential for a more economically driven and market focussed overview was considered. Consideration was also given to how explicitly these policy issues should be drawn through the NDF and their relationship with the NDF Outcomes. The NDF Outcomes specifically considered these three policy areas as they were developed.
- 2.5.27 It was concluded by the Welsh Government that a focus on Decarbonisation & Climate Change, Health & Well-being and Cohesive Communities & Welsh Language remained important. There was no need to significantly amend them or prepare a new Preferred Option and there are no realistic, reasonable alternative approaches. The NDF Outcomes would ensure a focus on them. The Welsh Government has determined that these three areas are 'whole plan'. Responding to the challenges of climate change, improving people's health and shaping cohesive communities requires co-ordinated action across all policy areas. All policies in the Draft NDF were therefore developed to help deliver them and the NDF Outcomes, and the monitoring of the whole plan will demonstrate the success in delivering them.
- 2.5.28 The Draft NDF policies were prepared to deliver the NDF Outcomes and the NDF Spatial Strategy. The Spatial Strategy was effectively developed alongside and as part of the same process of developing the Preferred Strategy and was taken forward to completion following public consultation. The review of evidence, key Welsh Government and other key stakeholder strategies, engagement and discussions with a wide range of people across Wales, and the ISA process itself, led to the development of a spatial strategy that sought to focus growth in three key strategic areas – Cardiff & Newport, Swansea Bay and Llanelli, and Wrexham and Deeside. Within each region, secondary growth areas were identified to provide a focus for regionally scaled and local growth. The Spatial Strategy focuses on resources across Wales, particularly the parts of Wales suitable for wind and solar energy generation and provides a strong framework for supporting our natural resources.
- 2.5.29 Table 2-5 identifies the Preferred Option (assessed February 2018) and how the Draft NDF Spatial Strategy and Policies (assessed May 2019) have been developed in the context of them. In most cases a policy issue identified in the Preferred Option, is addressed in multiple NDF policies. This reflects the integrated nature of the NDF preparation and the 'whole plan' approach to addressing the overarching policy aims. Consideration was given to preparing an NDF policy directly under each of the Spatial Issues and Strategic Policy Direction set out in the Preferred Option (April 2018). It was considered this approach did not allow for issues that have been identified across the consultation and subsequent research and engagement to be introduced; did not adequately reflect the spatial nature of issues in the context of a development plan; did not allow a view to be taken that the policy issue was appropriately and robustly already provided for in PPW10; and did not account for the interrelated nature of many policy issues. The reasonable alternatives that were considered as part of the detailed development of Draft NDF policies are set out in Appendix E.

Table 2-5: How the preferred option proposed for the NDF in February 2018 was incorporated into the policies proposed in the Draft NDF (assessed May 2019)

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
P1 Decarbonisation & Climate Change The NDF will ensure that the planning system in Wales plays a key role in facilitating clean growth and decarbonisation and helps build resilience to the effects of climate change. The transition to a low carbon society will bring opportunities around clean growth and quality jobs and deliver wider benefits, including better places to live and work, clean air and water and improved health outcomes. Achieving the Welsh Government's strategic decarbonisation goals, which include a reduction in our greenhouse emissions by at least 80% by 2050 are a key driver which all development plans must support.	NDF Outcomes & Spatial Strategy P1, P2, P3, P4, P6, P7, P8, P9, P10 to P15 P16 P17, P18, P19, P21, P22 P23, P24, P26 P27, P28, P29, P30, P31
P2 Health & Well-being The NDF will provide a strong policy framework requiring that physical and mental health and well-being outcomes, for both current and future generations, are central to spatial decision making. The NDF will recognise that disadvantaged and deprived communities can be disproportionately impacted by health problems and its regional focus will allow for regional inequalities to be tackled. The NDF and other development plans, must co-ordinate delivery of infrastructure to ensure essential services, including health and education, are connected and accessible. The NDF will make a positive contribution to the overall determinants of health. For example, resilience measures for climate change and transport policies will improve air and water quality and provide walking, cycling and green infrastructure to support healthier lifestyles. The reduction of fuel poverty, through the support for decentralised, localised energy generation and the delivery of high-quality housing, will have a positive impact on people's health and well-being.	NDF Outcomes & Spatial Strategy P1, P2, P3, P4, P5, P6, P7, P8, P9, P10 to P15 P16 P17, P18, P19, P21, P22 P23, P24, P26 P27, P28, P29, P30, P31, P33
P3 Cohesive Communities & Welsh Language The NDF will ensure that the planning system in Wales plays a key role in delivering cohesive communities. Strong and inclusive land use planning is essential to ensuring existing and future communities are well planned and equitable for all. The planning system must play its role in ensuring that no one is disadvantaged on the basis of who they are or where they live and must support actions to address existing problems. Development plans at all levels must ensure that health and economic inequalities are addressed; that all members of society have access to services and facilities, including health, education and digital infrastructure; that the planning system facilitates the delivery of land for high quality housing that meets all society's needs, in locations that are sustainable, accessible and connected; and that communities are resilient to environmental threats such as flooding, pollution and poor air quality. The NDF will ensure that Welsh speaking communities are supported and create conditions that enable the language to prosper. The NDF will support communities by enabling appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed and helps create the conditions to realise the Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050.	NDF Outcomes & Spatial Strategy P1, P2, P3, P4, P5, P6, P7, P10 to P15, P16 P17, P18, P19, P21, P22 P23, P24, P26 P27, P28, P29, P30, P31, P33

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
Economic inclusion is an important principle and the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. It must also ensure that high quality, modern infrastructure, which is a key enabler of competitiveness and productivity, is well planned to be a catalyst for wider regeneration and supporting vibrant communities.	
DN1 Identify national natural resources. NDF policies will maintain and enhance natural resources, improve resource efficiency and minimise the unsustainable use of natural resources.	P8 to P15, P16
DN2 Identify areas of current and future potential environmental risk. NDF policies will require that new development avoids areas of environmental risk and builds resilience to the risks from flooding, air quality, water quality, increases in temperatures, loss of habitats and ecosystems.	P16
DN3 Nationally important landscapes, seascapes, nature conservation sites and habitats will be identified. Opportunities for growth, expansion, greater connectivity and enhancement will be identified. NDF policies will require the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats.	P8, P16
DN4 Nationally important ecosystems will be identified. NDF policies will require strengthening of nationally important ecosystem resilience through greater diversity, connectivity, scale, condition and adaptability.	P8, P16
DN5 Nationally important green infrastructure and opportunities for new infrastructure will be identified. NDF policies will require the protection and enhancement and facilitate the delivery of new green infrastructure.	P8, P16, P33
DN6 Nationally important historic and cultural assets will be identified. Opportunities for new national cultural development will be identified. NDF policies will require the protection, promotion and enhancement of historic and cultural assets and facilitate the delivery of new national cultural development.	P1, P2, P3, P16
PE1 Nationally important energy generation, storage and distribution infrastructure will be identified. Locations for new national scale renewable and low-carbon energy generation, storage and distribution infrastructure will be identified. NDF policies will support the delivery of the Welsh Government's renewable energy targets including 70 per cent of electricity consumed in Wales from Welsh renewable sources by 2030 and locally owned renewable energy capacity in Wales, reaching 1 GW by 2030. Policies will support generation through a range of renewable and low-carbon technologies, storage and distribution infrastructure.	P10 to P15, P22
PE2 All Wales. NDF policies will provide a framework for the delivery of decentralised, local energy generation and distribution including community owned renewable energy schemes across the whole of Wales.	P13
PE3 All Wales NDF Policies will provide a framework for the delivery of modern digital infrastructure across the whole of Wales and will require technological capacity to be built into the design of new development, infrastructure (including transport infrastructure) and areas of growth and regeneration.	P6
PE4 Nationally important employment, mineral and waste areas will be identified. Locations for new nationally significant growth, including projects, linked to connectivity infrastructure and growth areas, will be identified. NDF policies will provide a framework to support growth in sectors helping deliver decarbonisation objectives, the transition to a low-carbon economy; and the circular economy.	P16, P17, P18, P23, P24, P27, P28, P29

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
PE5 Existing and new locations for nationally important economic growth sectors. NDF policies will provide a framework to support growth in key national sectors. This framework will include facilitating the infrastructure required to support their growth.	P16, P17, P18, P23, P24, P27, P28, P29, P10 to P15, P6, P20, P21, P22, P25, P26, P31, P32
PE6 All Wales. NDF policies will provide a framework to support growth including in the foundational sectors, which include the care, tourism, food and retail sectors across the whole of Wales.	P1, P2, P3, P4, P16, P17, P18, P20, P23, P24, P27, P28, P29, P32, P33
PE7 Wales – England Border. NDF policies will promote cross border spatial economic development, land use and transport planning, to maximise the positive, long term outcomes for both Welsh and adjoining regions.	P16, Draft NDF Section 5
PE8 Nationally important roads, railways, ports and airports will be identified. Proposals for new infrastructure investment including rail electrification, public transport hubs and metro schemes will be identified. NDF policies will provide a framework for investment in existing and new national transport infrastructure to decarbonise the transport sector, improve connectivity, efficiency and improve air quality.	P16, P17, P20, P21, P23, P25, P26, P27, P28, P31, P32
PE9 Nationally targeted regeneration areas will be identified. NDF policies will require regeneration activities support health and well-being benefits and focus on building places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive.	P16, P17, P18, P23, P24, P27, P28, P29
PE10 National Marine Plan designations and national projects with a marine-terrestrial relationship will be identified. NDF policies will provide a framework to ensure the delivery of national projects and policies covering the marine-terrestrial planning regimes.	Introduction, P20, P25
AS1 All Wales. NDF policies will require that strategic housing development is linked to connectivity infrastructure, key facilities (including health and education) and areas of growth; and supports the aim of providing better jobs and facilities closer to home.	P1, P2, P3, P4, P16, P17, P18, P23, P24, P27, P28, P29
AS2 All Wales. NDF policies will require that strategic housing development meets the needs of everyone and that the types of housing required are considered alongside locational and numerical considerations.	P5, P16
AS3 All Wales. NDF policies will identify a national policy-based population and housing projection, which will include an all Wales range of housing numbers for the plan period.	Draft NDF Section 5
AS4 National active travel (including walking and cycling) infrastructure will be identified. Improvements to existing and opportunities for new national active travel (including walking and cycling) infrastructure will be identified. NDF policies will provide a framework for improvements to existing and new national active travel (including walking and cycling) infrastructure.	P1, P16
R1 Three regions – North Wales, Mid & South West Wales and South East Wales will be identified. NDF policies will provide a framework for regional planning including the preparation of SDPs. The framework will support growth based on the regions distinctive strengths, to create more diverse, resilient economies, connected communities and address regional inequalities.	P16 to P33
R2 Three regions – North Wales, Mid & South West Wales and South East Wales will be identified.	P16 to P33

Relationship Between Preferred Option Strategic Policy & Spatial Direction (April 2018) and Draft NDF Spatial Strategy and Policies (Assessed May 2019)	
NDF Preferred Option – April 2018	Draft NDF Policies – (assessed May 2019)
NDF policies will identify regional policy-based population and housing projections for each region, which will include a regional range of housing numbers for the plan period.	
R3 City region and growth deal areas will be identified. NDF policies will provide a framework for connected, accessible and well-planned city region and growth deal areas through the co-ordinated delivery of national and regional transport, energy and digital infrastructure, housing and key services and facilities.	P17, P18, P23, P24, P27, P28, P29
R4 Rural areas within the three regions will be broadly identified. NDF policies will provide a framework for rural housing, services and facilities (including health and education) employment and connectivity (digital and transport) infrastructure to ensure Wales's rural communities retain and attract people.	P4, P16
R5 Rural areas within the three regions will be broadly identified. NDF policies will provide a framework for responding to the challenges and opportunities arising from exiting the EU over the plan period. Supporting agriculture and businesses and providing a clear framework for diversification and co-ordination with key Government strategies will be key policy objectives.	P4, P16

Table 2-6: Draft NDF Policy names and numbers

Draft NDF (2019) Policy Name	Policy number
Sustainable Urban Growth	1
Supporting Urban Centres	2
Public Investment, Public Buildings and Publicly Owned Land	3
Supporting Rural Communities	4
Delivering Affordable Homes	5
Planning in Mobile Action Zones	6
Ultra Low Emission Vehicles	7
Strategic framework for biodiversity enhancement and ecosystem resilience	8
National forest	9
Wind and Solar Energy in Priority Areas	10
Wind and Solar Energy Outside of Priority Areas	11
Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty	12
Other Renewable Energy Developments	13
Priority Areas for District Heat Networks	14
Master planning for District Heat Networks	15
Strategic Policies for Regional Planning	16
Wrexham and Deeside	17
North Wales Coastal Settlements	18
Green Belts in North Wales	19
Port of Holyhead	20
Transport Links to North West England	21
North West Wales and Energy	22
Swansea Bay and Llanelli	23
Regional Centres	24
Haven Waterway	25

Draft NDF (2019) Policy Name	Policy number
Swansea Bay Metro	26
Cardiff	27
Newport	28
The Heads of the Valleys	29
Green Belts in South East Wales	30
Growth in sustainable transit orientated settlements	31
Cardiff Airport	32
Valleys Regional Park	33

2.6 Summary of assessment of the Draft NDF (May 2019)

2.6.1 The July 2019 Draft NDF (assessed May 2019), including its Spatial Strategy and Policies, was appraised for its likely effects against each of the ISA Objectives. A summary of the assessment findings for each of these elements is provided below.

Spatial Strategy

- 2.6.2 The 'spatial strategy' of the NDF is the overall approach taken to the distribution and location of the proposed land-uses and policies. The spatial strategy is pursued in the NDF through its policies. The spatial strategy can be found in the NDF predominantly in Chapter 4. The Spatial Strategy appraisal is summarised in Table 2-7 and set out in full in Appendix D. This is different to a 'cumulative effects assessment' or the appraisals of individual policies, as the holistic appraisal of the 'spatial strategy' is focussed on the effects associated *only* with the locational aspect of the proposed policies and land-uses. P1 in the Draft NDF Including Proposed Changes sets out the Spatial Strategy for the NDF.
- 2.6.3 The Spatial Strategy proposed in the Draft NDF would be expected to result in predominantly positive sustainability effects, with significant positive effects on most ISA Objectives likely. Overall, the proposed spatial approach would be expected to help facilitate enhanced accessibility and increased capacity of education and health services throughout Wales, although there could be a risk of additional pressure being placed on their existing capacity in some urban areas. The approach would also facilitate excellent access to open spaces and the countryside for new people, which is important for physical and mental well-being. The support for significant economic growth and new housing that satisfies needs should help to reduce poverty and homelessness and better enable people of all backgrounds in many regions of Wales to pursue healthy and high-quality lifestyles. The spatial approach would be likely to help contribute towards significant economic growth in Wales, with development needs in both urban and rural areas being catered for. The range of employment opportunities in regions across Wales, and the accessibility of these opportunities for areas currently most employment deprived, is likely to be significantly boosted. The proposed spatial approach would be expected to help ensure that identified housing needs are satisfied at national, regional and local levels.
- 2.6.4 The proposed approach would direct the majority of new development towards existing urban regions and this should enable more sustainable development that facilitates lower-carbon living for people due to the good access to public transport modes and the shorter distances needed to travel to access key services and amenities. Generally speaking, people in existing towns and settlements would have excellent access to key services, communal areas and amenities.
- 2.6.5 Based on the assumption that appropriate sewage capacity is available in urban areas, focussing new development in these areas is also an effective means of reducing the risk of adversely impacting water quality as less development would be likely to be situated near natural waterbodies or to result in the loss of greenfield land and vegetation, which help to filter water pollutants. For a

similar reason, development in urban areas would also be less likely to adversely impact ecological connectivity in the countryside or to result in an adverse impact on a sensitive biodiversity designation. At the same time, brownfield sites and urban areas can be of high-biodiversity value, particularly as many of the existing towns and cities are coastal. Development in existing towns and cities would be expected to be able to make a more efficient and sustainable use and management of natural resources, particularly soils, due to opportunities for using brownfield sites, existing building and reused materials.

- 2.6.6 Focussing on existing towns and cities is an effective means of directing the majority of new development away from distinctive and natural landscapes in the countryside as well as landscapes designations including National Parks and AONBs. This is caveated somewhat by the potential risk of significant growth in towns and cities altering the existing townscape character. Effects on historic environments and heritage assets are typically more severe in rural areas where the newly built form can more greatly discord with their setting than they may do in urban locations. However, heritage assets are typically far more numerous in urban areas and so there is some potential for alterations to their setting - these alterations could be beneficial where development would revitalise a derelict or vacant plot.
- 2.6.7 The proposed Spatial Strategy would be likely to help enhance Welsh culture to a minor extent, primarily due to the protection afforded to rural areas where cultural and traditional places and activities are prominent. Likewise, effects of the proposed approach on Welsh language are likely to be somewhat limited although the new development facilitated by the approach is an opportunity to increase the number of Welsh speakers. There could be a risk that new economic development in settlements near the English border, such as Newport, could increase the number of people crossing the border for work purposes and this could potentially dilute rates of Welsh speaking.
- 2.6.8 The Spatial Strategy focusses on three clusters of major towns and cities. In these regions there is extensive flood risk present and there is a risk that the significant level of development proposed would place some new development in active floodplains at risk of flooding (although it is expected that development would still accord with national planning policy and NRW advice). There is also a risk that the development and growth would result in the loss of previously undeveloped land and above-ground vegetation that currently plays an important role in attenuating flood risk, such as permeable soil surfaces and upslope woodland. It should be recognised that situating development in the main towns and cities should limit these effects due to the plentiful opportunities for using brownfield sites and enhancing the presence of green infrastructure.

Table 2-7: Summary of the long-term effects of the Spatial Strategy Assessment (July 2019)

ISA Objective	Spatial Strategy
1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+
2. To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across	++
3. To create opportunities for an increase in employment across the country and promote economic inclusion	++
4. To promote sustainable economic growth, diversity and business competitiveness	++
5. To encourage the protection and promotion of the Welsh Language	+
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	++

ISA Objective	Spatial Strategy
7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	-
8. To encourage the protection and improvement of air quality	++
9. To contribute to the protection and enhancement of the quality of water features and resources	+
10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	++
11. To create the conditions within which an improvement in social cohesion and equality can be achieved	+
12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	++
13. To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscape	++
14. To encourage the conservation and enhancement of heritage assets	+
15. To encourage the protection and promotion of Welsh culture	+
16. To encourage the conservation and enhancement of biodiversity and geodiversity	++
17. To encourage the sustainable use of natural resources	++

Policies (Draft NDF, May 2019)

- 2.6.9 The appraisals of policies proposed in the NDF identified the likely effects of each policy on each Objective in the short, medium and long terms. Section 1.6 in this report sets out the methodology. Table 28 presents the scores for each of the policies proposed in the NDF against each ISA Objective. These show that the likely effects of policies are largely mixed, although the majority of effects are anticipated to be positive with only a very limited number of potential significant negative effects identified. Over time, effects of policies are generally expected to increase in magnitude as their influence on future decision making and planning across Wales grows and accumulates. For each policy, the Welsh Government considered reasonable alternatives, including a do-nothing (i.e. have no policy) approach. The appraisals of the preferred options are presented alongside the appraisals of their reasonable alternatives to enable quick comparisons. The assessment results helped the Plan-makers decide which of the policy options to pursue, amend or reject. Table 2-8 only presents the ISA Scores for the preferred policies (i.e. those proposed in the NDF).
- 2.6.10 All policies in the NDF would be expected to have either negligible, neutral, minor positive or significant positive effects on ISA Objectives 1 – 4, as well as ISA Objectives 10 - 12, which are related to topics on education, health, economy, employment, connectivity, social cohesion and housing. Effects on all other ISA Objectives (5, 6, 7, 8, 9, 13, 14, 15, 16 & 17) are more mixed. Various policies would be highly likely to make a positive contribution towards achieving these ISA Objectives. However, many of the policies proposed in the NDF would encourage or support new investment, development and growth in various industries and regions of Wales and there are likely to be a range of effects associated with new development that make achieving ISA Objectives more difficult. New development typically involves, for example, a degree of increase in local car use, water and energy consumption, land uptake or alteration to the surrounding townscape or landscape character. These are sustainability risks frequently associated with the effects of new development.

Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in GHG emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals be subject to more detailed analysis of their contribution to GHG emissions which could then inform a targeted mitigation strategy. Throughout the appraisals, which are presented in full in Appendix B, recommendations have been made that could help to reduce the risk or magnitude of potential adverse effects. A summary of these recommendations is presented in Table 2-8. During the iterative process of the ISA, the NDF has incorporated a range of recommendations that have helped to enhance the overall sustainability performance of NDF proposals.

Table 2-8: ISA Scores for all policies proposed in the Draft NDF (May 2019) for all ISA Objectives, including scores at the short, medium and long terms (see Table 2-6 for Policy names)

Policy	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes			14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity			17 Natural resources				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L								
P1	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+						
P2	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	-	-	-	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+					
P3	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+					
P4	+	+	+	+	+	+	+	+	+	+	+	+	-	-	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+					
P5	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	-	-	0	0	+	+	+	+	+	+	+	+	0	-	-	0	-	-	0	0	0	0	0	-	0	-	-	
P6	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	0	0	0	0	0	0	0	0		
P7	0	0	0	+	+	+	0	0	+	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
P8	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	0	+	+	0	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+				
P9	0	0	+	0	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+			
P10	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	0	0	0	0	0	0	+	0	0	0	-	-	-	-	-	-	0	0	0	+	+	+	+	+	+		
P11	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	
P12	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0	0	0	+	+	0	0	0		
P13	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	0	-	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+
P14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
P15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
P16	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+		
P17	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	0	0	+	+	+	+	+	+	+	+	+	+	0	-	-	0	-	-	0	0	-	0	-	-	0	-	-	
P18	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	0	0	0	+	+	+	+	+	+	+	+	+	+	0	-	-	0	-	-	0	0	-	0	-	-	0	-	-	
P19	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	0	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	
P20	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	?	?	?	-	-	-	-	-	-	+	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	0	0	-	-	-	-	-	-		
P21	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	?	?	?	-	-	-	0	0	0	+	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	0	0	-	-	-	-	-	-	-	

Policy	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes			14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity			17 Natural resources				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L					
P22	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	0	-	-	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	+	+	+	-	-	-	-	-	-		
P23	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	-	-	-	0	-	-	-	-	-	-	-	-	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-	
P24	-	-	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	+	+	-	-	-	-	-	-	+	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-
P25	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	0	-	-	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	-	-	-	+	+	+	0	0	0	-	-	-	+	+	+		
P26	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	0	0	0	-	-	-	0	0	0	+	+	+	-	-	-	-	-	-	
P27	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	-	-	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-	
P28	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	-	-	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	0	0	0	-	-	-	-	-	-	
P29	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-	0	-	-	-	-	-	0	0	0	+	+	+	+	+	+	+	+	+	0	0	-	-	-	-	0	0	0	-	-	-	-	-	-		
P30	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+			
P31	+	+	+	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	+	+	+	+	0	0	0	-	-	-	-	-	-	+	+	+	-	-	-	-	-	-	
P32	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	-	-	-	0	0	0	-	-	-	?	?	?	+	+	+	+	+	+	+	0	0	0	0	-	-	0	-	-	0	+	+	-	-	-	-	-	-	
P33	+	+	+	+	+	+	0	0	0	0	0	0	?	?	?	0	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+		

2.7 Avoiding, reducing or mitigating negative effects and maximising positive effects of the Draft NDF

2.7.1 Throughout the appraisals of the Draft NDF, recommendations were made for each policy against each ISA Objective, where appropriate, in order to help avoid or mitigate negative effects and to help maximise positive effects. Recommendations were also made alongside the cumulative effects assessment. A summary of the recommendations made in the Draft ISA Report to help enhance the sustainability performance of the NDF is presented in Table 2-9. In response, the Welsh Government considered that the spatial policies and proposals contained in the Draft NDF, coupled with topic based national planning policies provided in PPW and associated guidance, provide the suite of national planning policy to broadly align with the recommendations. Some of the recommendations have raised points for which it is considered necessary to strengthen the NDF. The Welsh Government's response to the recommendations is provided in Table 2-9.

Table 2-9: Summary of recommendations made in the ISA to help enhance the sustainability performance of the Draft NDF

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
Grouping 1	
Potential to strengthen links and connectivity to more rural areas to education and skills facilities	Policy 4 addresses access to services in rural areas and policy 12 deals with connectivity between rural and regional areas. The regional sections require coordinated delivery of development with education providers.
Potential to strengthen links and connectivity to more rural areas to improve access to facilities and services and improve connections to the natural environment.	Policy 4 addresses access to services in rural areas and Policy 12 dealt with connectivity between rural and regional areas. The regional sections require coordinated delivery of development with education providers. Policy 9 address connections to natural environment. References to Green Infrastructure have been strengthened throughout the plan.
P1 - recommend that walking and cycling access routes at new developments are incorporated into local Green Infrastructure (GI) networks. Well connected, attractive and safe GI networks that provide space for pedestrians and cyclists whilst being designed to be of a high biodiversity value (value provided by the species planted throughout the networks as well as the free movement of wildlife they facilitate) can provide a raft of social, economic and environmental benefits, including more accessible employment opportunities for local people.	Policy P2 has been strengthened to recognised green infrastructure and nature based solutions. Policies 11 and 12 both address active travel and the national cycle network. They also recognise the importance and integration with green infrastructure.
Adapting to increasing levels of flood risk in Wales could be afforded greater focus in the NDF, particularly with regards to development in and around urban areas where there is extensive flood risk. P1 and P2 could potentially explicitly state that development that avoids land at risk of flooding, or avoids exacerbating flood risk in other locations, would be particularly encouraged.	Policy 8 – Flooding, has been inserted to address these issues and flooding is also better reflected in chapter 2 and the regional sections.
See Objective 3 – high-quality, safe and attractive walking and cycling routes would help to reduce air pollution associated with transport. Policy P1 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development's adverse impact on air quality and also to protect site users from existing pollution. Access to green space and the consideration of green infrastructure could be key to minimising these potential effects and	Policy P2 has been strengthened to recognised green infrastructure and nature based solutions and air quality. Policies 11 and 12 both address active travel and the national cycle network. They also recognise the importance and integration with green infrastructure.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
should be specifically designed with this in mind, to help to reduce geographical inequalities.	
There is an opportunity to ensure links to rural and P4 could be strengthened to include reference to inclusive infrastructure and connections.re isolated communities are made to improve inclusive access to goods, facilities and services	P4 recognises meeting needs of all members of communities.
PPW (December 2018) seeks to ensure that high density and significant scale development in town and city centres enhances existing townscape character and setting and, through high-quality design measures, considerate layout and potentially vernacular architecture, should protect and enhance townscape character and increase the accessibility of places and networks for people and nature within our townscapes.	Noted. There is a strong link between policy 2 and PPW, placemaking, design.
High-density and significant scale development in town and city centres should seek to pay close consideration to the setting of any nearby heritage assets through high-quality design, considerate layout and potentially vernacular architecture. This should be implemented through PPW. However, the potential for heritage and culture led regeneration should be recognised here.	Noted. There is a strong link between Policy 2 and PPW, placemaking, design. The opportunities for regeneration are supported in the relevant policies. The detail and type of regeneration is to be addressed at the regional and local tiers of planning.
These policies could potentially seek to ensure that biodiversity in urban areas and on settlement boundaries is protected and enhanced. Biodiversity value and green infrastructure within urban sites should be protected to help establish and enhance the coherency of ecological networks that extend throughout urban areas and into the countryside in order to enable the free movement of wildlife and to avoid sensitive species or habitats being isolated in islands away from nature.	Policies 2 and 9 address this.
Grouping 2	
The opportunity to require Green Infrastructure and active travel provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy to increase healthy lifestyle choices.	Policy 3 has been strengthened to address this.
The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy.	Policy 3 has been strengthened to address this.
Policy P3 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development's adverse impact on air quality and also to protect site users from existing pollution.	This is addressed through other policies such as policies 2 and 12 and PPW.
The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy.	Policy 3 has been strengthened to address this.
P3 could potentially refer to sustainable place-making principles for new development on Government land holdings. However, this is included within PPW.	Policy 3 includes this reference as well as PPW.
Grouping 3	
The sustainability of sites for development should be a primary consideration over where to situate new homes delivered to satisfy local needs.	This is addressed throughout the NDF as well as PPW.
The NDF could explicitly refer to the need to avoid delivering affordable homes in the floodplain or on land at a degree of flood risk with which the development type is incompatible	TAN 15 and PPW address flood risk and development. Policy 8 has been inserted to address flood risk.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
Grouping 4	
Spatial implications of the Policy are relatively uncertain. P6 could potentially include a map or a more detailed spatial element that sets out priority areas where digital infrastructure would be strongly encouraged, in accordance with areas most at need.	The supporting text has been updated for policy 14 to reflect ongoing work in the mapping of these areas.
The provision of new mobile communications infrastructure should be carefully managed and located to help ensure adverse impacts on the local character are avoided.	The supporting text for policy 13 addresses impact on character and landscape etc.
The provision of new mobile communications infrastructure should be carefully managed and located to help ensure adverse impacts on the setting of heritage assets or historic areas are avoided.	The supporting text for policy 13 addresses impact on character and landscape etc.
Grouping 5 – no recommendations	
Grouping 6	
Where Green Infrastructure elements in urban locations are used to support sustainable growth, ecological connectivity, social equality and public well-being, wording could be included in the supporting text to emphasise that coherent and well managed GI networks in urban locations can provide essential ecosystem services beyond well-being of local people, including facilitating higher rates of low emission transport (walking and cycling), alleviating flood risk, capturing and storing carbon, filtering air and removing pollutants, protecting below ground natural resources and protecting and enhancing the local townscape character as well as the setting of nearby heritage assets.	The supporting text for policy 9 addresses the benefits of green infrastructure including in urban areas.
See Objective 6. The new forest proposed in P9 could be strategically located in order to maximise its flood risk alleviation ecosystem service value, for example by ensuring some of the forest covers upland areas or is in an active floodplain.	This is recognised in the supporting text for policy 15.
Establishing, protecting and enhancing a coherent ecological network across Wales that incorporates a diverse range of habitats, and is connected with GI networks in urban areas as well as the potential new National Forest, would be best achieved with well-coordinated management at various levels including the national and strategic level, the regional level and local level, to ensure that there is a coherency in the approach across Wales whilst regional and local bespoke needs are taken into consideration. Development should also seek to be in accordance with outcomes of the separate HRA process	Policies 2 and 9 address this. The HRA section in chapter 1 has been strengthened.
Grouping 7	
It is recommended that P10/11/12/13 could be considered in greater detail, widening the policy to include locations for other renewable and low carbon technologies such as hydropower or biomass. It is noted that developments under 10MW will be identified by local planning authorities in their renewable energy assessments. It is suggested that district heating might also be better addressed at a more local level. Ways in which developers might be able to demonstrate the economic benefits to local communities from schemes could be highlighted in the text, to enable implementation.	Policy 17 now includes all types and scales of renewable energy. Policy 16 sets the national context for heat networks. Further guidance will be produced to support the implementation of the renewable energy policies.
See recommendations under objective 3. It is suggested that district heating (P14 and P15) and the associated reasonable alternatives might be better addressed at a more local level.	Policy P2 has been strengthened to recognised green infrastructure and nature based solutions. Policies 11 and 12 both address active travel and the national cycle network. They also recognise the importance and integration with green infrastructure. Policy 16 sets a national direction for heat networks.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development. Policy 12 - the policy could be strengthened to include impacts from developments near to the boundary of these areas – in supporting text. Policy P14 could include text to ensure that the design of District Heat Networks is reflective of local character, as far as possible, as part of the criteria for their development within urban areas. If one of the alternative policies were pursued, these should provide robust wording with regards to visual controls as is provided in the preferred policies.	Policy 17 includes references to cultural improvements and policy 18 addresses settings for AONBs and National Parks.
P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development	Policy 17 includes reference to cultural improvements
Grouping 8	
Provide clarity on skills and training, in particular related to economic growth could widen term employment provision The policy could be improved by referring to the 'consideration of education establishments' in a regional context (for example, where there may be a regional catchment for establishments such as colleges) where it refers to the "location of key services".	This is addressed in PPW.
The policy refers to green belts and corridors but it is unclear whether or not this would encompass green infrastructure in its widest definition. This relationship with GI could be clarified in the supporting text.	Reference has been included to green infrastructure in Policy 19. PPW and Policy 9 address both green belt and green infrastructure.
The supporting text could clarify the definition of 'connectivity infrastructure'- it is proposed this should include a wide definition including digital, green, active travel etc. to maximise benefits.	The supporting text has been updated to define 'connectivity infrastructure'.
It is recommended that regional development plans are encouraged to collaborate with NRW to maximise flood risk management benefits.	Development Plan manual and PPW provide a fuller context for preparation of SDPs.
It is recommended that regional plans collaborate with NRW and water companies to ensure sustainable management and use of water resources in the region.	Development Plan manual and PPW provide a fuller context for preparation of SDPs.
Policy P16 currently advises that regional plans should identify green belts and green corridors. It is unclear if the intention is for regional plans to identify existing green corridors, or to identify and seek to establish new green corridors. In order to try and protect and enhance the connectivity of ecological networks across Wales, Policy P16 could potentially refer to ecological networks on the whole, such as wording to the effect of 'identification of ecological networks and opportunities for protecting or enhancing the connectivity of these networks'. The policy could encourage collaboration with NRW during the preparation of regional plans and to link with area statements to incorporate SMNR priorities.	Policy 19 should be read alongside P9 and PPW which address these issues.
The policy could be strengthened to include reference to pollution	Pollution must be considered and addressed through development plans and PPW sets out national policy on pollution
Grouping 9	
Supporting text should provide clarity on the definition of connectivity infrastructure. Policy P17 could be strengthened to include facilities and services.	Policy 20 includes reference to facilities and services. The supporting text defines connectivity infrastructure to include transport and digital infrastructure. This has been changed across all regions.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
Between Policies P17 and P22, there could potentially be a reference to ensuring strong interactions between North West Wales and North West England in terms of job markets. Whilst Deeside and Wrexham are the key economic areas in the region, it is important that smaller areas that interlink within this region are not forgotten. It may be appropriate to ensure that there is a robust evidence base for determining which urban areas will benefit from the significant investment	The supporting text for policy 20 recognises the strong interactions between the regions and policy 19. Due to the national scale of the plan, other areas which are not directly identified will be addressed at the regional and local scales.
Opportunities to enhance public transport modes in the Wrexham and Deeside region should be sought out and maximised through these policies. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality	Policy 20 addresses improvements in transport infrastructure and policies 11 and 12 strengthen active travel, public transport and low carbon transport options. Policy 23 promotes the North Wales metro.
P17, P20, P21 and P22 could seek to ensure that new development is not situated on the active floodplain. Proposals should be required to ensure that development would not worsen flood risk in other locations. The enhancement of GI through new development is an opportunities to minimise local flood risk further. Careful consideration should be given to the impacts of climate change in determining the distribution and extent of flood risk.	Policy 8 addresses this for all growth areas. Flooding is also addressed in supporting text for North Wales region. PPW and TAN 15 set out national policy on flood risk.
Policy P17 could be strengthened to include facilities and services.	Policy 20 includes this.
Policy P17 could be strengthened to include reference to connections to facilities and services. P21 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.	Policy 20 includes this. The supporting text for policy 23 includes reference to green infrastructure.
Given the sensitive nature and national significance of Anglesey AONB, the policy for development at Anglesey could potentially include wording that refers to ensuring the AONB is protected or enhanced by development in the region.	The supporting text refers to the AONB.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text	Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this.
Where policies support focus on regional level growth, the policies could encourage collaboration of the regional planning with NRW to maximise opportunities for protecting and enhancing biodiversity and SMNR principles. Where transport links are invested in and strengthened through P21, careful consideration to the impacts of these links on the coherency of the local ecological network should be provided for and transport links that are barriers to the free movement of wildlife in countryside areas should be avoided or mitigated.	Development Plan manual and PPW provide a fuller context for preparation of SDPs. The supporting text for policy 24 addresses this.
It is recommended that development supported through these policies is encouraged or required to minimise uses of non-renewable resources and to minimise the generation of waste sent to landfill.	This is addressed in PPW.
Grouping 10	
Supporting text should clarify the definition of connectivity infrastructure. Policy P23 could be strengthened to include facilities and services.	The definition of connectivity infrastructure has been included throughout the regional sections.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
These policies, or their supporting text, could potentially seek to encourage a greater uptake of sustainable transport modes such as by seeking to focus new investment on railway or bus routes. Policies could also encourage the use of low-carbon materials for construction and to use renewable energy. Should an alternative port be focussed on through P25, the Government could seek to ensure that energy generation here is equally focussed on renewable sources of energy.	The metro policy and policy 12 deal with sustainable transport modes. PPW addresses construction materials and renewable energy. Policy 32 haven waterway has been redrafted to focus on energy. Policy 10 addresses port policies.
Policies could specifically refer to the need to direct development away from land at risk of flooding sequentially, particularly land at a degree of flood risk with which the development type is incompatible in line with Welsh Government flood risk management policy.	Policy 8 addresses this for all growth areas. Flooding is also addressed in supporting text for North Wales region. PPW and TAN 15 set out national policy on flood risk.
Appropriate sewage capacity of development should be ensured prior to development in coastal areas.	PPW addresses this.
Policies P23 and P24 could be strengthened to include reference to connections to facilities and services. Policy P25 could be strengthened to include reference to inclusive infrastructure and connections	Policies 28 and 29 reflect the connections to facilities and services. PPW addresses infrastructure and outcome one also address this.
Policies P23 and P24 could be strengthened to include reference to connections to facilities and services. Policy P26 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text	Policies 28 and 29 reflect the connections to facilities and services. Policy 31 addresses green infrastructure in the supporting text
Where revising settlement boundaries is permitted, careful consideration to sensitive landscapes and seascapes or biodiversity assets or designations would be required to avoid adverse effects.	PPW and Policy 9 addresses this.
Where development in regional or local plans is designed to meet the needs of rural communities whilst responding to 'local circumstances', these 'local circumstances' should include the local range of historic assets and areas to ensure they are appropriately accounted for when determining the quantity of growth the area can support. P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	Historic assets are recognised in the supporting text for each region and PPW.
P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text	Historic assets are recognised in the supporting text for each region and PPW.
Development near coastal and marine areas should be required to incorporate appropriate avoidance and mitigation measures to prevent adverse impacts on sensitive habitats, species and designations. The Government should seek to only support development here that would not pose a significant risk to Natura 2000 sites. Flexible boundaries could potentially pose a risk to biodiversity in rural areas and so would require careful management. Development in urban locations should incorporate GI comprised of a diverse range of nature species to help enhance local biodiversity.	The HRA process addresses this and chapter 1 includes section on HRA and links to the HRA reports. PPW and TAN 5 also address this. Policies 9 and 2 sets out requirement for green infrastructure, biodiversity and urban areas
Policies could encourage development to incorporate low carbon techniques and materials during construction as well as to use renewable energy.	PPW addresses this.
Grouping 11	
P31 could be strengthened to include access by a range of sustainable transport modes not just public transport	Policies 12 and 36 address sustainable modes of transport.
P28 could be strengthened to include facilities and services. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. P31 could be strengthened to	Policy 28 addresses access to facilities and services.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
include access by a range of sustainable transport modes not just public transport.	The supporting text recognises the opportunities for environmental benefits in the region Policies 12 and 36 address sustainable modes of transport.
Development in areas of flood risk should not only be expected to conform with WG flood risk management policy through careful selection of sites for development and types of development considered to be compatible with these locations, but could also be encouraged to incorporate natural flood risk alleviation design measures such as green infrastructure elements and permeable surfaces, as well as SUDS.	This is part of WG flooding policy, see policy 8, PPW and TAN 15. Suds are a legislative requirement outside of planning
There is a potential to strengthen P27, P28 and P29 to focus the connectivity on low carbon options to improve air quality.	This is addressed through other policies such as policies 2 and 12 and PPW.
During the selection of locations for development in Cardiff and Newport, careful consideration should be giving to the potential impacts on natural waterbodies including the Severn Estuary. Development should be encouraged or required to adopt precautionary measures to minimise the risk of contamination or pollution. Should any natural waters be within or adjacent to sites, development should seek to enhance the quality of this water in order to help meet Water Framework Directive Requirements. New homes and businesses built in these regions should incorporate water efficiency measures to better enable people and businesses to minimise their water consumption. Development should only be permitted where adequate capacity in the local sewerage system is evident.	These issues are dealt with through a variety of aspects including PPW, building regulations, the HRA and WFD. Welsh Water and Natural Resources Wales are also statutory consultees for the planning system
P28 could be strengthened to include reference to connections to facilities and services. P31 -The supporting text to the policy recognises the role of the Metro in increasing connections in this area this could be recognised within the policy through a variety of metro and active travel opportunities which would bring about many health benefits	Policy 28 addresses access to facilities and services. Policy 12 recognises variety of active travel and metro.
P27 and P28 could be strengthened to include reference to connections to facilities and services. P31 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.	As above – facilities Policies 36 and 12 address green infrastructure as well as PPW.
P32 and its supporting text could potentially include wording that sets out a commitment to ensuring that the expansion and development at the airport would adopt place-making principles that protect and enhance the character of the surrounding area and the setting of heritage assets. P31 has the potential to deliver accessible and inclusive townscapes.	PPW sets out requirements for place making principles for development.
P28 The opportunity and benefits of heritage led regeneration could be recognised in the supporting text. P27 see objective 13.	Historic assets are recognised in the supporting text for each region and PPW.
P28 The opportunity and benefits of heritage led regeneration could be recognised in the supporting text or added to the Spatial Strategy as an overarching principle	Historic assets are recognised in the supporting text for each region and PPW.
P32 Cardiff Airport would adopt best practice to incorporate Green Infrastructure into the development that is not only visually attractive and leaves a positive impression on new visitors to Wales but is also of a high biodiversity value and makes a meaningful contribution towards habitat connectivity.	Policy 9 and PPW address this.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF following consultation
Cumulative effects	
Where the NDF seeks to encourage and support new employment opportunities, greater emphasis could be placed on those that also offer skills learning and education services. Where the NDF encourages investment and development of Wales' transport network and infrastructure, emphasis could be placed on the need for safe and convenient walking and cycling routes, ideally integrated into coherent green infrastructure networks that enhance the accessibility of education facilities via sustainable transport modes.	The importance of skills and education are recognised within the NDF and PPW. Policies 11 and 12 address active travel and green infrastructure opportunities.
The NDF could seek to specifically encourage and facilitate development that is carbon neutral.	PPW and NDF reflect the need for sustainable development.
Where the NDF encourages the provision of green infrastructure in strategic developments, it could include reference to the importance of GI and permeable surfaces in attenuating flood risk and this should be factored into the decision-making over what GI would be appropriate to include in developments.	Policy 9 addresses this.
Where policies propose, support or encourage new development or growth of existing developments, the policy would include wording that seeks to provide protection for biodiversity and wildlife. To ensure that biodiversity is not just conserved but overall enhanced, these policies should provide strong wording that states that the determination of planning applications would take into consideration any adverse impacts on biodiversity, and these cannot be outweighed by social or economic gains, as well as any foreseen enhancements to local biodiversity.	Policy 9 addresses this including net benefit. This is also covered in PPW

3 Assessment of the Draft NDF Including Proposed Changes Policies (March 2020)

3.1 Avoiding, reducing or mitigating negative effects and maximising positive effects of the Draft NDF Including Proposed Changes

3.1.1 Appendix F presents the assessments of policies from the Draft NDF Including Proposed Changes. Section 3.3 provides a summary of the assessment results alongside an assessment of the cumulative effects of all policies in-combination. During the assessment process, recommendations have been made to Welsh Government by the ISA experts in an iterative process. The assessment results in Appendix F and Section 3.3 record these recommendations. Table 3-1 provides an overview of how these recommendations have been considered by Welsh Government.

Table 3-1: Summary of recommendations made in the ISA to help enhance the sustainability performance of the Draft NDF Including Proposed Changes

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
Grouping 1	
Reasonable Alternatives	Policy 1 was the only policy to have a reasonable alternative that scored higher than the NDF policy. The Reasonable Alternative – A centralised urban focus for growth scored would not support rural areas and therefore would not help to create sustainable places across Wales.
Could recognise the universities and their role within the supporting text for the regional growth areas not just the National Growth areas.	Agree. Universities are mentioned in supporting text for each region and specifically in policy 24.
P1 – supporting text could be strengthened to recognise health benefits of the policy.	Agree. The health benefits of the strategy are recognised in the introduction to chapter 4 and a health in all policies approach has been taken to the drafting of the plan. Text has been added to supporting text for policy 1 to recognise the links to the NDF outcomes and aspirations for health, welsh language, decarbonisation and prosperity.
P2 could recommend that walking and cycling access routes at new developments are incorporated into local Green Infrastructure (GI) networks.	Agree. Supporting text for policy 2 recognises the opportunities to integrate active travel and green infrastructure.
Where P1 encourages development that meets local aspirations and need, it could also refer to the need for development that tackles local sustainability challenges. It could potentially also encourage carbon neutral development and net zero homes.	Addressed. The principles of sustainable development and reducing carbon is dealt with in PPW.
P2 and P6 could potentially explicitly state that development that avoids land at risk of flooding, or avoids exacerbating flood risk in other locations, would be particularly encouraged.	Addressed. National policy for flood risk is dealt with through PPW and TAN 15. Policy 8 addresses flood risk for the growth areas and the regional section incorporates flooding issues at the regional scale.
P2 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout. Green space and the consideration of green infrastructure could be key to minimising these potential effects.	Agree. Chapter 4 recognises the potential impact of increasing urban development and impacts on air quality. This will also be recognised in the supporting text for Policy 2. Policy 2 supporting text recognise the benefits of innovative nature based solutions including GI on air

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	quality. PPW addresses all of these issues and includes noise and soundscape.
There is an opportunity to ensure links to rural areas by strengthening P5 to include reference to inclusive infrastructure and connections for isolated communities. This would improve inclusive access to goods, facilities and services.	Addressed. Policy 12 address connectivity at the regional scale recognising the differences between urban and rural communities. Policy 4 focuses on good access to services and facilities for rural communities.
The potential for heritage and culture led regeneration could be recognised here notably in P2.	Addressed. Outcome 6 and the supporting text within the regional sections recognise the importance of heritage and culture through Wales and the need to protect and enhance it. The NDF recognises the opportunities for regeneration. PPW sets out the context for the regional and local development plans to take this forward.
Policies could potentially seek to ensure that biodiversity, and geodiversity where relevant, in urban areas and on settlement boundaries is protected and enhanced.	Addressed. Policy 9 and PPW address these issues.
Grouping 2	
Reasonable Alternative	The policy in the NDF scored higher than the reasonable alternative.
P3 could provide greater emphasis on the need for 'sustainable' growth and regeneration to capture the variety of environmental risks and opportunities in new development.	Agree. Policy 3 has been amended to reflect growth and regeneration. The principle of sustainable development is set through PPW and placemaking.
Policy could be strengthened to maximise public transport and active travel opportunities	Addressed. Supporting text for Policy 6 has been strengthened to recognise the importance of active travel and public transport and PPW addresses these issues.
Grouping 3 – no recommendations	
Reasonable Alternative	The policy in the NDF scored higher than the reasonable alternative.
Grouping 4 – no recommendations	
Reasonable Alternative	The policy in the NDF scored higher than the reasonable alternative.
Grouping 5	
Reasonable Alternative	The policy in the NDF scored higher than the reasonable alternative.
The new forest referenced in P15 could be strategically located to maximise its flood risk alleviation value.	Addressed. Supporting text for Policy 15 addresses the potential for flood alleviation.
P15 could emphasise the importance of maximising the ecosystem services value of the New National Forest and also ensure that it enhances ecosystem connectivity that is supported in P9.	Addressed. Supporting text for Policy 15 addresses the potential for maximising ecosystem connectivity alongside Policy 9.
Grouping 6	
Reasonable Alternative	The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies including transport, economy, environment, decarbonisation, regeneration etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also address climate change which will ensure this is considered and reflected in the NDF this includes ensuring communities are sustainable and resilient. The NDF reflects these and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra low emission vehicles; - Facilitating the delivery of renewable energy; - Promoting the National Forest; and - Promoting the principles of a circular economy.
P10 could be strengthened to include delivery of green infrastructure, active travel and sustainable transport.	Addressed. NDF is part of a broad range of policies and actions and government is taking action to deliver its climate change objectives. This is covered in PPW and NDF policies 9, 11 and 12.
Policy could seek to enhance sustainable transport links to and from Gateways. Policy could include wording to the effect of 'efforts to decarbonise international travel associated with the Gateways would be supported in principle'.	Addressed. NDF is part of a broad range of policies and actions and government is taking action to deliver its climate change objectives. This is covered in PPW and NDF policies 9, 11 and 12. Noted. NDF is part of a broad range of policies and actions and government is taking action to deliver its climate change objectives. The supporting text to policy 10 addresses this and the commitment to decarbonisation.
Could potentially include wording to ensure that development at Strategic Gateways protects and enhances the character of the surrounding area.	Addressed. The principles of place making, landscape, heritage and character are dealt with in PPW
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	Addressed. Outcome 6 and the supporting text within the regional sections recognise the importance of heritage and culture through Wales and the need to protect and enhance it. The NDF recognises the opportunities for regeneration. PPW sets out the

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	context for the regional and local development plans to take this forward.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	Addressed. Outcome 6 and the supporting text within the regional sections recognise the importance of heritage and culture through Wales and the need to protect and enhance it. The NDF recognises the opportunities for regeneration. PPW sets out the context for the regional and local development plans to take this forward.
Cardiff Airport should adopt best-practice to incorporate Green Infrastructure into the development that is visually attractive and of a high biodiversity value.	Addressed. This is covered in PPW and NDF policy 9.
P10 could offer greater clarity over whether new growth and development at the Strategic Gateways, which is considered to be necessary in order to 'maintain' their function/capacity, would be supported.	Noted. Policy 10 allows appropriate development in the context with our wider sustainability and decarbonisation objectives.
An integrated approach between the NDF and the emerging Wales Transport Strategy would help to ensure that people are connected with employment areas and opportunities.	Noted. The NDF chapter 1 outlines the relationship between the NDF and Transport strategy. The existing and emerging Wales Transport Strategy, along with the associated transport policies and projects, have directly contributed to the spatial strategy, outcomes and policies of the NDF. Welsh Government officials will continue to engage and work together on the emerging Transport Strategy.
Grouping 7	
Reasonable Alternative	Policy 13 reasonable alternative of do nothing would not maximise the opportunities and benefits that strengthening the delivery of digital communications infrastructure can bring throughout Wales.
Spatial implications of digital communications infrastructure are relatively uncertain. P14 could potentially include a map.	The supporting text has been updated for policy 14 to reflect ongoing work in the mapping of these areas.
New mobile infrastructure should avoid adverse impacts on heritage assets and historic areas.	Addressed. Outcome 6 and the supporting text within the regional sections recognise the importance of heritage and culture through Wales and the need to protect and enhance it. The NDF recognises the opportunities for regeneration. PPW sets out the context for the regional and local development plans to take this forward.
Grouping 8	
Reasonable Alternative	Policies 17 and 18, provide opportunities to generate economic benefits both directly and indirectly. The uncertain negative and positive impacts would be dependent on implementation and the policies provide clarity and certainty.
P18 could include a requirement for new renewable development and associated infrastructure to avoid unacceptable impacts on the water environment.	Addressed. The supporting text and policy 17 addresses this as well as PPW.
P17 could refer to all types of benefits, including cultural, not just in an economic context. P17 or P18 could encourage small scale community schemes that enhance cohesion.	Agree. Word 'economic' removed from policy. Addressed. Policy 17 covers all scale renewable energy and recognises local community benefits from such projects.

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
P17 or P18 could potentially be strengthened by including reference to cultural benefits to encompass all elements of sustainable development.	Addressed. Policy 17 includes references to cultural improvements.
P18 could include the need to protect Wales' geodiversity from unacceptable impacts.	Addressed. Supporting text, P17 and PPW addresses this.
Grouping 9	
Reasonable Alternative	Policy 19 results in uncertain negative and positive impacts however the policy provides a clear steer to regional plans and would enable a positive regional approach which could bring positive benefits in relation to the welsh language.
Provide clarity on whether employment provision would include skills and education - could refer to the 'consideration of education establishments' in a regional context.	Addressed. This is addressed in PPW.
P19 refers to green belts and corridors, but it is unclear whether or not this would encompass GI in its widest definition - relationship with GI could be clarified.	Reference has been included to green infrastructure in Policy 19. PPW and Policy 9 address both green belt and green infrastructure.
Supporting text could clarify the definition of 'connectivity infrastructure'- this should include digital, green, active travel etc. to maximise benefits.	Agree. The supporting text has been updated to define 'connectivity infrastructure'.
P19 could include consideration of cross-border cooperation with English authorities.	Addressed. The supporting text addresses cross border cooperation.
P19 could include GHG emissions as a fundamental element of regional plans.	Addressed. Pollution must be considered and addressed through development plans and PPW sets out national policy on pollution
It is recommended that regional development plans are encouraged to collaborate with NRW to maximise flood risk management benefits.	Addressed. Development Plan manual and PPW provide a fuller context for preparation of SDPs.
It is recommended that regional plans collaborate with NRW and water companies to ensure sustainable management and use of water resources.	Addressed. Development Plan manual and PPW provide a fuller context for preparation of SDPs.
P19 could include cross-boundary cooperation with English authorities.	Addressed. The supporting text addresses cross border cooperation.
P19 could refer to 'protecting & enhancing the connectivity of ecological networks'. P19 could encourage collaboration with NRW to link with area statements to incorporate SMNR priorities and protection for geodiversity.	Addressed. Policy 19 should be read alongside Policy 9 and PPW which address these issues.
P19 could be strengthened to include reference to pollution.	Addressed. Pollution must be considered and addressed through development plans and PPW sets out national policy on pollution.
Grouping 10	
Reasonable Alternative	Policy 19 results in uncertain negative and positive impacts however the policy provides a clear steer to regional plans and would enable a positive regional approach which could bring positive benefits in relation to the welsh language. Policies 20 and 21 The do-nothing alternatives would be likely to conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions

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	standards of vehicles and the increasing proportion of the vehicle fleet being electric and air quality trends are generally improving. The NDF policies 20 and 21 should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering of sustainable transport modes. The impacts on the historic environment would depend on the implementation of the policies in this grouping however the opportunities and benefits from these policies may not be achieved without the strategic direction of the NDF.
Supporting text should clarify the definition of connectivity infrastructure. It is recommended that a flexible approach to green space could be adopted, which considers green infrastructure as a whole, ensuring that access to green space is more equitable, including in both rural and urban areas.	Agree. The supporting text includes a definitions of connectivity infrastructure to include transport and digital infrastructure. This has been changed across all regions. Addressed. Green infrastructure is dealt with through policy 9 and PPW.
P20 and P24 could reference ensuring strong interactions between North West Wales and North West England in terms of job markets.	Addressed. The supporting text for policy 20 recognises the strong interactions between the regions and policy 19.
Opportunities to enhance public transport modes in the Wrexham and Deeside region should be sought out and maximised through these policies, in addition to the Metro proposal. There is a potential to strengthen the policy to focus the connectivity on low carbon options to reduce emissions.	Addressed. Policy 20 addresses improvements in transport infrastructure and policies 11 and 12 strengthen active travel, public transport and low carbon transport options. Policy 23 promotes the North Wales metro.
P20, P23 and P24 could seek to ensure that new development is not situated on the active floodplain. The enhancement of GI through new development is an opportunities to minimise local flood risk further. Careful consideration should be given to the impacts of climate change in determining the distribution and extent of flood risk.	Addressed. Policy 8 addresses this for all growth areas. Flooding is also addressed in supporting text for North Wales region. PPW and TAN 15 set out national policy on flood risk.
P20 and P21 There is an opportunity to increase access to facilities and services for all, including children and young people and the policy could be strengthened to include reference to these.	Addressed. Policies 20 and 21 refer to essential services, facilities and key services.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	Addressed. Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this.
Could encourage collaboration of the regional planning with NRW to maximise opportunities for protecting and enhancing biodiversity & SMNR principles. P23 - careful consideration of the impacts of transport links on biodiversity is necessary.	Addressed. Development Plan manual and PPW provide a fuller context for preparation of SDPs. The supporting text for policy 24 addresses this.

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Transport links that are barriers to the free movement of wildlife in countryside areas should be avoided.	
It is recommended that development supported through these policies is encouraged or required to minimise uses of non-renewable resources and to minimise the generation of waste sent to landfill.	Addressed. This is addressed in PPW and TAN 21 Waste.
Grouping 11	
Reasonable Alternative	Policies 25 and 26 The do-nothing alternatives would be likely to conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric and air quality trends are generally improving. The NDF policies 25 and 26 should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering. The impacts on townscape would depend on the implementation of the policy 27 however the opportunities and benefits from these policies may not be achieved without the strategic direction of the NDF.
P25 could recognise skills and training required to support this economic growth. P27 could include digital infrastructure and connectivity and the benefits this can bring.	Addressed. This is addressed in PPW. Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW.
The opportunities for the provision of green infrastructure could be recognised in the support text	Addressed. The benefits of green infrastructure are addressed in the supporting text.
P27 could ensure that sustainable transport is the focus of new investment. P27 could seek to reduce the need for people to travel such as through improved digital connectivity.	Addressed. The supporting text for policy 27 addresses investment in sustainable transport. Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW. Supporting text for the region also addresses this.
P27 could ensure that sustainable transport is the focus of new investment and also commit to reducing the need for people to travel such as through improved digital connectivity. The supporting text could include digital connectivity and recognise climate change resilience of the infrastructure	Addressed. The supporting text for policy 27 addresses investment in sustainable transport. Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW. PPW also address climate change resilience.
The supporting text could recognise the benefits of placemaking through reducing barriers good design and cross reference to overarching policies.	Addressed. PPW sets out the principles of placemaking.
In addition to supporting growth that caters to social and employment needs, of the region's natural environment through development proposals could also be supported in P25.	Addressed. The supporting text to the region, policy 9 and PPW addressed this.
Grouping 12	

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Reasonable Alternative	Policies 28 and 29 The do-nothing alternatives would be likely to conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric and air quality trends are generally improving. The NDF policies 28 and 29 should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering. The impacts on the historic environment would depend on the implementation of the policies in this grouping however the opportunities and benefits from these policies may not be achieved without the strategic direction of the NDF.
Supporting text should clarify the definition of connectivity infrastructure. It is recommended that a flexible approach to green space could be adopted, which considers green infrastructure as a whole, ensuring that access to green space is more equitable, including in both rural and urban areas.	Addressed. The supporting text has been updated to define 'connectivity infrastructure'. Green infrastructure is dealt with through policy 9 and PPW.
Should an alternative port be focused on through P32, the Government could seek to ensure that energy generation here is equally focused on renewable sources of energy.	Addressed. Policy 10 addresses port policies. Policies 17 and 18 address renewable energy, as well as PPW.
Development in areas of flood risk should not only conform with WG flood risk management policy but could also incorporate natural flood risk alleviation measures such as GI elements, permeable surfaces & SUDS	Addressed. This is part of WG flooding policy, see policy 8, PPW and TAN 15. Suds are a legislative requirement outside of planning.
Appropriate sewage capacity of development should be ensured prior to development in coastal areas.	Addressed. PPW addresses this.
Policy P32 could be strengthened to include reference to inclusive infrastructure and connections.	Addressed. Policy 32 focuses on energy and the Haven waterway and recognises its important role regionally and nationally. Improving infrastructure and connections in the region are captured within other policies and supporting text for the region and nationally.
Consideration could be given to seascapes as well as landscapes in P32.	Agree. Seascape has been added to the policy text.
P28 & P29 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text	Addressed. Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this.
Development near coastal & marine areas should incorporate appropriate avoidance and mitigation measures to prevent adverse impacts on sensitive habitats, species and designations. Development should deliver net gains.	Addressed. This has been addressed through the HRA and is also covered by PPW and TAN5. Policy 9 addresses net benefit.

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Policies could encourage development to incorporate low-carbon techniques and materials during construction as well as to use renewable energy.	Addressed. This is addressed in PPW, and policies 17 and 18 address renewable energy.
Grouping 13	
Reasonable Alternative	Policies 33 and 35 The do-nothing alternatives would be likely to conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric and air quality trends are generally improving. The NDF policies 33 and 35 should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering. The impacts on the historic environment, townscape and landscape would depend on the implementation of the policies in this grouping however the opportunities and benefits from these policies may not be achieved without the strategic direction of the NDF.
P36 could be strengthened to include access by a range of sustainable transport modes not just public transport	Addressed. The supporting text addresses this and policy 12.
P28 could include facilities and services. The supporting text to recognise the environmental benefits within this area. P31 could include access by a range of sustainable transport modes not just public transport.	Addressed. Policy 28 refers to services and facilities. Addressed. The supporting text for policy 31 addresses this and policy 12.
Development in areas of flood risk should not only conform with WG flood risk management policy but could also incorporate natural flood risk alleviation measures such as GI elements, permeable surfaces & SUDS.	Addressed. This is part of WG flooding policy, see policy 8, PPW and TAN 15. Suds are a legislative requirement outside of planning
There is a potential to strengthen P33 to focus the connectivity on low carbon options to improve air quality.	Addressed. This is addressed through policies 11 and 12 and PPW.
Development should be water efficient and encouraged to adopt precautionary measures to minimise the risk of contamination or pollution. Development should only be permitted where adequate capacity in the local sewerage system is evident.	Addressed. Pollution and sewage capacity must be considered and addressed through development plans and PPW sets out the relevant national policy.
P33 could include reference to connections to facilities and services. P36 - the role of the Metro in increasing connections could be recognised within the policy wording itself.	Addressed. Policy 33 refers to facilities and services. Policy 36 addresses this and is titled South East Metro.
P33 could be strengthened to include reference to connections to facilities and services.	Addressed. Policy 33 refers to facilities and services. The supporting text for policy 36 addresses green infrastructure as well as policy 9 and PPW.

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P36 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.	
Where P35 refers to maximising opportunities for development, it could instead refer to maximising social, environmental and economic opportunities offered by new development proposals in the region, to ensure that potential positive effects on the natural environment are maximised.	Addressed. Supporting text seeks to maximise economic, social, cultural and environmental potential. As well as policy 9 which will address this and PPW.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text of P33. P35 could refer to maximising on social, economic and environmental opportunities offered by new development in the region.	Addressed. Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this. Supporting text seeks to maximise economic, social, cultural and environmental potential. As well as PPW which will address this.
The opportunity and benefits of heritage led regeneration could be recognised in the supporting text of P33 or added to the Spatial Strategy as an overarching principle.	Addressed. Development and regeneration is recognised in policy 1 and the regional sections recognise their distinctive heritage and the need to enhance this.
P35 could refer to maximising opportunities for social, environmental and economic gains offered by new development, rather than just maximising on opportunities to deliver new development, to better ensure that the natural environment would be enhanced as a result of the new Regional Park.	Addressed. Supporting text seeks to maximise economic, social, cultural and environmental potential. As well as policy 9 which will address this.
Cumulative Impacts	
The NDF could place greater emphasis could be placed on those that also offer skills learning and education services.	
Where the NDF encourages investment and development of Wales' transport network and infrastructure, emphasis could be placed on the need for safe and convenient walking and cycling routes, ideally integrated into coherent green infrastructure networks, that enhance the accessibility of education facilities via sustainable transport modes.	The importance of skills and education are recognised within the NDF and PPW. The supporting text for the transport related policies address the need for active travel, green infrastructure networks. PPW also sets out relevant national policy.
The NDF could seek to specifically encourage and facilitate development that is carbon neutral.	This is addressed throughout the NDF and PPW.
Where policies propose, support or encourage new development or growth of existing developments, the policy could include wording that seeks to provide protection for biodiversity and wildlife. To ensure that biodiversity is not just conserved but overall enhanced, these policies should provide strong wording that states that the determination of planning applications would take into consideration any adverse impacts on biodiversity, and these cannot be outweighed by social or economic gains, as well as any foreseen enhancements to local biodiversity. Greater	This is covered through policy 9, policy 15 and PPW.

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emphasis could be placed on the value and importance of achieving a net gain in tree canopy.	

3.2 Contents of the Draft NDF Including Proposed Changes

3.2.1 The NDF is structured in the following way:

- 1. Introduction
 - *Sets out what the NDF is, how it fits with wider Welsh Government policy and the structure of the Welsh planning system.*
- 2. Wales: An Overview
 - *Sets out an overview of Wales and some of the key demographic, economic, environmental, cultural and social trends; and identifies the challenges and opportunities that have shaped the NDF.*
- 3. Setting and achieving our ambitions
 - *Includes the 11 NDF Outcomes which are a collective statement of where the Welsh Government wants Wales to be in 20 years' time and details of the review of the NDF.*
- 4. Strategic and Spatial Choices: The NDF Spatial Strategy
 - *Sets out the spatial strategy and its policies. The spatial strategy will be the guiding framework for where large scale change and nationally important developments will be focused over the next 20 years.*
- 5. The Regions.
 - *Sets out the NDF policies for Wales' four regions: North, Mid, South West and South East.*

3.2.2 The appraisal in the ISA has focussed on chapters 4 and 5 of the NDF, the Spatial Strategy and Regional Policies and their reasonable alternatives. The Outcomes were appraised and refined during the assessment of the Draft NDF (June 2019).

Table 3-2: Draft NDF Including Proposed Changes Policy names and numbers (March 2020)

Policy Name	Policy number
Where Wales will grow	1
Shaping Urban Growth and Regeneration – Strategic Placemaking	2
Supporting Urban Growth and Regeneration - Public Sector Leadership	3
Supporting Rural Communities	4
Supporting the rural Economy	5
Town Centre First	6
Delivering Affordable Homes	7
Flooding	8
Resilient Ecological Networks and Green Infrastructure	9
International Connectivity	10
National Connectivity	11
Regional Connectivity	12
Supporting Digital Communications	13
Planning in Mobile Action Zones	14
National Forest	15
Heat Networks	16

Policy Name	Policy number
Renewable and Low Carbon Energy and Associated Infrastructure	17
Renewable and Low Carbon Energy Developments of National Significance	18
Strategic Policies for Regional Planning	19
National Growth Area - Wrexham and Deeside	20
Regional Growth Area - North Wales Coastal Settlements	21
Green Belts in the North	22
North Wales Metro	23
North West Wales and Energy	24
Regional Growth Areas – Mid Wales	25
Growing the Mid Wales Economy	26
Movement in Mid Wales	27
National Growth Area - Swansea Bay and Llanelli	28
Regional Growth Areas – Carmarthen and the Haven Towns	29
Green Belts in the South West	30
South West Metro	31
Haven Waterway and Energy	32
National Growth Area – Cardiff, Newport and the Valleys	33
Green Belts in the South East	34
Valleys Regional Park	35
South East Metro	36

3.3 Summary of Assessment Results and Cumulative Effects Assessment

- 3.3.1 Table 3-3 sets out the scores recorded for each policy for each ISA Objective, including in the short, medium and long-terms. See Table 1-8 for the definition of scores.
- 3.3.2 Table 3-4 provides a summary of the assessment results for policies, the full results of which are presented in Appendix F.
- 3.3.3 In addition to appraising each of the proposals in the NDF separately they have all been appraised in-combination for their likely cumulative, secondary and synergistic effects against each ISA Objective. The results of this process are presented in Table 3-4 alongside the assessment summaries.
- 3.3.4 Table 3-5 presents the overall cumulative effects scores for each ISA Objective. The final row in this table titled 'Additional recommendations' sets out any new recommendations for Welsh Government's consideration beyond those already presented alongside the policies assessments in Appendix F.

Table 3-3 ISA Scores for all policies proposed in the Draft NDF Including Proposed Changes (March 2020) for all ISA Objectives, including scores at the short, medium and long terms (see Table 3-2 for Policy names). S, M and L represent short, medium and long-term effects respectively. See Table 1-8 for the definition of scores.

Policy	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes			14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity			17 Natural resources			
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L							
P1	+	++	++	+	+	++	++	++	++	++	++	++	+/-	+/-	+/-	-	-	-	O	O	-	O	-	-	O	O	-	+	++	++	+	++	++	O	+	+	+	+	+	O	+	+	+	+	++	+	+	++				
P2	+	+	++	+	+	++	++	++	++	++	++	++	O	+	+	O	+	+	O	+	+	+/-	+/-	+/-	O	+	+	+	+	++	+	+	++	O	+	++	O	+	+	O	+	+	+	+	+	+	++					
P3	+	++	++	+	++	++	+	++	++	+	++	++	+	+	+	+	++	++	O	+	+	+	++	++	O	+	+	+	++	++	+	++	++	+	+	++	+	+	+	+	+	+	+	++	++							
P4	O	+	+	+	+	++	+	++	++	+	++	++	+/-	+/-	+/-	+	+	+	O	O	O	+	+	+	O	O	O	+	+	++	+	+	++	+	++	++	+	+	+	+	+	+	+	+	+	+	+					
P5	+	+	++	+	+	++	+	++	++	+	++	++	O	O	+	+	+	+	O	O	O	+	+	+	O	O	O	+	+	++	+	+	++	+	++	++	+	+	+	+	+	+	+	+	+	+	+					
P6	+	+	++	+	+	++	++	++	++	++	++	++	O	+	+	O	+	+	O	+	+	+/-	+/-	+/-	O	+	+	+	+	++	+	+	++	O	O	O	O	+	+	+	+/-	+/-	+/-	O	+	+	+	+	+	++		
P7	O	O	O	+	++	++	+	+	++	+	+	+	+	+	++	O	O	O	O	O	O	O	O	O	O	O	O	O	+	+	+	+	++	++	++	++	++	++	O	O	O	O	O	O	O	O	O	O				
P8	O	O	O	O	+	++	+	+	++	+	+	++	O	O	O	O	O	+	++	++	++	O	O	O	O	+	+	O	O	+	O	+	++	O	+	+	O	+	+	O	+	+	O	O	-	O	+	++				
P9	O	+	+	O	+	++	+	+	+	+	+	+	O	O	O	+	+	+	+	+	+	+	+	+	+	+	+	O	+	+	O	+	+	O	O	O	+	+	++	+	+	++	+	+	+	+	++	++	+	+	+	
P10	+	+	++	?	?	?	+	+	++	+	+	++	O	+	+	-	-	-	O	O	-	-	-	-	O	-	-	?	?	?	?	?	?	?	O	O	O	O	O	-	O	O	-	+	+	+	O	O	-	O	O	-
P11	O	+	+	+	+	++	+	++	++	+	++	++	O	+	+	+	+	++	O	O	O	+	+	++	O	O	O	+	++	++	O	+	++	O	+	+	?	?	?	?	?	?	O	+	+	O	+/-	+/-	O	+/-	+/-	
P12	O	+	++	+	+	++	+	++	++	+	++	++	O	+	+	+	+	++	O	O	O	+	+	++	O	O	O	+	++	++	O	+	++	O	+	+	?	?	?	?	?	?	O	+	+	O	+/-	+/-	O	+/-	+/-	
P13	+	+	++	+	+	++	+	+	++	+	+	++	+	+	++	O	+	+	O	O	O	+	+	++	O	O	O	+	++	++	+	+	++	O	+	+	O	-	-	O	-	-	O	O	O	O	O	O	O	O	O	
P14	+	+	++	+	+	++	+	+	++	+	+	++	+	+	++	O	+	+	O	O	O	+	+	++	O	O	O	+	++	++	+	+	++	O	+	+	O	-	-	O	-	-	O	O	O	O	O	O	O	O	O	
P15	O	O	+	O	+	++	+	+	+	+	+	+	O	O	O	+	+	+	+	+	++	+	+	+	+	+	+	O	O	O	O	+	+	O	O	O	+	++	++	+	+	++	+	+	+	+	++	++	+	+	+	
P16	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	+	+	++	O	O	O	O	+	+	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	+	+		
P17	O	O	O	O	+	+	O	+/-	+/-	O	+/-	+/-	+	+	+	+	++	++	O	O	+	+	+	++	O	O	-	O	O	O	O	O	+	O	O	O	O	-	-	O	-	-	O	O	O	O	+/-	+/-	O	+	++	
P18	O	O	O	O	+	+	O	+/-	+/-	O	+/-	+/-	+	+	+	+	++	++	O	O	+	+	+	++	O	O	O	O	O	O	O	O	+	O	O	O	O	-	-	O	-	-	O	O	O	O	+/-	+/-	O	+	++	
P19	+	+	+	+	+	+	+	++	++	+	++	++	+/-	+/-	+/-	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++	+	++	++	
P20	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	-	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	++	O	-	-	O	-	-	O	+	+	O	-	-	O	-	-
P21	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	O	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	O	-	-	O	-	-	O	+	+	O	-	-	O	-	-	
P22	O	O	O	+	+	++	O	O	O	O	O	O	O	O	O	+	+	+	O	+	++	+	+	+	+	+	+	O	O	O	O	O	O	O	O	+	+	++	+/-	+/-	+/-	O	+	+	+	+	++	+	+	++		
P23	+	+	++	+	++	++	+	++	++	+	++	++	+/-	+/-	+/-	O	+	+	?	?	?	+	+	++	O	-	-	+	++	++	+	+	++	O	O	O	-	-	-	-	-	-	O	O	+	-	-	-	-	-		
P24	+	+	+	+	+	+	+	++	++	+	++	++	+	+	+	+	++	++	?	?	?	+	++	++	O	-	-	+	+	++	+	+	++	O	O	O	-	-	-	-	-	-	O	O	+	-	-	-	-	-		
P25	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	O	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	++	-	-	-	-	-	-	O	+	+	-	-	-	-	-	
P26	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	?	?	?	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	++	-	-	-	-	-	-	O	+	+	-	-	-	-	-	
P27	+	++	++	+	++	++	+	++	++	+	++	++	+	+	+	+	++	++	?	?	?	+	++	++	-	-	-	+	+	++	+	+	++	O	O	O	O	-	-	O	-	-	O	+	+	-	-	-	+/-	+/-	+/-	
P28	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	-	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	O	-	-	O	-	-	O	+	+	O	-	-	O	-	-	
P29	+	+	++	+	+	++	+	++	++	+	++	++	+	+	++	O	-	-	-	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	-	-	-	O	-	-	O	+	+	O	O	-	O	-	-	
P30	O	O	O	+	+	++	O	O	O	O	O	O	O	O	O	+	+	+	O	+	++	+	+	+	+	+	+	O	O	O	O	O	O	O	+	+	++	+	+	++	O	+	+	+	+	++	+	+	++			

Policy	1 Education			2 Health			3 Employment & inclusion			4 Economic growth			5 Welsh Language			6 GHGs & energy			7 Flood risk			8 Air quality			9 Water			10 Access & connectivity			11 Social cohesion			12 Housing			13 Landscapes & townscapes	14 Historic environment & assets			15 Welsh culture			16 Biodiversity & geodiversity	17 Natural resources							
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		S	M	L												
P31	+	+	++	+	++	++	+	++	++	+	++	++	O	+	+	+	+	++	-	-	-	+	+	++	+	+	++	O	O	O	-	-	-	O	O	-	+	+	+	-	-	-	-	-	-							
P32	+	+	+	+	+	+	+	++	++	+	++	++	O	O	O	+	++	++	?	?	?	+	++	++	-	-	-	+	+	++	+	+	++	+	++	++	-	-	-	+/-	+/-	+/-	O	O	O	-	-	-	+/-	+/-	+/-	
P33	+	+	++	+	+	++	++	++	++	+	++	++	+	+	++	O	-	-	-	-	-	-	-	-	-	O	-	-	+	+	++	+	+	++	++	++	++	O	-	-	O	-	-	O	+	+	O	-	-	O	-	-
P34	O	O	O	+	+	++	O	O	O	O	O	O	O	O	O	+	+	+	O	+	++	+	+	+	+	+	+	O	O	O	O	O	O	O	+	+	++	+	+	++	+	+	+	+	+	++	+	+	++			
P35	+	+	+	+	+	++	++	++	++	++	++	++	O	+	+	O	-	-	O	-	-	-	-	-	O	-	-	+	+	++	+	+	++	O	O	O	+/-	+/-	+/-	+	+	++	+	+	++	+/-	+/-	+/-	-	-	-	
P36	+	++	++	+	++	++	+	++	++	+	++	++	O	+	+	+	+	++	O	-	-	+	+	++	O	-	-	+	+	++	+	+	++	O	O	O	O	O	-	O	O	-	+	+	+	-	-	-	O	-	-	

Table 3-4: Summary of Draft NDF Including Proposed Changes Policies Assessments Results and Cumulative Effects Assessment

Summary of NDF Policies Assessments Results and Cumulative Effects Assessment
Education <i>ISA Objective 1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life</i> Affected SEA Annex 1(f) topics: Population, human health and material assets The assessments of NDF policies on the provision of education and skills learning opportunities for all people of Wales identified largely positive effects. All policies were predicted as having either positive or negligible effects, with no negative scores recorded. Over time, for many policies, these effects were predicted to increase in magnitude and to become significantly positive in the long-term. The pursuit of sustainable development throughout Wales, with an equal distribution at an appropriate scale and use for its specific location, would be expected to enhance the range and quality of education and learning opportunities in both rural and urban areas, such as due to the expansion of existing education facilities, the delivery of new facilities, attracting new investment into the area, and economic and employment growth that provides new skills learning opportunities. The NDF generally focuses new development in National and Regional Growth Areas (see P19 and P20 – P36). The NDF recognises the potential for increased access to education and training within rural communities. The emphasis on regional plan-making would be likely to help ensure that regional educational needs are catered for. This would also help to ensure that new residents are generally situated in proximity to existing education opportunities, such as primary schools, secondary schools and universities. Improvements to national and regional connectivity (P11 and P12) should help to ensure that people can access schools and skills learning opportunities via sustainable modes of transport. Improvements to digital and mobile connectivity (P13 and P14) should help to improve the digital skills learning opportunities for people. Where significant levels of new residential development take place, additional pressure would be placed on the capacity of existing schools. The assessments assume that in accordance with planning policy there would be adequate capacity of nearby schools to cater to the needs of new residents. Policies of the NDF in-combination would be expected have a cumulative significant positive effect as a result of improvements to existing educational facilities and their enhanced connectivity for all people. They would also combine to deliver cumulative positive effects through significant employment and economic growth that delivers skills and learning opportunities in accessible locations for communities throughout Wales.
Health <i>ISA Objective 2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales</i> Affected SEA Annex 1(f) topics: Population, human health and material assets The assessments of NDF policies recorded largely positive effects on the ISA Objective of improving the physical, mental and social health and well-being for all, including a reduction in health inequalities. An equal distribution of growth across Wales should help to enhance the provision of key health services across Wales. New development in each region would be focussed in National and Regional Growth Areas (see regional policies) where access to health facilities, such as GP surgeries and hospitals, is good. It is assumed that new development would only be permitted where there is adequate capacity of these facilities to cater to the needs of new residents. Guiding new development through regional planning, as encouraged in P19, should help to ensure that regional needs are met. Access to a diverse range of semi-natural habitats is important for the physical and mental health and wellbeing of Wales' population. The assessments recorded generally positive effects in this regard, with new development generally expected to be in proximity to the countryside or public rights of way that provide access to the countryside, whilst also providing an opportunity to enhance the GI coverage in urban locations. For example, P9 would help to protect and enhance ecological networks and GI coverage throughout Wales, P15 would lead to the development of a

Summary of NDF Policies Assessments Results and Cumulative Effects Assessment

new National Forest that would be accessible for most people in Wales whilst Policies P22, P30 and P34 seek to ensure that Green Belt land is identified and protected.

A key challenge to improving the health and wellbeing of people in Wales is improving air quality, particularly at locations where air quality is currently poor and is likely detrimental to people's health, such as within or in proximity to Wales' AQMAs. The NDF places great importance on improving the range, quality and accessibility of active and public transport modes, as per P11 and P12, which would help to reduce pollution associated with Wales' transport sector. The NDF also seeks to enhance Wales' GI coverage (e.g. policies P9, P15, P22, P30 and P34), which would be likely to enhance the air filtering ecosystem service provided by Wales' above ground biomass. The regional policies direct most new development towards National and Regional Growth Areas. This would help to limit the risk of new development adversely affecting air quality in less built up areas but at the same time it could lead to a large proportion of new residents and workers being situated in areas of existing poor air quality and this could make achieving air quality improvements increasingly difficult.

Policies in the NDF, in-combination, would be expected to deliver significant cumulative positive effects on the objective of improving physical, mental and social health and wellbeing in Wales as a result of new employment opportunities reducing inequality and poverty, enhanced transport infrastructure improving people's access to services, facilities and the natural environment, increased delivery of affordable housing improving the quality of living environments and enhancements to Wales' digital and mobile connectivity providing benefits for digital health services.

Employment and Economy

ISA Objective 3: *To create opportunities for an increase in employment across the country and promote economic inclusion*

ISA Objective 4: *To create opportunities for sustainable economic growth, diversity and business competitiveness*

Affected SEA Annex 1(f) topics: *Population, human health and material assets*

The assessment of NDF policies recorded positive effects against the ISA Objectives on increasing employment across the country and promoting economic inclusion as well as maximising opportunities for sustainable economic growth, diversity and business competitiveness. All policies were recorded as being likely to have either negligible or positive effects on these Objectives, with positive effects likely to be direct effects that grow in magnitude to become significant in the medium- and long-term, whilst no negative effects were recorded.

P1 seeks to ensure that development is distributed equally across Wales. P3 provides assurance that new development and regeneration in urban areas is supported whilst P4 and P5 help to ensure that the needs of rural communities and economies are met. P10 would help to maintain the international connectivity of Wales, whilst P11 and P12 would help to improve the national and regional connectivity of Wales. These policies would be expected to significantly benefit businesses throughout Wales, better enabling them to compete and succeed and grow and to provide increasing numbers of employment opportunities in accessible locations. Improvements to digital connectivity, as per P13 and P14, should further help to enable businesses to thrive in current and future markets.

The focus on regional plan making (P9), and the various policies set out for each region (P20 - P36), particularly those related to new development, would be likely to help ensure that regional needs are catered for and that the potential of each region's economy can be met and in so doing could help to improve economic equity between the regions.

Policies in the NDF would be expected to lead to significant positive effects in terms of increasing employment and promoting sustainable economic growth as a result of improving the accessibility of key employment areas, encouraging major new economic and employment development, catering to regional needs as well as urban and rural needs and promoting regional equity.

Welsh Language

ISA Objective 5: *To contribute towards the future wellbeing of the Welsh Language*

Affected SEA Annex 1(f) topics: *Population, human health and material assets*

The NDF policies assessments recorded mostly positive effects with regards to protecting and improving the future well-being of the Welsh language. In many cases it is believed that new development could support Welsh speaking communities and enhance their long-term viability in certain areas. For example, P7 would help to significantly enhance the availability of affordable housing in Wales and this could be particularly beneficial for encouraging local

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(potentially Welsh speaking) people to remain living in the area they grew up in. This would help to safeguard communities in Wales where Welsh-speaking is prevalent. Policy P1 specifically includes growth areas in all parts of Wales, which can reduce the out-migration of people from rural areas to urban areas considerable distances from their home communities.

At the same time, new development in these areas could risk a minor dilution effect as a result of new people, many of whom may not speak Welsh, being attracted to the area.

Schools provide an essential service in terms of providing Welsh-speaking learning opportunities, either at schools with Welsh language on the curriculum or schools that operate entirely in Welsh. Generally speaking, it is expected that development encouraged through the NDF, particularly that which is directed towards National and Regional Growth Areas (P20, P25, P28 and P32) would provide residents with good access to existing schools.

Policies in the NDF, in-combination, would be likely to lead to minor positive effects in terms of the well-being of the Welsh language as a result of encouraging new economic development and growth, improving education facilities and the accessibility these facilities and encouraging more affordable housing.

Energy and GHGs

ISA Objective 6: *To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, air, climatic factors and landscape*

The need to create opportunities within which greenhouse gas emissions can be reduced and limited and for encouraging energy efficient and sustainable design is becoming increasingly important, as highlighted by the Welsh Government's 2019 declaration of a climate change emergency.

The NDF places climate change at the core of its approach towards land-use planning and seeks to ensure that the sustainability of new development is maximised and evidenced.

The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies including transport, economy, environment, decarbonisation and regeneration. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out actions to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A Climate Conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also address climate change which will ensure this is considered and reflected in the NDF, including ensuring communities are sustainable and resilient.

The NDF reflects these and sets out specific policies that look to promote decarbonisation through:

- Delivering sustainable development;
- Reducing reliance on the car through increasing active travel and public transport;
- Supporting investment in infrastructure to enable ultra-low emission vehicles;
- Facilitating the delivery of renewable energy;
- Promotion of the National Forest; and
- Promoting the principles of a circular economy.

P11, P12, P23, P27, P31 and P36 would help to significantly enhance the public and active transport available to people in Wales and this could make a meaningful contribution towards Wales' transition towards a low-carbon transport sector. Policies such as P13 and P14, which would improve Wales' digital and mobile connectivity infrastructure, could help to reduce the need for people to travel. P20, P25, P28 and P32 would lead to the majority of new development being directed towards National and Regional Growth areas where access to sustainable transport modes is good, where the distance needed to travel to access key services and amenities is typically short and where

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there are likely good opportunities for developing efficient energy networks, such as the Heat Networks proposed in P16. National and Regional Growth Areas also offer opportunities for developing on brownfield and thereby help to limit the risk of new development taking place on greenfield that is currently an important carbon sink. The protection and enhancement of Wales' GI coverage and ecosystem resilience, such as through P9, P15, P22, P30 and P34, would help to conserve and enhance these important carbon sinks throughout Wales. The new National Forest proposed in P15 could be beneficial in this regard.

The NDF pays due consideration to the urgent need for Wales to increase its supply of renewable energy, as per P17 and P18, and this will make a significant contribution towards reducing the carbon footprint of Wales' energy sector over time.

At the same time, it is recognised that new development would lead to new residents, businesses and visitors to areas throughout Wales, particularly in National and Regional Growth Areas, and the construction and operation of this development would be likely to lead to a net increase in energy consumption and GHG emissions in relation to existing levels. This is inherent in new development, whereby most construction practices consume energy and are sources of GHG emissions, and new residents or businesses consume energy (e.g. for heating homes) and are sources of GHG emissions (e.g. transport movements). In 2018 it was calculated that households accounted for around 18% of the UK's carbon footprint, whilst the business sector also accounted for 18%³². Policies in the NDF that encourage new social or economic development risk leading to some degree of increase in energy consumption and GHG emissions, although this would be mitigated to some extent by the factors described above. PPW may also help to enhance the energy efficiency of new development and to encourage low-carbon techniques.

P10 seeks to maintain Wales' international connectivity through Strategic Gateways including Cardiff Airport and several ports. Air travel, as well as some port activities, are becoming increasingly fuel efficient and there is the potential for electrification of ships and planes to reduce emissions further. The supporting text for the policy sets out the requirement for development proposals to demonstrate compliance with Wales' carbon budgets. However, currently and likely for the duration of the NDF, flight and port activities are known sources of GHG emissions. An indirect effect of P10 is that the emissions associated with the different uses of each Strategic Gateway would continue to take place over the course of the NDF period. The overall effect of P10 is somewhat dependent on the implementation of the policy as it is uncertain whether, in order for the function of each Strategic Gateway to be 'maintained', an expansion of their capacity may be required over the coming years.

Cumulatively, policies in the NDF would be expected to lead to both positive and adverse effects in terms energy efficiency and GHG emissions. The NDF makes best efforts to significantly enhance the sustainability of new development in Wales and it is considered to be likely that most new development delivered during the NDF period would be more sustainable as a result of the NDF, than if it were delivered without the NDF being in place. The NDF would help to protect and enhance essential carbon sinks, significantly improve sustainable transport options, increase the renewable energy supply in Wales whilst encouraging more efficient heat energy networks as well as development being situated in proximity to key services and areas thereby reducing the need for people to travel. This could be countered to a limited extent by GHG emissions from activities associated with Wales' Strategic Gateways, as well as the increase in energy consumption and transport movements of people caused by the new development proposed in the NDF for all regions of Wales.

Flood Risk

ISA Objective 7: *To contribute to the reduction and management of flood risk*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors and landscape*

Whilst the NDF makes best efforts to enhance the sustainability of new development in Wales and to reduce its contribution towards anthropogenic climate change, the NDF also recognises the importance of enhancing the resilience of Wales' communities to the impacts of climate change such as the risk of flooding, which is prevalent throughout Wales with approximately 245,000 properties currently at risk of flooding. Extreme weather and storminess are also likely to increase over time.

Overall, policies in the NDF were recorded as having a variety of different effects on this Objective. The NDF encourages major new development, particularly in National and Regional Growth Areas (P20, P25, P28 and P32), and whether new development encouraged in the NDF would alter this flood risk or place new residents in areas of

³² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790626/2018-provisional-emissions-statistics-report.pdf (Accessed 06.08.20)

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flood risk is largely dependent on the implementation of development. Given the scale of development it may be difficult to avoid flood risk zones in all cases. At the same time, focussing new development in these areas would help to limit the risk of greenfield, which plays an important role in managing flood risk, being lost to new development. Policies that seek to enhance Wales' GI cover, such as P9, P15, P22, P30 and P34, would help to enhance the natural flood risk alleviation service it provides. Wales' above-ground biomass also plays an important role in managing microclimates, such as by cooling the temperature during extreme heat and managing water resources during droughts. Several Growth Areas are in coastal locations, which due to climate change and sea level rise will be likely to be exposed to increasing levels of coastal flood risk and protecting and enhancing GI would be of limited benefit in terms of alleviating this.

Development in Growth Areas could provide opportunities to focus investment into flood risk management measures that enable this development. P8 seeks to ensure that investment is directed towards flood risk management schemes to enable development in Growth Areas to proceed.

Minor adverse effects predicted for this Objective for a limited number of policies are primarily a result of considering the policies from a precautionary perspective. Whilst this development would need to conform with planning policy that prevents certain types of development being in areas of flood risk with which it is incompatible, it is largely uncertain precisely where new development would be situated and so at this stage the assessments highlight the risk that some development may be situated in active floodplains. This should be seen in the context of PPW, which seeks to ensure new development sustainably manages flood risk.

When considering all policies in the NDF in-combination they would be likely to lead to cumulative effects that are both positive and negative, with effects primarily dependent on the distribution and implementation of development in relation to flood risk. In general, it is expected that development would conform with planning policy and avoid land at a level of flood risk with which the type of development would be incompatible. However, given the scale of new development it may not be possible to avoid developing in land at risk of flooding in all cases. There is also a risk that development in some locations would lead to a loss of above ground vegetation and permeable soils, replacing it with hard standing and impermeable surfaces, and thereby altering the extent and distribution of local flood risk.

Air Quality

ISA Objective 8: *To create opportunities to encourage the protection and improvement of air quality*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, air, climatic factors and landscape*

Assessments of NDF policies against the air quality Objective of creating opportunities to encourage the protection and improvement of air quality are somewhat mixed, although more positive effects were identified than negative effects.

Negative effects predicted during the assessments are predominantly minor and associated with the impact of new businesses and homes on increases in transport movements. Whilst development would be directed towards National and Regional Growth Areas for the most part, where access to sustainable transport options is generally very good, it is likely that there would still be some degree of increase in car movements. The NDF seeks to ensure that both urban and rural needs are catered for. People in rural areas are generally particularly reliant on personal car use for many of their journeys. Effects of policies such as P1, P2, P3, P4, P5, P20, P25, P28 and P32 are therefore mixed.

P10 seeks to maintain Wales' international connectivity through Strategic Gateways including Cardiff Airport and several ports. Air travel, as well as some port activities, are becoming increasingly fuel efficient and there is the potential for electrification of ships and planes to reduce air pollution further. The supporting text for the policy sets out the requirement for development proposals to demonstrate compliance with Wales' carbon budgets, which would be likely to limit polluting activities at the Gateways. However, currently and likely for the duration of the NDF, flight and port activities are known sources of air pollution. An indirect effect of P10 is that the pollution associated with the different uses of each Strategic Gateway would continue to take place over the course of the NDF period. The overall effect of P10 is somewhat dependent on the implementation of the policy as it is uncertain whether, in order for the function of each Strategic Gateway to be 'maintained', an expansion of their capacity may be required over the coming years. However, P11, P12, P23, P27, P31 and P36 would help to significantly enhance the public and active transport offering available to people in Wales and this could make a meaningful contribution towards Wales' transition towards a low-emission transport sector.

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The protection and enhancement of Wales' GI coverage and ecosystem resilience, such as through P9, P15, P22, P30 and P34, would help to conserve and enhance the air filtration service provided by Wales' natural biomass. This will particularly be the case where GI is integrated into urban growth areas.

Enhancing the efficiency of Wales' energy networks and increasing the capacity of renewable energy generation, as per P16, P17 and P18, would help to minimise pollution associated with Wales' energy sector.

When considering policies in the NDF in-combination they would be likely to deliver both positive and negative cumulative effects. The NDF seeks to encourage, support and facilitate new economic, residential and strategic development that would have associated pollution risks. A secondary impact of the construction, occupation and operation phases of this development across Wales could also see an increase in car use due to economic and population growth. The NDF also supports the maintenance of Strategic Gateways, the different uses of which can pose air pollution risks.

Water Resources

ISA Objective 9: *To create opportunities to protect and enhance the quality and quantity of water features and resources*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors and landscape*

Assessments of NDF policies against the water resources Objective of creating opportunities to protect and enhance the quality and quantity of water features and resources recorded mixed results.

The distribution of new development, as per P1, P2, P3, P4, P5, P20, P25, P28 and P32, would generally be expected to avoid natural surface waterbodies and therefore helps to minimise the risk of adverse effects on water quality. This is dependent on the precise location and implementation of development in each case. There is an element of uncertainty here and it may be difficult to avoid adverse effects in every case. There could potentially be a risk to water quality as a result of an increase in the density of development as a result of increases in wastewater.

It is recognised that with new development likely comes an increase in the consumption of water, although development would need to conform with planning policy wherein it cannot proceed without appropriate capacity of water resources being evidenced.

The protection and enhancement of Wales' GI coverage and ecosystem resilience, through P9, P15, P22, P30 and P34, would help to protect and enhance the vital water filtration ecosystem service provided by Wales' above-ground vegetation and geomorphology.

When considering policies in the NDF in-combination they would lead to a mixture of both positive and negative cumulative effects. It is considered to be likely that the significant growth and development encouraged in the NDF would result in an increase in water consumption for new homes and new businesses. However, the locations targeted for this development are predominantly urban, where the risk to the quality of natural waterbodies such as rivers, lakes or the coast is more limited. The protection and enhancement of GI would also help to protect and improve the quality of local waterbodies due to the important role vegetation and soils play in the water cycle.

Access

ISA Objective 10: *To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, climatic factors and air*

People in Wales need sustainable access to basic goods, services, facilities and amenities for all groups. Policies in the NDF were recorded as having either positive or negligible effects in this regard, with no negative effects predicted. It is likely that over time the positive effects of many policies would be direct effects that grow in magnitude to be significantly positive in the medium- and long-terms.

P1 seeks to ensure that development is distributed equally across Wales. P3 provides assurance that new development and regeneration in urban areas is supported whilst P4 and P5 help to ensure that the needs of rural communities and economies are met. It is expected that this would help to ensure that people in both urban and rural areas would have appropriate access to the diverse range of key services and amenities people rely on. P20, P25,

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P28 and P33 would focus new development in each region in National and Regional Growth Areas, at which it is considered that access to key services and amenities is good.

P11 and P12 would significantly enhance national and regional connectivity in Wales and this would help to ensure that people in Wales can access key services and amenities via public and active transport modes.

Policies in the NDF would cumulatively be likely to make a significantly positive contribution towards the objective of improving the connectivity of communities throughout Wales and facilitating more sustainable access to basic goods and essential services for people throughout Wales of all backgrounds. Policies would combine to significantly enhance Wales's public transport offering. Public transport and efficient journeys are essential for ensuring people have sustainable access to goods, services and amenities. This focussed investment would also help to increase the range of services and facilities in accessible locations on offer to local people. P16 seeks to encourage regional planning throughout Wales and this would help to ensure that local needs in terms of access and the provision of services are being met. The NDF would be likely to lead to cumulative improvements to mobile and digital connectivity in areas most in need. An increasing proportion of people's needs and social interactions are being provided through online interactions so the NDF would be expected to help provide this important means of connectivity for communities across Wales.

Social Cohesion

ISA Objective 11: *To create the opportunities within which an improvement in social cohesion and equality can be achieved*

Affected SEA Annex 1(f) topics: Population, human health and material assets

The NDF policies assessments recorded only positive or negligible effects with regards to improving social cohesion and equality. It is likely that many of these positive effects would increase in magnitude to become significantly positive in the long-term.

The NDF encourages major new development throughout Wales that would benefit all people equally, P1, P2, P3, P4 and P5 would help to ensure that urban and rural communities benefit from new development that helps to combat inequality. Development at each region would primarily be directed towards National and Urban Growth Areas (P20, P25, P28 and P32), which should help to ensure that new residents and businesses are situated in proximity to existing land uses of a similar nature and this would minimise the risk of social isolation caused, for example, by new homes being built away from an existing community.

Improvements to Wales' GI coverage (e.g. policies P9, P15, P22, P30 and P34) as well as national and regional connectivity (P11, P12, P23, P27, P31 and P36) would make a meaningful contribution towards ensuring that all of Wales' people, regardless of background, are able to access and partake in social and community events, activities and opportunities.

Policies in the NDF, when considered in-combination, would be expected to lead to significant positive effects in terms of helping to create opportunities for increasing the cohesiveness of communities across Wales and to encourage greater equality. Regional planning and policies would help to ensure that regional and local needs, including in terms of what is needed to address local equality issues, are identified and satisfied whilst major enhancements to Wales' public transport infrastructure would help to ensure that people from all backgrounds are equally able to access goods, services and amenities.

Housing

ISA Objective 12: *To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs*

Affected SEA Annex 1(f) topics: Population, human health and material assets

The NDF policies assessments recorded only positive or negligible effects with regards to maximising opportunities for the provision of good quality, safe, affordable housing that meets identified needs. In most cases these positive effects would be likely to be direct effects that increase in magnitude to become significantly positive in the medium- and long-terms. No negative effects against this Objective were predicted for any policy. It is expected that the NDF would make a meaningful contribution towards tackling homelessness, poverty and inequality throughout Wales, including in areas of Wales where these issues are currently most pronounced.

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The NDF does not allocate new land for housing or state exactly how many homes should be delivered or where. Instead, P9 places an emphasis on regional plan-making that accounts for regional housing needs. In so doing, it is likely that the NDF will help to ensure that regional plans meet the regional housing needs.

The NDF places great emphasis on ensuring that development needs in both rural and urban areas are catered for, as per P1, P2, P3, P4 and P5. Regional policies focussing development in National and Regional Growth Areas, as per P20, P25, P28 and P32, would help to ensure that new homes in Wales are situated in appropriate locations near existing similar land-used and where there are opportunities for delivering good quality and safe homes.

P7 is designed to ensure that an appropriate proportion of new homes are affordable in relation to local needs and this would be carried out through regional plan-making.

Policies that would enhance GI coverage, such as P9, P15, P22, P30 and P34, could also help to enhance the amenity and quality of neighbourhoods throughout Wales.

Policies in the NDF, in-combination, would be expected to deliver significant positive effects in terms of ensuring that national, regional, urban and rural development needs, including housing needs, are met. The various regional policies would help to ensure that there is significant new residential development in each region of Wales that satisfies regional housing needs and contributes towards the national need.

Landscapes and Townscapes

ISA Objective 13: *To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors, cultural heritage including architectural and archaeological heritage and landscape*

The effects of NDF policies recorded in the assessments are mixed.

The distribution of development, as well as its type and scale, as per P1, P2, P3, P4, P5, P20, P25, P28 and P32, would generally help to minimise the risk of new development adversely affecting the character of natural landscapes, such as new development taking place in distinctive countryside locations. New development in these areas, where there are plentiful opportunities for using brownfield, also offers opportunities to enhance the character of the local townscape but this would depend on implementation.

Policies that seek to protect and enhance Wales' GI cover, such as P9, P15, P22, P30 and P34, would be likely to help protect and enhance the character of natural landscapes as well as townscapes. This is somewhat dependent on implementation as, for example, growing a new National Forest could alter the local character, but overall, positive effects are considered to be likely.

The focus on regional planning, as per P9 and P20 – P36, could help to better ensure that new development is of an appropriate scale, location and type for the surrounding areas.

The cumulative effects of the NDF policies, in-combination, on landscapes and townscapes is largely mixed as it can depend on the precise location of proposed land-uses in relation to the surrounding landscape or townscape. The NDF would direct much of new development towards urban areas, Growth Areas or existing large settlements and this would help to ensure that new development is situated within and adjacent to existing built form. The protection and enhancement of GI would further help to protect and potentially enhance character as a result of new development. However, a range of policies encourage and support new development and there is a risk that in some cases this development would alter the local townscape or landscape character and distinctiveness.

Cultural Heritage

ISA Objective 14: *To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors, cultural heritage including architectural and archaeological heritage and landscape*

The effects of NDF policies recorded in the assessments conserving and enhancing the historic environment are mixed. Only positive or negligible effects were predicted with regards to conserving Wales' culture but some potential adverse effects were predicted with regards to conserving sensitive heritage assets.

Summary of NDF Policies Assessments Results and Cumulative Effects Assessment

Effects of new development facilitated through policies P1, P2, P3, P4, P5, P20, P25, P28 and P32 on sensitive heritage assets, such as Listed Buildings, are dependent on the implementation of development. New development can alter the setting of these assets or potentially lead to direct harm. Most development would be directed towards urban locations (although rural development needs would be met). Development would therefore be likely to be in proximity to existing built form, which in some cases could include sensitive heritage assets. Depending on the implementation of development there could potentially be impacts on these assets. However, New development can also provide an opportunity to enhance the setting of heritage assets, such as by developing on brownfield land improving its contribution towards the local character.

When considering policies of the NDF in-combination, they would cumulatively direct much new development towards urban areas, Growth Areas or existing large settlements and this would help to ensure that new development is situated within and adjacent to existing built form. This could help to avoid potential impacts of development on the setting of heritage assets in rural areas whilst also providing opportunities for enhancing townscapes by revitalising brownfield sites. However, urban locations are typically home to a greater number of historic assets than countryside areas and, although new development within existing built-up areas is unlikely to have a significant impact, there is a risk of some degree of alteration to the setting of historic assets here. Policies protecting and enhancing GI minimise the risk of new development adversely impacting on Welsh culture or heritage assets. Effects are therefore largely dependent on implementation.

Wales' Culture

ISA Objective 15: *To create the opportunities for the protection and promotion of Welsh culture*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors, cultural heritage including architectural and archaeological heritage and landscape*

New development facilitated through policies P1, P2, P3, P4, P5, P20, P25, P28 and P32 would be likely to attract new investment to important areas for Welsh cultural activities and places and could help to protect them for future generations to appreciate. Some development could pose a risk to Welsh cultural activities, such as new development in countryside locations impacting on rural sheep farming, but occurrences of this are likely to be very limited.

The support for regional plans through P19 and the regional policies set out through P20 – P32 would be likely to combine to help ensure that regionally identified needs for rural communities are provided for and this could help to preserve and take advantage of local Welsh culture features and assets. Cumulative improvements to public transport, as a result of P11, P12, P23, P27, P31 and P36, would be likely to help enhance the sustainability of places and buildings that are integral to culture in Wales. These policies would also cumulatively enhance the accessibility of Wales' culture for visitors, including international tourists.

P9, P15, P22, P30 and P34 would combine to enhance the protection or creation of biodiversity assets and features that are integrated into a connected ecosystem. The countryside and natural environment in Wales is a key facet of its identity and culture. Policies P4 and P5 would cumulatively help to ensure that rural development needs are met and this would help to ensure the long-term viability of rural activities.

When considered in-combination, it is considered to be likely that the NDF policies would deliver minor positive benefits in terms of protecting and promoting Welsh culture.

Biodiversity and Geodiversity

ISA Objective 16: *To create opportunities for the conservation and enhancement of biodiversity and geodiversity*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors, cultural heritage including architectural and archaeological heritage and landscape*

With regards to creating opportunities for the conservation and enhancement of biodiversity and geodiversity, the assessments predicted both positive and negative effects.

The Natural Resources Policy identifies the key priorities, risk and opportunities to achieve the sustainable management of natural resources (SMNR) including addressing the climate change emergency and reversing biodiversity decline. Its objectives are to maintain and enhance the resilience of ecosystems and the benefits they provide. Planning Policy Wales outlines how the planning system should contribute towards these goals and the NDF builds on this policy by setting out specific policies that:

Summary of NDF Policies Assessments Results and Cumulative Effects Assessment

- Safeguard areas for the purposes of improving the resilience of ecological networks and ecosystems services, to identify areas for the provision of green infrastructure and to secure biodiversity enhancement (net benefit);
- To ensure resilient location and design choices by promoting a sustainable growth strategy as well as ensuring the consideration of natural resources and health and well-being form part of site and design choices; and,
- To facilitate the decarbonisation of the economy, including energy and transport choices, and promote the principles of a circular economy.

P1, P2, P3, P20, P25, P28 and P32 would each help to direct the majority of new development towards urban locations with good brownfield opportunities, which could enable more opportunities for delivering biodiversity net gains whilst minimising the risk of development harming geodiversity. At the same time, where new development proposed there is an inherent risk of the connectivity of ecological networks being reduced or sensitive biodiversity designations being impacted. Where development is proposed in rural areas, as per P4 and P5, the risk to biodiversity and geodiversity is magnified.

P9, P15, P22, P30 and P34 would each be likely to help significantly enhance the biodiversity value, and to protect the geodiversity value, of areas throughout Wales by protecting, supporting and enhancing ecosystems and greenfield land. The National Forest proposed in P15 could provide significant biodiversity gains although this is dependent on its implementation.

To some extent, reducing air pollution associated with Wales' transport and energy sectors as per P11, P12, P16, P17, P18, P23, P27, P31 and P36, would also benefit habitats in Wales that are sensitive to air pollution such as atmospheric nitrogen deposition.

When considering in-combination, policies in the NDF would be likely to deliver a mixture of cumulative effects in terms of protecting and enhancing biodiversity and geodiversity. New development could pose a risk to sensitive biodiversity assets and designations, such as due to cumulative increases in disturbance caused by visitors, increases in pollution and direct harm caused by development on greenfield. Adverse effects on biodiversity are unlikely to be entirely avoidable or mitigable in all cases. It also appears that adverse impacts on biodiversity (and the historic environment) would be weighed against the economic benefits of development and a balanced decision making approach would be undertaken. At the same time, P9, P15, P22, P30 and P34 would be expected to combine to deliver significant enhancements to Wales' biodiversity and geodiversity potentially helping to achieve biodiversity net gains, with ecological assets protected and connected in a coherent ecosystem. A coherent ecological network across Wales is essential to enabling the free movement of wildlife and avoiding isolated islands of habitats and species being 'cut off from nature'. The National Forest would be likely to be a region of significant biodiversity value that provides suitable habitat for a diverse range of protected species whilst enhancing connectivity.

Natural Resources

ISA Objective 17: *To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value*

Affected SEA Annex 1(f) topics: *Population, human health, material assets, biodiversity, fauna, flora, soil, water, climatic factors, cultural heritage including architectural and archaeological heritage and landscape*

With regards to creating opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value, the assessment identified a mixture of effects arising from NDF policies. Effects were predominantly associated with whether the policy would lead to new development on greenfield or brownfield land. Greenfield locations are often the location of important natural resources that need protection, such as soils, peatland and woodland. The distribution of development, as per P1, P2, P3, P20, P25, P28 and P32, would be expected to help reduce the amount of greenfield lost to new development.

P4 and P5 seek to ensure that rural development needs are met and risk greenfield being lost to development.

P9, P15, P22, P30 and P34 would each be likely to help protect important natural resources by conserving and enhancing aboveground biomass at these locations, which in turn would help to protect important natural resources often found in these locations.

Summary of NDF Policies Assessments Results and Cumulative Effects Assessment

Policies that propose new development would be likely to lead to the consumption of natural resources for construction and the extent to which this would be recycled or secondary materials or if they would be locally sourced is uncertain.

When considering in-combination, policies of the NDF would be expected to lead to both positive and negative cumulative effects on the ISA Objective of creating opportunities for the sustainable management and use of natural resources in Wales. The NDF would help to improve the efficiency of Wales' energy networks whilst increasing supply of renewable energy, whilst facilitating opportunities to develop on brownfield and protecting and enhancing GI. At the same time, policies would be likely to combine to encourage major new development throughout Wales that relies on natural resources. Not all new development in Wales that is supported by the NDF would be on previously developed land, and so some degree of land loss can be expected. Within this previously developed land are likely to be soils that are of at least ecological value and potentially agricultural value. New development would also be likely to lead to some degree of air pollution during the construction phase and, depending on the type of development, also during its operation phase such as that caused by a local increase in car usage. A cumulative impact of all development supported and encouraged by the NDF is also likely to be some degree of increase in the consumption of water, due to both the consumption by businesses as well as residential consumption. In addition to water consumption, there could be an increase in the risk and prevalence of pollution or contamination of waters. Whilst the NDF seeks to encourage an increase in the proportion of Wales' energy generation and consumption that stems from renewable sources, it is unclear and potentially unlikely that this will match or exceed the likely increase in energy consumption associated with the significant levels of growth that the NDF seeks to support and encourage.

Table 3-5: Summary of cumulative, synergistic and secondary effects appraisal for each ISA Objective

ISA Objective	Cumulative effects score		
	Short-term	Medium-term	Long-term
To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	+	+	++
To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across	+	+	++
To create opportunities for an increase in employment across the country and promote economic inclusion	+	++	++
To promote sustainable economic growth, diversity and business competitiveness	+	++	++
To encourage the protection and promotion of the Welsh Language	+	+	+
To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	+/-	+/-	+/-
To encourage climate change resilience, including contributing to the reduction and management of flood risk	+/-	+/-	+/-
To encourage the protection and improvement of air quality	+/-	+/-	+/-
To contribute to the protection and enhancement of the quality of water features and resources	+/-	+/-	+/-
To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	+	++	++
To create the conditions within which an improvement in social cohesion and equality can be achieved	+	+	++
To encourage the provision of good quality, safe, affordable housing that meets identified needs	++	++	++
To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscapes	+/-	+/-	+/-
To encourage the conservation and enhancement of heritage assets	+/-	+/-	+/-
To encourage the protection and promotion of Welsh culture	+	+	+
To encourage the conservation and enhancement of biodiversity and geodiversity	+/-	+/-	+/-
To encourage the sustainable use of natural resources	+/-	+/-	+/-

ISA Objective	Cumulative effects score		
	Short-term	Medium-term	Long-term
Education: The NDF could place greater emphasis on those that also offer skills learning and education services. Where the NDF encourages investment and development of Wales' transport network and infrastructure, emphasis could be placed on the need for safe and convenient walking and cycling routes, ideally integrated into coherent green infrastructure networks, which enhance the accessibility of education facilities via sustainable transport modes. GHG emissions: The NDF could seek to specifically encourage and facilitate development that is carbon neutral. Biodiversity and geodiversity: Where policies propose, support or encourage new development or growth of existing developments, the policy could include wording that seeks to provide protection for biodiversity and wildlife. To ensure that biodiversity is not just conserved but overall enhanced, these policies should provide strong wording that states that the determination of planning applications would take into consideration any adverse impacts on biodiversity, and these cannot be outweighed by social or economic gains, as well as any foreseen enhancements to local biodiversity. Greater emphasis could be placed on the value and importance of achieving a net gain in tree canopy.			

3.4 Findings of HRA and how these have fed into the assessment

- 3.4.1 The August 2020 HRA Report summarises how the NDF has evolved from the Issues and Options stage through to the most recent version NDF, along with the HRA work undertaken at each stage of the process. The potential implications for Natura 2000/ Ramsar sites have been considered throughout the development of the Plan, such that early avoidance of the issues (and/or reduction of risk) has been a key element of the process when compiling the policies within the NDF
- 3.4.2 The HRA Report comprises the HRA Screening of the policies set out in the NDF followed by the Appropriate Assessment (AA) of those policies where adverse effects on Natura 2000/ Ramsar sites could not be screened out.
- 3.4.3 The Draft NDF Including Proposed Changes identifies 36 policies covering a range of topics, which set the direction for development in Wales from 2020 to 2040. The HRA screened out 12 of these policies, because they would clearly result in no adverse effects on Natura 2000/ Ramsar sites, with 24 policies carried through to AA.
- 3.4.4 Overall, the AA concluded that none of the policies in the NDF are actively directing development in such a location or manner that potential impacts arising from projects emerging under the policies (or lower-tier plans which will identify development opportunities for allocation) could not be avoided or mitigated at the lower-tier plan or project level. Therefore, deferring the requirement for HRA to these lower-tier plans and/or projects would be appropriate due to the deliverable mitigation at that stage. All lower-tier plans and projects with the potential to impact Natura 2000/ Ramsar sites (regardless of their distance from such sites) are required to comply with the Conservation of Habitats and Species Regulations (2017) as a matter of law and PPW10 and TAN5. Therefore, irrespective of the policy wording or mitigation measures included within the NDF or this HRA document, statutory HRA of lower tier plans/ projects would be required. Compliance with PPW10, TAN5 and the mitigation measures set out against each of the policies will provide an overarching safeguard to which other policies within the NDF, as well as those in lower-tier plans and projects, will be required to adhere to. The Welsh Government would not support any lower-tier plans or projects, associated with policies within the NDF, where there are adverse effects on the integrity of Natura 2000/ Ramsar sites.
- 3.4.5 The in-combination assessment of the AA concludes that (assuming the avoidance/ mitigation measures set out within this HRA are implemented), there would be no adverse in-combination impacts on the integrity of any Natura 2000/ Ramsar sites as a result of implementation of the policies set out with the NDF.

3.5 Monitoring – Significant effects (Task B.6 and Stage E)

- 3.5.1 The ISA has identified the likely effects of the NDF on ISA Objectives over the short, medium and long terms. An indication of the certainty of these effects was also provided. However, there is a risk that the sustainability effects of the NDF, including the effects of specific policies or the cumulative effects of policies in-combination, are different to those anticipated due to unforeseen circumstances. It is therefore an essential component of delivering sustainable development to monitor the effects of the NDF in relation to the predicted effects. Regular monitoring then enables the relevant authorities to alter plans as necessary should unexpected negative effects arise or expected positive effects not arise. AS Stage B.6 of ISA, a monitoring framework, is proposed in this report. The act of monitoring the NDF, should it be adopted, would comprise Stage E.
- 3.5.2 It is anticipated that the Welsh Government will be monitoring the implementation and effects of the NDF post-adoption to feed into future plan review and revision. Table 3-6 proposes a Monitoring Framework to keep track of the sustainability effects of the NDF, for which it would be appropriate to integrate with NDF monitoring. This is a draft and will be subject to discussion and refining with Welsh Government. In addition to monitoring the extent to which the NDF results in the effects identified in the ISA, the Monitoring Framework will provide an indication of the effects of the NDF on the environmental baseline in Wales and this can be compared with the future trends of this baseline set out in Table 2-1.
- 3.5.3 Over the lifetime of the NDF new information, which will help inform the review of the NDF, will be added to the NDF Monitoring Framework. Some indicators currently used by the Welsh Government may be amended or replaced by new indicators. Other indicators are likely to remain constant where they can inform the long term outcomes for the NDF over its 20 year plan period.

Table 3-6: Proposed Monitoring Framework

ISA Objective		Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	The NDF would be likely to lead to a long-term significant positive impact on encouraging and supporting more, and improved, opportunities for people across Wales to learn new skills and qualifications.	NI22. Percentage of people in education, employment or training, measured for different age groups.
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	The NDF would be likely to lead to a significant positive impact on improving the physical, mental and social health and well-being for all.	Life expectancy at birth in Wales. Life expectancy at birth in regional areas across Wales. Healthy life expectancy at birth in regional areas across Wales. Frequency of active travel by walking and cycling in Wales. NI2. Healthy life expectancy at birth including the gap between the least and most deprived. NI3. Percentage of adults who have fewer than two healthy lifestyle behaviours. NI4. Levels of nitrogen dioxide (NO₂) pollution in the air. NI5. Percentage of children who have fewer than two healthy lifestyle behaviours. Percentage of people living in households in income poverty relative to the UK median: measured for children, working age and those of pension age. (national well-being indicator) Percentage of people living in households in material deprivation. (national well-being indicator) NI24. Percentage of people satisfied with their ability to get to / access the facilities and services they need. NI26. Percentage of people satisfied with local area as a place to live. NI29. Mean mental well-being score for people. NI30. Percentage of people who are lonely. NI38. Percentage of people participating in sporting activities three or more times a week. (national well-being indicator)

ISA Objective		Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
			NI41. Emissions of greenhouse gases within Wales. NI42. Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales.
3	To create opportunities for an increase in employment across the country and promote economic inclusion	The NDF would be likely to lead to a significant positive effect on employment and economic inclusion for people throughout Wales.	NI19. Percentage of people living in households in material deprivation. NI20. Percentage of people moderately or very satisfied with their jobs. NI21. Percentage of people in employment.
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	The NDF would be likely to lead to a significant positive effect on sustainable economic growth, diversity and business competitiveness.	Unemployment rate in Wales per annum. Gross Value Added (GVA) in Wales per head by year. Average (median) gross weekly earnings for Wales by year. Average (median) total household wealth for Wales. Workplace employment for Wales. Workplace employment for regional areas across Wales. Percentage of premises (homes and businesses) with access to 'fast' broadband in Wales. Percentage of premises (homes and businesses) with access to full fibre digital infrastructure in Wales. Tourism day visits and expenditure in Wales annually in comparison to the rest of the UK.
5	To contribute towards the future well-being of the Welsh language	The NDF would be likely to help protect and improve the well-being of the Welsh language.	NI36. Percentage of people who speak Welsh daily and can speak more than just a few words of Welsh. NI37. Percentage of people who can speak Welsh.
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	Development supported by the NDF could potentially make achieving GHG emissions reduction targets more difficult. Development supported by the NDF could lead to an increase in energy consumption, and much of this is likely to be non-renewably sourced.	Low carbon energy generation in Wales (in MW by technology). Low carbon energy generation in regional areas across Wales (in MW by technology). Transport usually used to get to work (by transport mode). NI41. Emissions of greenhouse gases within Wales.

ISA Objective		Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
			NI42. Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales.
7	To contribute to the reduction and management of flood risk	The NDF supports new development in new regions in Wales where there is extensive flood risk. This could potentially expose new people or properties to a risk of flooding.	NI32. Number of properties (homes and businesses) at medium or high risk of flooding from rivers and the sea.
8	To create opportunities to encourage the protection and improvement of air quality	Development supported by the NDF could help to ensure people in Wales are able to make relatively efficient and low-emission movements. Development supported by the NDF would be likely to make achieving air quality improvement targets more difficult in some locations.	NI4. Levels of nitrogen dioxide (NO ₂) pollution in the air. NI41. Emissions of greenhouse gases within Wales. NI42. Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales.
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	The NDF would support new development that would increase water consumption in Wales. New development supported by the NDF could potentially pose a risk to the quality of natural water bodies, including along the coast.	NI45. Percentage of surface water bodies, and groundwater bodies, achieving good or high overall status. Number of new developments taking place despite an adequate capacity in water supply to cater for the development not being secured
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	The NDF would be expected to make a significant positive contribution towards the creation of opportunities for improving connectivity between people and places, key services, goods and services.	NI24. Percentage of people satisfied with their ability to get to / access the facilities and services they need. NI26. Percentage of people satisfied with local area as a place to live. Percentage of people satisfied or dissatisfied with the availability of good services and facilities in their local area (within 15-20 minute walk from home) in Wales. Percentage of people satisfied with access to good services and facilities (within 15-20 minute walk from home) in Wales. Total number of railway station entries and exits in Wales by year. Transport usually used to get to work (by transport mode).
11	To create the opportunities within which an improvement in social	The NDF would be expected to make a significant positive contribution towards the creation of opportunities for enhancing the	NI23. Percentage who feel able to influence decisions affecting their local area.

ISA Objective		Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
	cohesion and equality can be achieved	cohesiveness of communities across Wales and moving towards a more equal society.	NI25. Percentage of people feeling safe at home, walking in the local area, and when travelling. NI26. Percentage of people satisfied with local area as a place to live. NI27. Percentage of people agreeing that they belong to the area; that people from different backgrounds get on well together; and that people treat each other with respect. NI35. Percentage of people attending or participating in arts, culture or heritage activities at least three times a year. NI46. The social return on investment of Welsh partnerships within Wales and outside of the UK that are working towards the United Nations Sustainable Development Goals.
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	The NDF would be expected to make a significant positive contribution towards ensuring that needs for good quality, safe and affordable housing are being provided for in regions and communities across Wales.	Number of new homes built in Wales per annum. Number of new homes built in regional areas across Wales per annum. Number of affordable housing units built in Wales per annum. Number of affordable housing units built in regional areas across Wales per annum. NI31. Percentage of dwellings which are free from hazards. NI33. Percentage of dwellings with adequate energy performance. NI34. Number of households successfully prevented from becoming homeless per 10,000 households.
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	The NDF would be likely to lead to new development taking place predominantly in urban areas, which could help to avoid adverse effects on sensitive natural landscapes. Development in urban areas could pose a risk to surrounding townscapes and settlement character.	Number of Green Infrastructure Assessments completed by local authorities in Wales. Area of woodland in Wales per annum (by thousand hectares). Area of new woodland planting in Wales per annum (by hectares). LANDMAP change reporting Review of designated landscapes

ISA Objective		Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
			*It may be appropriate to link monitoring for this ISA Objective with AONB monitoring plans
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	The NDF supports new development in regions throughout Wales where it could potentially alter the setting of sensitive heritage assets and historic areas.	NI40. Percentage of designated historic environment assets that are in stable or improved conditions.
15	To create the opportunities for the protection and promotion of Welsh culture	The NDF would be likely to help create opportunities for protecting and improving the accessibility of Welsh cultural places and activities.	NI27. Percentage of people agreeing that they belong to the area; that people from different backgrounds get on well together; and that people treat each other with respect. NI35. Percentage of people attending or participating in arts, culture or heritage activities at least three times a year.
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	The NDF supports new development across Wales that could potentially reduce the connectivity and coherence of ecological networks. New development supported by the NDF could potentially increase public access associated disturbances at sensitive habitats. New development supported by the NDF could potentially result in the direct loss of sensitive habitats or functionally linked land.	Number of Green Infrastructure Assessments completed by local authorities in Wales. Area of woodland in Wales per annum (by thousand hectares). Area of new woodland planting in Wales per annum (by hectares). NI4. Levels of nitrogen dioxide (NO ₂) pollution in the air. NI13. Concentration of carbon and organic matter in soil. NI14. The Ecological Footprint of Wales. NI43. Areas of healthy ecosystems in Wales. NI44. Status of Biological diversity in Wales. NI45. Percentage of surface water bodies, and groundwater bodies, achieving good or high overall status.
17	To create opportunities for the sustainable management and use of natural resources, taking	The NDF supports new development in regions across Wales that would be likely to lead to an increase in the consumption of natural resources.	NI15. Amount of waste generated that's is not recycled, per person.

ISA Objective	Effects to be monitored	Proposed indicators for monitoring (aligned with the NDF Monitoring Review. NI= national well-being indicators)
into account their benefits and intrinsic value		

4 CONCLUSION

- 4.1.1 This document comprises the ISA of the Draft NDF Including Proposed Changes. It satisfies the requirements of an Environmental Report as per the SEA Directive. The NDF, at each iteration, has been appraised for its likely significant effects against each of the ISA Objectives.
- 4.1.2 The ISA is a process that has been highly integrated with the development of the NDF, involving a close working relationship between the ISA experts and Welsh Government. During this process, the ISA has enabled Welsh Government to embed the principles of sustainability and wider considerations into the NDF outcomes, strategy and policies from the outset. The ISA has provided a structured way of considering the benefits, costs and risks of a wide range of options.
- 4.1.3 The ISA provides a consultation tool, providing the general public and statutory bodies with an analysis of how the NDF has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the NDF.
- 4.1.4 The ISA fundamentally provides a summary of the effects of the NDF, for consideration by Welsh Government, when considering the adoption of the NDF. Should it be adopted, it would be with the Welsh Government's awareness and acceptance of the effects predicted and described in the ISA.
- 4.1.5 The Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability effects, with significant positive effects on most ISA Objectives likely.
- 4.1.6 All policies in the NDF would be expected to have either negligible, neutral, minor positive or significant positive effects on ISA Objectives 1 – 4, as well as ISA Objectives 10 - 12, which are related to topics on education, health, economy, employment, connectivity, social cohesion and housing. Effects on all other ISA Objectives (5, 6, 7, 8, 9, 13, 14, 15, 16 & 17) are more mixed. Overall, policies would be highly likely to make a positive contribution towards achieving ISA Objectives.
- 4.1.7 The Draft NDF Including Proposed Changes was recorded as being likely to result in highly positive effects on the more social and economic ISA Objectives, including those related to education, health, employment, economy, connectivity, social cohesion, housing and culture. For many of these the identified effects would be likely to become significantly positive over the medium and long terms as the effects of the NDF grow over time.
- 4.1.8 More mixed effects were identified for eight of the ISA Objectives. These are predominantly associated with the natural environment, including energy and GHG emissions, air quality, flood risk, water, landscapes & townscapes, cultural heritage, biodiversity & geodiversity as well as natural resources. For most of these, it is unclear whether the positive or negative effects would outweigh the other, although it is expected that the NDF will help to make sure that new development in Wales is increasingly sustainable and, whilst there is uncertainty here, it is likely that development in Wales will be better equipped to avoid adverse effects whilst maximising positive effects on the natural environment as a result of the NDF.
- 4.1.9 Adverse effects are primarily the consequence of new development and growth in Wales, supported and encouraged by various NDF policies that would be likely to lead to some degree of increase in energy and natural resource consumption and emissions. However, it should also be noted that the NDF is intended to be applied alongside a wider suite of policy including PPW which will also help to mitigate uncertain negative effects at the more local level. The NDF does not intend to duplicate this policy.
- 4.1.10 Where negative effects have been predicted, the ISA has provided recommendations which, if incorporated into the policy in question, would be likely to help avoid or mitigate potential negative

effects or to enhance positive effects. Recommendations made to Welsh Government have been a key feature of the ISA process from its inception. Welsh Government has proved highly receptive to measures for enhancing the sustainability performance of the NDF and subsequently made enhancements and amendments to the NDF throughout. Recommendations made to Welsh Government, and how these were taken into consideration, were particularly discernible for the following elements of the NDF:

- **NDF Outcomes (formerly called NDF Objectives):** The compatibility assessment of the NDF objectives (now refined as Outcomes for the Draft NDF) was undertaken in three iterations. The results of these assessments led to the refinement of the objectives as presented in the 2018 Issues and Options NDF. The majority of the recommendations of the ISA were incorporated into the NDF.
- **NDF Preferred Option:** Options considered in the Issues and Options NDF were appraised in the Interim ISA Report. Alongside these appraisals, the ISA made various recommendations to help enhance the sustainability of the preferred option and these were taken into consideration by the Welsh Government.
- **Draft NDF Policies:** During the detailed appraisals of Draft NDF policies carried out for the Draft ISA Report, recommendations were made for each policy against each ISA Objective, where appropriate, and these were provided to the Welsh Government at an early stage. As and when the policies were amended, the new policy wording was factored into the appraisals. These appraisals and accompanying recommendations are presented in their entirety in Appendix E. In response to these recommendations the Welsh Government considers that the spatial policies and proposals contained in the Draft NDF, coupled with topic based national planning policies provided in PPW and associated guidance, provide the suite of national planning policy to broadly align with the recommendations. Some of the recommendations have raised points for which it is considered necessary to strengthen the NDF.
- **Draft NDF Including Proposed Changes:** Alongside the detailed appraisals presented in this ISA Report, as presented in Section 3 and Appendix F, recommendations have been made where appropriate in order to help further avoid or mitigate potential adverse effects and to maximise on opportunities for positive effects. These recommendations have been considered by Welsh Government who have responded to the recommendations in each case with regards to whether or not they have been taken on board and why. The iterative relationship between the plan-makers and ISA experts has enabled environmental, sustainability and other considerations, which have come to light through the ISA process, to shape the NDF and its policies.

5 NEXT STAGES

Stages C and E: ISA Report and Monitoring

- 5.1.1 This ISA Report is published (Stage C) in order to accompany the Draft NDF Including Proposed Changes. It is expected that this version of the NDF, accompanied by this ISA Report and other relevant documents, will be submitted to the Senedd in September for their consideration between September and November.
- 5.1.2 Following scrutiny by the Senedd, Welsh Ministers will have regard to any resolution or recommendation made by the Senedd. The Final NDF is due to be adopted early 2021.
- 5.1.3 Stage E of the ISA process involves monitoring the effects of the NDF should be it adopted in order to identify the positive and negative effects of the NDF over time and to ensure the efficacy of any avoidance, mitigation or enhancement measures that have been adopted.
- 5.1.4 Following the adoption of the NDF, a post-adoption ISA Statement will be prepared, alongside a Statement of Environmental Particulars, providing detail of how the ISA process has influenced the development of the NDF, the predicted significant effects, as well as the Monitoring Framework. A Draft Monitoring Framework is provided in Section 3 of this Report.
- 5.1.5 Further information about stages of the ISA process can be found in Section 1 of this report.

Appendix A Plans, Programmes and Environmental Protection Objectives Reviewed

Appendix B **Baseline Data and Key Issues and Opportunities**

Appendix C Draft NDF Outcomes

Appendix D Strategic Options

Appendix E Draft NDF, including Reasonable Alternatives

Appendix F Draft NDF Including Proposed Changes, including Reasonable Alternatives

Appendix G Consultation Responses

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APPENDIX A

Plans, Programmes and Environmental Protection Objectives Reviewed

Table A-1 List of Relevant Plans, Programmes and Environmental Protection Objectives

International Plans and Programmes
Convention on the Conservation of Migratory Species of Wild Animals (1979) The Bonn Convention AEWA (1995) Convention on the Agreement on the Conservation of African – Eurasian Migratory Waterbirds The Bonn Convention UNESCO (1971) The Ramsar Convention on Wetlands UNESCO (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage UNESCO (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage United Nations (1979) Geneva Convention on Long Range Transboundary Air Pollution United Nations (1989) UN convention on the Rights of the Child United Nations (1989) Basel Convention United Nations (1992) The Rio Convention on Biodiversity United Nations (1992) The Rio Declaration on Environment and Development United Nations (1994) The United Nations Framework Convention on Climate Change United Nations (1997) Kyoto Protocol to the UN Framework Convention on Climate Change United Nations (2001) Stockholm Convention on Persistent Organic Pollutants United Nations (2002) The World Summit on Sustainable Development United Nations (2009) The Copenhagen Accord United Nations (2010) Cancun Adaptation Framework United Nations (2016) Paris Agreement United Nations (2016) Committee on the Rights of the Child Recommendations report United Nations Economic Commission for Europe (1998) The Aarhus Convention World Health Organization (1999) Guidelines for Community Noise World Health Organisation (2004) Children's Environment and Health Action Plan for Europe
European Plans and Programmes
Council of Europe (1981) Convention on the Conservation of European Wildlife and Natural Habitats - The Bern Convention Council of Europe (1992) European Convention on the Protection of the Archaeological Heritage Council of Europe (2000) European Landscape Convention European Council (2013) Seventh EU Environmental Action Plan (EAP) (2013-2020) European Commission (1991) The Nitrates Directive 91/676/EEC European Commission (1991) The Urban Waste Water Directive 91/271/EEC European Commission (1992) EU Directive on the Conservation of Natural Habitats and Wild Fauna and Flora - The Habitats Directive 92/43/EEC European Commission (1998) The Drinking Water Directive 98/83/EC European Commission (1999) European Spatial Development Perspective (ESDP) (97/150/EC) European Commission (1999) Landfill Directive (1999/31/EC) European Commission (2000) The Water Framework Directive 2000/60/EC European Commission (2001) National Emissions Ceiling Directive 2001/81/EC European Commission (2006) Mineral Waste Directive 2006/21/EC European Commission (2002) Energy Performance in Buildings Directive 2002/91/EEC European Commission (2002) Environmental Noise Directive (END) 2002/49/EC European Commission (2003) Public Sector Information Directive (PSI) 2003/98/EC European Commission (2004) Environmental Liability Directive 2004/35/EC European Commission (2005) EU Thematic Strategy on Air Quality European Commission (2006) European Thematic Strategy on Soil Protection European Commission (2006) Groundwater Directive 2006/118/EC European Commission (2006) The Bathing Waters Directive 2006/7/EC European Commission (2006) Sustainable Development Strategy European Commission (2007) Together for Health - A Strategic Approach for the EU 2008-2013 European Commission (2007) The Integrated Climate and Energy Package European Commission (2007) The Floods Directive 2007/60/EC European Commission (2008) Ambient Air Quality and Cleaner Air for Europe Directive 2008/50/EC and Air Quality Framework Fourth Daughter Directive 2004/107/EC European Commission (2008) Waste Framework Directive 2008/98/EC European Commission (2008) Environmental Quality Standards Directive 2008/105/EC European Commission (2008) Marine Strategy Framework Directive 2008/56/EC

European Commission (2009) Review of the EU Sustainable Development Strategy
 European Commission (2009) The Birds Directive 2009/147/EC
 European Commission (2009) Renewable Energy Directive 2009/28/EC
 European Commission (2010) Industrial Emissions Directive (integrated pollution prevention and control) 2010/75/EU
 European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth
 European Commission (2010) Energy 2020 - A Strategy for Competitive, Sustainable and Secure Energy
 European Commission (2011) A Roadmap for Moving to a Competitive Low Carbon Economy in 2050
 European Commission (2011) EU Biodiversity Strategy to 2020
 European Commission (2011) Roadmap to a Single European Transport Area
 European Commission (2012) Energy Efficiency Directive (2012/27/EU)
 European Commission (2013) Strategy on Adaptation to Climate Change
 European Commission (2013) Towards Social Investment for Growth and Cohesion 2014-2020
 European Commission (2013) Seventh Environmental Action Programme to 2020 'Living well, within the limits of our planet'
 European Commission (2014) 2030 Policy Framework for Climate and Energy
 European Union (2001) SEA Directive (2001/42/EC)
 European Union (2005) Emissions Trading Scheme (EU ETS)
 European Union (2014) Environmental Impact Assessment Directive 2014/52/EU amending Directive 2011/92/EU

UK Plans and Programmes

The Department for Business, Innovation and Skills (BIS) (2010) Local Growth: Realising Every Place's Potential (Local Growth White Paper)
 Committee on Climate Change (2008) Building a Low-Carbon Economy - the UK's Contribution to Tackling Climate Change
 Defra (2005) Safeguarding Sea Life
 Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
 Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries
 Defra (2007) Conserving Biodiversity the UK Approach 2007
 Defra, Scottish Government, Welsh Government (2008) The Invasive and Non-Native Species Framework Strategy for Great Britain
 Defra (2009) Our Seas – a Shared Resource: High Level Marine Objectives
 Defra (2010) Air Pollution: Action in a Changing Climate
 Defra (2010) Adapting to Coastal Change: Developing a Policy Framework
 Defra (2011) Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO₂) in the UK: List of UK and National Measures
 Defra (2011) The Natural Choice: Securing the Value of Nature (Natural Environment White Paper)
 Defra (2011) Mainstreaming Sustainable Development
 Defra (2011) Marine Policy Statement
 Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status
 Defra (2012) National Policy Statement for Waste Water
 Defra (2012) UK Climate Change Risk Assessment: Government Report
 Defra (2013) The National Adaptation Programme: Making the Country Resilient to a Changing Climate
 DECC (2009) Framework for the Development of Clean Coal
 DECC (2009) UK Ports for the Offshore Wind Industry: Time to Act
 DECC (2010) Marine Energy Action Plan
 DECC (2011) Carbon Plan: Delivering our Low Carbon Future
 DECC (2011) National Policy Statements for Energy Infrastructure
 DECC (2011) UK Renewable Energy Roadmap
 DECC (2014) UK National Energy Efficiency Action Plan
 Department for Culture, Media & Sport (2007) Heritage Protection for the 21st Century
 Department for Culture, Media & Sport (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments
 Department for Transport (2007) Ports Policy Review Interim Report
 Department for Transport (2008) Delivering a Sustainable Transport System
 Department for Transport (2011) National Policy Statement for Ports
 Environment Agency (2005) Cleaner Coasts, Healthier Seas: EA Marine Strategy
 Environment Agency (2010) Managing the Environment in a Changing Climate
 Environment Agency (2013) Groundwater Protection Policy and Practice (GP3)
 Health Protection Agency (2007) Children's Environment and Health Action Plan
 Health Protection Agency (2008) Health Effects of Climate Change in the UK 2008 - An update of the Department of Health report 2001/2002

Health Protection Agency (2009) Health Strategy for the United Kingdom
 HM Government (1949) National Parks and Access to the Countryside Act 1949
 HM Government (1967) Forestry Act 1967
 HM Government (1973) The Protection of Wrecks Act 1973
 HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979
 HM Government (1981) Wildlife and Countryside Act 1981
 HM Government (1986) Protection of Military Remains Act 1986
 HM Government (1986) Agriculture Act (with numerous revisions) 1986
 HM Government (1990) Environmental Protection Act 1990
 HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990
 HM Government (1995) Environment Act 1995
 HM Government (1996) The Treasure Act 1996
 HM Government (2000) Transport Act 2000
 HM Government (2000) Countryside and Rights of Way Act 2000
 HM Government (2002) The National Heritage Act 2002
 HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
 HM Government (2006) The Stern Review: The Economics of Climate Change
 HM Government (2006) Government of Wales Act 2006
 HM Government (2006) Natural Environment and Rural Communities Act 2006
 HM Government (2006) Commons Act 2006
 HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010)
 HM Government (2008) Climate Change Act 2008
 HM Government (2008) The Energy Act 2008
 HM Government (2009) The Climate Change Act 2008 (2020 Target, Credit Limit and Definitions) Order 2009
 HM Government (2009) Flood Risk Regulations 2009
 HM Government (2009) The Marine and Coastal Access Act 2009
 HM Government (2010) Flood and Water Management Act 2010
 HM Government (2010) Air Quality Standards Regulations 2010
 HM Government (2010) The Equality Act 2010
 HM Government (2010) Marine Strategy Framework Directive - putting in place the legal framework for implementation
 HM Government (2010) Conservation of Habitats & Species Regulations 2010 (as amended 2011)
 HM Government (2010) Marine Strategy Regulations 2010
 HM Government (2013) Aviation Policy Framework
 HM Government (2015) Ozone-Depleting Substances Regulations 2015
 HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016
 HMG, NI Executive, Scottish Government, Welsh Government (2011) UK Marine Policy Statement
 HM Treasury (2011) UK Plan for Growth
 HM Treasury (2014) National Infrastructure Plan
 Health and Safety Executive (2009) The Health and Safety of Great Britain: Be Part of the Solution
 Inshore Fisheries and Conservation Authorities Bylaws (various)
 Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework
 Natural England and JNCC (2011) Marine Conservation Zone (MCZ) Project
 NERC (2010) Marine Environmental Mapping Programme (MAREMAP)
 Strategic Plan for Biodiversity 2011-2020 (2010)
 Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development
 Sustainable Development Commission (2010) Sustainable Development: The Key to Tackling Health Inequalities
 UK Marine Monitoring and Assessment Strategy (2010) Charting Progress 2: The State of UK Seas
 UK National Ecosystem Assessment (2011) UK National Ecosystem Assessment: Understanding Nature's Value to Society

National (Wales) Plans and Programmes

Children's Commissioner for Wales (2016) Annual Report 15-16
 Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales
 Countryside Council for Wales (now Natural Resources Wales) (2001) Register of Landscapes of Historic Interest
 Countryside Council for Wales (now Natural Resources Wales) (2015) National Seascape Assessment for Wales, LUC, NRW
 Joint Nature Conservation Committee (ongoing) Geological Conservation Review
 National Assembly for Wales (2009) Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009
 National Assembly for Wales (2012) Contaminated Land (Wales) (Amendment) Regulations 2012
 National Assembly for Wales (2014) Social Services and Well-being (Wales) Act 2014

National Assembly for Wales (2014) Third Sector Scheme, Welsh Government, January 2014
 National Assembly for Wales (2015) Planning (Wales) Act 2015
 National Assembly for Wales (2015) Well-being of Future Generations (Wales) Act 2015
 National Assembly for Wales (2016) Environment (Wales) Act 2016
 National Assembly for Wales (2016) Historic Environment (Wales) Act 2016
 National Assembly for Wales (2017) Public Health (Wales) Act 2017
 Natural Resources Wales (ongoing) LANDMAP Programme
 Natural Resources Wales (2015) LIFE Natura 2000 Programme for Wales
 Natural Resources Wales (2015) Natural Resources Policy Statement
 Natural Resources Wales (2016) State of Natural Resources Report (SoNaRR)
 NHS Wales (2011) Together for Health
 Public Health Wales (2015) A Healthier, Happier and Fairer Wales
 Sustainable Development Commission (2009) Low Carbon Wales
 Wales Council for Voluntary Action (2016) Shape Your Future - future trends: Implications for the third sector in Wales
 Wales Council for Voluntary Action (2016) Shape Your Future - future scenarios: Implications for the third sector in Wales
 Welsh Assembly Government (2007) One Wales – A Progressive Agenda for the Government of Wales
 Welsh Assembly Government (2008) One Wales: Connecting the Nation
 Welsh Assembly Government (2008) Welsh Coastal Tourism Strategy
 Welsh Assembly Government (2008) Designed to Add Value - a third dimension for One Wales
 Welsh Assembly Government (2009) Getting On Together - a Community Cohesion Strategy for Wales
 Welsh Assembly Government (2009) Capturing the Potential: A Green Jobs Strategy for Wales
 Welsh Assembly Government (2009) One Wales: One Planet, The Sustainable Development Scheme of the Welsh Assembly Government
 Welsh Assembly Government (2009) Rural Health Plan
 Welsh Assembly Government (2010) Improving Lives and Communities – Homes in Wales
 Welsh Assembly Government (2010) Setting the Direction: Primary & Community Services Strategic Delivery Programme
 Wales Biodiversity Partnership (2010) Wales Biodiversity Framework
 Welsh Government (2006) Play Policy Implementation Plan
 Welsh Government (2006) Environment Strategy for Wales
 Welsh Government (2007) Coastal Access Improvement Programme
 Welsh Government (2007) Making the Most of Wales' Coast: The Integrated Coastal Zone Management Strategy for Wales
 Welsh Government (2008) Wales Transport Strategy
 Welsh Government (2008) Wales Fisheries Strategy
 Welsh Government (2008) People, Places, Future – The Wales Spatial Plan
 Welsh Government (2009) Farming, Food and Countryside: Building a Secure future – A New Strategy for Farming
 Welsh Government (2009) Woodlands for Wales Strategy
 Welsh Government (2009) Living Well Living Independent Lives
 Welsh Government (2010) Economic Renewal: A New Direction
 Welsh Government (2010) Valuing the Welsh Historic Environment
 Welsh Government (2010) Climate Change Strategy for Wales
 Welsh Government (2010) Low Carbon Revolution – the Welsh Government Energy Policy Statement
 Welsh Government (2010) Towards Zero Waste One Wales: One Planet. The Overarching Waste Strategy Document for Wales
 Welsh Government (2010) Food for Wales, Food from Wales 2010:2020
 Welsh Government (2010) Fulfilled Lives, Supportive Communities
 Welsh Government (2010) Welsh-medium Education Strategy
 Welsh Government (2013) Policy Statement: Preparing for a Changing Climate
 Welsh Government (2011) Strategic Policy Position on Water
 Welsh Government (2011) Marine Renewable Energy Strategic Framework
 Welsh Government (2011) Sustainable Social Services for Wales: A Framework for Action
 Welsh Government (2011) Rural Development Plan for Wales (2014-2020)
 Welsh Government (2011) Rights of Children and Young Persons (Wales) Measure 2011
 Welsh Government (2011) Welsh Language (Wales) Measure 2011
 Welsh Government (2012) Working Differently – Working Together
 Welsh Government (2012) Energy Wales: A Low Carbon Transition
 Welsh Government (2012) Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales
 Welsh Government (2012) Wales Infrastructure Investment Plan
 Welsh Government (2013) Partnership for Growth: The Welsh Government Strategy for Tourism 2013 – 2020

Welsh Government (2013) National Flood and Coastal Erosion Strategy for Wales

Welsh Government (2013) Wales Marine and Fisheries Strategic Action Plan

Welsh Government (2013) The Historic Environment Strategy for Wales

Welsh Government (2013) Vibrant and Viable Places New Regeneration Framework

Welsh Government (2013) The Strategy for Older People in Wales 2013-2023

Welsh Government (2013) Active Travel (Wales) Act 2013

Welsh Government (2013) Framework for Action on Independent Living

Welsh Government (2014) Declaration of Rights for Older People

Welsh Government (2015) The Welsh National Marine Plan – Initial Draft

Welsh Government (2015) Water Strategy for Wales

Welsh Government (2015) Child Poverty Strategy for Wales

Welsh Government (2015) Wales Marine Evidence Report

Welsh Government (2015) Volunteering Policy, Supporting Communities, Changing Lives

Welsh Government 2015/16 Review of evidence of inequalities in Wales

Welsh Government (2016) Welsh Government Programme for Government, Taking Wales Forward 2016-2021

Welsh Government (2016) Active Travel Action Plan for Wales

Welsh Government (2016) Strategic Equalities Plan 2016

Welsh Government / NHS (2016) Measuring the health and well-being of a nation: Public Health Outcomes Framework for Wales

Welsh Government (2016) Social Services: The national outcomes framework for people who need care and support and carers who need support

Welsh Government (2016) Early Years Outcomes Framework

Welsh Government (2017) Cymraeg 2050: a million Welsh speakers 2017

Welsh Government (2018) Planning Policy Wales – Edition 10

Welsh Government (2018) Enabling Gypsies, Roma and Travellers Plan.

Welsh Water (2008) Surface Water Management Strategy

Welsh Water (2014) Final Water Resources Management Plan

Welsh Government (2006) Technical Advice Note (TAN) 2: Planning and Affordable Housing

Welsh Government (2016) Technical Advice Note (TAN) 4: Retail and Commercial Development

Welsh Government (2009) Technical Advice Note (TAN) 5: Nature Conservation and Planning

Welsh Government (2010) Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities

Welsh Government (2005) Technical Advice Note (TAN) 8: Renewable Energy

Welsh Government (1997) Technical Advice Note (TAN) 11: Noise

Welsh Government (2016) Technical Advice Note (TAN) 12: Design

Welsh Government (1997) Technical Advice Note (TAN) 13: Tourism

Welsh Government (1998) Technical Advice Note (TAN) 14: Coastal Planning

Welsh Government (2004) Technical Advice Note (TAN) 15: Development and Flood Risk

Welsh Government (2009) Technical Advice Note (TAN) 16: Sport, Recreation and Open Space

Welsh Government (2007) Technical Advice Note (TAN) 18: Transport

Welsh Government (2002) Technical Advice Note (TAN) 19: Telecommunications

Welsh Government (2017) Technical Advice Note (TAN) 20: Planning and the Welsh Language

Welsh Government (2014) Technical Advice Note (TAN) 21: Waste

Welsh Government (2014) Technical Advice Note (TAN) 23: Economic Development

Welsh Government (2014): Wales We Want National Conversation

Welsh Government (2017) Technical Advice Note (TAN) 24: The historic environment

Welsh Government (2017) Natural Resources Policy (NRP)

Welsh Government (2019) Welsh National Marine Plan, November 2019

Welsh Government (2019) Independent review of affordable housing supply: report, May 2019

Welsh Government (2019) Summary statistics for economic regions: 2019

Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019

Welsh Government (2019) Renewable energy targets: evidence, July 2019

Welsh Government (2019) A Railway for Wales Meeting the needs of future generations

Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020

Table A-2 summarises the outcomes of the review of International, European, UK and National plans, policies and environmental protection objectives. This identified key themes and the implications for the ISA and the NDF, illustrating how these link to the development of the ISA framework.

The Well-being of Future Generations (Wales) Act 2015 goals that are applicable to the themes relevant to the ISA have also been included within Table A-2. The goals are listed below:

1. A prosperous Wales
2. A resilient Wales
3. A healthier Wales
4. A more equal Wales
5. A Wales of cohesive communities
6. A Wales of vibrant culture and thriving Welsh language
7. A globally responsible Wales

The 17 ISA Objectives which are used to test the performance of the NDF to enable social, economic, environmental and cultural well-being to be fully considered are also listed below:

1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help improve opportunities for life	7. To encourage climate change resilience, including contributing to the reduction and management of flood risk	13. To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscapes
2. To contribute to an improvement in physical and mental health and wellbeing for all and contribute towards a reduction in health inequalities across Wales	8. To encourage the protection and improvement of air quality	14. To encourage the conservation and enhancement of heritage assets
3. To create opportunities for an increase in employment across the Country and promote economic inclusion	9. To contribute to the protection and enhancement of the quality of water features and resources	15. To encourage the protection and promotion of Welsh culture
4. To promote sustainable economic growth, diversity and business competitiveness	10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups	16. To encourage the conservation and enhancement of biodiversity and geodiversity
5. To encourage the protection and promotion of the Welsh language	11. To create the conditions within which an improvement in social cohesion and equality can be achieved	17. To encourage the sustainable use of natural resources
6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design	12. To encourage the provision of good quality, safe, affordable housing that meets identified needs	

Table A-2 Sustainability Themes linked to ISA Objectives

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
Maintain and enhance biodiversity, habitats and species with healthy functioning and resilient ecosystems, to make a more resilient Wales and maintain the ability to adapt to climate change	1,2,3,5 and 7	The Rio Convention on Biodiversity; The Water Framework Directive 2000/60/EC; Rio Declaration on Environment and Development; Environmental Liability Directive 2004/35/EC; World Summit on Sustainable Development; Convention on the Conservation of European Wildlife and Natural Habitats – The Bern Convention; EU Directive on the Conservation of Natural Habitats and Wild Fauna and Flora – The Habitats Directive 92/43/EEC; Convention of the Conservation of Migratory Species of Wild Animals (1979) – The Bonn Convention; Convention on the Agreement on the Conservation of African – Eurasian Migratory	Safeguarding Sea Life; Mainstreaming Sustainable Development; The Natural Choice: Securing the Value of Nature; Our Seas – a Shared Resource: High Level Marine Objectives; Wildlife and Countryside Act 1981; Environmental Protection Act 1990; Natural Environment and Rural Communities Act 2006; Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010); Conservation of Habitats & Species Regulations 2010 (as amended 2011); The UK Post-2010 Biodiversity Framework 2012; Charting Progress 2: The State of UK Seas; UK National Ecosystem Assessment: Understanding Nature's	Natural Resources Policy Statement; One Wales: One Planet: The Sustainable Development Scheme of the Welsh Assembly Government; Woodlands for Wales Strategy; Wales Biodiversity Framework; Wales Fisheries Strategy 2008; National Seascape Assessment for Wales; Wales Marine Evidence Report; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; SoNaRR; NRP; One Wales: Connecting the Nation; Capturing the Potential: A Green Jobs Strategy for Wales; Marine Renewable Energy Strategic Framework; Rural Development Plan for Wales (2014-2020); Wales Marine and Fisheries Strategic Action Plan; The Welsh National Marine Plan – Initial Draft; Water Strategy for Wales; Surface Water Management Strategy; Final Water Resources Management Plan; Technical Advice Note (TAN) 5: Nature Conservation and Planning; Welsh Government (2019) Welsh National Marine Plan, November 2019	The NDF should seek to make the environment and communities more resilient to major environmental problems including addressing declining biodiversity. Section 6 of the Environment (Wales) Act 2016 introduces an enhanced biodiversity and resilience of ecosystems duties for public authorities in relation to the exercise of their functions. The emphasis of the duty is that the consideration of biodiversity and ecosystems are embedded in the early thinking of the development of the NDF. Capturing this duty as an integral part of the NDF development process will be essential. The Plans, programmes and environmental protection	The ISA Framework should include objectives that seek to conserve and enhance biodiversity, species and habitats as part of a wider aim to protect and enhance ecosystems services.	Biodiversity, Flora and Fauna	6, 7, 9, 16 and 17

¹ Well-being of Future Generations (Wales) Act 2015

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		Waterbirds (1995)– The Bonn Convention; Convention on International Trade in Endangered Species of Wild Fauna and Flora; The Ramsar Convention on Wetlands (1971); Cancun Adaptation Framework (2010); Paris Agreement; Review of the EU Sustainable Development Strategy; The Birds Directive 2009/147/EC; EU Biodiversity Strategy to 2020; The Paris Agreement.	Value to Society;; Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework; Conserving Biodiversity the UK Approach; Joint Nature Conservation Committee (2012) UK Climate Change Risk Assessment 2017 Evidence Report; The Invasive and Non-Native Species Framework Strategy for Great Britain; Fisheries 2027: A long-term vision for sustainable fisheries Marine Policy Statement; Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status; National Parks and Access to the Countryside Act 1949; Environment Act 1995; The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003; Marine Strategy Regulations 2010; Ozone-Depleting Substances Regulations 2015; HMG, NI Executive, Scottish Government, UK Marine		objectives seek to conserve and protect biodiversity through international and national regulations or frameworks. Plans, programmes and environmental protection objectives that prioritise economic development without consideration of ecosystems resilience, may conflict with this theme. This is as an increase in built development or industrial processes could threaten the achievement of an improvement in, or the protection of, the natural environment.			

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
			Policy Statement; Inshore Fisheries and Conservation Authorities Bylaws (various); Natural England and JNCC (2011) Marine Conservation Zone (MCZ) Project; NERC (2010) Marine Environmental Mapping Programme (MAREMAP)					
Reduce air pollution and ensure improvements in air quality contributing to a healthier Wales	2, 3 and 7	Geneva Convention on Long Range Transboundary Air Pollution; The United Nations Framework Convention on Climate Change; Kyoto Protocol to the UN Framework Convention on Climate Change; Stockholm Convention on Persistent Organic Pollutants; The Copenhagen Accord; National Emissions Ceiling Directive 2001/81/EC; EU Thematic Strategy on Air Quality; Ambient Air Quality and Cleaner Air for Europe Directive 2008/50/EC and Air Quality Framework Fourth Daughter Directive 2004/107/EC; Seventh EU Environmental Action Plan; The EIA Directive 2014/52/EU; Industrial Emissions Directive	Building a Low-Carbon Economy - the UK's Contribution to Tackling Climate Change; Environmental Protection Act 1990; Air Pollution: Action in a Changing Climate; Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO ₂) in the UK; List of UK and National Measures; The National Adaptation Programme: Making the Country Resilient to a Changing Climate; Carbon Plan: Delivering our Low Carbon Future; UK Climate Change Risk Assessment: Government Report; Delivering a Sustainable Transport System; Managing the Environment in a	Environment (Wales) Act 2016; Environment Strategy for Wales; Climate Change Strategy for Wales; Low Carbon Revolution – the Welsh Government Energy Policy Statement; Policy Statement: Preparing for a Changing Climate 2013; Energy Wales: A Low Carbon Transition; Wales Transport Strategy; Well-being of Future Generations (Wales) Act 2015; UK Climate Change Risk Assessment 2017 Evidence Report, summary for Wales; A Healthier, Happier and Fairer Wales 2015; Low Carbon Wales 2009; Active Travel (Wales) Act 2013; Active Travel Action Plan for Wales; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Technical Advice Note (TAN) 18: Transport; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Welsh Government (2019) Renewable energy targets: evidence, July 2019; Welsh Government (2019) A Railway for Wales Meeting the needs of future generations	The NDF should seek to incorporate measures to improve air quality such as promoting low carbon initiatives and sustainable transport modes. The NDF should maximise the ability of Wales' natural habitats to absorb pollutants and improve air quality. The plans, programmes and environmental protection objectives seek to improve air quality through low carbon initiatives and policies. Plans, programmes and environmental protection objectives that prioritise economic development without consideration of ecosystems services, may conflict with this theme. This is as an increase in built development or	The ISA Framework should include objectives that seek to improve air quality and health through a range of potential opportunities such as transport, housing, economic development and improvements to the natural environment and ecosystems services.	Air, Population, Human Health and Climatic Factors	2, 6 and 8

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		(integrated pollution prevention and control) 2010/75/EU; Emissions Trading Scheme (EU ETS); Cancun Adaptation Framework (2010); Paris Agreement (2016)	Changing Climate; Climate Change Act 2008; Air Quality Standards Regulations 2010; Mainstreaming Sustainable Development; Environment Act 1995; Ozone-Depleting Substances Regulations 2015; Aviation Policy Framework		industrial processes could threaten the achievement of an improvement in, or the protection of, the natural environment.			
Reduce the risk of flooding and/or coastal erosion by assessing developments against the precautionary principle, and promote protection of floodplains or areas of managed realignment from inappropriate development	2, 3 and 7	The EU Water Framework Directive; EU Flood Directive; European Sustainable Development Strategy; EU Directive 2014/52/EU 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; The Floods Directive 2007/60/EC; The Rio Declaration on Environment and Development; The United Nations Framework Convention on Climate Change; Kyoto Protocol to the UN Framework Convention on Climate Change; Cancun Adaptation Framework (2010); Paris Agreement (2016); Marine Strategy Framework Directive 2008/56/EC; Review of the EU Sustainable Development Strategy	Flood Risk Regulations 2009; Flood and Water Management Act 2010; Adapting to Coastal Change: Developing a Policy Framework; Cleaner Coasts, Healthier Seas: EA Marine Strategy; The Marine and Coastal Access Act 2009; Marine Policy Statement; Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status; Environment Act 1995; The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003; Marine Strategy Regulations 2010; Ozone-Depleting Substances Regulations 2015; UK Marine Policy	PPW edition 10; TAN15 Development and Flood Risk; National Flood and Coastal Erosion Strategy for Wales; Welsh Coastal Tourism Strategy; Coastal Access Improvement Programme; Making the Most of Wales' Coast: The Integrated Coastal Zone Management Strategy for Wales; National Seascape Assessment for Wales; Wales Marine Evidence Report; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Welsh Government Strategic Policy Position on Water; Wales Marine and Fisheries Strategic Action Plan; The Welsh National Marine Plan – Initial Draft; Water Strategy for Wales; Surface Water Management Strategy; Final Water Resources Management Plan; Technical Advice Note (TAN) 14: Coastal Planning; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Welsh Government (2019) Renewable energy targets: evidence, July 2019; Welsh Government (2019) Welsh National Marine Plan, November 2019	The NDF should use natural features that contribute to flood management to reduce flood risk and coastal erosion. This must be considered when determining the location and design of new development. The NDF should ensure that new development avoids areas of flood risk and does not increase flood risk and should seek to ensure development incorporates climate change adaptation measures.	The ISA Framework needs to include objectives that seek to ensure that flood risk is reduced, reflecting the principles of national studies and objectives.	Water, Climatic Factors, Population and Human Health	7 and 9

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		European Commission (2009)	Statement; Inshore Fisheries and Conservation Authorities Bylaws (various); NERC (2010) Marine Environmental Mapping Programme (MAREMAP); Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development; UK Climate Change Risk Assessment 2017 Evidence Report;.					
Improve the connectivity of communities, and sustainable patterns of movement	1, 2, 3, 4, 5, 6 and 7	European Sustainable Development Strategy; Roadmap to a Single European Transport Area; The Rio Declaration on Environment and Development; Review of the EU Sustainable Development Strategy European Commission (2009)	Ports Policy Review Interim Report; Delivering a Sustainable Transport System; National Policy Statement for Ports; Transport Act 2000; The UK's Shared Framework for Sustainable Development; Countryside and Rights of Way Act; UK Ports for the Offshore Wind Industry: Time to Act; National Parks and Access to the Countryside Act 1949	PPW edition 10; TAN18: Transport; One Wales, One Planet; TAN6-Planning for Sustainable Rural Communities; Food for Wales, Food from Wales; Well-being of Future Generations (Wales) Act 2015; Wales Transport Strategy; Active Travel (Wales) Act 2013; Active Travel Action Plan for Wales; Framework for Action on Independent Living; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; Shape Your Future - future trends: Implications for the third sector in Wales; Shape Your Future - Future scenarios: Implications for the third sector in Wales; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Rural Development Plan for Wales (2014-2020); Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Welsh Government (2019) Renewable energy	Development should encourage efficient and sustainable patterns of movement in the first instance. The NDF should plan for reducing the need to travel, and provide opportunities to access new and existing development and services by a range of sustainable travel modes. The NDF should also seek to support digital inclusion through the provision of high speed broadband connections across Wales.	The ISA Framework should include objectives that encourage improving the connectivity of communities and sustainable patterns of movement, as well as sustainable transport options.	Population, Human Health and Material Assets	10

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
				targets: evidence, July 2019; Welsh Government (2019) A Railway for Wales Meeting the needs of future generations; TAN 19 Telecommunications.				
Sustainably manage natural resources and tackle the causes of climate change	1, 2, 3, 4, 5 and 7	Johannesburg Declaration on Sustainable Development; The EU Sixth Environmental Action Plan, European Sustainable Development Strategy; United Nations Framework Convention on Climate Change; European Climate Change Programme; The EU Air Quality Framework Directive; Agenda 21; EU Directive 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; UN Framework Convention on Climate Change Directive to Promote Electricity from Renewable Energy (2001/77/EC); Strategy on Adaptation to Climate Change; National Emissions Ceiling Directive 2001/81/EC; Industrial Emissions Directive (integrated pollution prevention and control) 2010/75/EU; Emissions Trading Scheme (EU ETS); Kyoto Protocol to the UN	Building a Low-Carbon Economy - the UK's Contribution to Tackling Climate Change; UK Climate Change Risk Assessment: Government Report; Health Effects of Climate Change in the UK 2008 - An update of the Department of Health report 2001/2002; The Stern Review: The Economics of Climate Change; Climate Change Act 2008; The Climate Change Act 2008 (2020 Target, Credit Limit and Definitions) Order 2009; Air Quality Strategy for England, Scotland, Wales and Northern Ireland; Water Resources Strategy for England and Wales; EA GP3 (Groundwater Protection Policy and Practice) Marine Policy Statement; Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status;	Environment Strategy for Wales; PPW 10; Wales Spatial Plan; The Future of our Farming; Energy Policy Statement; Climate Change Strategy for Wales; One Wales, One Planet; Surface Water Management Strategy; TAN6-Planning for Sustainable Rural Communities; Food for Wales, Food from Wales; Energy White Paper: Our Energy Future; Climate Change Wales; Well-being of Future Generations (Wales) Act 2015; Policy Statement 2013 Preparing for a changing climate. Energy Wales A Low Carbon Transition; Low Carbon Wales; Wales Marine Evidence Report; Taking Wales Forward 2016-2021; Active Travel (Wales) Act 2013; Active Travel Action Plan for Wales; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Capturing the Potential: A Green Jobs Strategy for Wales; Woodlands for Wales Strategy; Welsh Government Strategic Policy Position on Water; Marine Renewable Energy Strategic Framework; Rural Development Plan for Wales (2014-2020); Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales; Wales Marine and Fisheries Strategic Action Plan; The Welsh National Marine Plan – Initial Draft; Water Strategy for Wales; Surface Water Management Strategy; Final Water Resources Management Plan; NRP; Welsh Government (2019) Prosperity for All: A Low	The NDF should seek to reduce the consumption of natural resources and act to tackle the causes and consequences of climate change. The NDF could highlight the importance of managing and seeking to mitigate the consequences of climate change by building resilience into the natural and built environment.	The ISA Framework should include objectives that address climate change issues. This is likely to be reflected across the whole range of SA objectives as a key integral cross-cutting theme.	Air and Climatic Factors	6, 8 and 17

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		Framework Convention on Climate Change; Cancun Adaptation Framework (2010); Paris Agreement (2016); Groundwater Directive 2006/118/EC; Review of the EU Sustainable Development Strategy European Commission (2009)	Framework for the Development of Clean Coal; Forestry Act 1967; Planning (Listed Buildings and Conservation Areas) Act 1990; Environment Act 1995; The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003; Ozone-Depleting Substances Regulations 2015; UK Marine Policy Statement; One Future – Different Paths. Shared Framework for Sustainable Development; UK Climate Change Risk Assessment 2017 Evidence Report.	Carbon Wales, June 2019; Welsh Government (2019) Renewable energy targets: evidence, July 2019; Welsh Government (2019) Welsh National Marine Plan, November 2019				
Protect and improve the quality of water resources	2, 3 and 7	The EU Water Framework Directive; EU Flood Directive; European Sustainable Development Strategy; EU Directive 2014/52/EU 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; The Rio Declaration on Environment and Development; The United Nations Framework Convention on Climate Change; Kyoto Protocol to	Flood and Water Management Act 2010; Adapting to Coastal Change: Developing a Policy Framework; Cleaner Coasts, Healthier Seas: EA Marine Strategy; The Marine and Coastal Access Act 2009; Marine Policy Statement; Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status;	Coastal Access Improvement Programme; Making the Most of Wales' Coast: The Integrated Coastal Zone Management Strategy for Wales; National Seascape Assessment for Wales; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Welsh Government Strategic Policy Position on Water; Wales Marine and Fisheries Strategic Action Plan; The Welsh National Marine Plan – Initial Draft; Water Strategy for Wales; Surface Water Management Strategy; Final Water Resources Management Plan; PPW 10; Technical Advice Note (TAN) 14: Coastal Planning;	The NDF should seek opportunities to protect and improve the quality of water resources. The sustainable use of water should also be considered in new development.	The ISA Framework needs to include objectives that seek to ensure that the quality of water resources is protected and improved.	Water	9

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		the UN Framework Convention on Climate Change; Cancun Adaptation Framework (2010); Paris Agreement (2016); Marine Strategy Framework Directive 2008/56/EC; Review of the EU Sustainable Development Strategy European Commission (2009)	Environment Act 1995; The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003; Marine Strategy Regulations 2010; UK Marine Policy Statement; Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development; UK Climate Change Risk Assessment 2017 Evidence Report.	NRP; Welsh Government (2019) Welsh National Marine Plan, November 2019				
Minimise waste generation and increase levels of reuse and recycling to achieve more sustainable waste management and reduce landfill	2 and 7	The EU Landfill of Waste Directive; EU Waste Framework Directive; European Sustainable Development Strategy; EU Directive 2014/52/EU 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; Environmental Liability Directive; (EU) Council Directive on Waste (75/442/EEC) as amended by Council Directive 91/156/EC; Council Directive on the Landfill of Waste (99/31/EC); EU Hazardous Waste Directive	National Policy Statement for Waste Water; The UK's Shared Framework for Sustainable Development; Environment Act 1995; One Future – Different Paths. Shared Framework for Sustainable Development; UK Climate Change Risk Assessment 2017 Evidence Report.	Environment Strategy Wales; TAN21 – Waste; PPW edition 10; Wales Spatial Plan; One Wales, One Planet; Towards Zero Waste; Well-being of Future Generations (Wales) Act 2015; Low Carbon Revolution – the Welsh Government Energy Policy Statement; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Capturing the Potential: A Green Jobs Strategy for Wales; Technical Advice Note (TAN) 21: Waste; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019	The NDF should promote the reduction of waste. Opportunities for recycling and reuse should be encouraged and opportunities to reduce the amount of waste sent to landfill should be increased in line with National targets and goals.	The ISA Framework should include objectives that seek to encourage sustainable waste management.	Materials Assets, Soil, Population, Human Health and Climatic Factors	17

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		(91/689/EEC); EU Packaging and Packaging Waste Directive (94/62/EC); The Urban Waste Water Directive 91/271/EEC; Mineral Waste Directive 2006/21/EC; Landfill Directive (1999/31/EC); The Rio Declaration on Environment and Development						
Relieve pressure on natural resources by increasing energy efficiency and promoting the use of national renewable energy resources	1, 2, 3, 5 and 7	European Sustainable Development Strategy; EU Directive 2014/52/EU 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; Renewable Energy Coalition; Energy Performance in Buildings Directive 2002/91/EEC; The Integrated Climate and Energy Package; Renewable Energy Directive 2009/8/EC; Energy 2020 - A Strategy for Competitive, Sustainable and Secure Energy; Energy Efficiency Directive (2012/27/EU); 2030 Policy Framework for Climate and Energy; The United Nations Framework Convention on Climate Change; Kyoto Protocol to the UN Framework Convention on Climate	Marine Energy Action Plan; National Policy Statements for Energy Infrastructure; UK Renewable Energy Roadmap; UK National Energy Efficiency Action Plan; The Energy Act 2008; The UK's Shared Framework for Sustainable Development; Water Resources Strategy for England and Wales; Marine Policy Statement Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status; DECC (2009) Framework for the Development of Clean Coal; UK Ports for the Offshore Wind Industry: Time to Act; Forestry Act 1967; Environment Act 1995;	One Wales, One Planet; Wales a better Country; PPW edition 10; TAN8 – Renewable Energy; TAN6-Planning for Sustainable Rural Communities; Wales Spatial Plan; Energy Policy Statement; Climate Change Strategy for Wales; Well-being of Future Generations (Wales) Act 2015; Low Carbon Revolution – the Welsh Government Energy Policy Statement; Towards Zero Waste One Wales: One Planet; Marine Renewable Energy Strategic Framework; Policy Statement 2013 Preparing for a changing climate. Energy Wales A Low Carbon Transition;; Low Carbon Wales; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Capturing the Potential: A Green Jobs Strategy for Wales; Woodlands for Wales Strategy; Marine Renewable Energy Strategic Framework; Rural Development Plan for Wales (2014-2020); Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales; Wales Marine and Fisheries	The NDF should promote reduced energy usage and energy efficiency in new developments and the creation of energy from low or zero carbon energy sources, capitalising on the potential of Wales. The NDF should seek to create a level playing field in sustainable design, reducing potential conflicts between the environment and economic development, seeking to ensure that all developments are subject to the same environmental standards, whilst having regard to viability.	The ISA Framework should include objectives that seek to encourage energy efficiency as well as the creation of energy from low or zero carbon energy sources, capitalising on the potential of Wales.	Population, Air and Climatic Factors	6

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		Change; Environmental Quality Standards Directive 2008/105/EC; Review of the EU Sustainable Development Strategy; Seventh Environmental Action Programme to 2020 'Living well, within the limits of our planet'; SEA Directive (2001/42/EC)	Environmental Permitting (England and Wales) Regulations 2016; Ozone-Depleting Substances Regulations 2015; UK Marine Policy Statement; UK Climate Change Risk Assessment 2017 Evidence Report.	Strategic Action Plan; The Welsh National Marine Plan – Initial Draft; Water Strategy for Wales; Surface Water Management Strategy; Final Water Resources Management Plan; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Welsh Government (2019) Renewable energy targets: evidence, July 2019; Welsh Government (2019) Welsh National Marine Plan, November 2019				
To conserve soil resources, control soil erosion and maintain their quality	2 and 7	European Sustainable Development Strategy; EU 6 TH Environmental Action Plan; EU Soil Framework Directive; European Nitrates Directive; EU Directive 2014/52/EU 97/11/EC amending Directive 85/337/EEC on Environmental Impact Assessment; Environmental Liability Directive 2004/35/EC; EU Nitrates Directive; European Thematic Strategy on Soil Protection European Commission (2006)	Forestry Act 1967; Environment Act 1995; UK Climate Change Risk Assessment 2017 Evidence Report;	Environment Strategy for Wales; PPW 10; Wales Spatial Plan; Surface Water Management Strategy; The Future of our Farming; Food for Wales, Food from Wales; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Woodlands for Wales Strategy; NRP; Welsh Government (2019) Welsh National Marine Plan, November 2019	Better soil management will contribute to erosion prevention and supporting habitats. The NDF should ensure soil resources are not adversely affected by development.	The ISA Framework should include objectives with a focus on the protection of soil resources.	Soil, Material Assets and Water	17
Protect and enhance the local distinctiveness of our landscapes and the historic environment and its setting	1, 4, 5, 6 and 7	Convention Concerning the Protection of the World Cultural and Natural Heritage; European Landscape Convention; Convention on the Protection of Underwater Cultural	Heritage Protection for the 21st Century; The Protection of Wrecks Act 1973; Ancient Monuments and Archaeological Areas Act 1979; Protection of Military Remains Act	PPW edition 10; Cultural Tourism Strategy; Coastal Tourism Strategy; TAN12 – Design; TAN 24: the historic environment; Register of Landscapes of Historic Interest; Historic Environment (Wales) Act 2016; Valuing the Welsh Historic Environment; The Historic Environment Strategy for Wales; UK Climate Change Risk Assessment 2017	The NDF should protect and retain distinctiveness of the national landscapes, valued historic environment and cultural heritage and its setting.	The ISA Framework should include objectives that seek to protect local distinctiveness	Cultural Heritage and Landscape	13, 14 and 15

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		Heritage; European Convention on the Protection of the Archaeological Heritage	1986; Planning (Listed Buildings and Conservation Areas) Act 1990; Environment Act 1995; The Treasure Act 1996; The National Heritage Act 2002; Commons Act 2006	Evidence Report; National Seascape Assessment for Wales; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Welsh Government (2019) Welsh National Marine Plan, November 2019		s and the historic environment.		
Improve access to good quality affordable housing to ensure that everyone has the opportunity to live in a decent affordable home	1, 2, 3, 4, 5, 6 and 7			Social Services and Well-being (Wales) Act 2014; Well-being of Future Generations (Wales) Act 2015; Improving Lives and Communities – Homes in Wales; Getting on Together – a Community Cohesion Strategy for Wales; Living Well Living Independent Lives; Vibrant and Viable Places New Regeneration Framework; TAN2 – Planning and Affordable Housing; TAN12 – Design; Welsh Government (2019) Independent review of affordable housing supply: report, May 2019; Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019	The NDF should support the provision of a range of housing that meet the needs of the population and promotes safe and sustainable communities.	The ISA Framework should include objectives that address housing issues.	Population and Material Assets	12

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
Improve the health and well-being of the population and reduce health inequalities to create a healthier Wales	1, 2, 3, 4, 5 and 7	Guidelines for Community Noise 1999; Children's Environment and Health Action Plan for Europe; Together for Health - A Strategic Approach for the EU 2008-2013; The Drinking Water Directive 98/83/EC; Environmental Noise Directive (END) 2002/49/EC; The Bathing Waters Directive 2006/7/EC; Seventh Environmental Action Programme to 2020 'Living well, within the limits of our planet'	Cleaner Coasts, Healthier Seas: EA Marine Strategy; Children's Environment and Health Action Plan; Health Effects of Climate Change in the UK 2008 - An update of the Department of Health report 2001/2002; Health Strategy for the United Kingdom; The Health and Safety of Great Britain: Be Part of the Solution; Sustainable Development: The Key to Tackling Health Inequalities; One Future - Different Paths. Shared Framework for Sustainable Development; UK Climate Change Risk Assessment 2017 Evidence Report;	PPW edition 10; Wales Spatial Plan; Play Policy Implementation Plan; National Energy Efficiency Action Plan; One Wales, One Planet; Living Well - Living Independent Lives; The Strategy for Older People in Wales; Third Sector Scheme; Volunteering Policy; Supporting Communities, Changing Lives; Towards Zero Waste; Active Travel (Wales) Act 2013; Active Travel Action Plan for Wales; Well-being of Future Generations (Wales) Act 2015; Together for Health; A Healthier, Happier and Fairer Wales; Fulfilled Lives, Supportive Communities; Framework for Action on Independent Living; Declaration of Rights for Older People; Taking Wales Forward 2016-2021; Social Services and Well-being (Wales) Act 2014; Planning (Wales) Act 2015; Shape Your Future - future trends: Implications for the third sector in Wales; One Wales - A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Designed to Add Value - a third dimension for One Wales; Capturing the Potential: A Green Jobs Strategy for Wales; Rural Health Plan; Marine Renewable Energy Strategic Framework; Sustainable Social Services for Wales: A Framework for Action; Working Differently - Working Together; Wales Marine and Fisheries Strategic Action Plan; The Strategy for Older People in Wales 2013-2023; The Welsh National Marine Plan - Initial Draft; Child Poverty Strategy for Wales; Technical Advice Note (TAN) 11: Noise; Technical Advice Note (TAN) 16: Sport, Recreation and Open Space; Welsh	The NDF should use the natural resources available to encourage an improvement in physical and mental health whilst promoting healthy and active lifestyles. The NDF should recognise the potential for national green spaces as places for health and recreation, connecting habitats and supporting community interaction. A healthier population could enable people to achieve their potential and to make Wales a more equal society.	The ISA framework should include a variety of social, environmental, cultural and economic objectives that seek to benefit health and the local community, reflecting the wide range of potential influences that can affect health and well-being within communities. This is likely to be reflected across the whole range of ISA objectives as a key integral cross-cutting theme.	Population, and Human Health	2

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
				Government (2019) Independent review of affordable housing supply: report, May 2019; Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Welsh Government (2019) Welsh National Marine Plan, November 2019; TAN 19 Telecommunications.				
Promote and protect the Welsh language, culture and heritage	1, 2, 4, 6 and 7		Heritage Protection for the 21st Century (2007)	Welsh Language (Wales) Measure 2011; Cymraeg 2050: a million Welsh speakers ; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Well-being of Future Generations (Wales) Act (2015); One Wales: Connecting the Nation; Vibrant and Viable Places New Regeneration Framework; Welsh Medium Education Strategy 2010 Technical Advice Note 20: Planning and the Welsh language; Technical Advice Note 24 – the Historic Environment.	The NDF should support activities which promote and facilitate the use of the Welsh language.	The ISA Framework should include objectives that promote the Welsh language.	Population and Cultural Heritage	5, 14 and 15
Raise educational attainment to help improve opportunities for life	1, 2, 3, 4, 5 and 6	Aarhus Convention; PSI Directive; UN convention on the Rights of the Child 1989 and UN Committee on the Rights of the Child Recommendations report 2016.		Welsh Medium Education Strategy; Children's Commissioner for Wales Annual Report 15-16; Community Cohesion Strategy for Wales; Framework for Regeneration Areas – Vibrant and Viable Places; Wales – A Better Country; Well-being of Future Generations (Wales) Act 2015; Third Sector Scheme; Volunteering Policy, Supporting Communities, Changing Lives; A Healthier, Happier and Fairer Wales; Fulfilled Lives, Supportive	The NDF should seek to raise educational attainment.	The ISA Framework should include objectives that seek to improve skills and education.	Population and Material Assets	1

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
				Communities; Rights of Children and Young Persons (Wales) Measure 2011; Declaration of Rights for Older People; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Wales Infrastructure Investment Plan; Vibrant and Viable Places New Regeneration Framework; Child Poverty Strategy for Wales; Welsh Government (2019) Independent review of affordable housing supply: report, May 2019 Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; TAN 19 Telecommunications.				
Create safe, sustainable, balanced and cohesive communities, including in both rural and urban areas	1, 2, 3, 4, 5 and 6	Johannesburg Declaration on Sustainable Development; European Spatial Development Perspective; European Sustainable Development Strategy; Agenda 21; Rio Declaration on Environment and Development; EU Rural Development Policy; Aarhus Convention; PSI Directive; Review of the EU Sustainable Development Strategy European Commission (2009); Towards Social	Natural Environment and Rural Communities Act 2006; The Equality Act 2010; Planning (Listed Buildings and Conservation Areas) Act 1990; Commons Act 2006; One Future – Different Paths. Shared Framework for Sustainable Development	National Energy Efficiency and Savings Plan; Living Well – Living Independent Lives; Framework for Regeneration Areas – Vibrant and Viable Places; Wales – A Better Country; Improving Lives and Communities – Homes in Wales; National Flood and Coastal Erosion Strategy for Wales; Strategic Equality Plan for 2016-20; TAN 12- Design; TAN 19 Telecommunications; Play Policy Implementation Plan; Community Cohesion Strategy for Wales; PPW 10; TAN 2 – Planning and Affordable Housing; Gypsy Traveller Good Practice Guidelines; Enabling Gypsies, Roma and Travellers Plan; Travelling to a Better Future; Improving Lives and	The NDF should provide for a range of employment and other opportunities to enable people to realise their individual aspirations. The NDF should promote cohesive communities through design and connectivity.	The ISA Framework should include objectives that address community needs.	Population and Material Assets	10 and 11

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
		Investment for Growth and Cohesion 2014-2020		Communities; Third Sector Scheme; Volunteering Policy, Supporting Communities, Changing Lives; A Healthier, Happier and Fairer Wales; Fulfilled Lives, Supportive Communities; Welsh Language (Wales) Measure 2011; Cymraeg 2050: a million Welsh speakers ; Active Travel (Wales) Act 2013; Active Travel Action Plan for Wales; Framework for Action on Independent Living; Taking Wales Forward 2016-2021; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Setting the Direction: Primary & Community Services Strategic Delivery Programme; Welsh Government Rural Development Plan for Wales (2014-2020); Wales Infrastructure Investment Plan; The Strategy for Older People in Wales 2013-2023; Welsh Government (2019) Independent review of affordable housing supply: report, May 2019; Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019				

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
Promote quality employment opportunities and economic activity	1, 2, 4, 5 and 7	Johannesburg Declaration on Sustainable Development; The European Employment Strategy; Review of the EU Sustainable Development Strategy European Commission (2009); Public Sector Information Directive (PSI) 2003/98/EC	National Infrastructure Plan; One Future – Different Paths. Shared Framework for Sustainable Development	PPW edition 10; Coastal Tourism Strategy; Sustainable Tourism Framework; A Skills and Employment Strategy and Action Plan; Wales – A Better Country; Well-being of Future Generations (Wales) Act 2015; Taking Wales Forward 2016-2021; Natural Resources Policy Statement; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; Capturing the Potential: A Green Jobs Strategy for Wales; Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales; Wales Infrastructure Investment Plan; Technical Advice Note (TAN) 4: Retail and Commercial Development; Technical Advice Note (TAN) 20: Planning and the Welsh Language; Technical Advice Note (TAN) 23: Economic Development; Welsh Government (2019) Independent review of affordable housing supply: report, May 2019; Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; TAN 19 Telecommunications.	The NDF should use the natural resources available to ensure adequate provision of employment opportunities and increased economic activity.	The ISA Framework should address employment provision.	Population and Material Assets	3
Promote sustainable economic growth, diversity and business competitiveness	1, 2, 4, 6 and 7	European Spatial Development Perspective; The European Employment Strategy; The Aarhus Convention; Europe 2020: A strategy for smart, sustainable and inclusive growth	Local Growth: Realising Every Place's Potential (Local Growth White Paper); UK Plan for Growth; National Infrastructure Plan	Wales Spatial Plan; Economic Renewal: A New Direction; Third Sector Scheme; Volunteering Policy, Supporting Communities, Changing Lives; The Future of our Farming; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Capturing the Potential: A Green Jobs Strategy for Wales;	The NDF should encourage the creation of infrastructure and networks which enable business innovation and stimulates business growth. As this has the potential to conflict with environmental	The ISA Framework should include objectives relating to economic growth and development	Population and Material Assets	4

Themes relevant to ISA of Wales NDF	Relevant Goals ¹	Source					Main SEA Topics	Relevant ISA Objective
		International and European	UK	National	Implications for the NDF	Implications for the ISA		
				Wales Infrastructure Investment Plan; Vibrant and Viable Places New Regeneration Framework; PPW 10; Welsh Government Technical Advice Note (TAN) 4: Retail and Commercial Development; Technical Advice Note (TAN) 23: Economic Development; Welsh Government (2019) Independent review of affordable housing supply: report, May 2019; Welsh Government (2020) Estimates of Additional Housing Need in Wales (2019-based), August 2020; Welsh Government (2019); Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; Tan 19 Telecommunications.	sustainability aims, this should seek to be achieved within the boundaries of environmental limits, as reflected in the first well-being goal (a prosperous Wales).	within the context of the delivery of the green growth agenda, ecosystems services and environmental limits.		
Establish a strong tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	1, 2, 5 and 6		Heritage Protection for the 21st Century (2007)	PW 10; TAN13 – Tourism; Cultural Tourism Strategy for Wales; Wales Spatial Plan; Welsh Coastal Tourism Strategy; Partnership for Growth: The Welsh Government Strategy for Tourism 2013 – 2020; Welsh Language (Wales) Measure 2011; Cymraeg 2050: a million Welsh speakers ; Planning (Wales) Act 2015; One Wales – A Progressive Agenda for the Government of Wales; One Wales: Connecting the Nation; Capturing the Potential: A Green Jobs Strategy for Wales; Wales Infrastructure Investment Plan; Vibrant and Viable Places New Regeneration Framework; Welsh Government (2019) Summary statistics for economic regions: 2019; Welsh Government (2019) Prosperity for All: A Low Carbon Wales, June 2019; TAN 24 the historic environment.	The NDF should promote the use and enhancement of landscape, coastal, cultural and historic resources for tourism development, within environmental limits.	The ISA Framework should include reference to capitalising on the tourist economy nationally, capitalising on, but not threatening, the wealth of national environmental and cultural resources and attractions.	Population, Cultural Heritage and Landscape	13, 14 and 15

APPENDIX B

Baseline, Key Issues and Opportunities

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Abbreviations Used in this Appendix

Abbreviation	Definition
AONB	Area of Outstanding Natural Beauty
ASNW	Ancient Semi-Natural Woodland
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CO ₂	Carbon Dioxide
CSI	Core Subject Indicator
DBEIS	Department for Business, Energy and Industrial Strategy
Defra	Department for Environment, Food and Rural Affairs
EC	European Commission
FPI	Foundation Phase Indicator
GDP	Gross Domestic Product
GDHI	Gross Disposable Income
GVA	Gross Value Added
HBAI	Households Below Average Income
HMO	Houses in Multiple Occupancy
ISA	Integrated Sustainability Appraisal
LA	Local Authority
LCA	Landscape Character Area
LSOA	Lower Super Output Area
MCA	Marine Character Area
MCZ	Marine Conservation Zone
NDF	National Development Framework
NEET	Not in education, employment or training
NI	National Indicator
NLCA	National Character Areas
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides

Abbreviation	Definition
NRW	Natural Resources Wales
ONS	Office for National Statistics
NQF	National Qualifications Framework
NVZ	Nitrate Vulnerable Zone
PM	Particulate Matter
RIGS	Regionally Important Geodiversity Sites
SAP	Standard Assessment Procedure
SAC	Special Area of Conservation
SCA	Seascape Character Assessment
SME	Small to Medium Enterprises
SoNaRR	State of Natural Resources Report
SMP	Shoreline Management Plan
SPA	Special Protection Area
SPP	Statement of Public Participation
SSSI	Site of Special Scientific Interest
TAN	Technical Advice Note
TSA	Tourism Satellite Account
UNESCO	United Nations Educational, Scientific and Cultural Organization
WCVA	Wales Council for Voluntary Action
WIMD	Welsh Index of Multiple Deprivation

B-1. Introduction

This appendix provides the baseline social, economic, cultural and environmental data for Wales that is being used to help undertake the following aspects of the ISA:

- Identify the current baseline social, economic, cultural and environmental situation within Wales against which the likely effect of the NDF will be predicted;
- Identify key trends, issues and opportunities for the ISA and NDF to consider;
- Develop the ISA Framework to use for the appraisal of the NDF; and
- Ultimately assist the development of an ISA monitoring framework to monitor the significant effects of the NDF.

The appendix has been structured around each of the seven well-being goals. Within those goals, the baseline data has been sub-divided into a series of ISA topics. Each section is structured as follows:

1. Wellbeing Goal and identification of relevant ISA topics within it.
2. Overview of Baseline Conditions for each topic. This comprises:
 - a. The relevance of that topic to the NDF;
 - b. The baseline conditions and trends structured around the baseline data sets;
 - c. Any data gaps that are in the process of being filled; and
 - d. Identification of the relevant ISA Objectives and questions relevant to that topic.
3. Key Issues derived from the above that are relevant to the NDF and opportunities for it to address them.

Note on the baseline data sets

In the ISA the baseline data sets used are specific facts and statistics that are gathered by different organisations including, for example, the Welsh Government; the UK Government; or statutory bodies such as Natural Resources Wales (NRW), amongst others. These have been carefully selected to help give an appropriate overview of the baseline conditions and trends over time at a national scale and where necessary more detail on regional variations within Wales. Where possible, the Wales National Indicators have also been used as contextual indicators which are monitored regularly by the Welsh Government.

In relation to the National Indicators, the Well-being of Future Generations (Wales) Act 2015 requires that Ministers publish an annual progress report setting out the progress made by Wales as a nation over the past year towards the 7 well-being goals. The Annual Well-being report draws on the latest information available on the 46 National Indicators.

It is intended that the baseline data sets can be used as factual yardsticks to support the appraisal of the effects of the NDF against each of the relevant ISA Framework Objectives.

Ultimately, once the ISA is complete and the NDF is adopted, indicators will be produced to help monitor the predicted significant effects of the NDF as it is used.

There are hundreds of potential baseline data sets that could be used, many providing only subtly different information. As such, the selection of indicators for this ISA will be focussed, streamlined and reflective of the national scale and influence that the NDF is expected to have.

B-2. Well-Being Goal: A Prosperous Wales

This section provides baseline data relating to the following well-being goal:

‘An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.’

The data relates primarily to:

- The Economy, Employment and Income in Wales; and
- Education in Wales.

2.1 Overview of Baseline Conditions

2.1.1 The Economy, Employment and Income in Wales

Relevance to the NDF

A strong national economy is vitally important for securing people's wealth, jobs and incomes. This has a large contribution to the quality of life and the economic, social, cultural and environmental well-being of people and communities in Wales.

The NDF has a key role in developing the national economy, through helping to guide decisions relating to economic activity and its supporting infrastructure, through the planning process.

Baseline conditions and trends

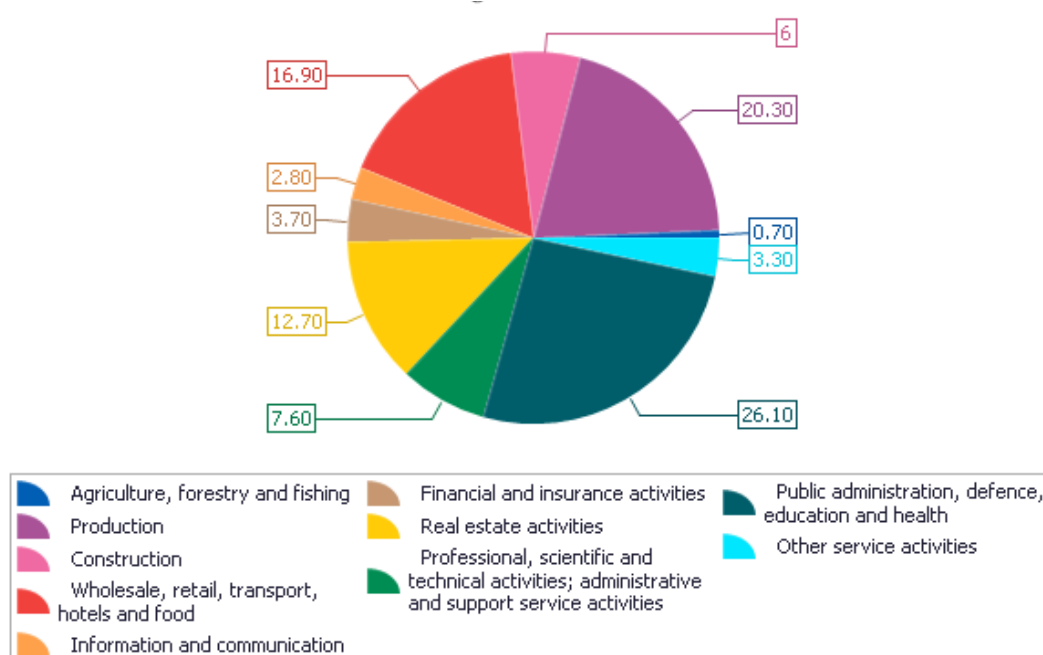
The economy of Wales is closely aligned with that of the rest of the UK. However, for a long time, economic output has been lower in Wales compared with other areas. In 2015, the GVA (a key measure of economic output) was £55.8 billion, or £18,002 per head. This was 71.0% of the average for the total of all UK regions, up from 70.5% in 2014. Wales had the lowest level of GVA per head in the UK (measured against the other UK regions), behind Northern Ireland and the North East, where GVA per head was 73.3% and 74.7% of the UK average respectively (Welsh Government analysis of Regional Accounts, ONS – 2015). GVA is rising, however the economic future of the whole of the UK is currently uncertain in light of the approaching exit of the UK from the European Union. Economists and politicians are currently divided over what this will mean for the UK, with many schools of thought suggesting a short-term economic downturn, with potential for higher growth in the longer term.

Over the past decade (2005-2015), GVA per head in Wales has increased by 20.5%, although this has been less than the overall UK level (24.5%) in the same period. Comparative trends are anticipated to continue in this manner, although with the caveat of uncertainty surrounding Brexit. The highest levels of output in 2015 were from Cardiff; the Vale of Glamorgan; Monmouthshire; Newport; Flintshire; and Wrexham, reflecting the larger proportion of industry, population and services in those areas. GVA per head is significantly lower across much of the rest of Wales, reflecting its more rural nature. The Isle of Anglesey recorded the lowest GVA per head (£13,411). The fastest growth over the last decade has been in the Central Valleys region (all figures from Stats Wales).

In 2015, GVA per hour worked in Wales was 19% below the UK average – making it the joint lowest region in the UK alongside Northern Ireland. This reflects a lower than average level of productivity in Wales (ONS).

The second half of the 20th century saw a significant decline in the traditional manufacturing and extractive industries in Wales with a move towards service sector employment. The modern Welsh economy is now dominated by the service sector including public health, education, defence and administration, accounting for over half of the total Wales GVA. Figure 1-1 shows the split of GVA per industry.

Figure 1-1 Gross Value Added in Wales by industry (%)



Source: Stats Wales (2015)

After the service industry, the next largest group is the 'Production' industry. Whilst heavy industry has been in decline, Wales still has a diverse manufacturing sector. This includes:

- Metal ore refining at plants in, for example, Port Talbot, Llanwern, Newport, Trostre, Shotton, Ammanford, Pontardulais, Tafarnaubach and Caerphilly;
- Oil refining at Milford Haven;
- Automotive component production; and
- Growth in the electronics industry.

Rural economy

Wales is largely rural in nature, so agriculture and forestry represent a large area of economic land-use. This is dominated by beef, sheep and dairy farming on relatively small farms, compared to the rest of the UK. Economic output from these industries is, however, relatively small.

Tourism

With its rich natural and cultural assets, tourism is also a significant and growing part of the national economy. Cardiff, in particular, is a primary tourist destination due to its large number of high-quality attractions. This brings income and employment opportunities for a range of associated businesses such as hotels, food and retail outlets. The Wales Tourism Satellite Account (TSA) estimated a total tourism GVA of £1.8bn – around 4.4% of total direct GVA for the Welsh economy in that year. Emerging research suggests that when indirect impacts are added, the Tourism GVA increases to £2.5bn, which represents 6% of the whole economy (The Welsh Government Strategy for Tourism 2013 – 2020).

Third sector

The third sector, as defined by the Wales Council for Voluntary Action (WCVA), is a very diverse range of organisations including voluntary organisations and social enterprises that share a set of values and characteristics. There are between 52,800 and 79,200 posts in the third sector, equivalent to between 4% and 7% of all jobs in Wales (WCVA Statistical Resource 2012).

The value of the third sector has been estimated by WCVA by adding the value of volunteer time (provided by organisations – an estimated 145 million hours is given in a year and this has a monetary value of £1.7 billion), to the overall income of organisations (£2.0 billion third sector income). When the monetary value of

volunteer hours is added to the overall income of the third sector, this gives £3.7 billion which is equivalent to 6.8% of Wales GDP (WCVA Statistical Resource 2012).

SMEs and Micro-businesses

In 2016, there were an estimated 250,100 enterprises, the highest estimate since the start of the series in 2003. There was a steady annual increase from 2009-2016 and this trend is likely to continue (StatsWales). The overall increase was largely attributed to growth in the micro size-band enterprises - 0-9 employees (up to 49%). This could be a result of the recent labour market conditions, which may have encouraged people to set up businesses, as they are made redundant (for example). Regionally, micro enterprises in 2016 accounted for 94.3% in North Wales; 95.7% in Mid Wales; 94.1% in South West Wales and 93.8% in South East Wales. The agriculture, forestry and fishing sector had the smallest proportion of total employment in SMEs in Wales at 4.9 per cent. This suggests a major bias towards urban areas for SMEs and micro-businesses, with very few in rural areas (Stats Wales).

Innovation

The Welsh Government also monitors the levels of innovation in the economy. It identified that in 2015, 51% of Welsh businesses were innovation active, comparable to levels in Scotland, but just behind England (54%) and ahead of Northern Ireland (Welsh Government).

Economic Activity

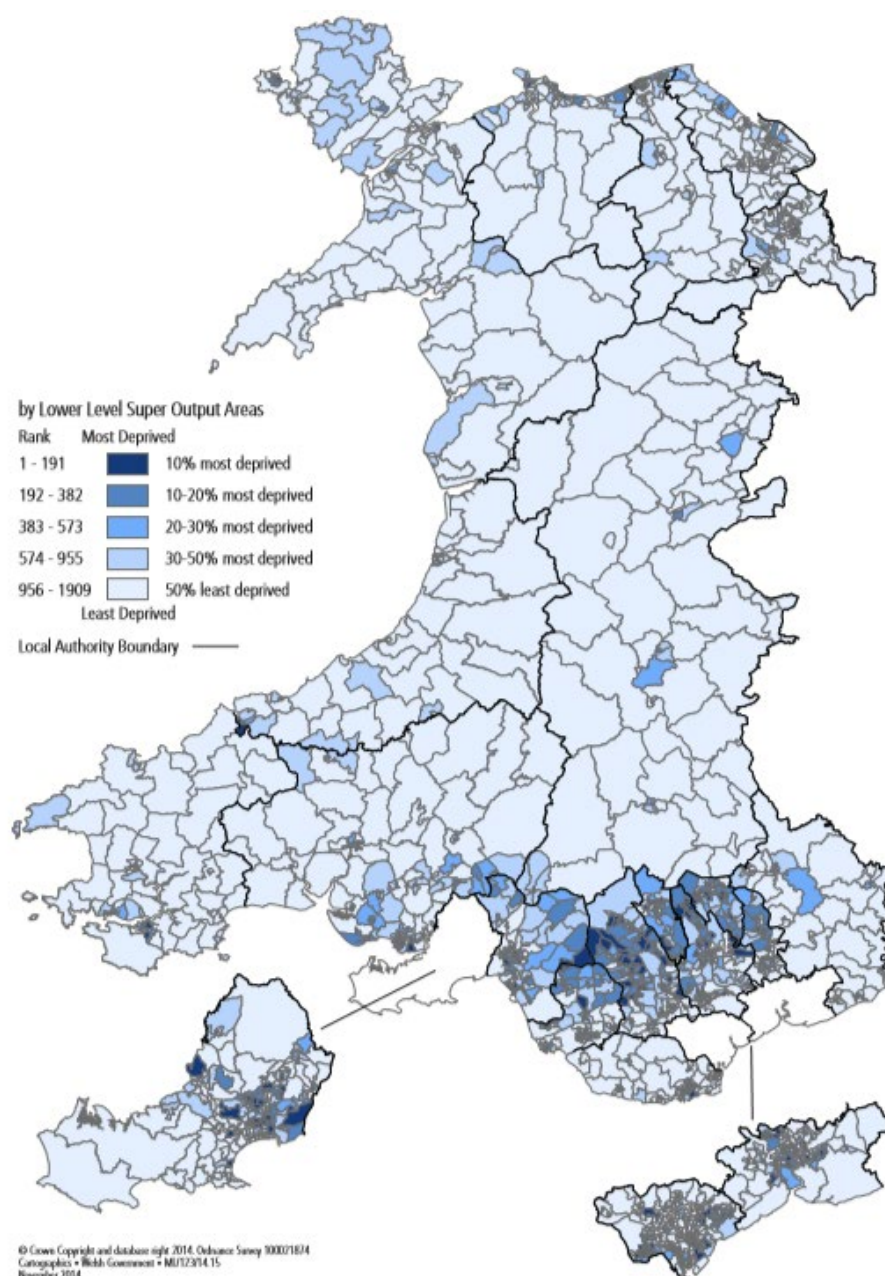
The 2010, the Welsh Government publication, *Economic Renewal: a new direction*, identified two important factors responsible for Wales weaker economic position compared to the rest of the UK. These are a low employment rate and low average wages (reflecting low average productivity).

In November 2016, the number of people economically active had increased in Wales over the past decade by 1.9% from 74% to 75.9% (between Nov 2006 – Nov 2016). Whilst similar to the UK, the national trend of growth in Wales has been below the UK average over this period – the UK average was 78.3% in November 2016. For Wales, the drop in those economically active has come mainly from men; with the number for males dropping 0.5% and females 4.1% over the last ten years (NOMIS/Stats Wales). The future direction of this trend is likely to be affected by the outcome of Brexit.

According to the Welsh Index of Multiple Deprivation (WIMD)¹ 2014 employment domain (see Figure 1-2), the highest levels of employment deprivation were in the South Wales valleys and in some North Wales coastal towns. In terms of local authorities, Merthyr Tydfil recorded the highest proportion of LSOAs in the most 10% in Wales for the employment domain. Monmouthshire had no LSOAs in the most deprived 10%.

¹ The WIMD ranks each of the 1909 Lower Super Output Areas (LSOAs) in Wales in terms of the level of deprivation that LSOA exhibits for a given domain. Those ranked in the bottom 191 LSOAs are, therefore, in the 10% most deprived nationally.

Figure 1-2 WIMD 2014 Map for Wales, Employment Domain



Source: WIMD 2014

Education/ Training

The Welsh Government also publishes data on the learning activities and labour market status of young people (aged 16 to 24) in Wales. The provisional data series for 2015 further focuses on the proportion of young people who are not in education, employment or training (NEET) in Wales.

In terms of 16-18 year olds, around 79.5% were in education or training (down from 80.1% in 2014) and 33.2% were in full or part-time employment (up from 31.8% in 2014). In addition, 10.5% of 16-18 year olds were reported as NEETs, which is fall of 0.3% from the previous year.

Since 2004, the proportion of 19-24 year olds in education or training has remained around a similar level (37 to 39 per cent), whilst the proportion who are NEET increased to higher levels, following the start of the 2008 recession, reflecting contracting employment levels. There has, however, been an increase in employment, and a decrease in the proportion who are NEET in the last 3 successive years. As with many economic statistics, the immediate future direction of this trend is likely to be influenced by Brexit.

In terms of 19-24 year olds, around 37.6% were in education or training (down from 38.2% in 2014) and 61.2% were in full or part-time employment (up from 60.3% in 2014). In addition, 19% of 19-24 year olds were reported as NEETs which is fall from 20.4% from the previous year.

Earnings

In April 2016, the average (median) weekly earning in Wales was £492.40. This has increased from £478.60 in April 2015 and is anticipated to continue to grow steadily. However, this compares to a UK average of £538.70.

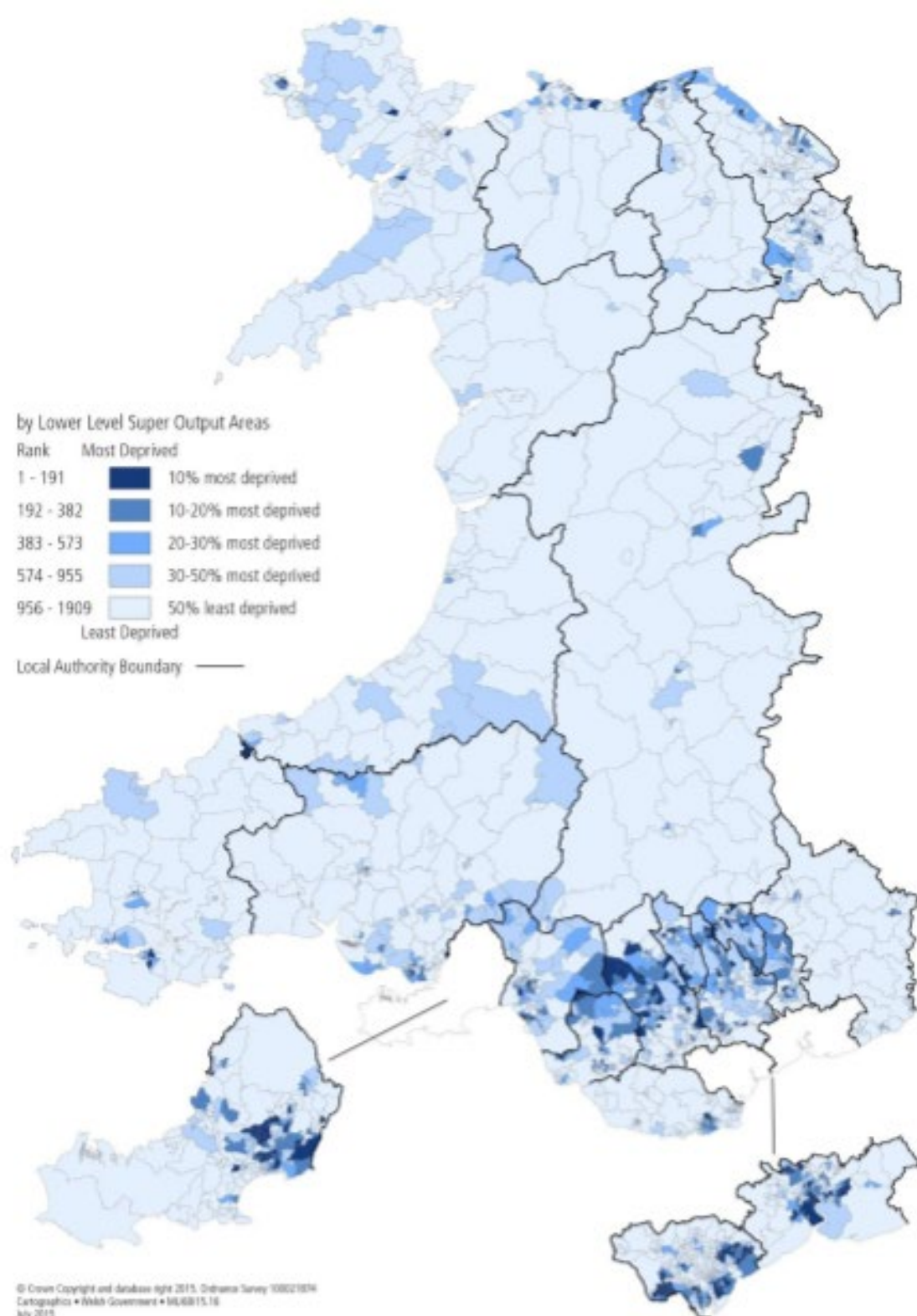
The highest average earnings were in the South East and West Wales economic regions, followed closely by the North Wales economic region with the Mid Wales region significantly lower (Stats Wales).

In Wales, 62.2% of people in employment were either on permanent contracts (or have a temporary contract and are not seeking permanent employment) and were earning more than two thirds of the UK median wage for August to October 2016 (Welsh Government Statistical Bulletin Feb 2017).

UK total Gross Disposable Household Income (GDHI) in 2014 was £1,160 billion. Of that, Wales accounted for 4.1% (which was the 3rd lowest out of all the UK regions). Wales experienced a growth in overall total GDHI growth in 2014 by 0.3% from the previous year (ONS 2016). Low income is a key concern nationally, which the Welsh Government is looking to improve.

The WIMD 2014 income domain (see Figure 1-3) focuses on the proportion of people with income below a defined level and has a weight of 23.5% in the overall index. In the WIMD 2014 income domain, there were pockets of high deprivation in the South Wales valleys, and in some North Wales coastal towns. The local authority with the highest proportion of LSOAs in the most deprived 10% in Wales, for the income domain, was Newport (20%). Powys and Monmouthshire had no LSOAs in the most deprived 10%.

Figure 1-3 Overall Income Deprivation Map for Wales

**Notes**

(r) This map was revised on 12 August 2015 following provision of revised data by the Department for Work and Pensions (DWP).

Source: WIMD 2014

Job Satisfaction

In 2013-14, respondents (to the National Survey of Wales) were asked how satisfied they were with their present job. On a scale of 0-10, the average satisfaction score was 7.5. There appears to be a strong correlation between satisfaction with present job and satisfaction with commuting time. 66% of people who were highly satisfied with their present job were also highly satisfied their commuting time.

Broadband

Whilst the coverage of internet access is growing, speeds and, in particular, access to superfast broadband can be a particular issue in rural communities, particularly amongst those with low incomes (National Survey for Wales, 2014-15). Poorer households across Wales are less likely to have internet access in their home. This is exacerbated in rural areas by relatively poor access to good quality broadband (Rural broadband ICT Toolkit, Welsh Government). Over time, it is anticipated that the coverage of high speed broadband will improve.

Data Gaps

No significant data gaps have been identified for this topic at this stage.

2.1.2 Education in Wales

Relevance to the NDF

Education is a fundamental factor in developing people's skills, both for future employment and for life in general. Improvements in educational attainment are directly linked to increased incomes, employment and overall economic growth. In particular, education and training to meet the skill-sets required to grow the economy are of greatest importance.

The NDF has a key role to play in educational development through helping guide decisions through the planning process relating to educational facilities, training promotion and job creation which overall contributes to a healthy economy.

Baseline conditions and trends

Educational attainment in Wales is slightly below the UK average. The proportion of adults of working age holding Higher Education or equivalent level qualifications (NQF level 4 or above) in 2015 was 36%, compared with 35% in 2014. Wales is below the UK average level for NQF level 4 (which is 36%). However, Wales is above Northern Ireland (31%) and some other UK regions. Over 75% of adults were qualified to NQF level 2 or above.

The trend is rising, with a more than 25% increase in NQF level 4 attainment in working age adults since 2008, with the greatest rises being amongst women.

In terms of regional distribution, adults in Mid Wales had the highest level of qualifications, whereas adults in South West Wales had the highest number of adults with no form of qualifications. This is presented in Table 1-1. More specifically, qualification levels were highest in Cardiff, Monmouthshire, and Vale of Glamorgan and lowest in Blaenau Gwent, Merthyr Tydfil and Neath Port Talbot.

Table 1-1 Percentage of adults with qualifications at the different levels of the NQF

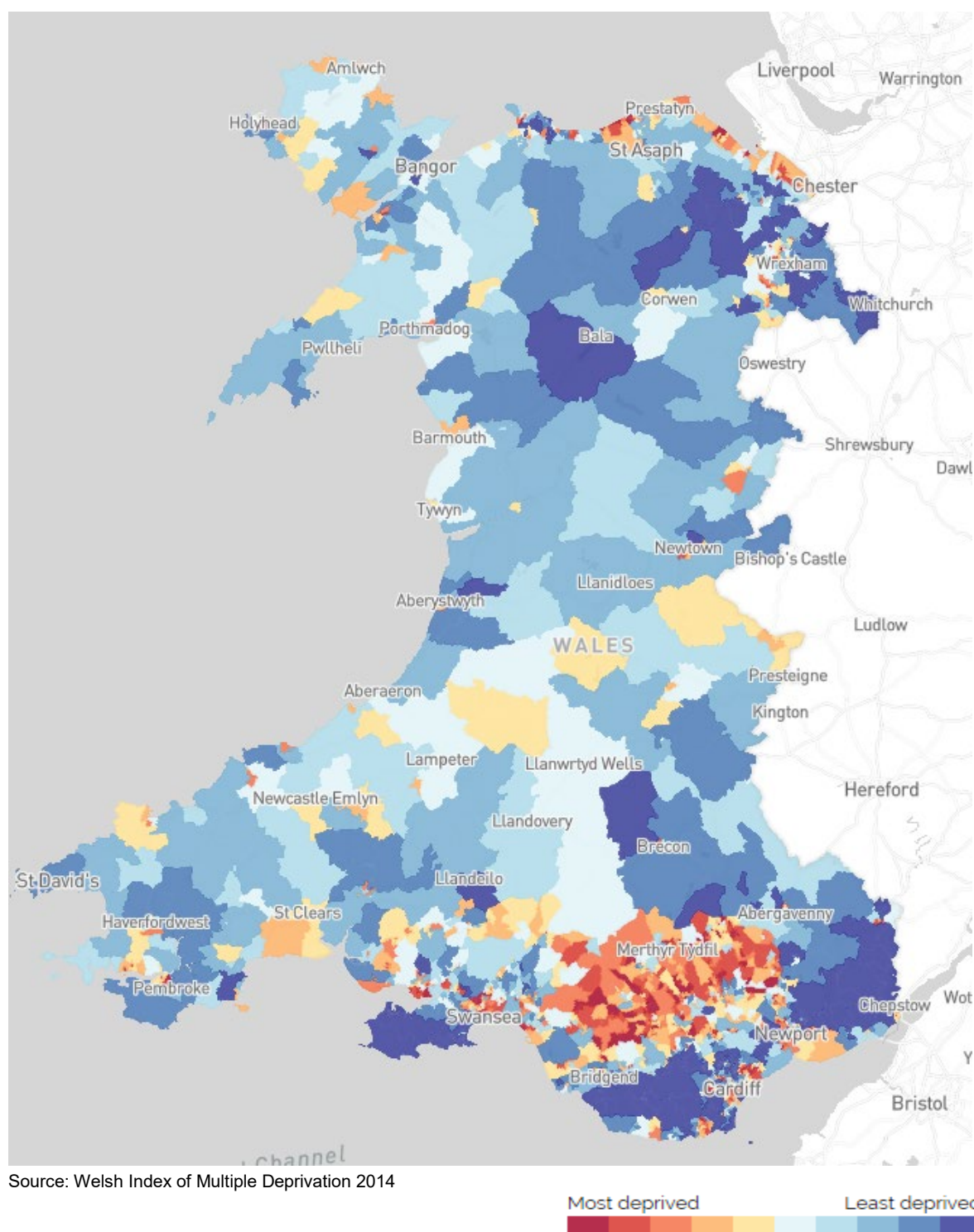
Area	No qualifications	Qualified to below level 2	Qualified to NQF level 2 or above	Qualified to NQF level 3 or above	Qualified to NQF level 4 or above
Wales	10.2%	13.5%	76.2%	56.6%	35.8%
North Wales	7.9%	14.1%	77.9%	56.9%	36.0%
Mid Wales	6.9%	9.9%	83.2%	62.8%	38.1%
South West Wales	12.5%	13.6%	73.9%	53.5%	33.5%
South East Wales	10.7%	13.7%	75.6%	57.0%	36.3%

Source: Stats Wales

In terms of core subjects only (English/Welsh language, mathematics or science), in 2016, 88.6% of pupils achieved a Core Subject Indicator (CSI) level of 4 or above – which was an increase of 0.9% since 2015 and the highest on record. Science had the highest percentage of pupils achieving the expected Key stage 2 Level or above. This has always been the case since figures started to be collected in 1999.

The distribution of LSOAs and their relative deprivation in the education domain illustrates regional variation in educational attainment and access to education. This is shown in Figure 1-4 below.

Figure 1-4 Education Deprivation for LSOAs in Wales



The South Wales valleys are the most educationally deprived area of Wales. This area includes the local authorities of Merthyr Tydfil, Blaenau Gwent and Rhondda Cynon Taff. There are also parts of the urban areas of Cardiff, Newport and Swansea that are suffering from education deprivation. Parts of Monmouthshire, Powys, Vale of Glamorgan and the North-East corner of Wales exhibit relatively low levels of education deprivation.

The development of young people in Wales is also monitored. The statutory curriculum for all 3 to 7 year olds, in both maintained and non-maintained settings is measured as the Foundation Phase Indicator (FPI).

The Foundation Phase has 7 areas of learning, which are delivered through practical activities and active learning experiences both indoors and outdoors. The areas of learning are:

- Personal and social development, well-being and cultural diversity;
- Language, literacy and communication skills;
- Mathematical development;
- Welsh language development;
- Knowledge and understanding of the world;
- Physical development; and
- Creative development.

The percentage of pupils achieving an FPI Outcome of 5 or above has increased every year since 2012, when the measure was introduced. This percentage was 87% in 2016 – which is the highest figure on record and shows a rising trend, although the increase between 2015 and 2016 was slightly smaller than previous years.

Data gaps

No significant data gaps have been identified for this topic at this stage.

2.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

The economy of Wales is closely aligned with that of the rest of the UK. There has been a move towards service sector employment and a decline in heavy industry; Wales still has a diverse manufacturing sector.

Economic productivity per head is below the UK average.

Relatively low employment rates and low earnings compared to other parts of the UK although these have been increasing.

There are clear geographical differences in employment activity in Wales with pockets of higher than average deprivation in the South Wales valleys and in some North Wales coastal towns.

Key reasons for this relatively poor economic performance include:

- Relatively low skills levels and poor educational attainment levels (although improving), particularly in the more deprived parts of the country.
- The largely rural nature of the country results in relatively small urban areas which would otherwise be more strongly associated with agglomeration effects.
- There is a relatively high proportion of older people who are retirement age.

Opportunities

The NDF has a role to play in the promotion and diversification of economic growth through guiding the planning system. This can be through the promotion of appropriate employment development and supporting infrastructure in areas to maximise their benefits including connective infrastructure. It can also provide a framework that is more responsive to the needs of the economy and able to support new, emerging sectors and support transition of existing ones. Furthermore, it can also help to guide the creation of an environment that is attractive to inward investment and encourages sustainable access to jobs. As part of this, it should seek to address the geographical differences within the country. Similarly, the NDF can help guide improvements to educational provision and access and in particular seek to address geographical disparities.

Other sector-specific opportunities include:

- Opportunities for the development of the rural economy could be supported through the NDF alongside programmes geared specifically towards rural areas such as the *Rural Development Programme 2014-*

2020. Furthermore, opportunities could be sought through the NDF to support the growth of the rural economy through new micro and small enterprises.

- Access to high speed internet can be a particular issue in rural communities and for those with low incomes. The NDF could help to address digital exclusion by seeking to support the delivery of high speed connections.
- There are opportunities for tourism to grow in a sustainable way and to make an increasing contribution to the economic, social, cultural and environmental well-being of Wales.

Overall, the NDF must help to achieve the important balance of economic and social improvement that is also sustainable and respects the country's valuable natural and cultural environment.

2.3 Relevant ISA Objectives and Questions

The Economy of Wales

4. To promote sustainable economic growth, diversity and business competitiveness

- Encourage economic growth?
- Encourage diversification within the economy and encourage new business formation and inward investment?
- Encourage businesses who are innovation-active?
- Encourage and promote sustainable tourism, sensitively capitalising on environmental, cultural, heritage and leisure assets?
- Support enhancements to the rural economy and rural diversification (including agriculture, SMEs, micro businesses and the development of digital connectivity)?
- Maintain and encourage third sector activities?

3. To create opportunities for an increase in employment across the country and promote economic inclusion

- Encourage and support opportunities to increase employment?
- Support an improvement in physical access to jobs through land use planning initiatives?
- Create opportunities for an increase in the number of people who are satisfied with their job?
- Encourage new investment and a growth in the number of skilled workers?

Education in Wales

1. To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life

- Encourage and support an increase in levels of participation and attainment in education for all members of society?
- Encourage and support an improvement in access to lifelong learning opportunities?
- Encourage and support an improvement in the provision of education and training facilities through land use planning initiatives?

B-3. Well-Being Goal: A Resilient Wales

This section provides baseline data relating to the following well-being goal:

'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).'

The data relates primarily to:

- Air Quality;
- Biodiversity, Flora and Fauna;
- Climate and Flood Risk;
- Geology and Soils;
- Water Environment; and
- Minerals and Waste.

3.1 Overview of Baseline Conditions

3.1.1 Air Quality

Relevance to the NDF

Clean air is important for both human health and the health of the natural environment. The UK's air is cleaner in overall terms since the start of the Industrial Revolution. However, poor air quality still causes adverse health effects. It is estimated that the life expectancy of every person in the UK is reduced by an average of 7-8 months due to air pollution². Air pollution can directly affect vegetation (e.g. through exposure to sulphur dioxide or high levels of ozone), or indirectly affect the wider environment through pollutant deposition. Deposition of pollutants can adversely affect the acid and nutrient status of soils and waters, which, in turn, can affect habitat integrity and the fauna and flora they support. The introduction of environmental protection legislation has led to significant changes in the way air quality is managed and controlled, although the planning system also has a large role to play.

The NDF can affect air quality through helping to guide decisions through the planning process relating to the location of polluting sources relative to sensitive receptors such as residential areas, schools and hospitals and by helping to minimise pollution from transport, through minimising the distance travelled and encouraging more sustainable modes of transport. Landscaping and environmental policies could also encourage the reduction of the effects of pollution through sequestration.

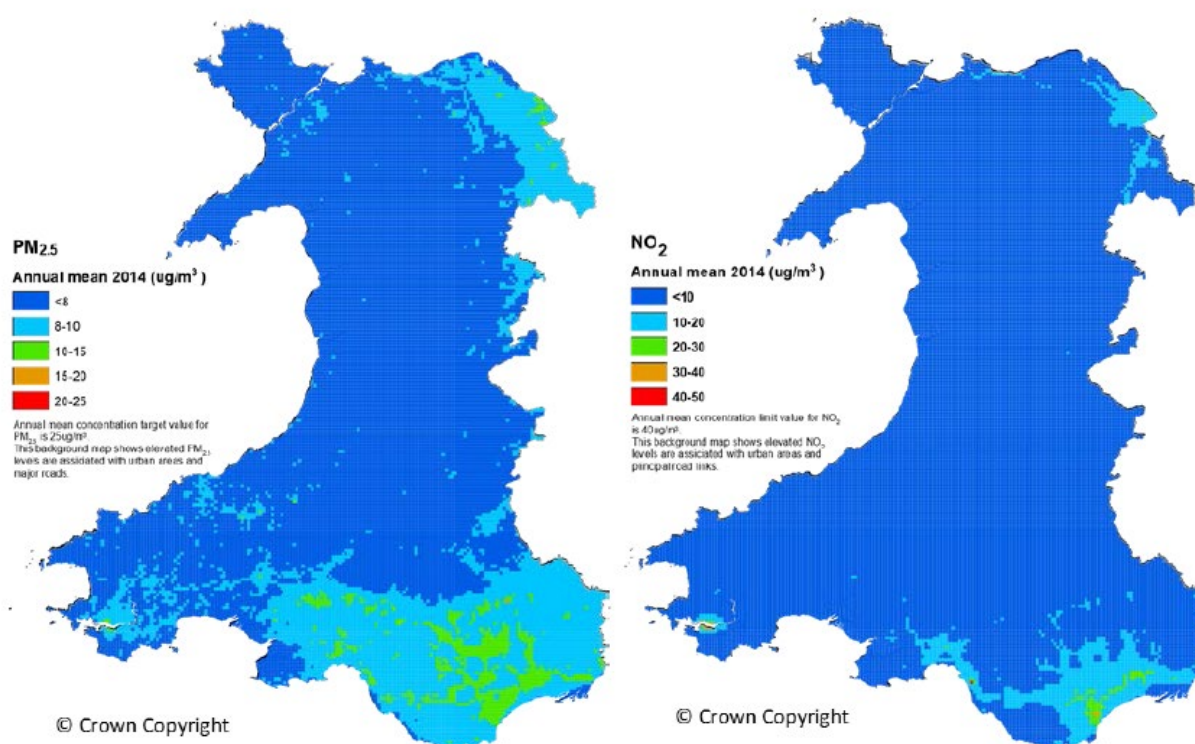
Baseline conditions and trends

Air pollution is a local, national and international problem caused by the emission of pollutants. In Wales, air quality is generally very good, largely due to its predominantly rural nature and historic decline in heavy industry which has resulted in a reduction in emissions of some pollutants, such as particulate matter (PM) and Nitrogen Dioxide (NO₂). However, there are some parts of the country that experience highly elevated levels of localised pollution, notably due to road traffic. Targets for NO₂, PM, nickel and polycyclic aromatic hydrocarbons are still being breached in certain parts of Wales thereby posing a threat to human health and the natural environment (SoNaRR, 2016).

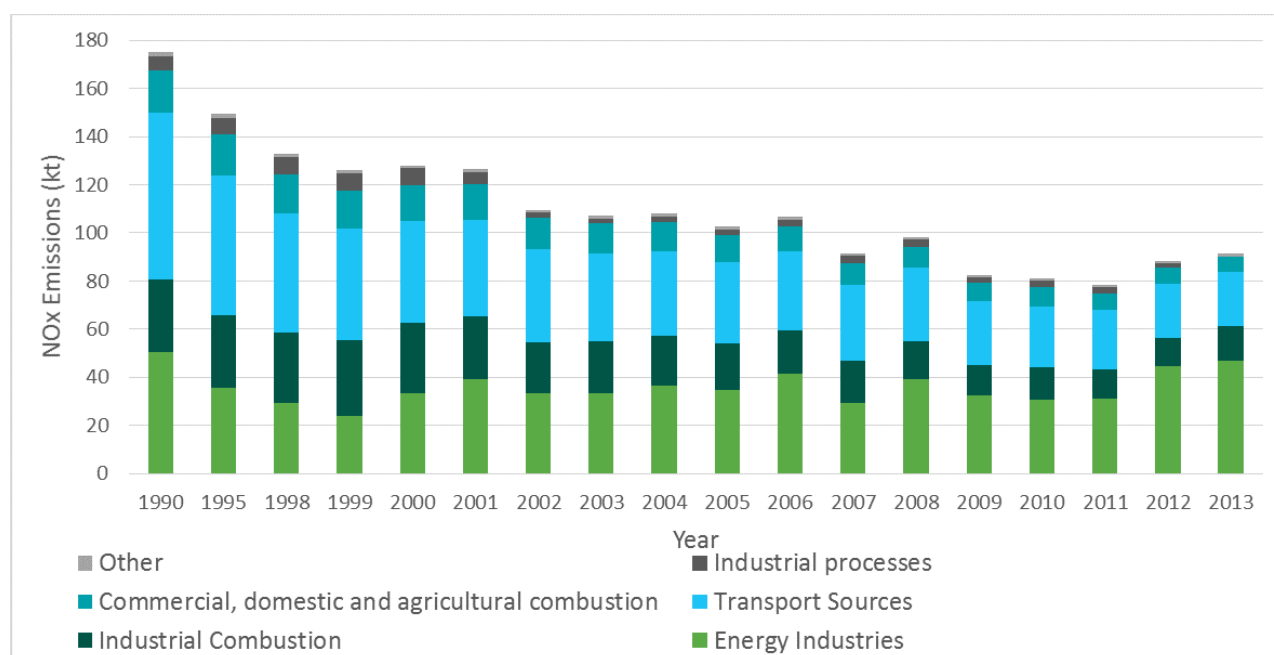
There are currently 38 designated Air Quality Management Areas (AQMAs) in Wales all of which are found in the south particularly centred around urban centres such as Cardiff, Newport and Swansea and relate to vehicle emissions. However, one area of elevated air pollution from an industrial source also exists associated with Port Talbot, where Tata Steel is located (Defra, 2017). Only four designated AQMAs have been revoked in Wales, with the last AQMA being revoked in 2015 in Rhondda Cynon Taff. The other three revocations occurred in Cardiff in 2007 (two AQMAs revoked) and 2013. Figure 2-1 illustrates the highest concentrations of PM and NO₂ nationally.

² Defra in partnership with the Scottish Executive, Welsh Assembly Government and the Department of the Environment Northern Ireland (2007) the Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Volume 1.

Figure 2-1 $PM_{2.5}$ and NO_2 concentrations in Wales (SoNaRR, 2016).



Levels of Nitrogen Oxides (NO_x) emissions have seen a significant decrease of over 50% between 1990 and 2013. The major contributor to NO_x emissions is the energy industry, however, the largest decrease in emissions between 1990 and 2013 was recorded by transport sources (see Figure 2-2).

Figure 2-2 Wales nitrogen oxides (NO_x) emissions by source sector (Defra, 2017)

Over time, air pollution is expected to decline as a result of continued regulation and, in particular the uptake of cleaner vehicle technologies. However, the volume of road traffic is expected to increase in the future.

Ammonia also remains an issue, both as a local air pollutant and as a contributor to the formation of secondary particulate matter. Concentrations of secondary particulate matter have risen in Wales in recent years, largely due to changes in agricultural practice. Indeed, 90% of semi-natural nitrogen sensitive Welsh habitats are subject to nitrogen deposition in excess of critical load limits (SoNaRR, 2016).

Data gaps

No significant data gaps have been identified for this topic at this stage.

3.1.2 Biodiversity, Flora and Fauna

Relevance to the NDF

Biodiversity refers to the variety of all living organisms. It can be seen at a number of levels, in terms of the diversity within species, the diversity between different species, and the diversity of different ecosystems (i.e. the environments within which species live). High levels of diversity ensure habitats and species are more robust and able to cope with changes in the environment, both in terms of natural fluctuations and those caused by human activity, therefore supporting their long-term survival.

Ensuring the protection of biodiversity, including important marine and terrestrial habitats, species and protected sites, as well as biodiversity in general (including non-designated sites) and its resulting benefits in terms of ecosystems services, in turn, will have benefits to an improved economic and social health of an area. Therefore, conserving biodiversity not only fulfils our global responsibility but will improve the quality of life for Wales' residents and help maintain its attraction as a place to live and visit.

The NDF can significantly influence biodiversity through helping to guide decisions through the planning process to ensure features of ecological importance, as well as their connectivity and the ecosystems services they provide, are protected and enhanced.

Baseline conditions and trends

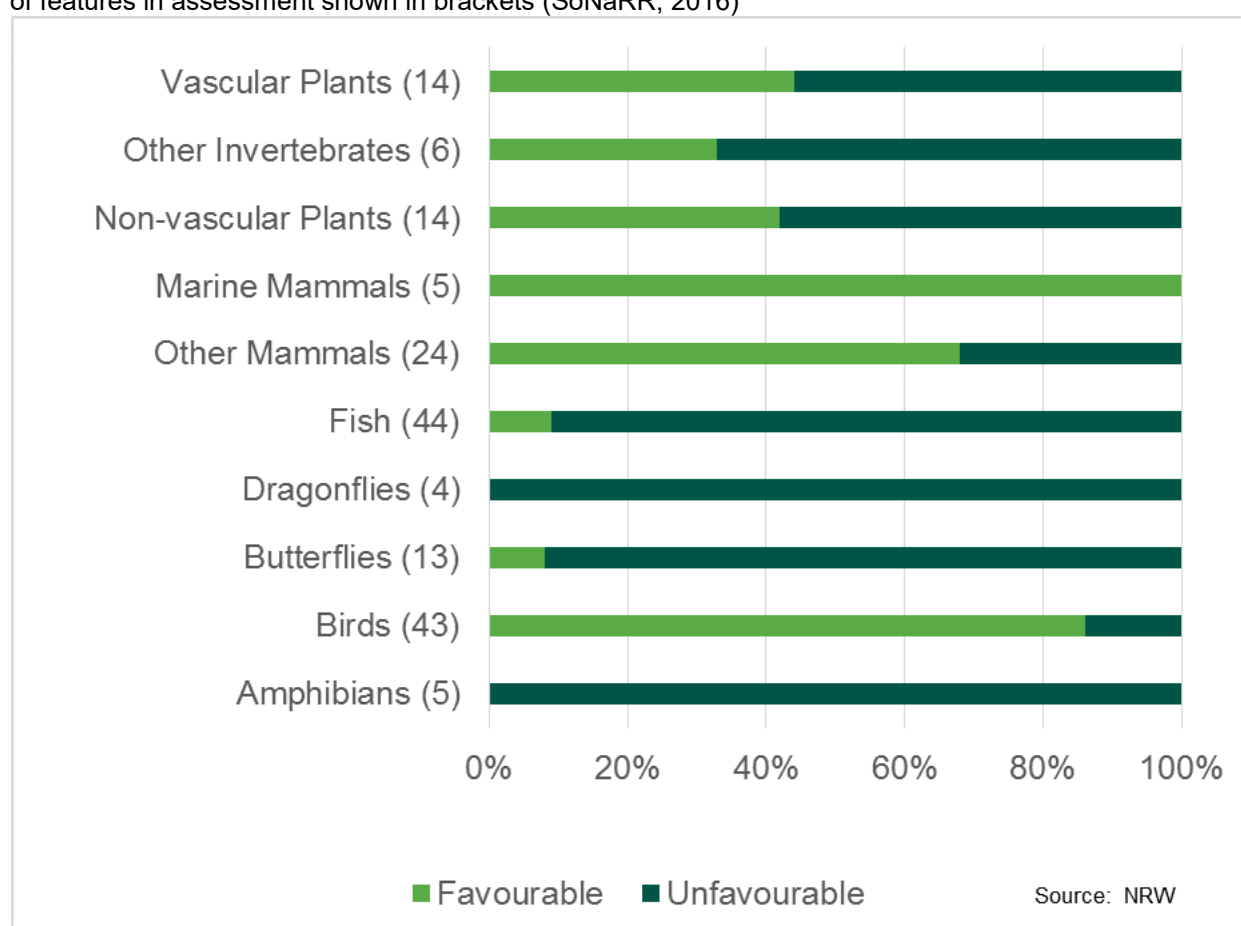
The land area of Wales covers 2,078,224 ha. The Welsh marine area extends out to 12 nautical miles, covering just under 15,000 km² or 41% of the territory of Wales.

Wales has a wide representation of species across a broad range of taxonomic groups with estimates varying from 25,000 to 50,000 different species of animals, plants and other organisms. There are 20 Special Protection Areas (SPAs) for internationally important populations of birds and 92 Special Areas of Conservation (SACs) for other threatened species and natural habitats. 562 of the total 1,016 Sites of Special Scientific Interest (SSSI) (as of 2010) have individually qualifying species and 54 have species assemblages which qualify. Many of the same species are also found on sites that qualify for their habitat. The list of species and habitats of principal importance in Wales (the interim Section 7 list) includes 557 species (SoNaRR, 2016).

Species

The 2013 reports on the Annexes of the Habitats Directive and Birds Directive summarise the UK status and trends of the selected habitats and species and are important evidence resources. A summary of the Welsh results for species is presented in Figure 2-3.

Figure 2-3 Overview of condition of Habitat and Bird Directive species features on SACs and SPAs. Number of features in assessment shown in brackets (SoNaRR, 2016)



From monitoring data collected for species features on Natura 2000 sites, the overall condition of SAC and SPA species features on these sites in Wales, as reported in 2013, was mostly unfavourable (55%) with the exception of birds and mammals of which 86% and 68% were in favourable condition respectively.

In Wales, the interim Section 7 list of the Environment (Wales) Act has 557 species and 55 habitats of principle importance. These were originally selected for the Section 42 list of the Natural Environment and Rural Communities Act 2006 for prioritised action from the UK Biodiversity Action Plan using criteria based on the level of threat they face, the level of responsibility in Wales for their populations and whether remedial action could be taken to improve their status. The list includes species as diverse as slow-worm (*Anguis fragilis*), hornet robber fly (*Asilus crabroniformis*) and long-snouted seahorse (*Hippocampus guttulatus*).

An assessment of the status of some of the interim Section 7 species in comparison to their condition at the time of the last Biodiversity Action Plan report in 2008 is shown in Box 1 below.

Box 1 Assessment of the state of some of the Welsh priority species at broad taxonomic group level (SoNaRR, 2016).

Of the 104 invertebrate species listed as priorities, 67 were assessed. 21% of these were declining, the outlook was improving for 25%, and the remaining 54% showed little change in their status.

83 vertebrate species appear on the list of priority species and we assessed 78 of them. 37% of these were declining and the outlook was improving for 21%. The remaining 42% showed little change in their status.

Of the 87 fungi and lichens listed as priorities, 55 were assessed. 29% of these were declining, the outlook was improving for 27% and the remaining 44% showed little change in their status.

52 bryophytes feature on the priority species list and we assessed 49 of them. 47% of these were declining, the outlook was improving for 24% and the remaining 29% showed little change in their status.

The latest studies (2015) suggest that climate change may pose more of a threat to UK species than had been previously realised. A study of the impact of the 1995 drought on butterfly abundance showed that some widespread species, including large skipper (*Ochlodes sylvanus*) and green-veined white (*Pieris napi*), were particularly drought-sensitive. The impact of extreme weather events is also relevant to many invertebrates and birds on a yearly basis.

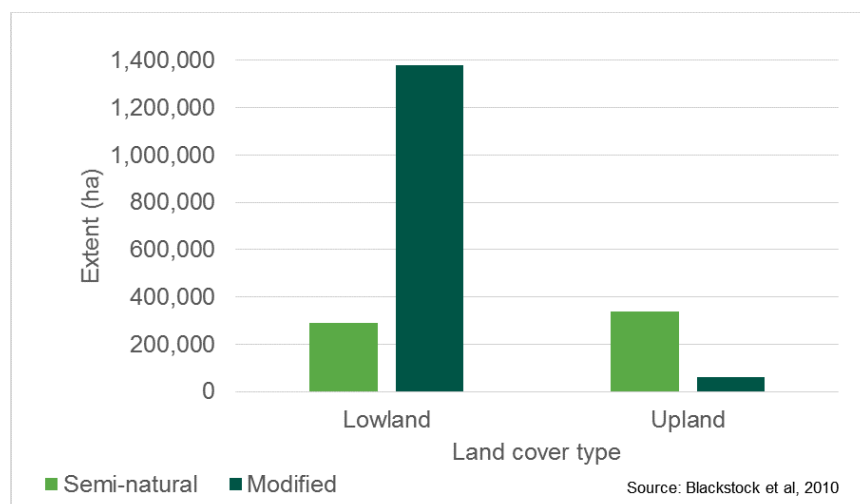
Climate change impacts such as acidification, sea temperature rises and extreme weather events have the potential to affect marine species through a number of factors including prey population dynamics, reproduction and distribution.

Habitats

The Habitat Survey of Wales provides complete coverage of the country and was undertaken between 1979 and 1997. More detailed information for habitats which are a priority for conservation measures is provided by NRW's ongoing Phase 2 Habitat Survey.

The land-cover of Wales can be divided broadly into semi-natural habitats and modified land-cover types. Semi-natural habitats retain many of their characteristic species. Modified land-cover types include the built environment as well as land where ecological processes and species composition have been hugely altered, for example, improved grassland, arable land and conifer plantations. The representation of semi-natural habitat varies significantly across Wales. The Welsh lowlands are highly modified as shown in Figure 2-4. Of the lowlands 17.3% is semi-natural habitat, whereas of the upland area 84% is semi-natural habitat. Semi-natural habitats in Wales cover a total of 626,100 ha (30% of the Welsh land surface) (SoNaRR, 2016).

Figure 2-4 Summary of the representation of semi-natural habitats and modified land-cover types in Wales.



The extent, condition and trends of terrestrial species in Wales are influenced primarily by habitat management and by climate change. Habitat management directly influences plant community composition, amounts of bare substrate, shading and vegetation structure. Shading due to scrub encroachment, following changes in grazing regime, can be as damaging for butterflies and many other species groups as overgrazing or agricultural improvement. These effects are compounded by direct habitat loss which leads to fragmentation of suitable habitat types or conditions and the increasing influence of nutrient enrichment which leads to changes in plant communities and patterns of growth. As above, climate change is also a significant threat to both habitats and the species they support (SoNaRR, 2016).

Habitats of Principle Importance

In Wales, the interim Section 7 list has 55 habitats of principle importance, which were originally selected for the Section 42 list of the Natural Environment and Rural Communities Act 2006. These habitats cover terrestrial, freshwater and marine. They include blanket bog, ponds and seagrass beds and were selected for prioritised action from the UK Biodiversity Action Plan (BAP) using criteria based on the level of threat they face, their relative importance as habitat in Wales and whether remedial action will be able to improve their status. Terrestrial habitats of principle importance extend over a total area of 387,300 ha. The most extensive of these in Wales (each with a resource of greater than 30,000 ha) include upland heathland, blanket bog, upland oak woodland, purple moor-grass and rush pasture, lowland dry acid grassland and coastal and floodplain grazing marsh. However, some key habitats of conservation importance are scarce, small in extent and highly vulnerable. Marine Intertidal BAP habitats extend over 15,000 ha. The most extensive intertidal BAP habitat, mudflats, covers over 14,000 ha and is found all around the coast of Wales. Honeycomb worm reefs cover 476 ha and are mainly found in South and West Wales. More than 50% of all BAP habitats were in decline in Wales in 2008 (SoNaRR, 2016).

Ancient Woodland

The area of Ancient Woodland in Ancient Wood Inventory (AWI) 2011 is 33,000ha (53 percent) greater than in AWI 2004. Largely, the revised figure consists of Ancient Semi-Natural Woodland (ASNW) in private ownership (29,000ha). 5,000 ha more Ancient Woodland has been identified on the Welsh Government Woodland Estate managed by Natural Resources Wales, compared with the AWI 2004. The AWI shows that South Wales Valleys and South Powys are the most populous ancient woodland areas. Most of these woodland resources are designated Plantations on Ancient Woodland Sites (SoNaRR, 2016).

European and UK Protected Sites

European protected sites are designated either as exemplars of listed habitat and species types or specifically to conserve wild birds that are listed as rare and vulnerable. The protection of these sites makes a significant contribution to conserving the habitats and wildlife species that live there. Protected sites also exist in the marine environment, and work continues to ensure these sites contribute to an ecologically coherent network of marine protected areas in UK seas.

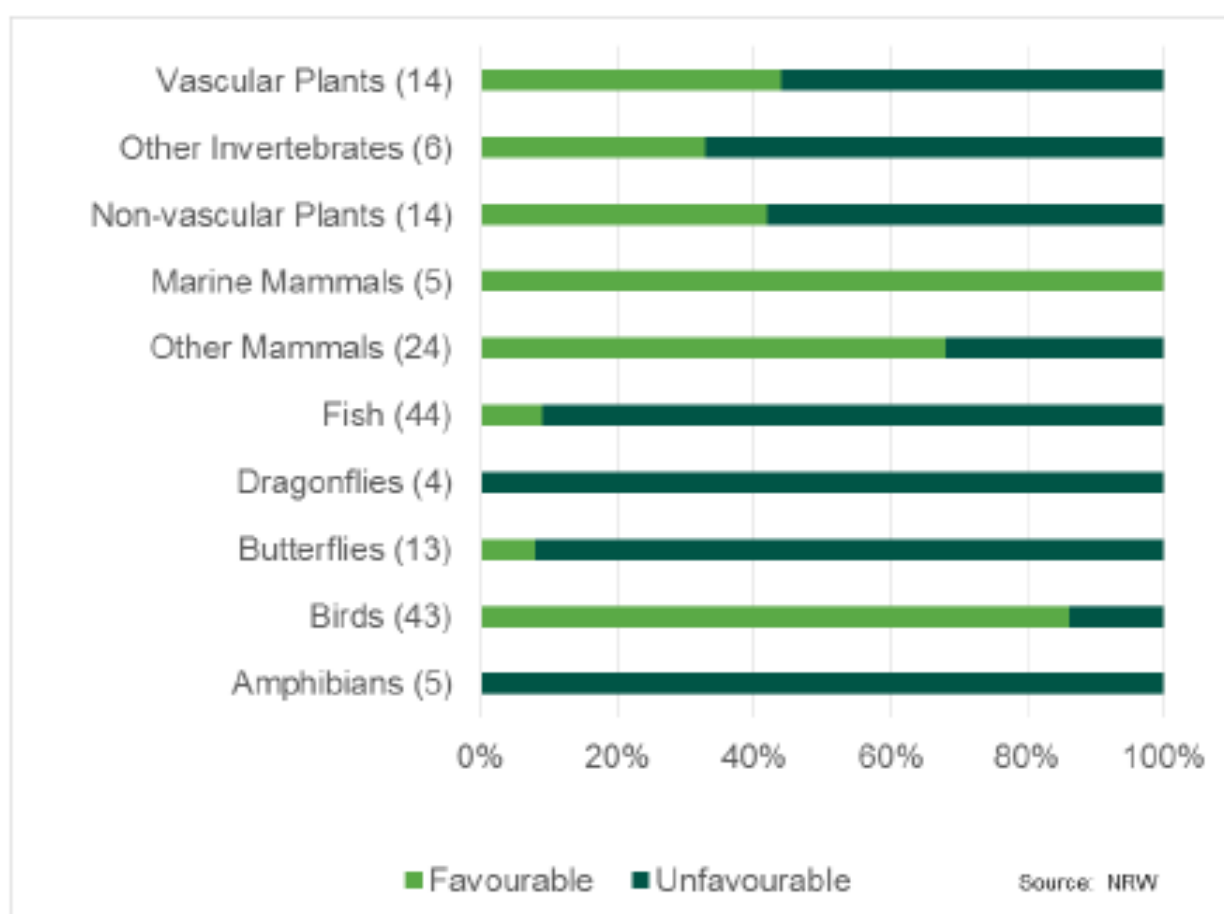
Special Protection Areas (SPA)

SPAs are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species (Defra, 2013).

SPAs in Wales include the coastline between Burry Port and Saundersfoot, sections of the Pembrokeshire coast and the coastline from Penarth to the Severn Bridge in South Wales. The area between Llandrindod Wells and Tregaron in Mid Wales and the South Gwynedd area and Northern coastline in North Wales. The spatial distributions of Welsh SPAs can be found in Figure 1 - Designated Nature Conservation Sites.

The condition of SAC and SPA species features on sites in Wales, as reported in 2013, remains mostly unfavourable (55%), with the exception of birds and mammals of which 86% and 68% were in favourable condition, respectively. A summary of the results for species is shown in Figure 2-5.

Figure 2-5 Overview of condition of Habitat and Bird Directive species features on SACs and SPAs. Number of features in assessment shown in brackets.

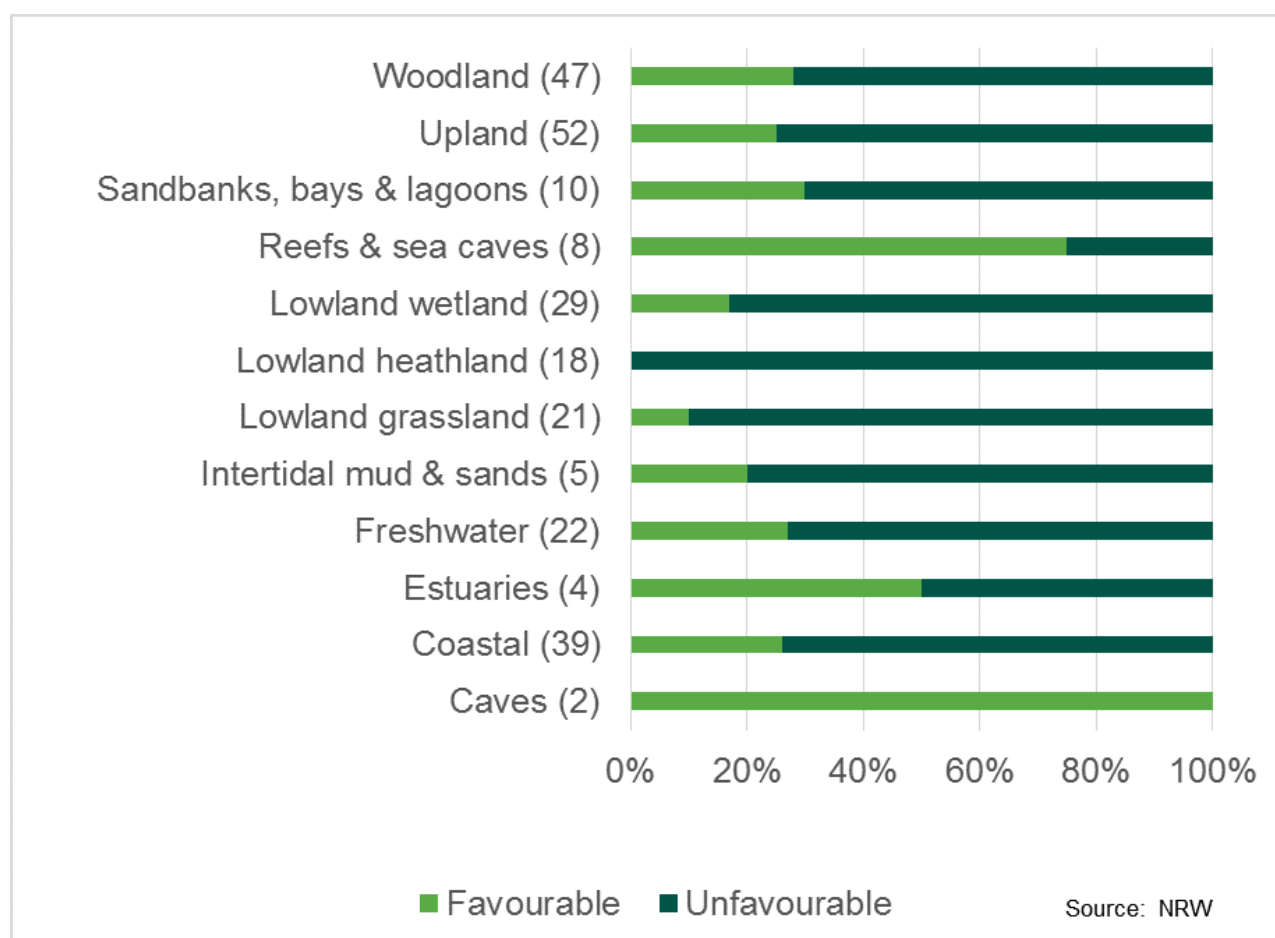


Special Areas of Conservation (SAC)

A Special Area of Conservation (or SAC) is a site designated under the Habitats Directive. These sites, together with Special Protection Areas (or SPAs), are called Natura 2000 sites and they are internationally important for threatened habitats and species.

SACs in Wales include the coastline between Burry Port and St. Davids; sections of the Pembrokeshire coast; and the coastline from Penarth to the Severn Bridge in South Wales. Large sections of the coastline between Cardigan up to Caernarfon in Mid Wales and the coast between Bangor and Conwy in North Wales are also protected under this designation. The spatial distributions of Welsh SACs can be found in Figure 1 – Designated Nature Conservation Sites. As an overview, roughly a quarter of SAC habitats in Wales are in a favourable condition, see Figure 2-6.

Figure 2-6 Percentage of SAC habitat features in favourable and unfavourable condition. Number of habitat features in assessment shown in brackets (SoNaRR, 2016)



Ramsar Sites

The Ramsar Sites in Wales include wetlands that are considered to of international importance under the Ramsar Convention. Wales currently has 10 Ramsar Sites including The Dee Estuary, Llyn Idwal, Llyn Tegid and Corsydd Mon a Llyn in the north, Cors Caron, Cors Fochno and Midland Meres and Mosses in Mid Wales/Midlands and Burry Inlet, Crymlyn Bog and Severn Estuary in the south. The spatial distributions of Welsh Ramsar sites can be found in Figure 1 – Designated Nature Conservation Sites.

Sites of Special Scientific Interest (SSSI)

SSSIs are the most important sites for Wales' natural heritage. They help conserve and protect the best of the nation's wildlife, geological and physiographical heritage for the benefit of present and future generations.

SSSIs in Wales include coastline, freshwater, upland and lowland sites and range from small fens or sand dunes to woodlands and vast reaches of mountain. They contain important types of land, plants and wildlife. Geological sites range from quarries to rocky outcrops and massive sea-cliffs (Natural Resources Wales, 2016). As demonstrated in Figure 1 – Designated Nature Conservation Sites, the SSSIs in Wales are geographically spread across the country with a slight cluster in the rural areas North Powys and South Gwynedd.

National Nature Reserves

National Nature Reserves tend to occupy the coastal areas of the country. There is a strong presence of nature reserves in the coastal areas of Wales. The highest concentration is to the east of the Llyn Peninsula. The spatial distributions of Welsh National Nature Reserves can be found in Figure 1 – Designated Nature Conservation Sites.

Marine Conservation Zones (MCZ)

The marine environment includes 2,740 km of coastline. The marine ecosystems in Wales form part of two wider biogeographic regions: the Irish Sea, and the Western Channel and Celtic Sea. There is a high diversity of habitats and species including sediment and biogenic habitats, sessile and highly mobile species. A proportion of marine habitats are surveyed and mapped, but for some areas our understanding only comes from modelling.

In 2014, the first MCZ in Welsh waters was established. Skomer MCZ is situated around the island of Skomer and the Marloes Peninsula in Pembrokeshire, South West Wales. Before 2014 the area had been Wales' only Marine Nature Reserve for 24 years (Joint Nature Conservation Committee). This is clearly visible in Figure 2-7 below.

Figure 2-7 Skomer Marine Conservation Zones – The first and only current MCZ in Wales situated off the South-West coast of Wales.



Data gaps

No significant data gaps have been identified for this topic at this stage.

3.1.3 Climate and Flood Risk

Relevance to the NDF

Measurements indicate that over the past century air and ocean temperatures have increased, rates of ice melt in valley glaciers and ice caps have accelerated and sea levels have risen. However, the extent of future warming and both the nature and geographical distribution of its impacts are the subject of much greater uncertainty. Scientists predict that climate change will result in increased sea-levels, increased average annual temperatures, warmer wetter winters, hotter drier summers and an increase in extreme weather events. These factors have significant implications for both our human and natural environment.

Although climate change is regarded as a global phenomenon, the causes and therefore solutions to the problem need to be addressed at a local level. The implications of climate change for the NDF are related to the need to arrest, or mitigate, the causes of global warming, and to adapt to future conditions. Flooding is a key area in which the effects of climate change are felt locally.

Baseline conditions and trends

Flooding is a key area in which the effects of climate change are felt locally. Flood risk is a significant issue in Wales including coastal, fluvial and surface water flooding.

Figure 2-8 presents the Technical Advice Note (TAN) 15 development flood risk areas, including the identification of areas served by significant infrastructure including flood defences; areas without flood defences; areas known to have had past flooding events; and areas at little or no risk of fluvial coastal or tidal flooding. The North West, North East, and South East regions are areas that have a high risk of flooding due to the extent of watercourses. Shoreline Management Plans (SMPs) provide a large-scale assessment of the risks associated with coastal processes that result in both erosion and flooding and presents a policy framework to reduce these risks to people and the developed, historic and natural environment in a sustainable manner. Wales is covered by the following SMPs:

- SMP 19 Anchor Head to Lavernock Point (Severn Estuary);
- SMP 20 Lavernock Point to St Ann's Head (South Wales);
- SMP 21 St Ann's Head to Great Ormes Head (West of Wales); and
- SMP 22 Great Ormes Head to Scotland (North West England and North Wales).

Overall it has been assessed that:

- There are at present around 208,500 properties at risk from flooding from rivers and sea in Wales. Around 163,000 properties are at risk from surface water flooding.
- Natural Resources Wales³ estimates that 33 properties could be lost to coastal erosion over the next 20-50 years, and about 156 could be lost in the next 50-100 years. These estimates take into account the interventions proposed in the Second Generation Shoreline Management Plans. Without the interventions, these figures could increase to about 559 properties within 20-50 years and about 2,126 in 50-100 years.

³ NRW (2015) Flood and Coastal Erosion Risk Management in Wales 2011-2014

Figure 2-8 TAN 15 Development Flood Risk



Source: Development Advice Maps, Welsh Government

Flood risk and the need to manage and adapt to it is a very significant issue for Wales in the future as the risks brought about by climate change are anticipated to exacerbate flooding issues in the future. The most recent information for Wales from the UK Climate Impacts Programme (UKCP09) forecasts that by 2080 (under a medium emissions scenario), there will be an increase in winter mean precipitation of 19% (it is very unlikely to be less than 4% and it very unlikely to be more than 42%). Sea levels are forecast to increase by 36.2 cm compared to 1990 levels⁴.

⁴ UK Climate projections (2009) maps and key findings. Available: <http://ukclimateprojections.defra.gov.uk/21708#key> (accessed March 2017)

Almost 28% of the coast has some form of artificial protection, whilst 23.1% of the Welsh coast is considered to be eroding, with the potential to affect people, properties and infrastructure. In addition, both erosion and coastal protection have the potential to affect protected sites, although allowing dynamic processes to take place is usually considered to be positive.

Flooding is not only a pressure on communities and built structures but also causes impacts on the environment, as seen in the 2013-14 winter storms. These storms caused £8.1 million of damage to flood defence structures, in addition to the financial costs associated with the approximately 300 properties that were flooded. The work by NRW, Lead Local Flood Authorities, Internal Drainage Boards and Water and Sewerage companies has sought manage flooding and coastal erosion. In the winter storms of 2013/14, it is estimated that approximately 75,000 properties and 34,000 hectares of agricultural land was protected from flooding. Between 2011 and 2014, in excess of 340 coastal and river flood defence schemes were delivered, reducing flood risk to approximately 6,700 properties (Welsh Government Climate Change Annual Report 2014). It is estimated that £2.96 billion of damage to properties was avoided as a result of protection from defences (SoNaRR, 2016). The trends in hydrological processes, which include sea-level rise and increased storminess, are likely to increase the likelihood and consequences of coastal flooding and erosion.

Data gaps

No significant data gaps have been identified for this topic at this stage.

3.1.4 Geology and Soils

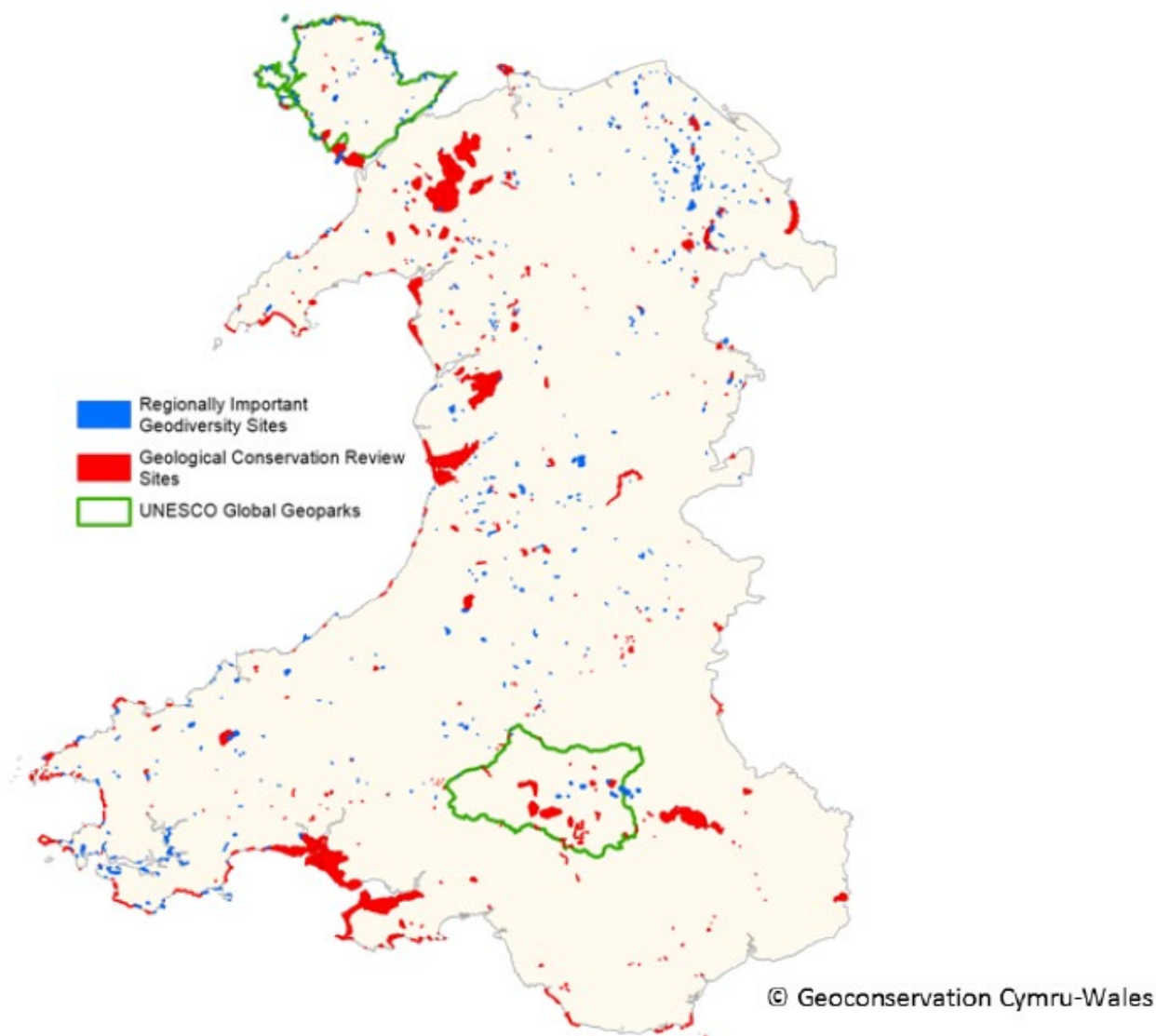
Relevance to the NDF

Wales has some of the most varied geology in the world representing all geological periods and spanning 1.4 billion years of the Earth's history. This diverse geology not only underpins the country's biodiversity and landscape but also provides important mineral resources. The protection and sustainable use of geological diversity, soil resources and minerals can be delivered through the guidance within the NDF.

Baseline conditions and trends

As identified above, Wales' geodiversity is significant. 300 SSSIs in Wales, covering 48,815 ha, contain some 500 geological features and 93% of these features are in favourable condition. Figure 2-9 illustrates the distribution of geological SSSIs and Regionally Important Geodiversity Sites (RIGS). Two UNESCO Global Geoparks, Geo Môn and Fforest Fawr, cover 1,483 km² of Wales and are also designated for the primary purpose of promoting geo-tourism (SoNaRR, 2016).

Figure 2-9 Welsh Geodiversity Sites (SoNaRR, 2016).

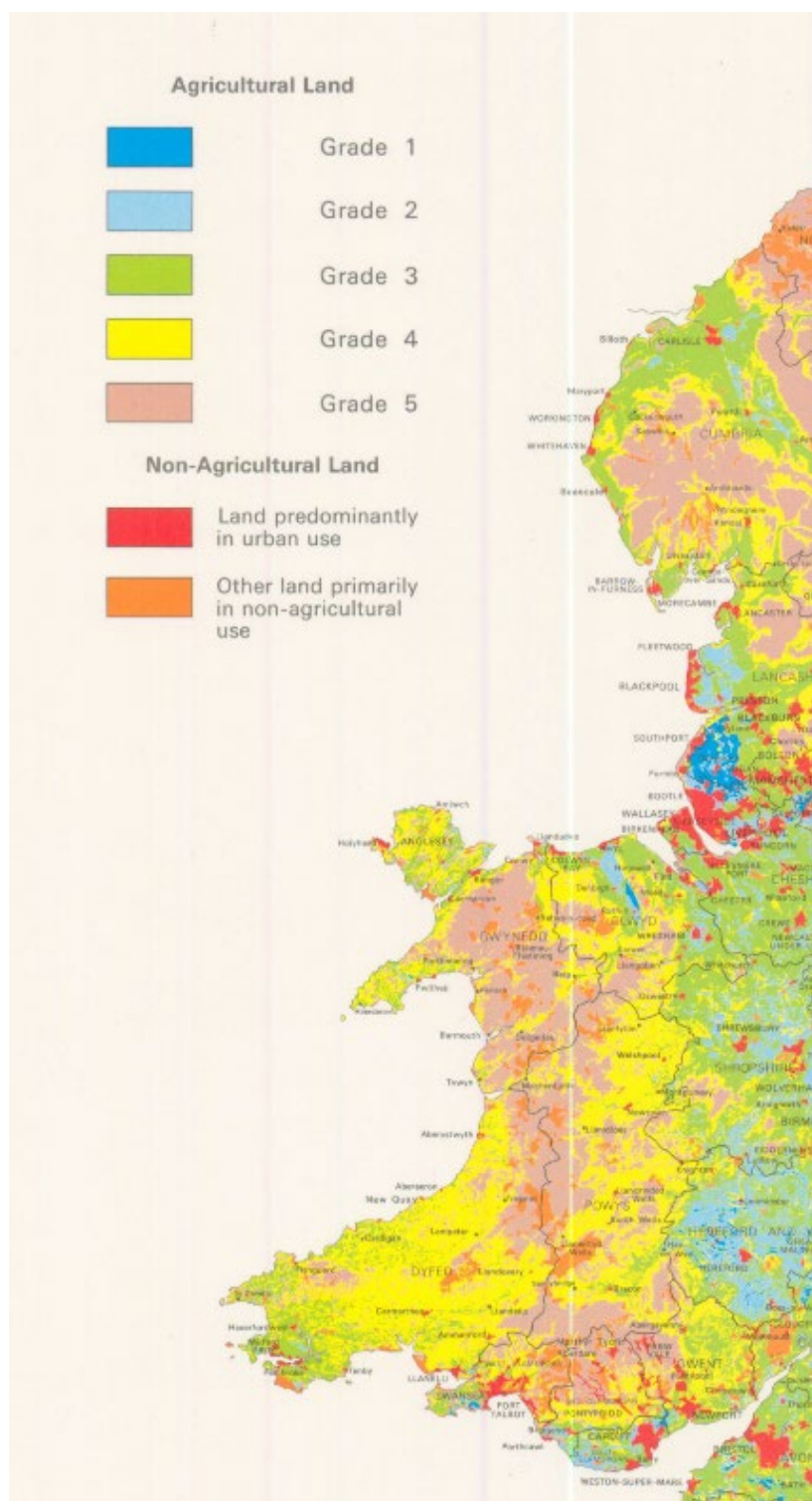


In the future, geological hazards may change as a response to climate change. For example, coastal erosion, landslides and pollution from former mine sites. Exploration for conventional and unconventional sources of oil and gas also remains a possibility in Wales and its consideration will form a part of the emerging Welsh Government Energy Strategy.

The soil and agricultural land quality of Wales is reflective of the topography and geology of the country. The soil types are diverse with over 400 different soil types present across the country, which contribute to a rich geodiversity and biodiversity, landscapes and land uses. The majority of Wales is either Grade 4 or 5 in the Agricultural Land Classification. This classification is generally considered to be of poor or very poor quality agricultural land and is largely due to the predominantly upland nature of Wales. This has a strong influence on the types of agriculture feasible, lending itself more towards livestock farming. The soils of best quality and most productive agricultural land are a scarce and finite resource in Wales accounting for less than 7% of land area.

Soil quality has deteriorated over time across all habitats apart from woodlands where there has been some improvement (SoNaRR, 2016).

Figure 2-10 Agricultural Land Classification Map of England and Wales (extract) (Natural England).

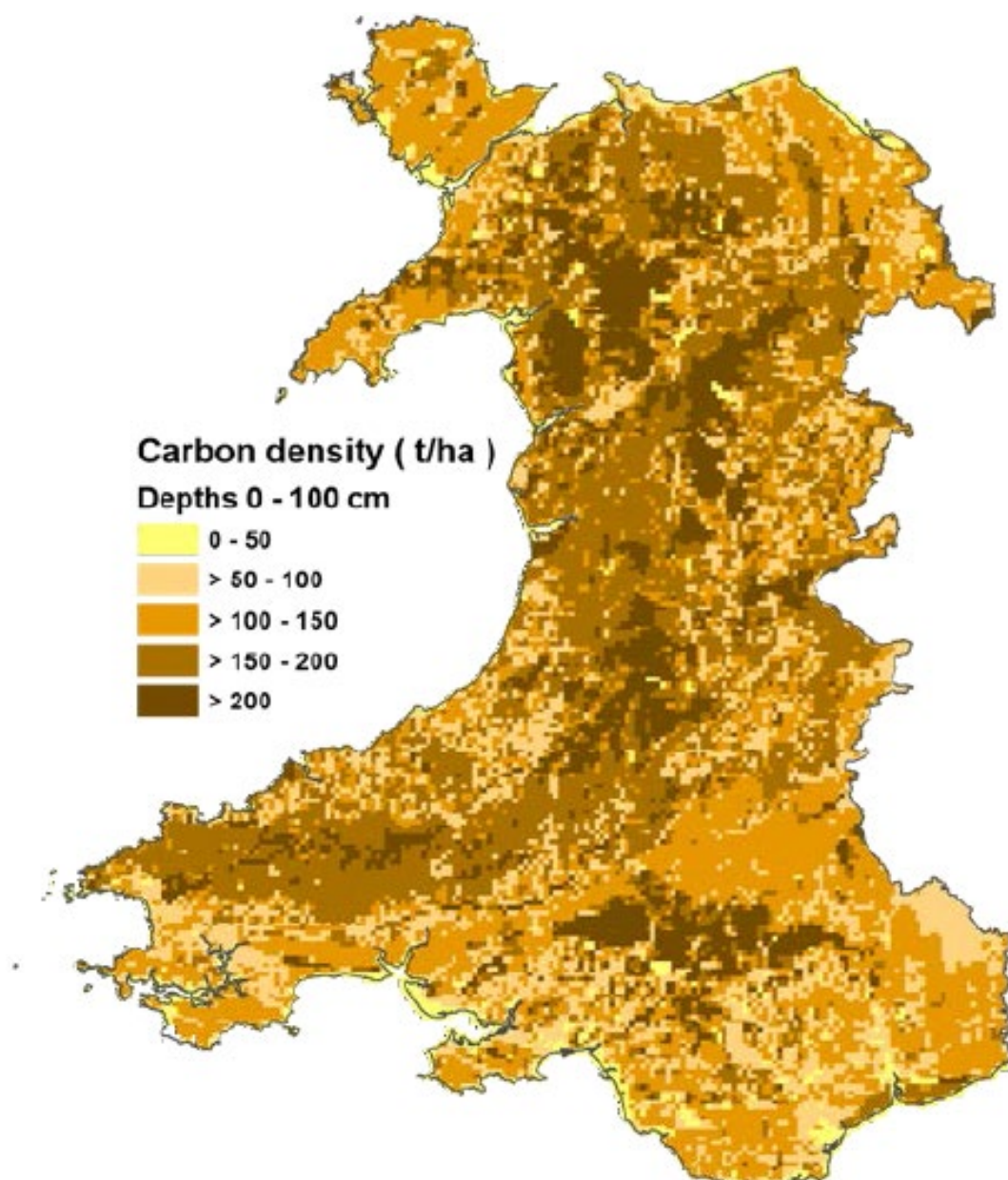


Whilst the severity and spatial extent of soil erosion has not been directly quantified in Wales, around 10-15% of grassland fields in England and Wales are thought to be affected by severe soil compaction and 50-60% are in moderate condition. Only 30% of the Welsh peat soil area is considered to be in 'good condition' (SoNaRR, 2016).

Remediation has been completed at 97 of the 111 Contaminated Land sites identified in Wales, but around 9,330 potentially contaminated sites have yet to be investigated (SoNaRR, 2016).

Welsh soils contain 410 million tonnes of carbon. The carbon density of Wales on the whole, is relatively high with the densest areas mainly being upland parts of the country. Again, this reflects the country's upland nature and large quantities of peaty soils. Figure 2-11 below, shows the carbon density of Wales at a depth of 0-100cm. Topsoil carbon concentrations are generally stable and there is ongoing recovery from soil acidification (SoNaRR, 2016).

Figure 2-11 Distribution of soil carbon in Wales, shown as carbon density (t/ha) depth 0-100 cm (SoNaRR, 2016).



Data gaps

No significant data gaps have been identified for this topic at this stage.

3.1.5 Water Environment

Relevance to the NDF

Water is central to life. Wales relies on considerable quantities of water to produce resources, transport goods, provide recreational benefits, as a drinking resource and to grow food. The quality and quantity of water is therefore vitally important.

The NDF can help manage the water environment through helping to guide decisions through the planning process relating to development that could harm water quality or put pressure on water resources. It also has a role to play in environmental protection in general through its guidance.

Baseline conditions and trends

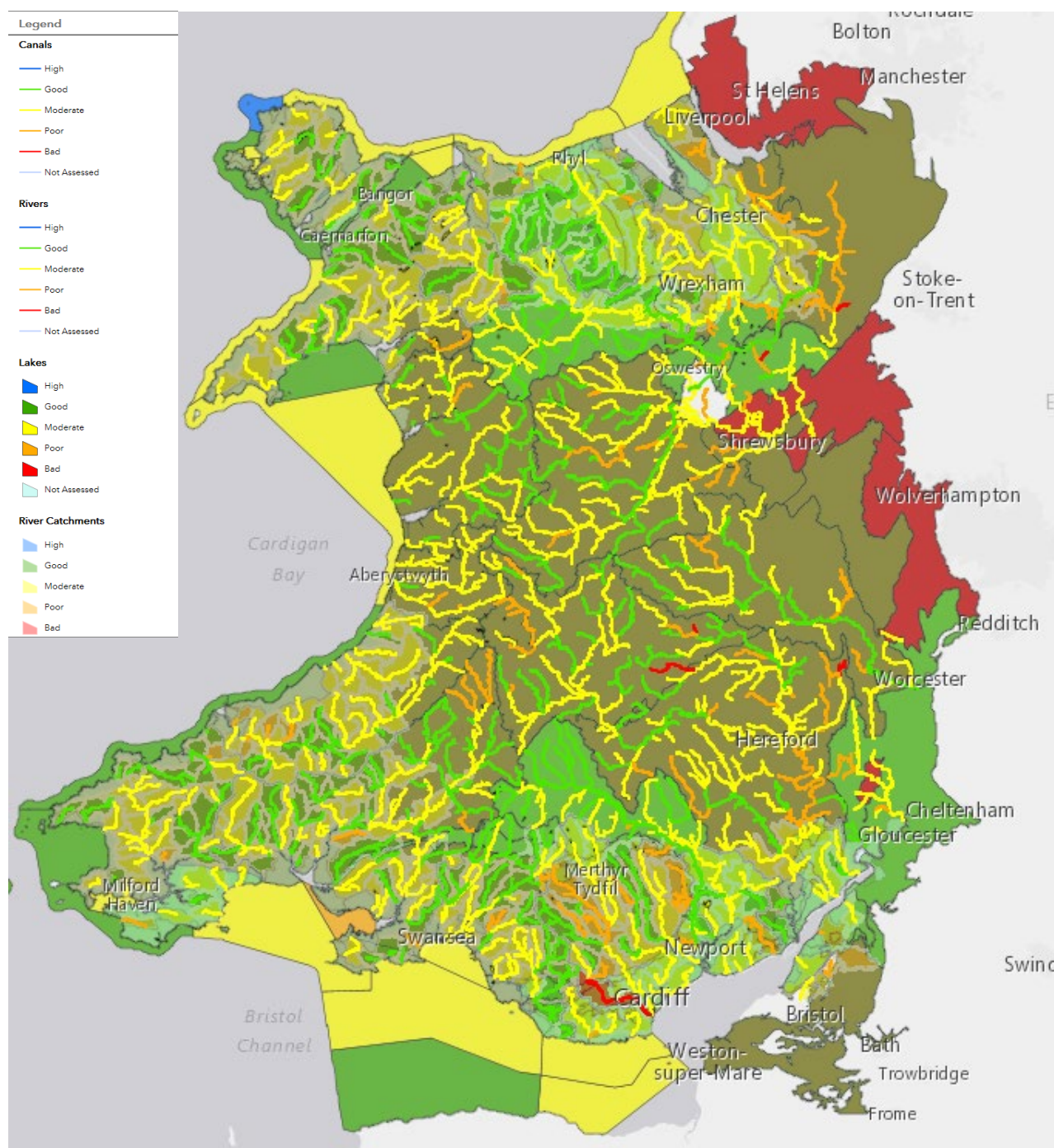
The water features map of Wales in Figure 2-9 was produced under the requirements of the Water Framework Directive. The map shows the river catchments and other water features in Wales. Water resources across Wales tend to range from a good to poor classification but are very rarely classed as high or bad. In particular, the river catchments in the south and Cardigan Bay are classed as moderate or good.

The Water Framework Directive required the UK to achieve 'good' status of all water bodies (including rivers, streams, lakes, estuaries, coastal waters and groundwater) by 2015.

In 2014 42% of water bodies in Wales were classified as being of 'good' ecological status compared to 21% in England. There was a slight decrease to 39% classified as being of 'good' ecological status in 2015 (Natural Resources Wales).

In many Welsh rivers, flows are particularly vulnerable to climate change because they tend to rise and fall quickly in response to rainfall. Increased flows during winter may also increase pressure upon sewerage and drainage systems and diffuse pollution (SoNaRR, 2016).

Figure 2-12 Water Features and Quality in Wales



(Source: Natural Resources Wales)

Welsh Water supply drinking water to most of Wales and parts of England. Around 95% of its water resources originates as surface water either from reservoir storage or river abstractions. Welsh Water has 65 impounding reservoirs which are water storage areas mainly created by building dams; 68 water treatment works, where reservoir water is treated so it can be drunk from the tap, and it supplies an average of 840 million litres of water every day through a network of 27,400 km of water mains. As many reservoirs and water treatment works are on high ground, gravity helps supply much of the water required (Welsh Water).

Whilst Wales is perceived to be water-rich, it is already facing challenges. For example, in 7% of water bodies, water is only reliable for new consumptive abstractions for 30% of the time. This is anticipated to be a continued concern in the future (SoNaRR, 2016).

Groundwater provides a third of the drinking water in England and Wales, and it also maintains the flow in many of our rivers. All of Wales is classified as groundwater inner source protection zone. The zone is defined as the 50-day travel time from any point below the water table to the source. These areas apply at and below the water table. The criteria are set to protect against transmission of toxic chemicals and water-borne disease.

In Wales, the EC Nitrates Directive (91/676/EEC) was brought into law through the Nitrate Pollution Prevention (Wales) Regulations 2013. A Nitrate Vulnerable Zone (NVZ) is an area of land draining into ground or surface waters that are currently high in nitrate, or may become so if appropriate actions are not taken. Around 2.4% of Wales is currently within an NVZ.

Data gaps

No significant data gaps have been identified for this topic at this stage.

3.1.6 Minerals and Waste

Relevance to the NDF

As described above, Wales' diverse geology provides important mineral resources which underpins the country's construction and energy industries and is therefore an important aspect of the economy. Waste can also be viewed as a resource, both in terms of recycling and re-use for other purposes or as a source of energy.

The sustainable use of these minerals and waste resources can be delivered through the guidance within the NDF.

Baseline conditions and trends

Following a long history, metal mining has ceased and there is only localised coal mining and slate quarrying in Wales. The aggregates industry is now the main mineral extraction industry in Wales, including marine and terrestrially derived aggregates. In 2014, the largest extraction of minerals in tonnes was limestone and dolomite (see Table 2-6 (SoNaRR, 2016)).

Table 2-1 Mineral Production in Wales for 2014 (SoNaRR, 2016)

Mineral	Thousand Tonnes Extracted
Coal (deep-mining)	91
Coal (opencast)	2,343
Igneous Rock	1,905
Limestone and Dolomite	8,934
Sand and gravel (land)	673
Sand and gravel (marine)	632
Sandstone	2,774
Total	17,352

The future trend in minerals extraction is heavily influenced by the national economy and confidence in the construction industry. Exploration for conventional and unconventional sources of oil and gas also remains a possibility in Wales and its consideration will form a part of the emerging Welsh Government Energy Strategy.

The Welsh Government publication, 'Towards Zero Waste 2010–2050' aims for Wales to become a high recycling nation by 2025 and a zero-waste nation by 2050. The 2015 Progress Report identifies the following key statistics and trends:

- Wales leads the UK in recycling municipal waste by a significant margin, achieving 54.3% in 2013/14.

- Wales has reduced waste sent to landfill at permitted sites by 37% between 2010 and 2013.
- Since 2009-10, Wales has made progress in reducing household waste arisings by an average of 1.8% per year, and the recycling rate of local authority collected waste has improved by 13.8%.
- Wales met the EU target 2020 for biodegradable waste collected by local authorities and others sent to landfill eight years early.
- Wales has also reduced the greenhouse gas emissions from waste by 4.7% per year since 2007, exceeding the target reduction of 3% per year set in the Climate Change Strategy.

Table 2-2 shows the total amount of waste per sector that was not recycled, re-used or composted as a percentage of overall municipal waste production. This shows a steady decrease in the amount of waste sent to landfill. This trend is echoed in the commercial and construction sectors.

Table 2-2 Percentage of Municipal Waste sent to Landfill (Statistical Bulletin 'Local authority municipal waste management report for Wales, 2013-14', Welsh Government)

Year	% municipal waste sent to landfill
2009-10	59.5%
2011-12	50.0%
2013-14	45.7%

Data gaps

No significant data gaps have been identified for this topic at this stage.

3.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Air Quality

Air quality in Wales is generally very good, reflective of its largely rural nature and high quality natural environment. However, targets are being breached for a number of key pollutants which pose a risk to human health and the natural environment. These notably occur in urban areas and adjacent to busy roads.

90% of semi-natural nitrogen sensitive Welsh habitats are subject to nitrogen deposition in excess of critical load limits.

Biodiversity, Flora and Fauna

Wales has a rich and varied natural environment including a wide representation of important habitats and species. However, the condition of species features in European designated sites in Wales and the condition of priority habitats in Wales remains mostly unfavourable.

Terrestrial and marine biodiversity is under threat from development, pollution and climate change.

Climate and Flood Risk

The effects of climate change are increasing and adaptation and resilience to its effects is an increasing necessity. Notably, flood risk is a significant issue in Wales including coastal, fluvial and surface water flooding. This is exacerbated by an increase in extreme weather events and this means that properties and businesses are increasingly becoming at risk.

Geology and Soils

In the future, geological hazards may change as a response to climate change. For example, coastal erosion, landslides and pollution from former mine sites. This poses risks to the human and natural environment.

The soils of best quality and most productive agricultural land are a scarce and finite resource in Wales and soil quality has deteriorated over time across all habitats. Only 30% of the Welsh peat soil area is considered to be in 'good condition'. This is important for biodiversity, landscape character, tourism, agricultural productivity and climate change resilience. Topsoil, in particular peaty soils in Wales are a major carbon sink which needs protection.

Water Environment

The quality of Wales' water bodies is still not up to Water Framework Directive requirements with only 42% being of good ecological status in 2014. Land management and development practices are a key contributor to poor water quality.

In many Welsh rivers flows are particularly vulnerable to climate change because they tend to rise and fall quickly in response to rainfall. Increased flows during winter may also increase pressure upon sewerage and drainage systems and diffuse pollution.

Whilst Wales is perceived to be water-rich, it is already facing challenges in terms of supply and water resources can become relatively scarce during prolonged warm, dry weather.

Minerals and Waste

The country still has substantial resources if required. However, such extraction can be very damaging to the natural and human environment and as such sustainable management of this is a key issue for any ongoing or future activity. Minerals safeguarding can sometimes also conflict with other forms of development.

Wales has made good progress on the 2050 Zero Waste Ambition and continues to reduce the proportion of waste sent to landfill. However, future development needs will continue to put pressure on this aim.

Opportunities

Air Quality

The planning system can benefit air quality and its effects through helping to guide decisions through the planning process relating to the location of polluting sources relative to sensitive receptors such as residential, schools, hospitals and sensitive habitats and by helping to minimise pollution from transport through minimising the distance travelled and encouraging more sustainable modes of transport. Sustainable design and landscaping policies could help to provide opportunities for absorbing some pollutants.

Biodiversity, Flora and Fauna

The NDF can both benefit and enhance biodiversity through guiding the location and manner in which new development occurs. It provides opportunities to ensure biodiversity is protected and enhanced through the planning system, not just in terms of protected sites but also in terms of biodiversity and connectivity in general.

Opportunities can be sought to maximise benefits to ecosystems through sustainable design and management. The services provided by ecosystems and green infrastructure are a significant opportunity and could enable species to adapt to the changing climate.

Climate and Flood Risk

The NDF has a significant role to play in terms of climate change adaptation and resilience. Flooding and coastal erosion are key areas in which the effects of climate change are felt locally and the NDF can help provide guidance on the location and design of development to help minimise this risk. It is also an opportunity to further work with partners such as NRW in developing flood management and protection schemes as part of encouraging sustainable land and ecosystem management.

Geology and Soils

The NDF has an opportunity to guide the sustainable use of Wales' geology and soils. In particular, valuable soils and geodiversity should be protected from inappropriate land-uses whether this is directly or indirectly as they can have an important function in terms of biodiversity, the economy and climate change.

The NDF should also help to avoid future risks by managing or avoiding geological hazards through the planning system. Exploration for conventional and unconventional sources of oil and gas also remains a possibility in Wales and its consideration will form a part of the emerging Welsh Government Energy Strategy. The NDF will be used to implement the outcomes of the overarching Energy Policy

Water Environment

The NDF can help to guide new development and land management practices in a manner that seeks to avoid pollution of water bodies. It should also be cognisant of the potential limitations of water supply and should promote measures to reduce water use in developments.

The NDF should also consider the impact of climate change on water quality and supply in the future and how this can be accommodated through the planning system

Minerals and Waste

The NDF has an important role to play with regard to minerals demand (through economic aspirations), planning and management. It can help to guide the sustainable use of such resources through its policy and strategic development proposals.

There is also opportunity for the NDF to help consider waste volumes and recycling alongside its ambitions for new development.

3.3 Relevant ISA Objectives and Questions

Air Quality

8. To encourage the protection and improvement of air quality

- Create the conditions within which air quality can be protected and improved where necessary?
- Reduce the likelihood of new Air Quality Management Areas being required through land use planning initiatives?
- Create the conditions within which potential emissions from traffic and industry may be reduced?
- As far as is possible through land use planning, ensure that the most vulnerable communities are not disproportionately affected by poor air quality?

Biodiversity, Flora and Fauna

16. To encourage the conservation and enhancement of biodiversity and geodiversity

- Promote the establishment of more coherent and resilient ecological networks on land that safeguard ecosystem services for the benefit of wildlife and people?
- Encourage the conservation and enhancement of designated nature conservation sites, habitats and species?
- Encourage the conservation and enhancement of non-designated habitats and species?
- Provide an improvement in opportunities for people to access wildlife and open green spaces?
- Encourage the conservation and enhancement of marine ecosystems?
- Encourage the conservation and enhancement of the quality of greenspaces?

Climate Change and Flood Risk

7. To encourage climate change resilience, including contributing to the reduction and management of flood risk

- Contribute to the reduction and management of flood risk?
- Encourage all new development to be climate change resilient?
- Promote the benefits of flood risk management?

Geology and Soils

16. To protect and enhance biodiversity and geodiversity

- Protect geodiversity?

17. To encourage the sustainable use of natural resources

- Encourage the remediation of contaminated sites and prevention of further contamination?
- Encourage the reduction of hazardous waste?
- Provide the conditions within which soil quality can be maintained and/or enhanced?
- Encourage the protection of peatland?

Water Environment**9. To contribute to the protection and enhancement of the quality of water features and resources**

- Contribute to the protection and enhancement of ground and surface water quality?
- Contribute to the protection and enhancement of coastal waters?
- Encourage the sustainable use of water resources in both domestic and industrial settings?

Minerals and Waste**17. To encourage the sustainable use of natural resources**

- Encourage a reduction in the demand for raw materials?
- Promote the use of recycled and secondary materials in construction?
- Encourage development of brownfield land where appropriate?
- Encourage an increase in the proportion of waste recycling and re-use?
- Encourage a reduction in the proportion of waste sent to landfill?

B-4. Well-Being Goal: A Healthier Wales

This section provides data relating to the following well-being goal:

‘A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.’

The data relates primarily to:

- Human Health; and
- Well-Being.

4.1 Overview of Baseline Conditions

4.1.1 Health and Well-being

Relevance to the NDF

Better health is central to human happiness and well-being and also makes an important contribution to economic progress as healthy populations live longer and are more productive. The health and well-being of the Welsh population is important in helping to enable people to achieve their potential and to make Wales a more equal society.

The NDF has a key role in supporting health and well-being through helping to guide decisions through the planning process relating to health services as well as natural resources available that can encourage an improvement in physical and mental health whilst promoting healthy and active lifestyles.

Baseline conditions and trends

In many ways, health in Wales is improving; people are living longer and rates of certain types of diseases are coming down. In many parts of Wales the health of those living in rural communities is generally good in comparison to those in a more urban setting. However, there are factors specific to a rural environment compared to those of urban environments that can impact on health more significantly and lead to inequalities and poorer health, such as distance from public services and support; availability of transport; housing standards; and an ageing population.

Fuel poverty

Fuel poverty has been defined as when a household needs to spend more than 10% of its household income on energy to achieve an adequate standard of warmth since the introduction of the Warm Homes and Energy Conservation Act in 2000. The combination of (moderately) rising household incomes, reduction in household energy consumption due to energy efficiency improvements, and decreasing gas and oil prices since 2014, have led to fuel poverty levels across all Welsh households decreasing since 2014 to a projected level of 23% (291,000 households) in 2016. The predicted national levels of fuel poverty for Wales are higher than in England but lower than in Scotland or Northern Ireland (as a percentage of all households) (Estimated Levels of Fuel Poverty in Wales, Welsh Government 2016).

Child poverty

The Households Below Average Income (HBAI) data for Wales published in June 2016 show a two-percentage point reduction in the proportion of children living in relative poverty in Wales. For the three-year period ending in 2014/15, 29% of children in Wales were living in poverty. This compares to 31% for the three-year period ending in 2013/14. These figures show that whilst progress is being made in reducing child poverty, rates in Wales still remain stubbornly high (Child Poverty Strategy, Welsh Government, 2016).

Healthy life expectancy at birth including the gap between the least and most deprived

Healthy life expectancy is an estimate of the years of life that will be spent in good health. In 2015, life expectancy in Wales between 2013-2015 was generally below the UK average. However, it is noted that six out of the 22 Welsh local authorities had life expectancies (for male and female) at or above the UK levels (Neighbourhood Statistics). Life expectancy has increased for both males and females by 2.3 years and 1.8 years for males and females respectively since 2003-2005.

Whilst people in Wales are living longer and spending longer in good health, large differences in life expectancy persist between the least and most deprived areas. In men, there remains a gap in life expectancy of around 9 years between the least and most deprived, and an even larger gap in healthy life expectancy of approximately 19 years. These gaps show no clear sign of reducing over time (Measuring Inequalities, 2016).

Percentage of live single births with a birth weight of under 2500g

In terms of live single births, low weight births are associated with health risks in an infant's first year of life. In 2015, approximately, 6.7% of all live births in Wales were of low birth weight, that is, less than 2,500g. The records show that there was no notable change in the distribution of births by birth weight over the last 10 years.

Percentage of adults who have fewer than two healthy lifestyle behaviours

The 2015 Welsh Health Survey assessed whether Welsh respondents exhibited the following healthy lifestyle behaviours:

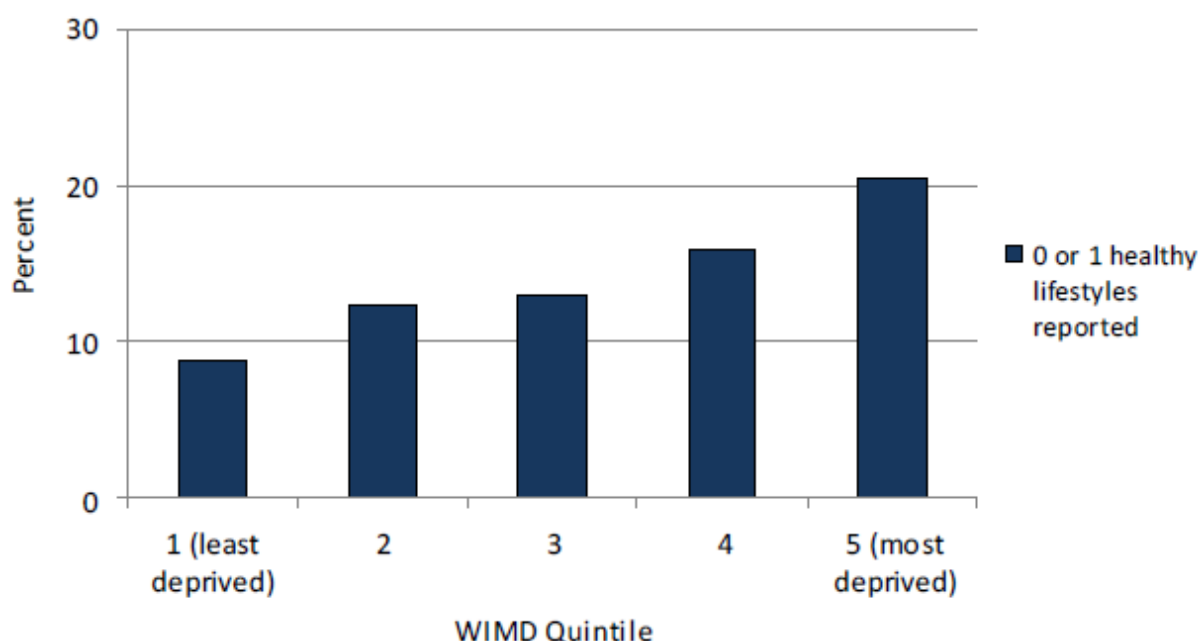
- Not smoking;
- Not drinking above daily guidelines in the previous week;
- Eating five or more portions of fruit and vegetables the previous day;
- Being physically active for at least 150 minutes in the previous week; and
- Maintaining a healthy weight/body mass index.

Around 1 in 7 (14%) of adults reported following less than 2 healthy lifestyle behaviours, 1 in 20 (5%) of adults reported following all 5 healthy lifestyles.

In terms of specific groups, the percentage of adults who followed none or one healthy lifestyles was slightly more common in men (15%) than women (12%), and among adults aged 45-64.

Figure 3-1 shows that the percentage of adults who reported following 0 or 1 healthy lifestyles was more prevalent in the most deprived areas (age-standardised).

Figure 3-1 Percentage of adults who exhibited 0 or 1 healthy lifestyles, by deprivation quintile



Source: Welsh Government

Spatially, the Welsh Health Survey (2015) established the following trends:

- For the years 2014 and 2015 combined, amongst local authorities the highest smoking rate reported was 26% for Blaenau Gwent and the lowest was 16% for Ceredigion (age standardised).
- For the years 2014 and 2015 combined, the percentage of people who reported drinking above guidelines ranged from 35% in Torfaen to 46% in Monmouthshire. The percentage of people who reported binge drinking ranged from 20% in Pembrokeshire to 29% in Swansea (age-standardised).
- For the years 2014 and 2015 combined, Ceredigion reported that 39% of their respondents met the guidelines for the consumption of fruit and vegetables.

Mean mental well-being score for adults

In 2015, the mean mental well-being score for people in Wales 49.2 (where higher scores indicate better health). Furthermore, well-being and the respondents focus on their own perception of their mental health and the impact it has on their daily lives. Male respondents (50.5) reported higher scores than female respondents (48.0). In terms of survey respondents, 12.6% of respondents reported as having any form of mental illness.

Percentage of people who are lonely

In 2014-15, the National Survey for Wales asked people whether they agreed with a series of statements about their current life status. Users of care and social services were the most likely to agree that they often felt lonely (29% compared with 13% of those who were not users or carers).

Percentage satisfaction with life

In 2015, Wales was the only country to have reported significantly lower life satisfaction than the UK as a whole (7.55 compared with 7.61). Compared to the previous year, satisfaction levels in Wales did not have any significant positive improvements between 2013-2014, whereas England, Scotland and Northern Ireland all had significant improvements in the average estimates for life satisfaction (ONS).

Location of health facilities in Wales

There are a number of hospital facilities within Wales spread across a number of departmental requirements, the number and types of facilities are shown in Table 3-1. In addition, in 2016, 85% (375 practices) of GP practices were open for daily core hours, (08:00 to 18:30) or within one hour of the daily core hours, Monday to Friday. This is an increase from 82% (373 practices) in 2015 (GP Access, Welsh Government, 2016).

Table 3-1 Number and Type of Hospital Facilities within Wales

Hospital Facility Type	Number
Major A&E Unit	13
Minor A&E Unit	1
Minor Injuries Unit	20
Other Hospitals	
Acute	2
CHC Local Committee	3
Clinic	19
Community	31
Community Hospital: Elderly Mental Infirm	4
Day Hospital	5
Major Acute	1
Psychiatric: Learning Disability	2
Psychiatric: Mental Illness	16
Psychiatric: Mental Illness / Learning Disability	2
Specialist Acute	3

Source: NHS Wales

Percentage participating in sporting activities three or more times a week

During the spring and summer of 2015 almost 1000 schools took part in the School Sport Survey within Wales. The survey demonstrated that the numbers of young people taking part in sport or physical activity three or more times a week has risen from 40% in 2013 to 48% in 2015. Boys (52%) were still more likely than girls (44%) to regularly participate in sport and physical activity, though the figures for both have increased, the gap remains static (School Sport Survey 2015).

Percentage of people overweight in particular levels of childhood

In 2015, 59% of adults were classified as overweight or obese, including 24% obese. Obesity levels in Wales have seen an increase since the Welsh Health Survey began in 2003/2004. Childhood obesity rates were higher in Wales in 2014 than in England. The prevalence of overweight and obese children in Wales was highest in Merthyr Tydfil (34%), Gwynedd and Bridgend (both 30%) and lowest in Monmouthshire (21%) and the Vale of Glamorgan (22%) (Public Health Wales).

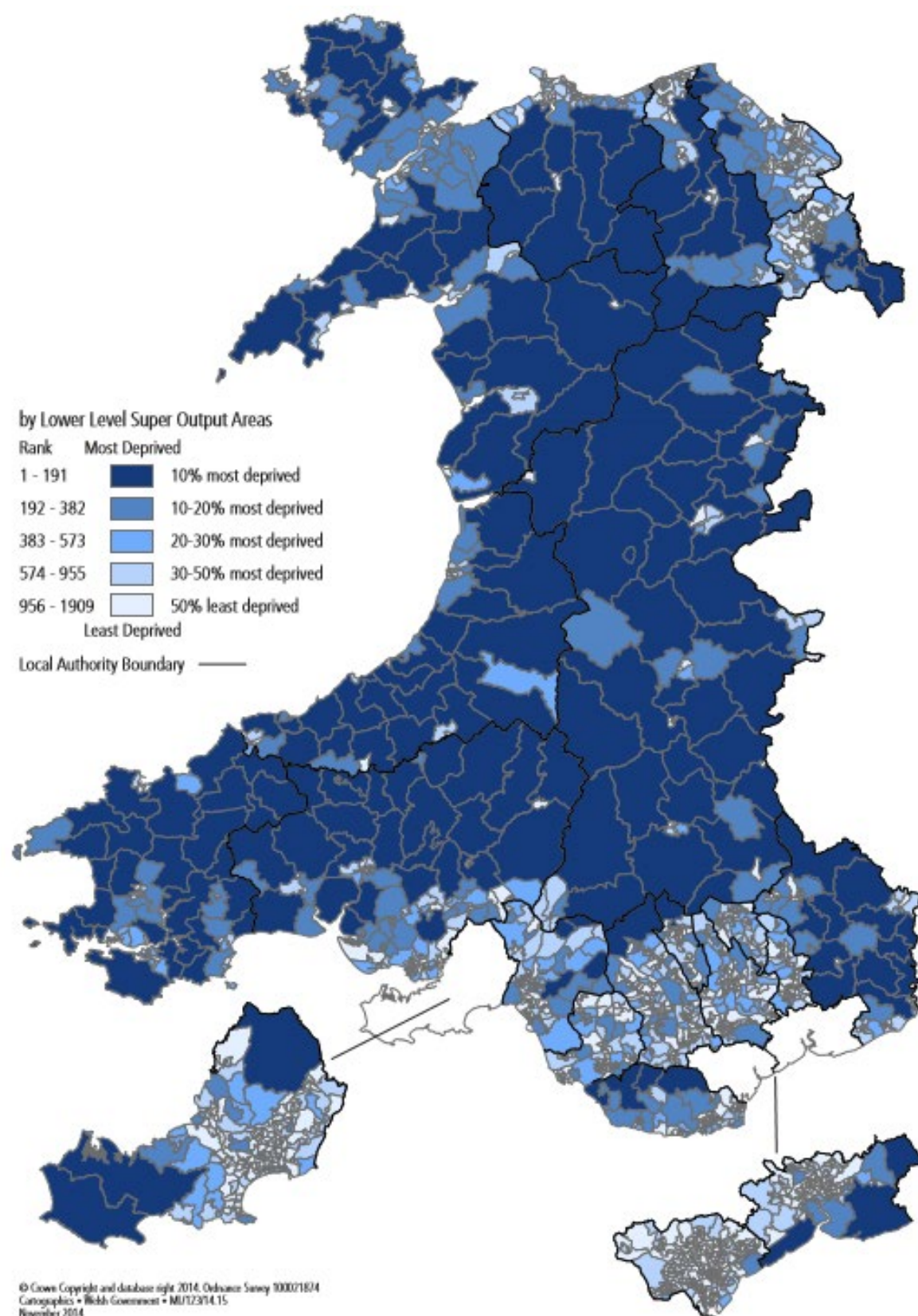
Number and distribution of LSOAs in bottom 10% of most deprived in terms of access to services

Latest figures for the LSOAs in Wales (there are 1909 LSOAs in total in Wales) include average travel times using private transport when access to services have been considered. The WIMD 2014 access to services domain results have demonstrated that there is a widespread deprivation across Wales and also particularly within rural areas in terms of access. Furthermore, there are some deprived pockets near large urban areas.

The local authorities with the highest proportion of LSOAs in the most deprived 10% were Powys (46.8%) and Ceredigion (43.5%). Blaenau Gwent, Bridgend, Caerphilly, Cardiff and Torfaen had no LSOAs in the most deprived 10%.

Figure 3-2 shows the deprivation levels of the LSOAs in Wales with regard to access to services.

Figure 3-2 Access to Services Deprivation Map for Wales



Source: WIMD 2014

No of LSOAs in bottom 10% Health deprivation domain

Table 3-2 presents data relating to the WIMD 2014 for health. Patterns in health deprivation in Wales have remained largely unchanged since the 2011 WIMD. High deprivation levels were recorded in South Wales valleys and large cities, coastal areas of North Wales and border towns. The local authority the highest proportion of LSOAs in the most deprived 10% in Wales for health domain was Merthyr Tydfil. Three local authorities (The Isle of Anglesey, Ceredigion and Monmouthshire) were recorded as having had no LSOAs in the most deprived 10%.

For the health domain, the most deprived LSOA in Wales was Rhyl West 2, Denbighshire.

Table 3-2 WIMD 2014 Health domain deprived LSOAs, by local authority

Local authority	Number of LSOAs in local authority	% LSOAs in most-deprived 10% ranks 1-191	% LSOAs in most-deprived 20% ranks 1-382	% LSOAs in most-deprived 30% ranks 1-573	% LSOAs in most-deprived 50% ranks 1-955
Isle of Anglesey	44	0.0	4.5	15.9	29.5
Gwynedd	73	2.7	4.1	5.5	19.2
Conwy	71	1.4	7.0	15.5	31.0
Denbighshire	58	10.3	15.5	22.4	37.9
Flintshire	92	2.2	8.7	17.4	34.8
Wrexham	85	4.7	16.5	27.1	50.6
Powys	79	1.3	5.1	8.9	19.0
Ceredigion	46	0.0	0.0	4.3	15.2
Pembrokeshire	71	4.2	7.0	12.7	31.0
Cardiganshire	112	4.5	11.6	29.5	55.4
Swansea	148	14.2	20.9	29.7	54.7
Neath Port Talbot	91	17.6	36.3	50.5	72.5
Bridgend	88	12.5	29.5	45.5	61.4
Vale of Glamorgan	79	3.8	11.4	17.7	41.8
Rhondda Cynon Taf	154	21.4	43.5	56.5	77.3
Merthyr Tydfil	36	30.6	47.2	58.3	86.1
Caerphilly	110	20.0	32.7	45.5	74.5
Blaenau Gwent	47	14.9	40.4	61.7	95.7
Torfaen	60	6.7	21.7	33.3	61.7
Monmouthshire	56	0.0	0.0	1.8	17.9
Newport	95	8.4	22.1	33.7	52.6
Cardiff	214	14.5	22.0	29.9	44.4
Wales	1909	10.0	20.0	30.0	50.0

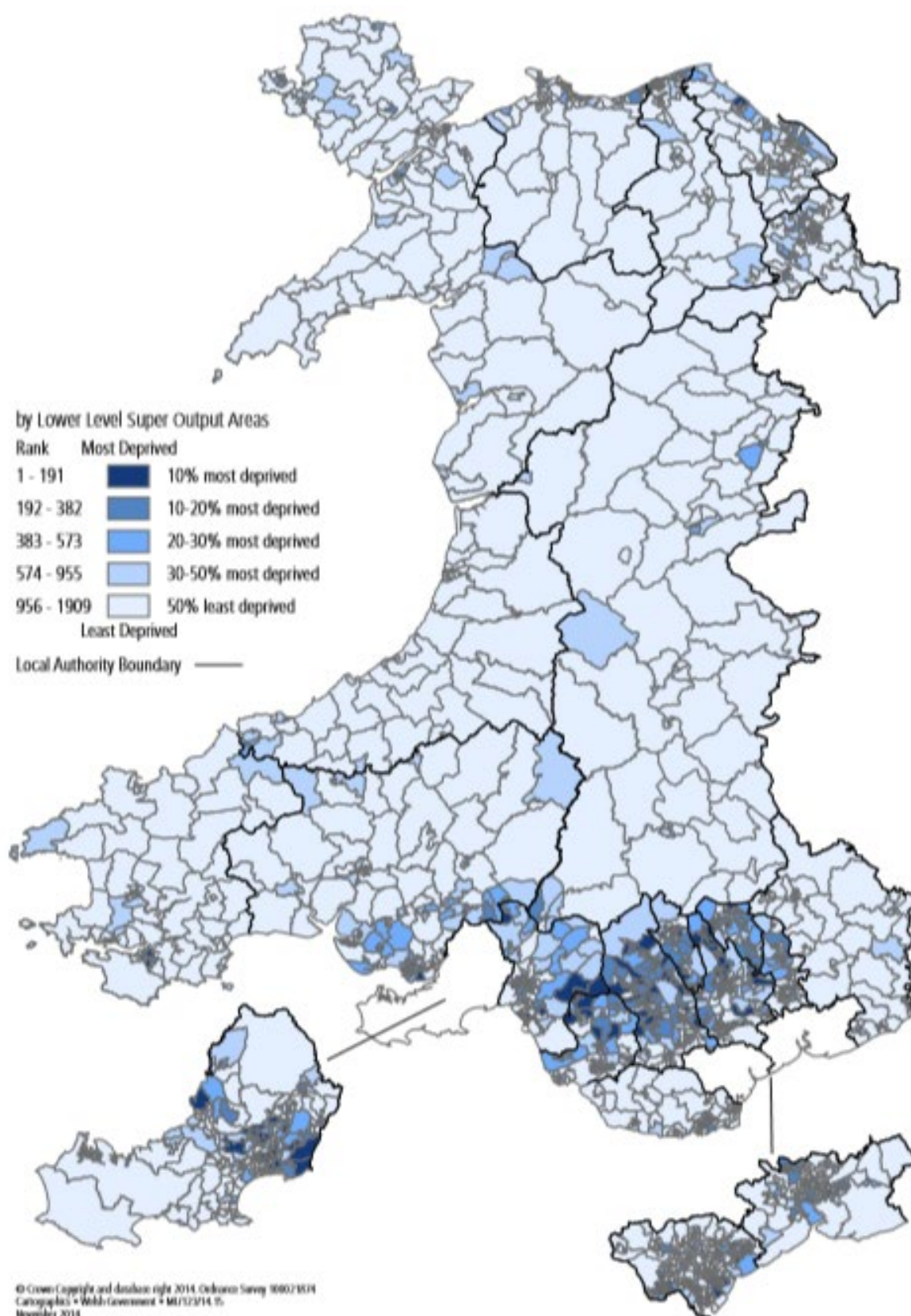
Source: WIMD

Percentage of good / bad health

In 2011 77.4% of people in Wales reported their general health as either 'Very good' or 'Good'. This is 3.6% lower than that of England (81.4%). The gap between local authorities reporting the highest (Cardiff: 81.4%) and lowest (Blaenau Gwent: 72.6 per cent) percentages of 'Very good' and 'Good' general health was 8.8%. The concentration of low percentages of 'Good' general health recorded in 2011 corresponds with the former coal mining and heavy industrial centres of the Welsh valleys in 2011 suggesting that these former industries have had long term health implications. Cardiff, Gwynedd and Flintshire were identified as having the best levels of general health (ONS).

Isle of Anglesey, Ceredigion and Monmouthshire had no LSOAs in the most deprived 10%. Only 15.2% of the LSOAs in Ceredigion were in the most deprived 50% in Wales. Blaenau Gwent had the highest proportion of LSOAs in the most deprived 50% in Wales (95.7%). The next highest was Merthyr Tydfil, with 86.1% of its LSOAs in the most deprived half of Wales.

Figure 3-3 Health Deprivation Map for Wales



Source: WIMD 2014

Data Gaps

- Up to date national data relating to access to open space

4.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Overall health statistics for Wales are improving with life expectancy increasing and fewer people with reported poor health over the past decade however health gains are not distributed equally across the country and in particular access to services is varied, being good in more urban areas, notably the south, but relatively poor across much of rural Wales. Although the health of those living in rural communities is generally good compared to those of urban environments.

Factors specific to a rural environment compared to those of urban environments that can impact on health more significantly and lead to inequalities and poorer health, such as distance from public services and support, availability of transport, housing standards and the ageing population. Access to healthcare can be limited in many parts of rural Wales.

Whilst people are living longer and the rates of some diseases is decreasing, challenges such as living environment and modern lifestyles can contribute towards increasing levels of chronic diseases such as diabetes, joint problems, heart disease and some cancers which in turn can lead to disability and increased demand on health services. In addition, poor mental health can also be an underpinning factor in a number of physical diseases and unhealthy lifestyles.

Opportunities

Overall, the NDF must help to achieve the important balance of economic and social improvement that is also sustainable and respects the country's valuable natural and cultural environment.

The NDF should recognise the potential for national green spaces as places for health and recreation, connecting habitats and supporting community interaction. Improving the quality and access to green and open spaces can greatly encourage healthier lifestyles and a healthier population could enable people (including children) to achieve their potential and to make Wales a more equal society.

The NDF has an important contribution to make towards ensuring that health challenges are addressed in order to improve health and well-being and reduce inequalities.

4.3 Relevant ISA Objectives and Questions

Health and Well-being

2. To contribute to an improvement in physical and mental health and well-being for all and contribute towards a reduction in health inequalities across Wales

- Contribute towards an improvement in access to health and social care services especially in isolated/rural areas?
- Contribute towards a reduction in health inequalities amongst different groups in the community including specifically children and older people?
- Promote healthy lifestyles through land use planning initiatives?
- Contribute towards a reduction in levels of child poverty and fuel poverty?
- Contribute towards improving access to open space including opportunities for play?

11. To create the conditions within which an improvement in social cohesion and equality can be achieved

- Create the conditions within which social cohesion and equality can be improved?
- Create the conditions within which equalities based on background or circumstances can be improved?
- Create the conditions within which gender inequality may be reduced?
- Create the conditions within which age inequality may be reduced?
- Create the conditions within which inequalities based on disability can be improved?
- Ensure children who have any kind of disability can lead full and independent lives?
- Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment?
- Ensure children can live to a standard that is good enough to meet their physical and mental needs?
- Ensure children have access to an education?
- Ensure children can relax and play, and join in a wide range of activities?
- Encourage the development of strong, cohesive communities?
- Create conditions to reduce levels of crime and the fear of crime?
- Create the conditions within which an improvement in satisfaction of people with their neighbourhoods as a place to live can be achieved?

B-5. Well-Being Goal: A More Equal Wales

This section provides baseline data relating to the following well-being goal:

'A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).'

The data primarily relates to:

- Population

5.1 Overview of Baseline Conditions

5.1.1 Population

Relevance to the NDF

An equal society in Wales can help to ensure that public services and employment are fair and accessible to all and that communities are inclusive. The NDF could contribute positively towards making more fair and inclusive societies.

Baseline conditions and trends

The following baseline indicators have been used to characterise existing conditions relating to goal 4 of the Well-being of Future Generations (Wales) Act 2015 for population in Wales:

Percentage of people who feel able to influence decisions affecting their local area

The National Survey for Wales is a large-scale survey of adults in Wales, covering a range of topics such as wellbeing and people's views on public services. The results included are from 2014-2015 (there was no survey taken in 2015-2016; 2016-2017 is in progress).

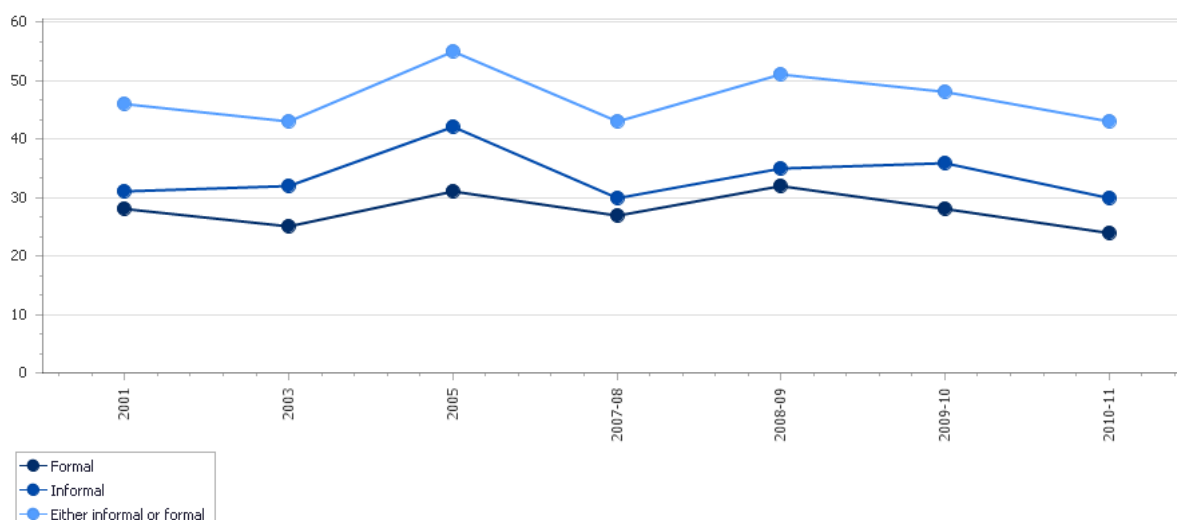
When asked if they felt able to influence decisions affecting their local area, the survey revealed that 35% of people tended to disagree; 24% strongly disagreed and 18% tended to agree. Only 3% of those surveyed strongly agreed that they felt able to influence decisions affecting their local area. 20% of respondents neither agreed nor disagreed. The results demonstrate that over 50% of respondents felt that they cannot influence decisions affecting their local area.

Community cohesion

In response to being asked whether or not people in their local area from different backgrounds 'get on well together', the National Survey for Wales revealed that 31% of people strongly agreed and 48% tended to agree with that assertion. 12% neither agreed or disagreed. 6% tended to disagree and 3% strongly disagreed. This demonstrates that over 70% of people agreed with the statement.

Percentage of people who volunteer

Figure 4-1 Percentage of people volunteering on a formal and informal basis



(Source: Stats Wales)

Since 2001 -2011 volunteer levels shows a consistent level of volunteers across Wales over the 10 year period from 2001-2011, as presented in Figure 4-1. There are higher levels of informal volunteering compared with those undertaking more formal volunteering roles.

Gender pay difference

The gender pay gap for median earnings of full-time employees decreased to 9.4%, from 9.6% in 2014. This is the lowest since the survey began in 1997, although the gap has changed relatively little over the last 4 years. A similar trend is seen when full-time and part-time employees are combined, although the gap is unchanged from 2014, at 19.2% (ONS).

Percentage of Ethnic Groups

The ethnic make-up of the Welsh local authorities compared to national figures is shown in Table 4-1 below.

Table 4-1 Percentage of Ethnic Groups in Wales and local authorities

Area	All categories: Ethnic group	White (%)	Mixed (%)	Asian (%)	Black (%)	Other (%)
United Kingdom	63,182,178	87.2	2.0	6.9	3.0	0.9
Wales	3,063,456	95.6	1.0	2.3	0.6	0.5
Anglesey	69,751	98.2	0.7	0.7	0.1	0.3
Blaenau Gwent	69,814	98.5	0.6	0.7	0.1	0.1
Bridgend	139,178	97.8	0.7	1.1	0.2	0.2
Caerphilly	178,806	98.3	0.7	0.8	0.1	0.1
Cardiff	346,090	84.7	2.9	8.1	2.4	2.0
Carmarthenshire	183,777	98.1	0.6	1.0	0.2	0.2
Ceredigion	75,922	96.7	1.0	1.4	0.4	0.5

Area	All categories: Ethnic group	White (%)	Mixed (%)	Asian (%)	Black (%)	Other (%)
Conwy	115,228	97.7	0.8	1.1	0.2	0.3
Denbighshire	93,734	97.4	0.8	1.5	0.2	0.1
Flintshire	152,506	98.5	0.6	0.8	0.1	0.1
Gwynedd	121,874	96.5	0.8	1.8	0.2	0.7
Merthyr Tydfil	58,802	97.6	0.8	1.2	0.2	0.2
Monmouthshire	91,323	98.0	0.7	1.0	0.2	0.1
Neath Port Talbot	139,812	98.1	0.7	1.0	0.2	0.1
Newport	145,736	89.9	1.9	5.5	1.7	1.0
Pembrokeshire	122,439	98.1	0.6	1.0	0.1	0.2
Powys	132,976	98.4	0.6	0.9	0.1	0.1
Rhondda Cynon Taf	234,410	97.4	0.6	1.3	0.6	0.1
Swansea	239,023	94.0	0.9	3.3	0.8	1.0
The Vale of Glamorgan	126,336	96.4	1.3	1.6	0.4	0.3
Torfaen	91,075	98.0	0.7	1.1	0.2	0.1
Wrexham	134,844	96.9	0.7	1.7	0.5	0.2

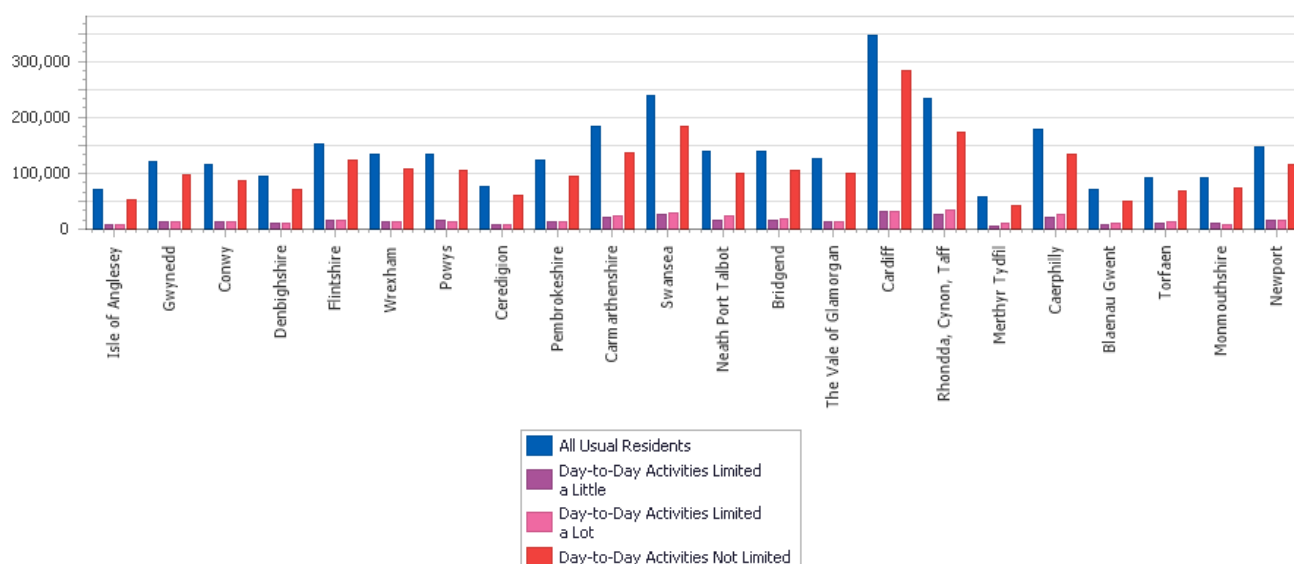
(Source: 2011 Census – Nomis)

In 2011, Wales had 8% more of its population who were white compared to the rest of the United Kingdom and a lower percentage of people who were Asian, black, mixed or other. The white ethnic group is dominant across all of the local authorities. The urban areas of Cardiff and Newport have a slightly more multicultural population and their percentages of white persons compares similarly with the UK figures.

Limiting long term illness or disability by local authority

Figure 4-2 shows the extent of illness or disability by local authority in Wales. In all cases, the majority of residents do not have an illness or disability that limits their day-to-day activities. The trend of results on a national scale for Wales is similar to that of the local authorities with 11.9% limited a lot and 10.8% limited a little. However, levels in Wales were slightly higher than that of England with 8.3% limited a lot and 9.3% limited a little in England (ONS).

Figure 4-2 Limiting long term illness or disability by local authority



(Source: StatsWales)

Experience of discrimination

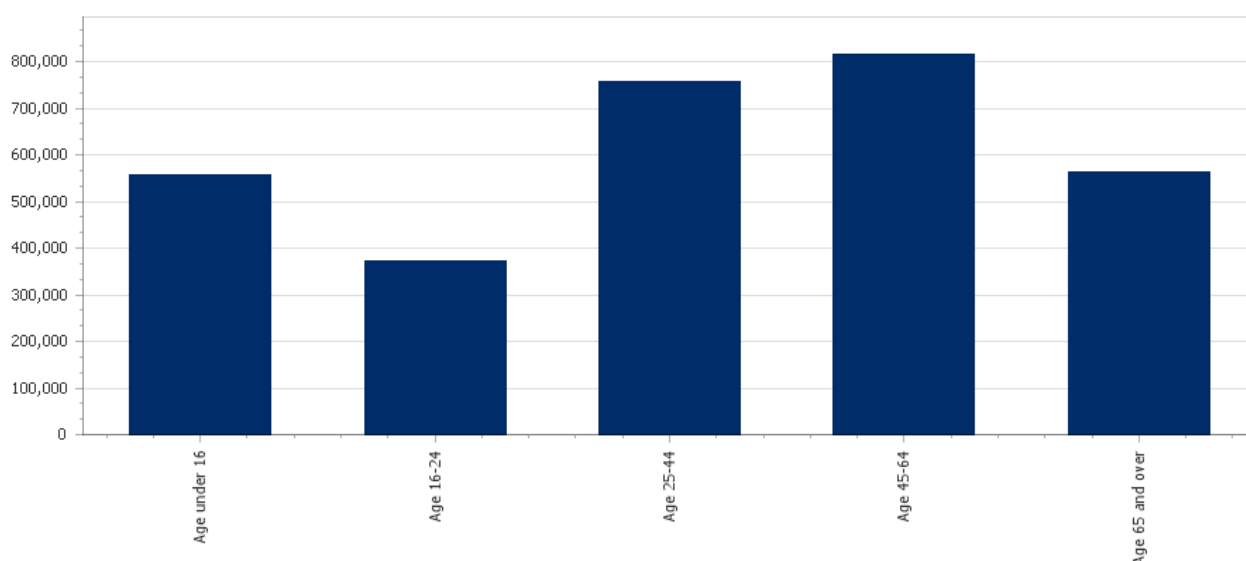
Welsh Government's 'Programme for Government' sets out the aim to improve community cohesion to reduce the incidence of domestic and sexual violence; reduce homophobic, transphobic, disability-related and religiously-motivated bullying; and tackle hate crime (National Survey for Wales). The National Survey for Wales defines these as reasons for discrimination. The 2012 National Survey for Wales found that the main reasons people were discriminated against were due to where they lived (15.7%), nationality (11.4%), age (10.6%), health problems or disability (9.7%).

Population Age Structure

Wales' population age structure for 2011 is shown in Figure 4-3. It shows the dominant age group is 45 – 64 years old. The results would also suggest that Wales is an 'aging' population with the higher figures leaning towards the older age groups. The number of people aged 65 and over is projected to increase by 292,000 (44%) between 2014 and 2039 (ONS). The 2009 Older People's Wellbeing Monitor identified that 44% of older people in Wales had a limiting long-term illness or disability.

In local authority terms, the majority of the authorities have a higher population between 25 and 64 with a fairly even split between the 25-44 and 45-64 age groups. Cardiff has a considerably higher proportion of 25-44 year olds.

Figure 4-3 Resident Population in Wales by broad age group



(Source: statswales.wales.gov.uk)

Country of Birth

The number of those born in Wales currently residing in Wales has decreased by 2.9% to 72.7% over 10 years subsequently leading to an increase in the number of those now residing in other parts of the UK and elsewhere across Europe. In comparison, the percentage for the UK in 2011 was 21.9% and this has increased by 0.4%.

Net Migration Trends

Net migration in Wales has fluctuated over the past 12 years. Between 2012 and 2013 showed a considerable upturn in net migration (14,000) compared to the preceding years. Wales nationally experienced a steady rise in net inward migration from 2001 to 2013.

Data Gaps

No significant data gaps have been identified for this topic at this stage.

5.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Levels of community cohesion could be impacted through a projected increase in net-migration mainly from within the UK and with urban areas projected to see greatest increase. However, it is noted that over 70% of people agree that people from different backgrounds within their area get on well.

Increasing levels of those aged 65 and over could present pressures across the country (dependent on whether healthy life expectancy i.e. the number of years you live a healthy life, continues to track overall life expectancy) including:

- Pressure on health services to provide adequate care;
- Availability of residential homes to meet the needs of the whole population, including but not limited to, the elderly and adults with a learning disability; and
- Provision of appropriate services for an older generation (e.g. transport).

Opportunities

Overall, the NDF can help to address issues surrounding the aging population through facilitating the provision of accessible services supported by connective infrastructure to meet local population growth needs.

Third sector/volunteering could improve cohesion within a community by increasing levels of employment and contributing to the well-being of the residents from a social perspective.

An equal Wales can enable people to reach their full potential whilst addressing social, economic, cultural and environmental inequality. The NDF could provide an opportunity to reduce isolation and encourage the development of integrated and liveable communities.

5.3 Relevant ISA Objectives and Questions

Population

11. To create the conditions within which an improvement in social cohesion and equality can be achieved

- Create the conditions within which social cohesion and equality can be improved?
- Create the conditions within which equalities based on background or circumstances can be improved?
- Create the conditions within which gender inequality may be reduced?
- Create the conditions within which age inequality may be reduced?
- Create the conditions within which inequalities based on disability can be improved?
- Ensure children who have any kind of disability can lead full and independent lives?
- Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment?
- Ensure children can live to a standard that is good enough to meet their physical and mental needs?
- Ensure children have access to an education?
- Ensure children can relax and play, and join in a wide range of activities?
- Encourage the development of strong, cohesive communities?
- Create conditions to reduce levels of crime and the fear of crime?
- Create the conditions within which an improvement in satisfaction of people with their neighbourhoods as a place to live can be achieved?

B-6. Well-Being Goal: A Wales of Cohesive Communities

This section provides baseline data relating to the following well-being goal:

‘Attractive, viable, safe and well-connected communities.’

The data relates primarily to:

- Crime;
- Housing;
- Deprivation and Living Environment; and
- Transportation.

6.1 Overview of Baseline Conditions

6.1.1 Crime

Relevance to the NDF

The creation of cohesive communities which are attractive, well-connected, safe and meet the needs of the population are important for Wales. The NDF has a key role to play in helping to guide decisions through the planning process relating to the development of space which can help to reduce crime.

Baseline Conditions and trends

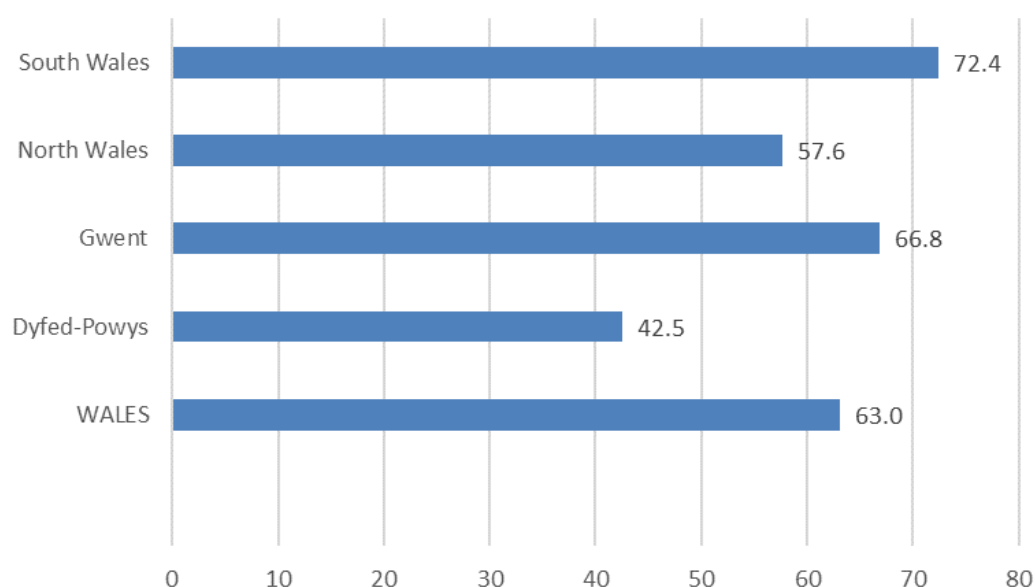
Recorded Crime Rates / 1000 for Key Offences

Latest figures for year ending September 2016 show the total crime rate per 1000 population / households in Wales was 63 per 1000 for headline offences. Broken down in key crime statistics the crime rates compared to the change from year ending September 2015 figures are as follows (Source ONS):

- Violence against the person – 18.4 / 1000 (+21%)
- Sexual offences – 1.8 / 1000 (+19%)
- Robbery – 0.2 / 1000 (-0.1%)
- Burglary – 5.3 / 1000 (-7%)
- Theft offences including a motor vehicle – 24 / 1000 (-3%)

The above figures show violent crime and sexual offences in Wales have increased compared to a year ago but theft offences and burglary rates have both decreased. Robbery rates are negligible. Figure 5-1 shows the crime recorded per 1000 population in the local authorities in Wales compared to the national average. South Wales and Gwent recorded higher crime rates than the national average.

Figure 5-1 Crime Rate per 1000 Population in Wales and Other Welsh police force areas, year ending in September 2016



Source: ONS

Theft offences and violence against the person are the two highest crimes recorded in Wales at 38.1% and 29.2% respectively.

Safe for Children to Play Outside in Local Area

The proportion of Wales residents who feel it safe to let their children play outside is a useful indicator of the general feeling of safety in an area. In 2014, 64% of people considered it safe to allow their children to play outside, whereas 25% did not and 11% were undecided. In terms of local authorities, Isle of Anglesey was perceived as the safest place for children to play outside with 81% of respondents agreeing with this statement. Whereas, Blaenau Gwent was perceived as the least safe place for children to play outside with only 51% of respondents stating it was a safe area (stats wales).

Percentage of people feeling safe at home, walking in the local area and when travelling

In 2014, In the National Survey, people were asked how safe they felt in a variety of situations after dark:

- 79% of people said they felt safe walking alone in their local area after dark;
- 96% of people felt safe at home after dark; and
- 79% of people felt safe on public transport after dark (this has increased from 74% in 2012-13).

Percentage of people satisfied with local area as a place to live

In 2014, the National Survey included a series of questions on the quality of the local area. These were included in the survey to help investigate the environmental dimension of well-being.

People were asked whether they agreed or disagreed with positive statements about their local area. 70% agreed with the statement 'my local area is well maintained', 77% agreed that their local area was free from graffiti and vandalism, and 62% agreed that 'my local area is free from litter and rubbish'. In terms of local authority level analysis:

- 80% of people in Pembrokeshire felt that their local area was well-maintained, compared with 56% of people in Blaenau Gwent.
- 93% of people in Powys felt that their local area was free from graffiti and vandalism, compared with 65% of people in Merthyr Tydfil.

In 2015, 79% agreed that in their local area people from different backgrounds get on well together. 79% agreed that people in their local area treat each other with respect and consideration. Older people were more likely to have a positive view about people in their local area than younger people.

Data Gaps

No significant data gaps have been identified for this topic at this stage.

6.1.2 Housing

Relevance to the NDF

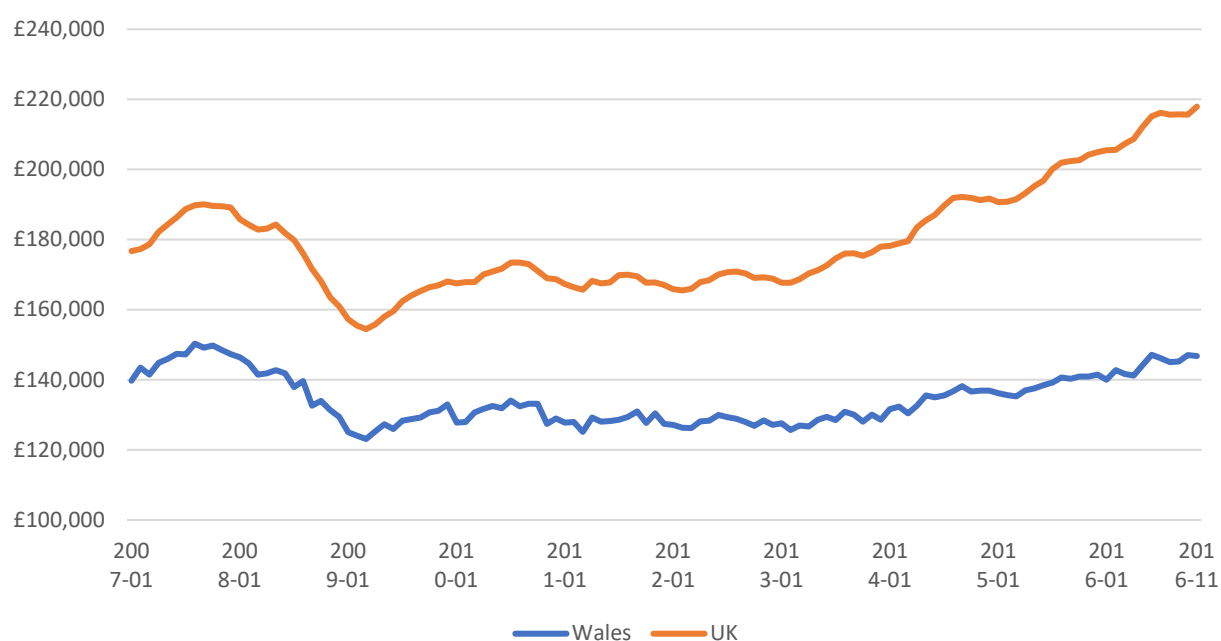
The development of housing to meet needs of the population within Wales are both important for Wales and have strong links with supporting the economy. The NDF has a key role to play in helping to guide decisions through the planning process relating to housing.

Baseline Conditions and trends

Average House Prices

Figure 5-2 shows the average house prices from 2007 to 2016 in Wales. It shows that prices have fluctuated considerably since 2007 and have stabilised since the significant price falls in 2009 due to the recession – which saw prices fall to around £123,100. As of November 2016 the average house price in Wales was £146,700. The Welsh average house price is 33% lower than the UK average (which stood at around £217,900).

Figure 5-2 Average House Prices in Wales from 2007-2016



Source: Proviser

Residential land availability

Welsh Government's planning policy requires local planning authorities in Wales to identify specific, deliverable sites for the following five-year period and to review this position on an annual basis through the preparation of a Joint Housing Land Availability Study.

According to local planning authority (LPAs) information, it was identified in the Welsh LPAs' 2016 Studies that as, at 1 April 2016, 14 out of the 25 local planning authorities had less than five years housing land supply – (five local planning authorities had not published their 2016 data yet). By comparison, 17 local planning authorities had less than five years housing land supply in 2015, 12 of which still have less than five years supply in 2015 (this figure excludes the five local planning authorities who have not yet published their 2016 data).

12 local planning authorities have had less than five years housing land supply for three or more consecutive years.

Percentage of Households Living in Type of Accommodation

In 2011, there were 1,302,676 properties in Wales, 27.7% of these were detached, 31.8% were semi-detached, 27.7% were terraces and 12.3% were flats/apartments. Compared to 2001, this is an increase of 0.6%, 0.1% and 1.1% for detached housing, semi-detached and flats / apartments respectively. There was a fall in terraced housing types over the 10 years, by 1.8%.

No. of Houses in Multiple Occupation (HMOs)

In 2015-16 there were 14,749, ca. 1.1% households known as Houses in Multiple Occupancy (HMOs) with 18,782 predicted for the whole of Wales. This figure represents a considerable fall over recent years, being of 1,363 properties since 2007 where it was 20,145. The four local authorities with the highest number of HMOs were located in South Wales (Cardiff - 5,344); South West Wales (Swansea - 1,658) and north Wales (Gwynedd -1,300 and Conwy - 1,100). The local authorities with the lowest number of HMOs were all located in the South and South East of Wales (Torfaen – 37; Blaenau Gwent 46; Merthyr Tydfil 48 and Monmouthshire 59).

New home building rates

In 2015-16, Wales accounted for around 3.9% of all permanent dwellings started in the UK – this figure recorded for Wales was the similar to Northern Ireland. These figures were the lowest for any of the UK countries. In 2015-16 Wales accounted for 4.1% of all the UK's permanent houses built.

Dwellings Demolished

Flintshire recorded the highest number of dwellings that were demolished across Wales (114 total dwellings demolished) over 2015-16 period. Six local authorities across Wales recorded no dwellings demolished.

Affordable housing availability and building rates – Granted permission

In 2015-16, 930 new affordable properties were granted permission provided through planning obligations in Wales. This shows a decrease of 37% from the year before (2014-15 – 1,483 properties). Monmouthshire provided the highest number of affordable properties through planning obligations (165 properties in 2015-16) compared to five authorities that did not grant permission for any affordable properties (Flintshire, Wrexham, Swansea, Merthyr Tydfil and Pembrokeshire Coast National Park).

Affordable housing availability and building rates – delivered

In 2015-16, 705 new affordable properties were delivered in Wales. This shows a decrease of 11% from the year before (2014-15 – 796 properties). Bridgend delivered the highest number of affordable properties (126 properties in 2015-16) compared to six authorities that did not deliver any affordable properties (Gwynedd, Denbighshire, Powys, Merthyr Tydfil, Caerphilly and Blaenau Gwent).

Vacant Housing

Both the number and the percentage of vacant social housing stock decreased during 2015-16. At the end of March 2016, 1.9% (4,340) of all social housing stock was vacant, down by 4% on the previous year (StatsWales).

Housing units vacant for more than 6 months decreased by 13%, compared to the end of March 2015 and accounted for 28% of all vacant social housing compared with 31% in 2014 indicating that a decreasing trend in the number of vacant housing units.

In 2015-2016 the local authorities with the highest number of vacant housing for more than 6 months were Neath Port Talbot (153), Rhondda Cynon Taf (138) and Blaenau Gwent (213) (Stats Wales).

Data Gaps

No significant data gaps have been identified for this topic at this stage.

6.1.3 Deprivation and Living Environment

Relevance to the NDF

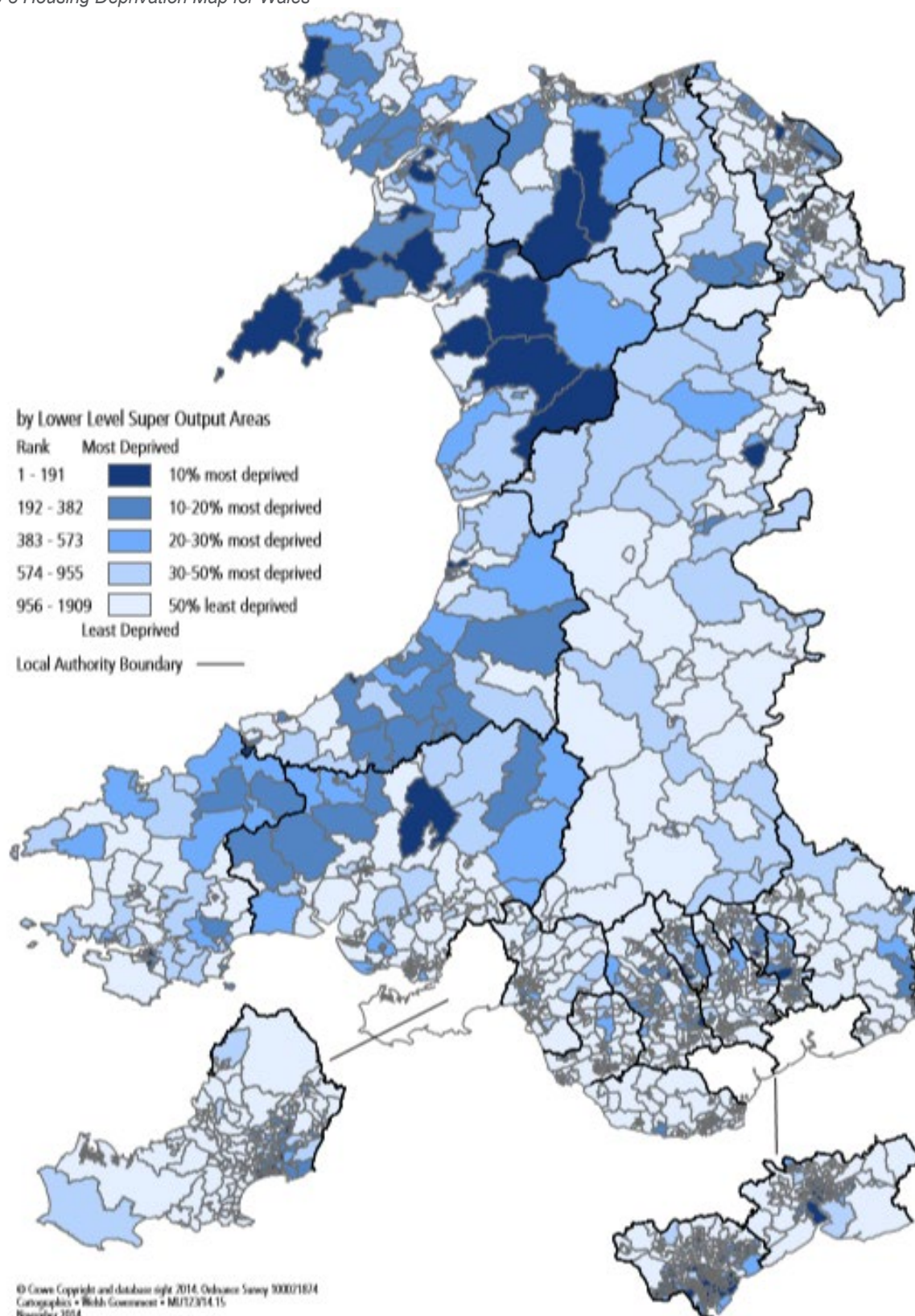
The creation of cohesive communities which are attractive, well-connected, safe and meet the needs of the population are important for Wales. The NDF has a key role to play in helping to guide decisions through the planning process relating to the development of space which can help to reduce deprivation and deliver sustainable living environments.

Baseline Conditions and trends

Number and Distribution of LSOAs Within Bottom 10% Most Deprived Housing

Figure 5-3 shows the deprivation levels of the LSOAs in Wales with regard to housing.

Figure 5-3 Housing Deprivation Map for Wales



Source: WIMD

Wales has 1909 LSOAs in total – In the WIMD 2014 housing measurement there are pockets of high housing deprivation in the urban areas in the large South Wales cities and in the more rural areas of North West.

In terms of local authorities, the highest proportion of housing deprivation in Wales was prevalent in Cardiff (36.9%). Monmouthshire and Caerphilly had no LSOAs in the most deprived 10%.

Percentage of people living in households in income poverty relative to the UK median

Between 2008-09 and 2014-2015, 23% of people in Wales were living in households experiencing income poverty (after housing costs) – this meant that Wales experienced the highest percentage in household poverty compared to the other countries in the UK.

In 2012-13 to 2014-15, Wales had the highest levels of children, working age adults and pensioners living in household poverty compared to other countries in the UK.

Percentage of households living in material deprivation

The National Survey for Wales (April 2014 – March 2015) includes material deprivation which is one of the measures the Welsh Government use to analyse poverty – such questions that are asked include whether household is able to afford things like keeping the house warm enough, make regular savings, or have a holiday once a year.

Material deprivation questions are designed to capture the consequences of long-term poverty on households, rather than short-term financial strain.

The key findings regarding material deprivation include:

- 16% of people were materially deprived (that is, unable to afford certain things such as keeping the house warm enough, make regular savings, or have a holiday once a year).
- 9% of parents had materially deprived children (that is, being unable to afford certain things like warm winter coats for the child(ren), or to celebrate special occasions such as birthdays and Christmas).
- People in urban areas were more likely to be materially deprived than those in rural areas: 17% of people in urban areas were materially deprived, compared with 12% in rural areas.
- People in their 30s were the age group most likely to be materially deprived. 23% of people aged 30 to 39 were materially deprived, compared with 6% of people aged 70 or over. (National survey of Wales).

Percentage of dwellings which are free from hazards

According to Stats Wales, during 2015-16, local authorities carried out 6,276 assessments under the Housing Health and Safety Rating System (HHSRS), a decrease of 7% on the previous year. Over two thirds (68 per cent) of all assessments made during 2015-16 recorded no Category hazards.

During 2015-16, Category 1 hazards were found in 2,024 (32%) of all assessments made. The most common Category 1 hazard found in both Houses in Multiple Occupation (HMOS) and non-HMO dwellings was 'excess cold'.

Number of households successfully prevented from becoming homeless for at least 6 months – rate per 10,000 households

During 2015-16, 7,128 households in Wales were assessed as being threatened with homelessness within 56 days. For 4,599 households (65 per cent), homelessness was successfully prevented for at least 6 months.

For a further 1,119 households (16 per cent of those threatened with homelessness), prevention for at least 6 months was unsuccessful. In these cases, the applying households have been discharged and have become statutorily homeless and may be owed a duty under Section 73 (Welsh Government).

Data Gaps

No significant data gaps have been identified for this topic at this stage.

6.1.4 Transport

Relevance to the NDF

The development of transportation links within Wales are both important for Wales and have strong links with supporting the economy. The NDF has a key role to play in helping to guide decisions through the planning process relating to transportation.

Baseline Conditions and trends

Distance travelled to work

Table 5-1 shows the majority of Welsh residents travel less than 10km to work. The majority of residents living within all Welsh regions travel a maximum distance of less than 10km to work at a proportion ranging between 37.9 to 58%. Of the residents who work from home Mid and West Wales work have significantly higher numbers than the Welsh and other regional levels. The transportation network across Wales is presented in Figure 4 – Transportation Network.

Table 5-1 Distance travelled to work by Welsh Regions

Distance travelled to work	Mid and West Wales	North Wales	South Wales Central	South Wales East	South Wales West	Wales
Less than 10km	37.9%	48.6%	58.0%	51.2%	55.9%	50.5%
10km to less than 30km	23.0%	23.5%	20.4%	25.8%	21.1%	22.8%
30km and over	11.7%	9.6%	6.1%	7.6%	8.1%	8.5%
Work mainly at or from home	18.2%	10.8%	7.8%	8.1%	7.7%	10.4%
Other	9.3%	7.6%	7.7%	7.3%	7.2%	7.8%

Source: 2011 Census

Journey to work by mode

The method of travel to work census data (QS701EW) for Welsh residents are illustrated in Table 5-2. The results show a similar split between each mode type compared across each country by Welsh regions. The results for Wales overall the majority of residents travel by car (car or van driver, car passenger or motorcyclist) 45% and lower for active travel (walking or cycling) 7%, whilst the proportion of residents travelling via public transport (bus or rail) lower at 4%. The proportion of residents not in employment in Wales overall at 39%.

Table 5-2 Method travelled to work by Welsh Regions, 2011 Census

Source: 2011 Census

Distance travelled to work	Mid and West Wales	North Wales	South Wales Central	South Wales East	South Wales West	Wales
Car	44%	48%	42%	47%	46%	45%
Public Transport	2%	4%	7%	5%	4%	4%
Active	8%	7%	9%	6%	6%	7%
Other method of travel to work	1%	0%	0%	0%	0%	0%
Not in employment	38%	37%	39%	40%	42%	39%
Working from home	7%	3%	2%	2%	2%	3%

Road accidents by area by year and people killed or seriously injured on roads

In 2015, 105 people were killed and 1,081 people seriously injured on Welsh roads.

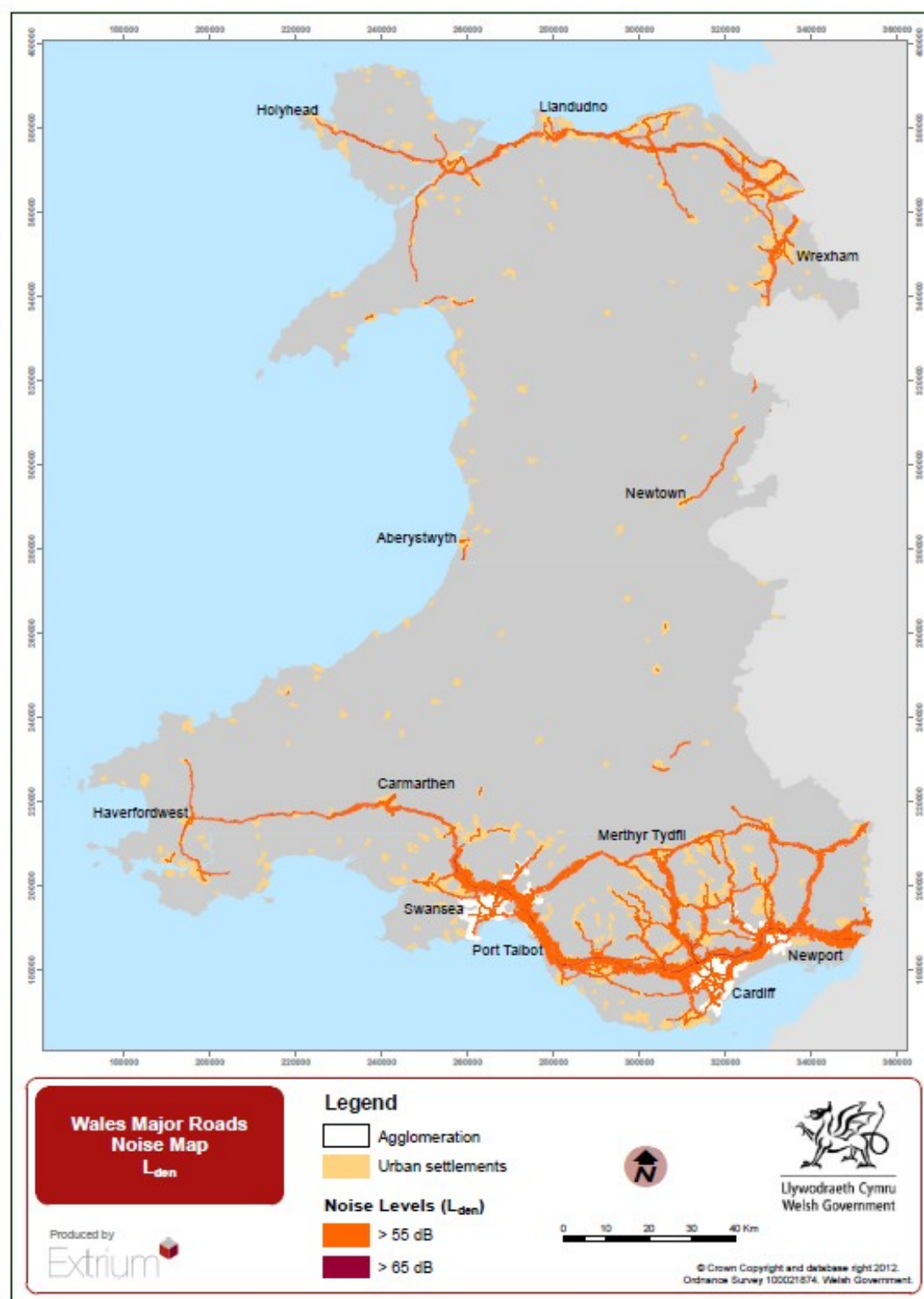
In 2015, there were 5,543 road accidents in Wales involving personal injury recorded by the police, a reduction of 333 on 2014 (6% reduction). These recorded accidents resulted in 7,682 casualties, which was 526 fewer than in 2014.

According to statistics, the majority of areas have experienced falls in all road accidents over the past 15 years. In 2015, Gwent police force has recorded the lowest number of incidents and South Wales police recording the highest number – this is largely due to South Wales being the largest police force in Wales in terms of population.

Noise pollution

Noise mapping carried out by the Welsh Government in 2013 under the Environmental Noise Directive (see Figure 5-4) highlights that road noise is focused around the M4 in South Wales and adjoining 'A' roads. The A55 and adjoining 'A' Roads in North Wales, and the A483 in Mid Wales, also contribute to high levels of noise pollution.

Figure 5-4 Wales Major Roads Noise Map



Source: Welsh Government (2013) Data Flow 4 and 8 Supplementary Report Major Roads in Wales. Available at <http://gov.wales/docs/desh/publications/130214noise-major-roads-en.pdf> [Accessed January 2016].

Data Gaps

At the time of writing, information on development on brownfield land was only available at the Local Authority level. However, this information was not available for all the authorities within Wales therefore a national representation of this information could not be gathered.

6.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Surveys suggest that in 2014, 70% agreed with the statement 'my local area is well maintained', 77% agreed that their local area was free from graffiti and vandalism. These figures are highest in rural areas such as Powys and Pembrokeshire and lowest in Blaenau Gwent and Merthyr Tydfil.

In 2014, 64% of people considered it safe to allow their children to play outside, whereas 25% did not therefore there are issues around the level of perceived safety within neighbourhoods. The Isle of Anglesey was perceived as the safest place and Blaenau Gwent the least safe place.

Levels of housing deprivation are relatively high in pockets of the urban centres in the South and in the more rural areas of the North West and between 2008-09 to 2014-2015, 23% of people in Wales were living in households experiencing income poverty (after housing costs) – this meant that Wales experienced the highest % in household poverty compared to the other parts of the UK

Levels of noise pollution around key roads within Wales are high. Noise can have multi-ranging effects, including on landscape receptors, ecological resources and human health.

Opportunities

The NDF should support the provision for a range of housing that meet the needs of the population and promotes safe and sustainable communities. This could be through methods such as identifying strategic housing locations and/or developing national housing targets.

The creation of safe and well-maintained communities, where there is a sense of cohesion, should be a priority.

The NDF should also plan for reducing the need to travel, and provide opportunities to access new and existing development and services by a range of sustainable travel modes and or improvements to digital connectivity.

The NDF should consider strategic transport proposals in terms of the opportunities they present to encourage regional equality as well as improving human health, landscape and nature conservation from a reduction in noise and light pollution.

6.3 Relevant ISA Objectives and Questions

Crime

11. To create the conditions within which an improvement in social cohesion and equality can be achieved

- Create conditions to reduce levels of crime and the fear of crime?
- Create the conditions within which an improvement in satisfaction of people with their neighbourhoods as a place to live can be achieved?

Housing

12. To encourage the provision of good quality, safe, affordable housing that meets identified needs

- Encourage the provision of sufficient housing to meet identified needs in all areas?
- Create the conditions within which all housing should meet acceptable standards?
- Create the conditions within which the availability of affordable housing should increase?
- Create the conditions within which rural housing needs can be met?

- Create the conditions within which levels of homelessness are reduced?
- Create the conditions within which there is a reduction in the number of households in income poverty?

Deprivation and living environment

11. To create the conditions within which an improvement in social cohesion and equality can be achieved

- Create the conditions within which social cohesion and equality can be improved?
- Create the conditions within which equalities based on background or circumstances can be improved?
- Create the conditions within which gender inequality may be reduced?
- Create the conditions within which age inequality may be reduced?
- Create the conditions within which inequalities based on disability can be improved?
- Ensure children who have any kind of disability can lead full and independent lives?
- Ensure children can develop healthily, and have access to good quality health care, clean water, nutritious food and a clean environment?
- Ensure children can live to a standard that is good enough to meet their physical and mental needs?
- Ensure children have access to an education?
- Ensure children can relax and play, and join in a wide range of activities?
- Encourage the development of strong, cohesive communities?
- Create conditions to reduce levels of crime and the fear of crime?
- Create the conditions within which an improvement in satisfaction of people with their neighbourhoods as a place to live can be achieved?

Transport

10. To improve the connectivity of communities and sustainable access to basic goods, services and amenities for all groups

- Encourage the provision of public transport services that meet people's needs through land use planning initiatives?
- Plan for highways infrastructure that meets people's needs (including walking and cycling routes)?
- Promote the use of sustainable travel modes and encourage a reduction in dependence on the private car?
- Encourage an improvement in access to cultural and recreational facilities?
- Support the provision of new and improvement of existing digital connective infrastructure?
- Encourage the maintenance and improvement of access to essential services and facilities, particularly in rural areas?
- Encourage an improvement in access to open space?
- Encourage an increase in opportunities for the public to access to the countryside and coastal areas?

B-7. Well-Being Goal: A Wales of Vibrant Culture and Thriving Welsh Language

This section provides baseline data relating to the following well-being goal:

‘A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.’

The data relate primarily to:

- Welsh Language;
- Landscape and Townscape Character; and
- Cultural and Heritage Assets.

7.1 Overview of Baseline Conditions

7.1.1 Welsh Language

Relevance to the NDF

Wales is a bilingual country and the Welsh language is an important component of Welsh national identity and culture. As such, the protection and promotion of Welsh Language needs to be a core element of the NDF.

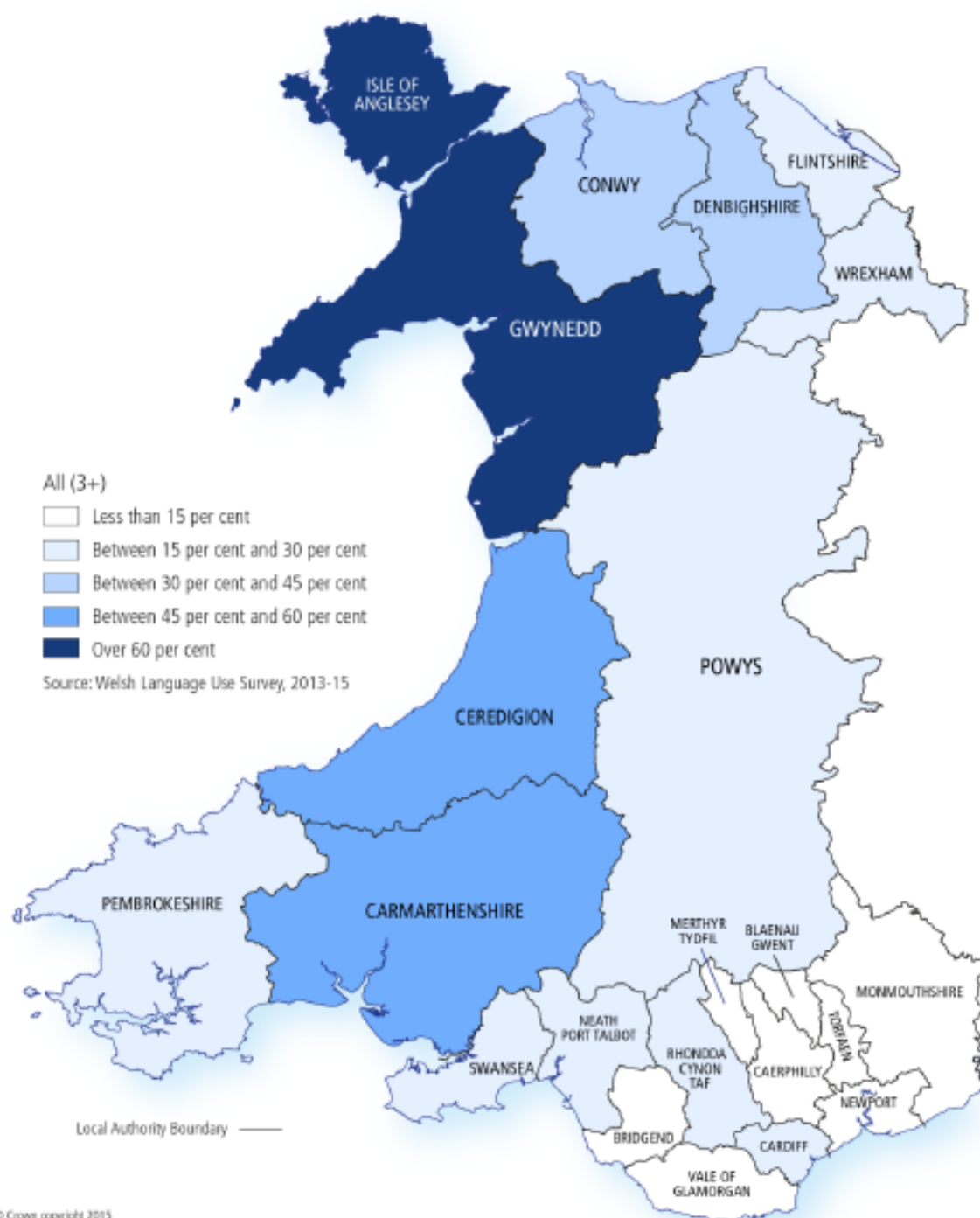
Baseline conditions and trends

The historic decline in use of the Welsh language has been halted and has now been on a general upward trend since the early 1990s. This is, in part due to Welsh entering the national curriculum and being a compulsory subject in schools. However, levels of fluency are still low and there are large regional variations.

The Welsh language use survey is funded jointly by Welsh Government and the Welsh Language Commissioner. It provides information about Welsh speakers' use of the Welsh language. The most recent survey covers 2013 – 2015. According to the Welsh Language Use Survey 2013-15, 24% of people aged three and over were able to speak Welsh. The percentage of Welsh speakers decreased with age; it was at its highest amongst the 3 to 15 age group, 41%, and at its lowest amongst the 45 to 64 age group, 18%.

The percentage of people able to speak Welsh also varies between local authority areas. Figure 6-1 presents the percentage of people able to speak Welsh by local authority area. The highest concentration of Welsh speakers can be found in North West and West Wales, especially in Gwynedd, the Isle of Anglesey, Ceredigion and Carmarthenshire. The lowest percentage of people able to speak Welsh can be found in South East Wales.

Figure 6-1: Percentage of people who are able to speak Welsh by local authority area



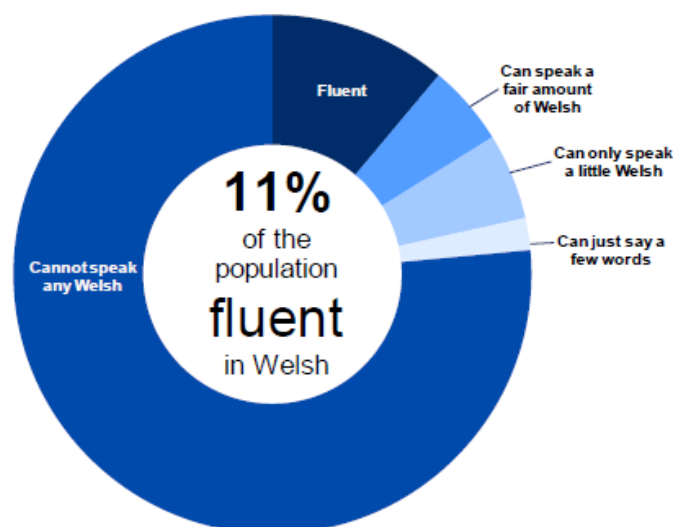
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November 2015

OGL

Source: Welsh Language Use in Wales (2013-2015)

Adults and young people aged three and over were asked as part of the Welsh Language Use Survey 2013-15 to best describe their ability to speak Welsh. Figure 6-2 presents the results of the question on fluency as a percentage of the whole population.

Figure 6-2: percentage of people who speak Welsh by fluency



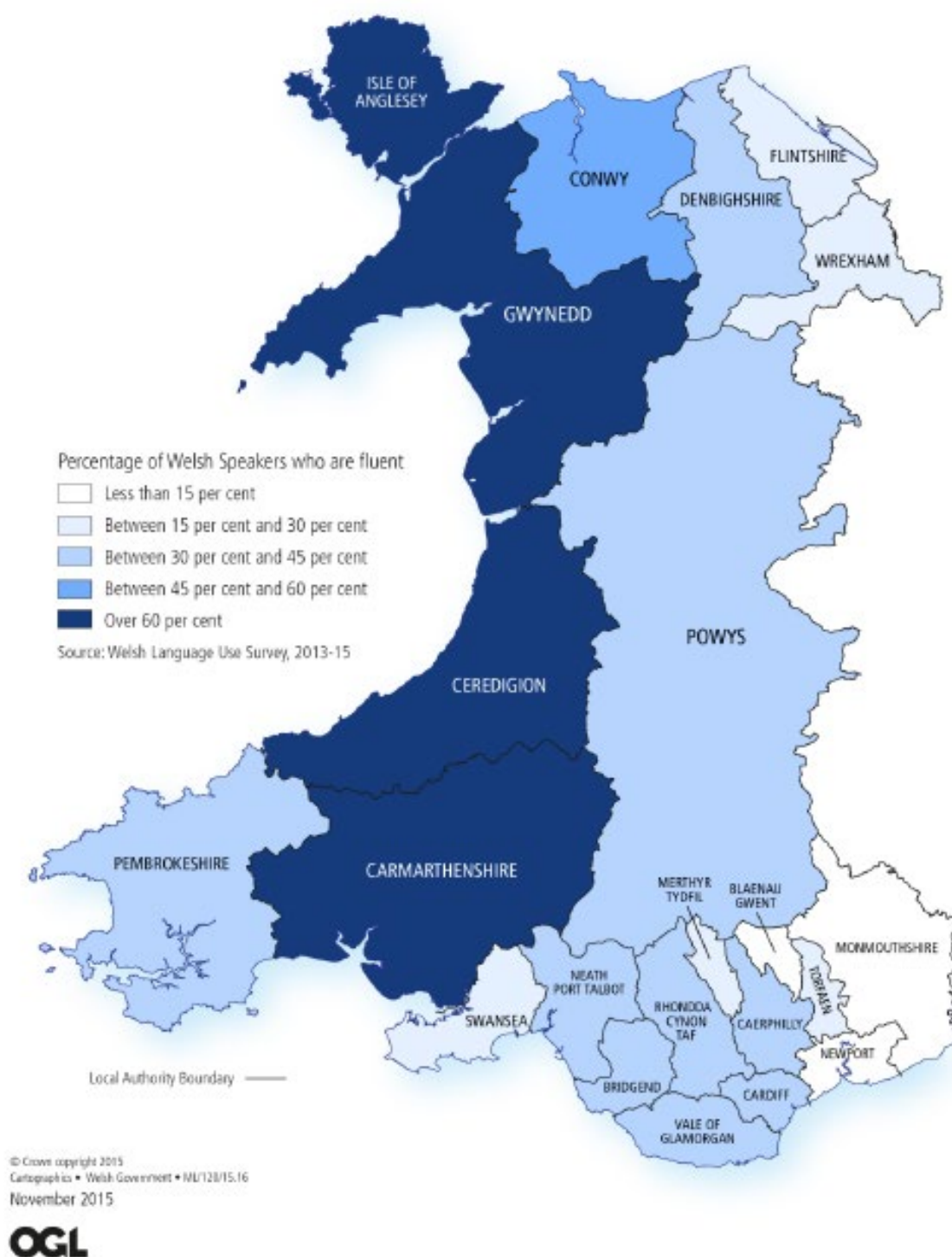
Source: Welsh Language Use in Wales (2013-2015)

11% of all people aged three and over living in Wales were able to speak Welsh fluently. This represents around 318,800 people. 12% of people stated that they could speak Welsh but not fluently. Both the percentage and the number of people who stated that they are fluent Welsh speakers have remained relatively constant since 2004-06. 12% of all people aged three and over were able to speak Welsh fluently in 2004-06, which represents 317,300 people.

The percentage of people who were fluent in Welsh tend to decrease with age, from 15% of the 3 to 15 age group to 9% of the 45 to 64 age group. The percentage of people aged 65 and over who were fluent was slightly higher than the percentage of the 30 to 44 and 45 to 64 age groups (Welsh Language Use in Wales (2013-2015)).

Fluency also varies according to local authority areas. Figure 6-3 presents the percentage of Welsh speakers who were fluent based on local authority area. The local authority areas with the highest percentages of Welsh speakers also had the highest percentages of fluent Welsh speakers, and are located in North West and West Wales. The percentage of Welsh speakers who are fluent was highest in Gwynedd, where almost four in every five Welsh speakers are fluent.

Figure 6-3: Percentage of Welsh Speakers who are fluent by local authority area



Source: Welsh Language Use in Wales (2013-2015)

Data Gaps

No significant data gaps have been identified for this topic at this stage.

7.1.2 Landscape and Townscape Character

Relevance to the NDF

Welsh landscapes reflect the extent and condition of a range of natural resources and ecosystems against the complexity of human influences and land-use decisions. Townscapes and urban character also reflect a long history of human development. Similarly, seascape information complements the landscape/townscape information and together the two types of information provide an understanding of the cultural benefits to be had from both the terrestrial and the marine environment.

These elements have been strongly shaped by human intervention and land-uses throughout history and the NDF will continue to play an important role in shaping this character through its guidance on land-use planning. Landscape, townscape and seascape character are important in terms of Wales' strong sense of place and cultural identity with close links to the tourism industry.

Baseline conditions and trends

Wales has a varied and, generally high-quality landscape with over 50% of the land area being nationally valued for its scenic quality and character. Many Welsh landscapes are iconic with a clear sense of place and recognisable identity (SoNaRR, 2016). The country is predominantly rural in character with 60% of the landscape defined as Field Pattern/Mosaic and 20% is categorised as Open Land (SoNaRR, 2016).

National landscape change to 2015 has been small overall, but some changes have been substantial locally. The key contributors to landscape change in the built environment include: the expansion of settlements, commercial and industrial developments, quarries and road improvements, onshore wind-farms, turbines and large recreational related developments. In the rural environment examples include: the felling of conifers and replanting with broadleaves, woodland expansion and changing bracken cover.

Climate change over time is likely to have significant impacts on landscape character, local distinctiveness and quality, directly through changing land cover (migrating habitat and species ranges) and indirectly by influencing land use decisions. Landscape changes may also be evident from mitigation measures, such as renewable energy generation, water resource management and adaptation through the planned expansion of woodland. Climate change also poses a risk to landscapes from pests, pathogens and invasive species and from changes in frequency and/or magnitude of extreme weather and wildfire events.

25% of Wales is designated as either National Park or Area of Outstanding Natural Beauty.

Protected Landscapes

Within Wales there are three National Parks; Brecon Beacons, Pembrokeshire Coast and Snowdonia. Each National Park also has local planning authority status in Wales. Combined these National Parks in Wales cover around 20% of the land area of Wales. The locations of the National Parks in Wales are presented on Figure 2 – Landscape Features.

Brecon Beacons

The Brecon Beacons National Park contains some of the most distinctive upland landforms in southern Britain. The Park covers 520 square miles (1344 square kilometres) and lies between rural Mid Wales and the industrial South Wales Valleys. It is a diverse landscape, where sweeping uplands contrast with green valleys, with dramatic waterfalls, ancient woodland, caves, forests and reservoirs. The highest point is Pen y Fan, at the centre of the National Park. Its distinctive table topped summit stands at 886m, and it is climbed by hundreds of thousands of people each year.

The National Park is also home to 33,000 people, over 9000 different plants and animals, and has a strong Welsh heritage and rich economic, social and cultural life. The largest settlement is the cathedral town of Brecon with a population of approximately 7,500⁵.

⁵ Brecon Beacons National Park Authority Local Development Plan 2007-2022

Snowdonia National Park

The Snowdonia National Park takes its name from Snowdon which, at 1085m (3,560 feet), is the highest peak in Wales. The Snowdonia National Park is rich in landscape and townscape and has 60km of coastline. In addition to this, Snowdonia has extensive areas of woodlands and over 96,000 hectares of moorland. The landscape within the National Park has been formed over millions of years. Since the end of the last Ice Age, 10,000 years ago, the interaction between people and nature has shaped the landscape of the National Park and there are strong cultural associations between people and place. The traditional rural character of settlements is distinct to the National Park and forms part of its historic landscape character. Fourteen towns and villages in Snowdonia have Conservation Areas and there are 1,900 listed buildings, 13 being Grade I and 116 buildings at Grade II*, there are also 21 Historic Parks and Gardens within the National Park. The Welsh language is a fundamental part of the area's culture. Welsh is the spoken and written language of approximately 62% of the population of Snowdonia and in some communities the percentage is as high as 85%. The 2001 Census showed a population of 25,482, with a small increase to 25,745 in the Mid-2006 Population Estimates for National Parks⁶.

Pembrokeshire Coast National Park

Pembrokeshire Coast National Park boasts some of the most spectacular scenery and diverse wildlife in Britain including internationally important nature reserves, geology and archaeology. The Park was designated in 1952 and remains the only UK National Park recognised primarily for its coastline. It is one of the smallest UK National Parks, but has one of the most diverse landscapes – sandy beaches, rugged cliffs and islands, quiet wooded estuary and hill country with big sea views. The Park covers 232.5 square miles (602 sq km). At the widest point, it is about 16km, at its narrowest about 100m. Around 22,500 people live in the National Park⁷.

In Wales, there are five AONBs: Anglesey, Gower, Llŷn, the Clwydian Range and Dee Valley and Wye Valley. See Figure 2 – Landscape Features.

Anglesey AONB

Designated in 1966 the Isle of Anglesey's AONB, has one of the most distinctive, attractive and varied landscapes in the British Isles. It is also home to approximately 7,000 people. Some of the main features of the Anglesey AONB are:

- Low cliffs alternating with coves and pebble beaches;
- Sheer limestone cliffs interspersed with fine sandy beaches; and
- Stretches of sand dunes with beaches.

A number of the habitats found on Anglesey are afforded even greater protection both through UK and European designations because of their nature conservation value, these include:

- 5 Special Areas of Conservation;
- 3 Special Protection Areas;
- 1 National Nature Reserve;
- 31 Sites of Special Scientific Interest; and
- 75 Scheduled Monuments⁸

⁶ Eryri Local Development Plan 2007-2022

⁷ <http://www.pembrokeshirecoast.org.uk/?PID=552>

⁸ <http://www.anglesey.gov.uk/planning-and-waste/countryside/areas-of-outstanding-natural-beauty-aonbs/aonbs-in-wales/>

Gower AONB

The Gower AONB was designated in 1956 for its classic limestone coast and the variety of its natural habitats, it was the first AONB designated in the UK. Rich and diverse, Gower's scenery ranges from fragile dune and salt marsh in the north to the dramatic limestone cliffs along the south coast, intercut by sand beaches. Inland, the hills of Cefn Bryn and Rhossili Down dominate the landscape of traditional small fields, wooded valleys and open commons⁹.

Pen Llyn AONB

The Pen Llyn was designated as an AONB in 1956, the third to be designated in the UK. The Llŷn Peninsula, is renowned for its diverse and interesting coastline. The AONB encompasses around one quarter of the peninsula a total of 15,500 hectares, mostly along the coast, but it also extends inland and includes prominent igneous protrusions. Llŷn, whose complex geology includes ancient pre-Cambrian rock formations, is a natural extension of the Snowdonia massif. The geology is typified by the wide variation of coastal landscapes, ranging from the steep cliffs of Aberdaron Bay and promontories to the sand dune systems in the Abersoch area. The highest point in Llŷn is the Eifl (564m) mountain range which levels out to a plateau that extends towards the sea and the black rocks of Mynydd Mawr at the tip of the Peninsula. The area is typified by narrow and winding roads, farms and whitewashed cottages and also includes open areas of ancient common land¹⁰.

Clwydian Range and Dee Valley AONB

The Clwydian Range was designated as an AONB in July 1985, then in November 2011 the Welsh Government's Environment Minister confirmed a southerly extension to include much of the Dee Valley from Corwen to Newbridge along with stunning natural features such as the Eglwyseg Escarpment, Horseshoe Pass and Esclusham Mountain. At the same time the whole area became known as the Clwydian Range and Dee Valley AONB. Its special qualities include historic landmarks such as Pontcysyllte Aqueduct and Canal and the Iron Age hillforts that crown the Clwydian Range. They also include cultural and artistic inspirations such as the eisteddfodau held all over the area, its quarrying and mining heritage¹¹.

Wye Valley AONB

The rich combination of breath taking views, impressive geology, historic legacies and diverse wildlife in the valley of the River Wye between Hereford and Chepstow led to the designation, in 1971, of the valley and adjoining plateaux and hills as an AONB. The Wye Valley AONB covers 92km (58 miles) of the lower reaches of the River Wye totalling an area of 327km². It stretches from Mordiford in the north, just east of the city of Hereford, southwards to the outskirts of Chepstow¹².

The location of AONBs in Wales are presented on Figure-002 Landscape Features.

Quality of Landscapes

The most detailed landscape baseline in Wales reporting on landscape state, condition and trend is LANDMAP. LANDMAP is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated. LANDMAP explains the physical, geological, ecological, visual, historic and cultural landscape: the summary descriptions, evaluations and management recommendations aid understanding of landscape and identify important landscape qualities and characteristics. By capturing multi-dimensional landscape information, it ensures that all aspects of the landscape can be taken into account. It is the focus for landscape monitoring in Wales, enabling the tracking of change and identifying key factors determining landscape change, condition and resilience.

Landscape Character Areas (LCAs) are identified at both a local planning authority level and at a national level, with 48 National Landscape Character Areas (NLCA) identifying regional landscapes. They offer overall landscape summaries linked to the five LANDMAP layers, key characteristics, and forces for change, and may be linked to design or sensitivity studies.

⁹ <http://www.swansea.gov.uk/aonb>

¹⁰ Penrhyn Llŷn Area of Outstanding Natural Beauty, Management Plan, 2010-2015

¹¹ <http://www.clwydianrangeaonb.org.uk/landscape/>

¹² Wye Valley Area of Outstanding Natural Beauty (AONB), Management Plan, 2015 – 2016

Special Landscape Areas that identify areas of high landscape importance, often linked to LCAs, are identified by some authorities (SoNaRR, 2016) within Wales there are many of these landscapes designated.

Marine Character Areas

70% of Wales' coastline is designated or registered AONB, National Park, Heritage Coast or Historic Landscape (Seascapes and Marine Planning in Wales, 2014). Seascape information complements available landscape information and together the two types of information provide an understanding of the cultural benefits to be had from the marine environment. There 29 national Marine Character Areas (MCAs) (National Seascape Assessment for Wales, NRW Evidence Report 80¹³, the 50 Regional Seascapes (Welsh seascapes and their sensitivity to offshore developments, CCW Policy Research Report 08/5, 2009) and the local Seascape Character Assessments (SCA) of Pembrokeshire, Snowdonia and Ynys Mon provide comprehensive seascape information for Wales as a whole.

Landscapes of Historic Importance

The landscape of Wales is a vital resource for social, economic, cultural and environmental well-being. It has also been historically shaped by human activity and is rich in evidence of the past. To recognise the value of historic landscapes, and raise awareness of their importance, Cadw, in partnership with NRW and the ICOMOS UK compiled a Register of Landscape of Historic Interest in Wales. The Register identifies 58 landscapes of outstanding or special historic interest, which are considered to be the best examples of different types of historic landscapes in Wales. Figure 3 – Heritage Features shows the locations of historic landscapes.

The Register provides information to decision makers and landscape managers, to help ensure that the historic character of the landscape is sustained, and that where change is contemplated, it is well-informed (Cadw).

7.1.3 Dark Skies and Tranquil Areas

Relevance to the NDF

It is recognised that dark skies and tranquil areas can bring benefits to an area including enhancing the environment, attracting visitors and can boost the local economy. The NDF has a key role to play in helping to guide decisions through the planning process.

Baseline Conditions and trends

Dark sky areas are a good indicator of very low light pollution. There are three locations in Wales that have been designated as part of the International Dark Sky Places Program. These are:

- Brecon Beacons National Park (Dark Sky Reserve status)
- Snowdonia National Park (Dark Sky Reserve status)
- Elan Valley Estate, Powys (A Silver-tier International Dark Sky Park)

The Countryside Council for Wales (now NRW) commissioned a tranquil areas assessment in 2009, following an earlier assessment in 1997. This identified 55% of Wales (11,600 km²) as tranquil in 2009, a loss of 1500km² of tranquil landscapes from 1997.

The two largest Tranquil Areas on the 2009 Map are both over 1,000km². These areas are parts of the Berwyn Mountains, bordered by the towns of Dolgellau, Bala, Llangollen and Welshpool, and the southern part of the Cambrian Mountains, bordered by Llangurig, Rhayader, Llandovery, Lampeter and Tregaron.

Between 1997 and 2009, there was a loss of Tranquil Areas of nearly 1,500km² of land. This is over 6% of the total land area of Wales, and is greater than the area of the Brecon Beacons National Park.

¹³ <http://naturalresources.wales/our-evidence-and-reports/marine-character-areas/?lang=en>

Data Gaps

No significant data gaps have been identified for this topic at this stage.

7.1.4 Cultural and Heritage Assets

Relevance to the NDF

Cultural heritage comprises archaeological remains, intact structures and relict landscapes associated with past human activity. This section also covers cultural activities undertaken by the population. Wales has a large number of designated and non-designated cultural heritage assets reflecting its long history of human occupation. Many of these provide important tourist attractions in addition to being central to Welsh cultural identity.

The NDF has a key role to play in the protection and enhancement of cultural heritage through guiding decisions made in the planning system. New development can have a range of direct and indirect effects on heritage assets which need to be avoided or mitigated. This includes effects on cultural activities.

Baseline conditions and trends

Heritage assets in Wales are numerous. This section describes the key types of asset present.

World Heritage Sites

World Heritage Sites are regarded as being universally important and 'belonging to all the peoples of the world, irrespective of the territory on which they are located'. They are listed by UNESCO.

Wales currently has three world heritage sites:

- The Castles and Town Walls of Edward I in Gwynedd at Caernarfon, Conwy, Beaumaris and Harlech in North-West Wales;
- Blaenavon Industrial Landscape in South-East Wales; and
- Pontcysyllte Aqueduct and Canal in North-East Wales.

Each of these cover large areas straddling a number of local authorities and have management plans which detail the planning policies of each authority regarding the protection of the World Heritage Sites. Some, such as Pontcysyllte, have buffer zones to add a supplementary degree of protection within the landscape adjacent to the site while others, such as Edward's Castles, have defined their Essential Setting and Significant Views within the management plan to protect the surrounding area. Each of the Welsh World Heritage Sites, their buffer zone, or their essential setting/significant view contain privately owned houses or land. Figure 3 – Heritage Features shows the locations of the World Heritage Sites in Wales.

Listed Buildings

The National Assembly for Wales is required by law to compile lists of buildings of special architectural or historic interest; and listed buildings. The lists are used to help planning authorities make decisions with the interests of the historic environment clearly identified. Compilation of the lists is undertaken by Cadw. Listed buildings are classified in grades to show their relative importance. The grades are:

- I — Buildings of exceptional, usually national, interest. Currently, fewer than two per cent of buildings listed in Wales qualify for this grade;
- II* — Particularly important buildings of more than special interest; and
- II — Buildings of special interest, which warrant every effort being made to preserve them.

There are over 30,000 Listed Buildings (Grade I, Grade II and Grade II *) within Wales (Cadw) distributed across its counties varying from medieval halls and castles to Edwardian villas.

Scheduled Monuments

Cadw compile and maintain a Schedule of Ancient Monuments. The monuments included on this Schedule are of national importance and cover a diverse range of archaeological sites. Some examples may be completely buried below ground, and may only be known through archaeological excavation. Others are more prominent, and include the great standing ruins of well-known medieval castles and abbeys. The oldest known example in Wales is a natural cave — found to contain the earliest evidence of people in Wales — dating to a quarter of a million years ago. At the other end of the spectrum are twentieth-century military structures. Scheduled monuments are often in a ruinous or semi-ruinous condition or take the form of earthworks.

Over 4,000 monuments have now been scheduled across Wales and the number is increasing as part of an ongoing planned policy of enhancing the Schedule (Cadw).

Scheduled monuments in Wales are distributed throughout its counties and their locations are presented on Figure 3 – Heritage Features.

Registered Historic Battlefields

The locations where historic battles took place can be significant historic assets. They often retain topographical and archaeological evidence, including war graves, which can increase understanding of these events. To date there is no formal Register of Historic Battlefields in Wales. However, this is something that is being developed by Cadw.

Conservation Areas

There are over 500 conservation areas in Wales. They are designated by local planning authorities for their special architectural and historic interest. Many local planning authorities have undertaken conservation area character appraisals which identify areas where enhancement through development may be desirable (Cadw).

Conservation areas in Wales are distributed throughout its counties and are largely situated within urban settlements from small villages to areas within towns and cities.

Heritage Coasts

Heritage coasts are 'defined' rather than designated, so there isn't a statutory designation process like that associated with National Parks and AONBs. However, they are largely located within areas that are afforded with National Park or AONB status.

Within Wales there are 14 heritage coasts:

- Glamorgan;
- Gower;
- South Pembrokeshire;
- Marloes and Dale;
- St Brides Bay;
- St Davids Peninsula;
- Dinas Head;
- St Dogmaels and Moylgrove;
- Ceredigion;
- Llŷn;
- Aberffraw Bay;
- Holyhead Mountain;
- North Anglesey; and
- Great Orme.

The location of heritage coasts is presented on Figure 3 – Heritage Features.

Historic Parks and Gardens

Wales has a rich inheritance of historic parks and gardens. They form an important and integral part of the historic and cultural fabric of the country.

Cadw has undertaken a comprehensive survey of historic parks and gardens in Wales. Those thought to be of national importance are included on the Cadw / ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales. The Register was compiled in order to aid the informed conservation of historic parks and gardens by owners, local planning authorities, developers, statutory bodies and all concerned with them. Through the Historic Environment (Wales) Act 2016 it is now statutory and has six volumes. It was completed in 2002 however, sites can be added (or subtracted) at any time. There are currently almost 400 sites on the Register.

Sites on the Register are Graded I, II* and II in the same way as listed buildings. Approximately 10% are Grade I and 23% Grade II*. Grade I sites, such as Bodnant, Powis Castle, Dynevor Park, Margam Park, Erddig, Plas Brondanw and Raglan Castle, are of international importance.

Parks and gardens on the Register range from medieval to late twentieth century. Many are multi-period, with features of different styles and periods (Cadw).

Locations of historic parks and gardens are presented on Figure 3 – Heritage Features.

Heritage at Risk

A key element of Cadw's heritage regeneration activity is action related to heritage assets in a deteriorating condition. Cadw have been working to identify the number and type of listed buildings at risk in Wales. Surveys of the condition of listed buildings have been carried out in Wales for more than 15 years. 2015 data shows that the trend for buildings at risk is moving in the right direction. The number of buildings in an 'at risk' or 'vulnerable' condition has decreased since the last comparable data available (2013) and the percentage of buildings at risk has fallen from 8.92% to 8.54%. This figure is calculated using existing survey data and the most up-to-date data available from the 20% of the building stock which has been re-surveyed in the past year (Cadw). The percentage of building at risk over time has fallen since 2013.

Over time, there have been additional buildings given listed status. The Historic Environment (Wales) Act 2016 aims to give more effective protection to listed buildings and scheduled monuments, to improve the sustainable management of the historic environment and to introduce greater transparency and accountability into decisions taken on the historic environment. These seek to preserve the cultural heritage and historic environment of Wales and in turn will provide greater financial gain for the Welsh tourism sector.

Cultural activity

According to the National Survey for Wales 58% of people had been to an arts event in the last 12 months, 59% had visited an historic place, and 39% had been to a museum. Of those people that attended 97% of people were satisfied with the arts and historic place they visited, and 96% were satisfied with the museum they visited (National Survey for Wales, 2014 – 2015).

Data Gaps

There are no significant data gaps for this topic.

7.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Welsh Language

There has been an upward trend since the 1990s in the number of people using the Welsh language, noting large regional variations; there are opportunities to increase levels of fluency.

Landscape and Townscape Character

Wales is renowned for its high-quality landscapes with over 50% of the land area being nationally valued for its scenic quality and character. This has implications for new development within these areas with a key challenge for sustainable management being to enable appropriate levels of growth whilst retaining the distinctiveness of places and landscapes. This must also recognise that the natural and historic components of landscape are important to both place and the cultural value of landscape.

Landscape character and tranquillity is already under pressure from development with around 1,500 km² of tranquil landscapes were lost between 1997 and 2009.

In addition, there are non-anthropogenic risks to landscapes from pests, pathogens and invasive species and from changes in frequency and/or magnitude of extreme weather and wildfire events.

Cultural Heritage and Assets

Wales has a wealth of historic and cultural assets which are important components of national cultural identity. Many such assets are at risk from, for example, decay, climatic factors, neglect and inappropriate development. As with other environmental factors, recognising and protecting cultural heritage assets is a key challenge for sustainable planning and management.

Opportunities

Welsh Language

The NDF has an opportunity to protect and promote the use of the Welsh language through the planning system.

Landscape and Townscape Character

The planning system has a major role to play in how future development affects landscape, townscape, seascape and sense of place in general. Appropriate guidance could be developed to assist the protection and enhancement of this resource as part of the planning system.

Cultural Heritage and Assets

As with landscape, the NDF has a major role to play in the protection and enhancement of cultural heritage through guidance to the planning system. This should include the recognition that non-designated heritage assets are also an important part of the make-up of cultural identity and sense of place and that indirect effects on the setting of assets are also important considerations.

Opportunities also exist for the NDF to promote awareness of cultural heritage and encourage the enhancement of cultural education centres.

7.3 Relevant ISA Objectives and Questions

Welsh Language

5. To encourage the protection and promotion of the Welsh Language

- Encourage an increase in the number of Welsh language speakers across Wales?
- Encourage an increase in the proportion of Welsh language speakers who are fluent across Wales?
- Encourage an increase in the number of people who speak Welsh daily and who can speak more than just a few words of Welsh?
-

Landscape and Townscape Character

13. To encourage the protection and enhancement of the local distinctiveness of our landscapes and townscapes

- Encourage the protection and enhancement of areas of landscape and seascape character, distinctiveness, diversity and quality?
- Encourage the protection and enhancement of townscape character and quality?
- Promote sensitive design in development?
- Encourage a reduction in noise and light pollution?
- Encourage the maintenance of areas of tranquillity?

Cultural and Heritage Assets

14. To encourage the conservation and enhancement of heritage assets

- Encourage the conservation and enhancement of heritage assets and their settings?
- Encourage the conservation and enhancement of the historic landscape?

15. To encourage the protection and promotion of Welsh culture

- Create the conditions within which Welsh culture can thrive, through land use planning initiatives?
- Promote access to Wales' cultural and heritage assets and activities?

B-8. Well-Being Goal: A Globally Responsible Wales

This section provides baseline data relating to the following well-being goal:

'A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.'

In many ways, this well-being goal relates to all of the ISA topics. However, for the purposes of presentation, the data in this section relate primarily to:

- Energy Consumption, Greenhouse Gas Emissions and Ecological Footprint

8.1 Overview of Baseline Conditions

8.1.1 Energy Consumption, Greenhouse Gas Emissions and Ecological Footprint

Relevance to the NDF

Wales is a globally responsible nation and the NDF has an important role in helping to guide planning and development in a way that contributes positively to this. In particular energy consumption and greenhouse emissions are two things that occur locally through homes, businesses and transport but contribute to global consequences.

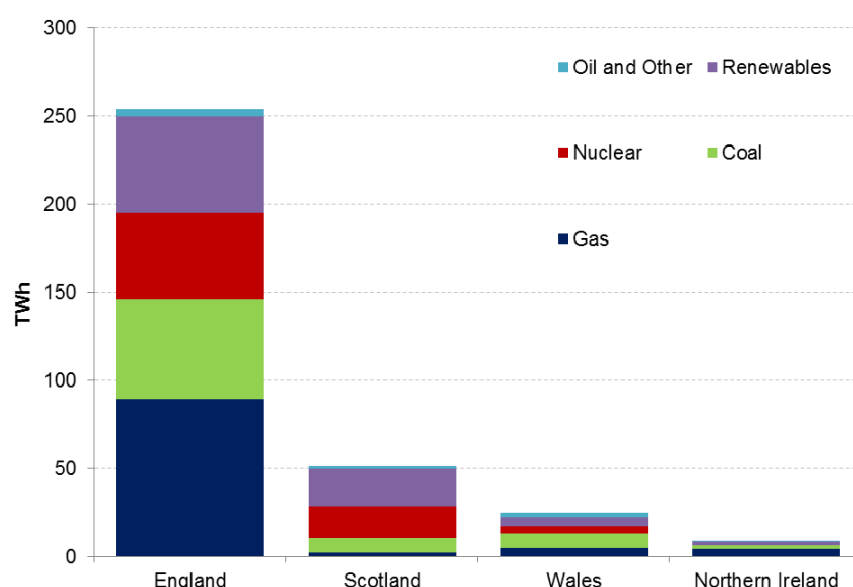
Baseline conditions and trends

Energy Generation

Energy generation in Wales is relatively evenly split between gas, coal, renewable and other sources with generation overall being significantly lower than in England and Scotland. Production has been in decline since 2010, largely due to the decline in energy from gas generation (Welsh Government, Energy Generation and Consumption Biennial Report, 2015).

Figure 7-1 below shows energy generation by fuel in 2015 for England, Scotland, Wales and Northern Ireland in 2015.

Figure 7-1 Energy Generation by fuel in 2015 for England, Scotland, Wales and Northern Ireland in 2015



Sources: www.gov.uk

Between 2000 and 2013, the percentage of electricity generated from renewable energy sources has increased from less than 3% to over 10%. This is largely as a result of wind generation. However, this proportion of generation is still lower than any other UK country. The use of renewable energy could help to reduce Wales' carbon footprint over time. The Capacity (in GWh) of renewable energy generated in Wales in a recent study was 5,182.6 GWh (DECC).

Energy Consumption

Energy use in Wales in 2015 was about 25TWh which is about a 10th of the 250TWh energy used in England. Total energy consumption has been falling since 2005, though more so since 2007, which coincides with the economic downturn (as of 2015). The industry and commercial sector accounts for a large proportion of this decline¹⁴.

The average energy efficiency of new homes in Wales is monitored. Percentage of dwellings with a Standard Assessment Procedure (SAP) rating of 65 or above is considered adequate. The SAP is a methodology used by Government for assessing the energy performance of dwellings. The SAP rating is expressed on a scale of 1 to 100 – the higher the number, the lower the running costs. Average SAP rating of new homes in Wales in 2008 was 77.6 and in 2009 this was 77¹⁵.

Greenhouse Gas Emissions

Total greenhouse gas emissions in Wales in 2014 amounted to 46,402 ktCO_{2e}. This compares to 56,620 ktCO_{2e} in 1995, although that figure has fluctuated over the period showing a gradual decreasing trend overall. Total greenhouse gas emissions from Wales have reduced between 1990 and 2014 by 18%, whilst carbon dioxide emissions have fallen by 12%. These emission reductions are mainly due to efficiencies in energy generation and business sector heating, the use of natural gas to replace some coal and other fuels as well as abatement in some chemical industries, and variations in manufacturing output (e.g. in iron and steel, bulk chemical production)¹⁶.

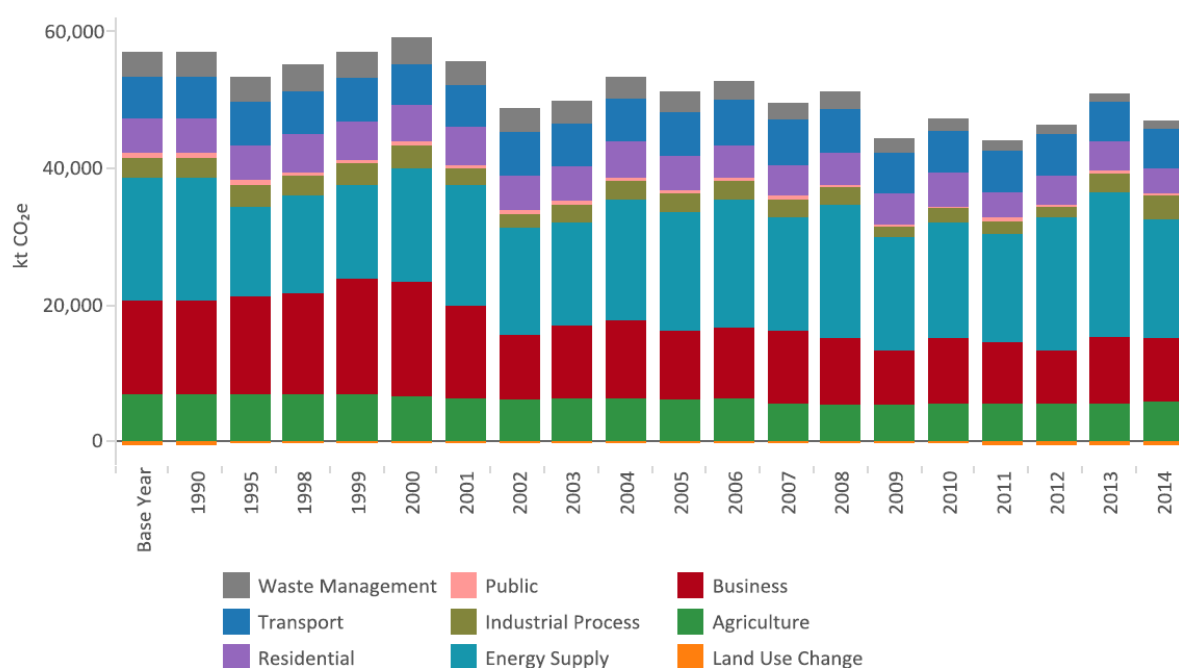
Wales is moving in the right direction to help combat some of the most serious causes of climate change. The increase of renewable energy production is an example of this. A reduction of overall CO₂ emissions is helping Wales and the whole of the UK meet its reduction targets. However, although moving in the right direction, change needs to happen in Wales and across the UK to ensure reduction targets are met.

Figure 7-2 illustrates the split of emissions between different sources in Wales between 1990 and 2014. This shows that the largest contributor remains the energy supply industry. Since 1990, the sector that has decreased its proportion of emissions the most is the business sector (NAEI Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990-2014).

¹⁴ Welsh Government, Energy Generation and Consumption Biennial Report, 2015

¹⁵ data.gov.uk

¹⁶ NAEI Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990-2014

Figure 7-2 Total Greenhouse Gas Emissions per Sector in Wales (ktCO₂e)

Ecological footprint

A study in 2008 estimated that Wales' ecological footprint at 10.05 million global hectares (gha), which is roughly five times the size of Wales, or 3.28 global hectares per capita (gha/c). Wales' carbon footprint is estimated at 34 Mt CO₂e, or 11 t CO₂e per capita. In comparison with other developed countries, Wales' ecological footprint is significantly higher (Stockholm Environment Institute/University of York).

Data Gaps

No significant data gaps have been identified for this topic at this stage.

8.2 Key Issues relevant to the NDF and opportunities for it to address them

Issues

Greenhouse gas emissions have been steadily falling in Wales; there is still a long way to go to meet the emissions targets.

This reduction is partly as a result of a gradual shift in energy generation to renewable and cleaner fuels together with technological and efficiency improvements in industry. However, again there are challenges to maintain these positive trends.

The estimated global footprint of Wales is high compared with other developed countries. There is a challenge to reduce this whilst also accommodating new development and economic growth.

Opportunities

The NDF has an opportunity to help promote low carbon fuels and improved standards of energy efficiency in industry and residential development.

There is an opportunity for the NDF to provide a national Framework against which the generation of energy from low and zero carbon sources can be delivered.

8.3 Relevant ISA Objective and Questions

Energy Consumption, Greenhouse Gas Emissions and Ecological Footprint

6. To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design

- Encourage a reduction in greenhouse gas emissions from existing development?
- Encourage a reduction in greenhouse gas emissions from new development?
- Contribute to a reduction in CO2 emissions from the transport sector?
- Encourage a reduction in the negative effects of power generation, heavy industries and transport on local air quality?
- Encourage cleaner technology for power generation, heavy industry and transport?
- Create the conditions whereby sustainable design is required to be an integral part of new development?
- Encourage a reduction in the demand for energy and increase energy efficiency?
- Increase the potential for the use of low carbon or zero energy sources?

APPENDIX C

Draft NDF Outcomes

Development of draft NDF Outcomes

These tables provide an explanation of the evolution of the NDF Objectives from those consulted on at the Issues, Options and Preferred Options stage to those which formed part of the Draft NDF.

Following the consultation on the Issues, Options and Preferred Option Consultation, Edition 10 of Planning Policy Wales (PPW) was published¹. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales as required by the Planning (Wales) Act and Well-being of Future Generations (Wales) Act 2015.

PPW sets out the Key Planning Principles for Wales which represent a guiding vision for all development plans, including the NDF. These Key Principles shape the NDF, which no longer contains a Vision. PPW requires every development plan to take forward its national sustainable placemaking outcomes, which seek to outline what a sustainable place will look like, characterised by the planning principles they relate to, and use them to develop an overarching set of outcomes, considering the scale of the plan.

Welsh Government has reviewed the Preferred Option Objectives in light of the Key planning principles and Placemaking Outcomes from PPW (Table C-1) and, taking on board the engagement and ISA findings to date, have developed a set of NDF Outcomes. The development of this work is set out in Table C-2. The outcomes are presented in Table C-3.

The compatibility assessment of the NDF objectives was undertaken in three iterations. The commentary provided in Table B-2 of Appendix B of the Interim ISA Report² presents the iterative process of assessment, and how the recommendations have been taken into account, where relevant. This demonstrates that the majority of the recommendations of the ISA have been incorporated into the NDF. This has included the following improvements, which have improved the potential for the NDF objectives to contribute to more sustainable development, compared to previous iterations:

- Strengthened consideration of landscape (NDF objective 6);
- NDF objectives shortened, simplified where necessary and given greater focus;
- Additional text added to objective 4 relating to population retention, to strengthen communities;
- Reference to marine planning has been included (NDF objective 6);
- Text added to include consideration of pollution (NDF objective 6);
- Improvement to the Welsh Language objective to include consideration of socioeconomic infrastructure of communities; and
- Additional NDF objective relating to cohesive communities added.

It makes sense for the NDF Outcomes to align with the Outcomes of PPW in order for spatial planning across Wales to be delivered consistently. Tables C-1 and C-2 demonstrate that they align, and therefore a further compatibility assessment with the ISA Objectives is not necessary.

¹ Welsh Government, Planning Policy Wales, Edition 10, December 2018, available: <https://beta.gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

² <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf>

Table C-1: NDF Preferred Option Objectives and the National Sustainable Place Making Outcomes (PPW)

NDF – Preferred Option Objectives	Key Planning Principles and National Sustainable Placemaking Outcomes
1. Climate change, decarbonisation and energy • To enable the transition to a low-carbon economy • To enable management of and adaptation to the consequences of climate change • To support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets	Creating and Sustaining communities • Enables Welsh Language to thrive • Appropriate development densities • Homes and jobs to meet society's needs • A mix of uses • Offer cultural experiences • Community based facilities and services
2. Economic prosperity and regeneration • To provide strategic direction for the delivery of infrastructure that supports economic prosperity for all and green growth • To support the national and foundation sectors; and growth and innovation in a low carbon economy • To support strong, regional economies • To tackle inequality and provide strategic direction for regeneration initiatives.	Making best use of resources • Makes best use of resources • Prevents waste • Prioritises the use of previously development land and existing buildings • Unlocks potential and regenerates • High quality and built to last
3. City Regions & Growth Deals • To support the effective delivery of city region deals and growth deals across Wales.	Growing our economy in a sustainable manner • Fosters economic activity • Enables easy communication • Generates its own renewable energy • Vibrant and dynamic • Adaptive to change • Embraces smart and innovative technology
4. Rural Wales • To enable the delivery of jobs, services and infrastructure to strengthen rural communities and retain young people. • To support resilience and diversification in the rural economy	Maximising environmental protection and limiting environmental impact • Resilient biodiversity and ecosystems • Distinctive and special landscapes • Integrated Green Infrastructure • Appropriate soundscapes • Reduces environmental risks • Manages water resources naturally • Clean air • Reduces overall pollution • Resilient to climate change • Distinctive and special historic environment
5. Housing	Facilitating accessible and healthy environments

NDF – Preferred Option Objectives	Key Planning Principles and National Sustainable Placemaking Outcomes
To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth.	- Accessible and high-quality green space - Accessible by means of active travel and public transport - Not car dependent - Minimises the need to travel - Provides equality of access - Feels safe and inclusive - Supports a diverse population - Good connections - Convenient access to goods and services - Promotes physical and mental health and well-being
6. Natural Resources, Circular Economy & Flooding - To strengthen the resilience of biodiversity assets, including habitats species and designated sites. - To support the sustainable management of our natural resources and facilitate nature recovery - To protect, promote and enhance nationally important landscapes - To provide strategic direction to manage and adapt to the potential threat of flooding - To ensure resource efficiency, minimise the unsustainable use of resources and support the development of the circular economy - To support the reduction of pollution and improve air, noise and water quality - To support the delivery of the objectives of the Welsh National Marine Plan	
7. Culture & Heritage - To protect, promote and enhance national cultural and historic assets - To support opportunities for new national cultural development	
8. Transport - To support a reduction in travel by private vehicles and a growth in walking, cycling and public transport - To facilitate the delivery and improvement of key transport infrastructure to decarbonise travel	

NDF – Preferred Option Objectives	Key Planning Principles and National Sustainable Placemaking Outcomes
9. Welsh Language • To support the socioeconomic infrastructure of communities and help to create the conditions to realise the Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050	
10. Health & Well-being • To support healthy and active lifestyles and improve access to services • To support the reduction of health inequalities across Wales	
11. Digital Infrastructure • To support the delivery of digital infrastructure and help achieve the Welsh Government's objective of 100% coverage of broadband and telecoms services across Wales	
12. Cohesive Communities • To support the delivery of cohesive communities	

Table C-2 How the Preferred Option Objectives relate to the Draft NDF Outcomes

The Draft NDF Outcomes are concise and focused. These are supported by and expanded upon in the descriptions.

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
1. Climate change, decarbonisation and energy 1.1 To enable the transition to a low-carbon economy 1.2 To enable management of and adaptation to the consequences of climate change 1.3 To support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets	This NDF Objective is incorporated within the proposed Outcome 11. The previous impact highlighted on landscape is captured within Outcome 9.	A Wales where people live ... 11.. in places which are decarbonised	The challenges of climate change demand urgent action on carbon emissions, and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new work sectors.
2. Economic prosperity and regeneration 2.1 To provide strategic direction for the delivery of infrastructure that supports economic prosperity for all and green growth 2.2 To support the national and foundation sectors; and growth and innovation in a low carbon economy 2.3 To support strong, regional economies 2.4 To tackle inequality and provide strategic direction for regeneration initiatives.	Section 2.1 and 2.2 of this NDF Objective is incorporated within the proposed Outcome 6. Sections 2.3 and 2.4 are incorporated within Outcome 3. The national and foundation sectors, although aren't directly referenced are captured within the term sectors more generally.	3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth 6..in places where prosperity, innovation and culture are promoted	The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being. Development Plans will have a forward thinking, positive attitude towards economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
3. City Regions & Growth Deals 3.1 To support the effective delivery of city region deals and growth deals across Wales.	This NDF Objective is incorporated within the proposed Outcome 5.	5..and work in towns and cities which are a focus and springboard for sustainable growth	Cities and large towns are magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide. Development plans will enable and support aspirations for large towns and cities to grow, founded on sustainability and urban design principles, active travel and investment in key built and green infrastructure to enable population and economic growth whilst reducing pollution. Areas outside the urban centres will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services
4. Rural Wales 4.1 To enable the delivery of jobs, services and infrastructure to strengthen rural communities and retain young people. 4.2 To support resilience and diversification in the rural economy	This NDF Objective is incorporated within the proposed Outcome 2. The outcome has been expanded to reference all people and not just young people which will enable this to be refined to reflect the evidence/ trends within regions.	2..in vibrant rural places with access to homes, jobs and services	In rural areas job opportunities and community services will be supported, to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.
5. Housing 5.1 To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth.	This NDF Objective is incorporated across the proposed Outcomes 1, 2 and 3. This reflects placemaking principles – not thinking about housing in isolation.	1..and work in connected, inclusive and healthy places 2..in vibrant rural places with access to homes, jobs and services 3..in distinctive regions that tackle health and socio-economic inequality through	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services. In rural areas job opportunities and community services will be supported, to help attract and retain people. A balance will be found between development and preserving the

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
		sustainable growth	character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification. The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.
6. Natural Resources, Circular Economy & Flooding 6.1 To strengthen the resilience of biodiversity assets, including habitats species and designated sites. 6.2 To support the sustainable management of our natural resources and facilitate nature recovery 6.3 To protect, promote and enhance nationally important landscapes 6.4 To provide strategic direction to manage and adapt to the potential threat of flooding 6.5 To ensure resource efficiency, minimise the unsustainable use of resources and support the development of the circular economy 6.6 To support the reduction of pollution and improve air,	This NDF Objective is incorporated within the proposed Outcomes 9 and 10. Waste is captured within the definition of resources. The relationship with the Welsh National Marine Plan will be addressed within the draft NDF.	9. in places that sustainably manage their natural resources and reduce pollution 10. in places with biodiverse, resilient and connected ecosystems	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. The variety of flora and fauna found across Wales makes Wales a special place. Biodiversity underpins 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 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.

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
noise and water quality 6.7 To support the delivery of the objectives of the Welsh National Marine Plan			
7. Culture & Heritage 7.1 To protect, promote and enhance national cultural and historic assets 7.2 To support opportunities for new national cultural development	This NDF Objective is incorporated within the proposed Outcome 6. This reflects the NDF role and focus around heritage and tourism.	6..in places where prosperity, innovation and culture are promoted	Development Plans will have a forward thinking, positive attitude towards economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses
8. Transport 8.1 To support a reduction in travel by private vehicles and a growth in walking, cycling and public transport 8.2 To facilitate the delivery and improvement of key transport infrastructure to decarbonise travel	This NDF Objective is incorporated across the proposed Outcomes 1 and 7.	1..and work in connected, inclusive and healthy places 7..in places where travel is sustainable	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services. All methods of travel will need to have low environmental impact and low emissions, with ultra-low emission vehicles and public transport replacing today's petrol and diesel varieties. Active travel and public transport will be a significant part of the transport mix, allied with a reduced reliance on private vehicle use, with sustainable transport infrastructure embedded within new developments to enable easy and convenient access from one place to another for commuting, business, tourism and leisure purposes
9. Welsh Language 9.1 To support the socioeconomic infrastructure of communities and help to create the	This NDF Objective is incorporated within the proposed Outcome 4.	4.. in places with a thriving Welsh Language	We aim to have a million Welsh speakers in Wales by 2050 – an increase of almost 80% on current levels. Where Welsh is the everyday language of the community, development will be managed to

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
conditions to realise the Welsh Government's Welsh language objectives, including 1 million Welsh speakers by 2050			ensure there are jobs and homes to enable the language to remain central to those communities' identities. Elsewhere education authorities will develop the infrastructure they need and to generate other facilities where the language can develop as a natural, thriving part of communities.
10. Health & Well-being 10.1 To support healthy and active lifestyles and improve access to services 10.2 To support the reduction of health inequalities across Wales	This NDF Objective is incorporated across the proposed Outcomes 1 and 3. This reflects the wider determinants of health.	1..and work in connected, inclusive and healthy places 3..in distinctive regions that tackle health and socio-economic inequality through sustainable growth	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services. The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.
11. Digital Infrastructure 11.1 To support the delivery of digital infrastructure and help achieve the Welsh Government's objective of 100% coverage of broadband and telecoms services across Wales	This NDF Objective is incorporated within the proposed Outcome 8.	8..in places with world-class digital infrastructure	Broadband provision will develop and evolve, beginning with comprehensive coverage of superfast and progressing to ultra-fast fibre, which will help businesses to be more productive, resilient and innovative. Better digital communication will enable changes to the economy and way of life and ensure Wales can lead and keep pace with the latest global technological advancements.
12. Cohesive Communities 12.1 To support the delivery of cohesive communities	This NDF Objective is incorporated across the proposed Outcomes 1, 2 and 3.	1.. and work in connected, inclusive and healthy places 2..in vibrant rural places with access to homes, jobs and services 3..in distinctive	Our cities, towns and villages will be physically and digitally well connected, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Places will meet and suit the needs of a diverse population, with accessible community facilities and services.

NDF – Preferred Option Objectives	Comments	Draft NDF Outcomes	Descriptions
		regions that tackle health and socio-economic inequality through sustainable growth	In rural areas job opportunities and community services will be supported, to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification. The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. The three regions will address inequalities, by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.

Table C-3: The Draft NDF including proposed changes Outcomes

A Wales where people live...	
1.	and work in connected, inclusive and healthy places...
	Our cities, towns and villages will be physically and digitally well connected places, offering good quality of life to their residents. High-quality homes meeting the needs of society will be well-located in relation to jobs, services and accessible green and open spaces. Incorporating placemaking principles in all development will ensure that places meet and suit the needs of a diverse population, with accessible community facilities and services.
2.	in vibrant rural places with access to homes, jobs and services...
	In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. The rural economy will be thriving and communities will be well connected digitally and physically. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.

3.	in distinctive regions that tackle health and socio-economic inequality through sustainable growth...
	The regional approach will recognise that different parts of Wales work differently to each other, with distinct underlying characteristics and challenges. Inequalities in the four regions will be addressed by building stronger links between public services, communities and business. Each region will be encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.
4.	in places with a thriving Welsh Language...
	We aim to have a million Welsh speakers in Wales by 2050 – an increase of almost 80% on current levels. The language will be an embedded consideration in the spatial strategy of all development plans. Where Welsh is the everyday language of the community, development will be managed to ensure there are jobs and homes to enable the language to remain central to those communities' identities. Elsewhere development will be a positive force towards encouraging the creation of education and social infrastructure to enable the language to develop as a natural, thriving part of communities.
5.	and work in towns and cities which are a focus and springboard for sustainable growth...
	Cities and large towns will be magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide. Development plans will enable and support aspirations for large towns and cities to grow, founded on sustainability and urban design principles. Investment in active travel, public transport, flood risk management and green infrastructure will enable population growth and economic growth while reducing pollution and carbon consumption. Areas outside the urban centres will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services.
6.	in places where prosperity, innovation and culture are promoted...
	Development Plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses.
7.	in places where travel is sustainable...

	All methods of travel will have low environmental impact and low emissions, with increased use of public transport and ultra-low emission vehicles replacing today's petrol and diesel vehicles. Sustainable transport infrastructure will be embedded within development to enable easy and convenient access from one place to another for commuting, business, tourism and leisure purposes. Development will focus on active travel and public transport, allied with a reduced reliance on private vehicles.
8.	in places with world-class digital infrastructure...
	Broadband provision will develop and evolve, beginning with comprehensive coverage of superfast and progressing to ultra-fast fibre, which will help businesses to be more productive, resilient and innovative and improve the way of life for communities and individuals. Better digital communication will enable economic and social progress, and ensure Wales can lead and keep pace with the latest global technological advancements.
9.	in places that sustainably manage their natural resources and reduce pollution...
	Wales' natural resources, including its minerals, soils and geodiversity, 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 the risks of flooding and coastal erosion will be effectively managed and mitigated while better resource choices will be reflected in more sustainable places. Places will benefit from reduced pollution and be healthier and more liveable.
10.	in places with biodiverse, resilient and connected ecosystems...
	The variety of flora and fauna found across Wales make Wales a special place. Biodiversity underpins 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 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.
11.	in places which are decarbonised and climate-resilient
	The challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation commitments and renewable energy targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors. New homes will be energy efficient and will help communities adapt to the changing climate.

APPENDIX D

Strategic Options

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Keys for assessments

Tables D-1 to D-4: Keys, terms and effects for assessment tables

Scoring of Assessment		
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)	
+	Minor positive – likely to result in limited progress towards the ISA objective	
0	Neutral outcome	
+/-	Range of possible positive and negative outcomes	
?	Uncertain outcome	
-	Minor negative – likely to work against the achievement of the ISA objective	
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)	
Type of Effect	Definition	
Secondary	Indirect effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.	
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.	
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.	
Key and terms		
Scale	Geographic extent: Local; Sub-regional; Regional/National; or International.	
T/P	Temporary/Permanent	
Cert	Certainty: Low; Medium; or High	
ST	Short Term	
MT	Medium Term	
LT	Long Term	
Future Baseline: Summary of predicted future trends for each ISA Objective, without the implementation of the NDF		
Improving	Static	Declining

The appraisals in this Appendix satisfy the requirements of impact assessments including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language (Wales) Measure 2011 and Standards, Children's Rights Impact Assessment (CRIA), Equalities Impact Assessment (EqIA), Well-being of Future Generations (WBFG) Act (2015)¹; and Sustainable Management of Natural Resources (SMNR) & the Natural Resources Policy (NRP). Where appropriate, boxes prior to appraisal results indicate which impact assessments other than SA and SEA are particularly relevant to the appraisal.

¹ Available online at: <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted> [Accessed 10.04.19]

Appraisals of Alternative Options (February 2018)

During the Issues and Options stage of the NDF, five alternative options were considered for the strategy to be adopted. These are presented in Tables D-5 to D-9 below. Following these, an appraisal table is provided for each ISA Objective, within which the appraisal of the five alternative options against that ISA Objective is shown. These appraisals were originally prepared for the Interim ISA Report published online in April 2018². The final row in each table indicates how preferable elements of each option could be carried through to the preferred option.

Table D-5: Alternative Option 1

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas
Summary Overview This option focuses the long-term growth and development of Wales around the strongest market areas. It seeks to support economic growth in areas where markets are strongest and which have the best potential to grow. This option recognises that many objectives – deprivation, regeneration, physical and mental health, language, resilience of natural resources - are directly linked to economic prosperity. The role of the NDF will be to direct growth to these areas and provide the infrastructure required to support growth. It will take a top-down approach to the delivery of major infrastructure and make clear choices on which parts of Wales will grow and how they should grow. The planning system will be responsive to opportunities for supporting economic growth and will not constrain or delay investment in identified growth areas.
Why has this option been developed? There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan which provided a framework for nationally important infrastructure. The need for greater certainty and speed of delivery were identified as important and it was recognised that the national planning tier is the appropriate level at which to plan for national needs. Local and regional planning cannot easily balance local impacts with national interests. We were told there is a need for a clear top-down approach to dealing with national issues. There was recognition that many of the challenges faced in Wales stem from economic issues and that much health, deprivation, well-being and other issues can be addressed through improving economic circumstances. Over the long term, there is a need to support a dynamic and growing economy and there was recognition that strong businesses and new investment have positive benefits for Wales. There is a need to support economic growth and investment. It was identified that silo thinking and un-coordinated approaches mean that investment is not focussed on a clear goal and decisions made through the planning system lack coherency. A NDF focussed on economic growth, offers the opportunity to ensure all land-use decisions at all levels are working towards a common goal. There is a need to ensure a clear, economic focus. This option has been developed and subject to further engagement in October 2017.
Full Overview: How would this option help meet the NDF objectives? <i>Note: 'objectives' here refers to the 'NDF Objectives' at the time of appraisal, which have since been translated into the NDF Outcomes.</i>
Cultural Assets This NDF supports existing and the provision of new heritage, sporting and arts development assets where they provide economic opportunities. It recognises that these should be economically viable and promotes appropriate housing and commercial uses around them, to maximise economic potential. Culture-led regeneration projects are supported where they provide direct opportunities for economic growth. Developments at all scales and opportunities for cross-subsidisation with other developments are supported. Cultural projects unable to demonstrate an economic value are not prioritised.

² Interim ISA Report, April 2018, Available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf>

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

Housing

House building is viewed as a significant economic driver in its own right with large potential multiplier effects for local economies. Housing development which meets market demand is facilitated, helping to attract and retain a skilled labour force. New housing provision is particularly targeted at areas within commuting distance of economic growth areas. Significant new land allocations are made to accommodate development, with release of large sites in and around settlements if necessary. This may include managed release of greenfield land, following policy and capacity reviews. Affordable housing initiatives are progressed in areas where economic growth is particularly concentrated, aiming to meet the needs of key workers. Market housing is directed to areas attractive to the market, with unattractive areas reliant on public investment only. Opportunities for cross-subsidisation of housing and other developments are supported.

Climate change, decarbonisation & energy

Investment in energy is driven by the private sector. Development patterns continue to focus primarily on the most viable technologies including wind energy developments (with large-scale schemes predominating). Off-shore developments would be facilitated through appropriate on-shore infrastructure. Opportunities for green jobs within these sectors are high on the agenda.

Issues arising from climate change, such as rising sea levels and flooding are approached from an economic perspective. Steps will be taken to address these challenges in so far as they minimise risks to growth. Decarbonisation objectives will be supported where they provide economic opportunities and growth. Economic land allocations take climate change into account to minimise risks to business.

Broadband & digital infrastructure

Telecommunication and digital technology is a key priority, with the NDF supporting provision of the required infrastructure through the market, as well as encouraging technological capacity to be built into the design of new buildings, infrastructure (including transport infrastructure) and areas of urban expansion and renewal. Infrastructure will be provided on the basis of market demand only and to serve the areas of greatest growth potential.

Economic prosperity & economic regeneration

This NDF responds to market demand as well as need and is based on active engagement with business and industry, with an emphasis on increasing land supply and minimising business development costs. Significant new land allocations are made to accommodate development, with release of sites in and around settlements. This includes the release of greenfield land, following policy and capacity reviews. This NDF would support commercial development in the most viable locations, including both in-town and out-of-town locations. Town-centre focussed development would not be prioritised over out-of-town and the market would determine the most viable location. Brownfield sites (including those in use) attractive to the market would be released for new economic uses. Enterprise Zones are a key focus of intervention. Existing commitments to community regeneration are reviewed, so that future investment can be targeted at people with the most significant economic potential rather than those with greatest social need. Poverty will be tackled by improving the overall prosperity of Wales rather than focussing on specific areas.

Rural Wales

This NDF supports increasing prosperity in all parts of Wales, though its focus will be on the most profitable urban areas and it will only support significant investment in rural parts of Wales where this is market driven. It will not seek to reverse depopulation and will actively provide opportunities for people to move to more prosperous, better served areas to support growth objectives. Support for agriculture would be primarily focussed on food security. National Parks and AONBs would be supported for their economic value.

City Regions & Growth Deals

Cities are the primary drivers of the economy and the primary focus of economic investment. Wider regions provide both workers and potential consumers and this NDF supports wider regional interventions that improve economic productivity. A larger, dynamic workforce provides a larger employment pool and this is attractive to the market. Whilst this NDF will support the principles of city regions, its focus will be on the most profitable economic core and it will be expected that the benefits of growth will spread across the region over time predicated on accessibility.

Transport

Large scale strategic infrastructure projects are taken forward, such as metro projects, directly through the NDF to allow a high level of growth and facilitate land release. Road and public transport infrastructure are upgraded. Internal (inter-city region) and external links by air, sea and high-speed rail are promoted. International profile is important to promote Wales and attract investment. Projects which seek to promote external connectivity are taken forward. Transport links to key gateways are substantially improved to help stimulate private sector investment, and in response to business needs. Facilitating the easy movement of international freight, through key

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

gateways by road and rail will be a key priority. Expansion of Cardiff Airport if required, improvements to the infrastructure that support it and economic opportunities for growth in and around the airport will be facilitated.

Natural Resources

This NDF supports the realisation of the economic potential of Wales's natural resources. It would also support the principle of the circular economy and ensuring the full economic potential is realised of all resources, including waste. Investment would be driven by the private sector. Environmental quality is recognised as a strong potential driver of growth, making Wales attractive to visitors and potential investors.

Ecological, biodiversity and landscape designations, particularly at the local and regional level, will be reviewed where they prevent growth and the delivery of physical infrastructure. Over the life of the NDF, the role of national and international designations will be reviewed, in particular in light of Brexit, to understand their role in supporting national economic priorities. Agricultural land could be released for other uses including the best quality land.

Welsh Language

This NDF will support all initiatives that support economic growth and by delivering new employment opportunities, help retain Welsh speakers in Wales. Its focus will be on areas with the strongest economic potential and movements of Welsh speakers from weaker to stronger market areas will be supported.

Health

Good health and well-being enable economic potential to be fulfilled. This NDF focuses growth and services in the strongest urban areas. Health facilities will be planned to support growth.

What are the key assumptions that support this option?

- Cities and their regions are viewed as the primary drivers. Growth is focussed in these areas, with more limited growth in mid-Wales, small towns and regeneration areas.
- The identification of national transport projects is driven by their potential to facilitate economic growth in particular in the strongest market areas. Internal connectivity is improved by substantial multi-modal infrastructure investment. External connectivity is actively improved including enhanced air and sea links, and new high speed rail links to England and beyond to Europe. Freight links between continental Europe and Ireland are also improved.
- There are significant levels of investment in transport, energy and digital infrastructure as key drivers of growth, with prioritisation of projects which offer the greatest improvements in connectivity and support the widest range of objectives.
- Public investment in new infrastructure is driven by the desire to facilitate and attract new investment, both in existing strong market areas and areas of the greatest economic potential.
- The identification of Developments of National Significance would be important, providing clear direction from the Governmental, certainty and greater expediency in decision making.
- There will be higher rates of housing and economic development and increased land take overall.
- Greenfield land for development is released, with development focusing on areas that are already most accessible and in strong market areas.
- Planning controls are streamlined in priority investment areas and some environmental regimes, particularly at the local level, are relaxed where legislative requirements provide scope to do so.
- Planning controls are less prescriptive. Wider planning policy, the sequential test and proximity principle for example are relaxed to give wider spatial choices.
- Affordable housing provision focuses on links with the economy, in terms of locational decisions and market sectors (e.g. key worker housing).
- Environmental initiatives focus on place-making and therefore coincide with areas with greatest economic investment potential. Environmental quality is recognised as a driver of growth, but there is reduced emphasis on environmental justice. Multiple benefits are not necessarily pursued.
- Businesses themselves seek to be more sustainable in operational terms, pursue energy efficiency and are assisted in adapting to climate change to reduce potential economic effects.
- The private sector leads investment in energy sector and waste, leading to variation in types and levels of provision.

What would Wales in 2040 look like?

Cultural Assets

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

National investment in cultural assets is economically driven and has focussed on the strongest market growth areas, as part of a package of wider investment initiatives.

Housing

Both private and social housing has focussed in strongest market growth areas. The NDF has facilitated through SDPs and LDPs, major urban expansion and greenfield release. Parts of Wales outside of these areas deal with local issues only and do not have a national strategic role.

Climate change, decarbonisation & energy

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support their expedient delivery. Areas of greatest potential for wind, solar, tidal and other energy generation are the focus for new development. Grid, transmission and storage infrastructure is facilitated. Strong support has been given to new economic opportunities in these sectors.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery of infrastructure. The market determines investment and is primarily focused on strongest market growth areas.

Economic prosperity & economic regeneration

Has focussed on the strongest market growth areas, driven by the delivery of new transport, energy and telecommunications infrastructure and a clear direction for the land-use system to support growth in these areas.

Rural Wales

Has been supported to ensure food, energy and water security for wider societal benefits. New investment has been limited to that promoted by the market and there has been no active intervention to reverse depopulation and other social trends.

City Regions & Growth Deals

There has been strong support for city regions in Cardiff, Swansea and North East Wales. Investment in new infrastructure has supported their growth, which has been facilitated by alignment of the land-use system at all levels.

Transport

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support its expedient delivery. The focus has been on supporting the strongest market growth areas and improving international connections that support economic growth.

Natural Resources

Driven by the market, the economic realisation of natural resources has been strongly promoted across the whole of Wales.

Welsh Language

The primary focus has been on improving the economic health of Wales. Opportunities to support the Welsh language have been supported from an economic rather than spatial perspective. Welsh language speakers have moved away from the traditional heartlands in North-West and Mid-West Wales to the strongest market growth areas.

Health

The provision of services and facilities have been planned to support growth areas.

What did the October 2017 engagement say about this option?

Positive

There was a strong sense that cities are economic drivers and it is unrealistic to think national scale growth objectives can be met without a strong and clear focus on them. Providing infrastructure to support cities and their regions is necessary and generally supported. These are ultimately the areas where the majority of people in Wales live and work.

The importance of identifying key infrastructure and providing a framework to ensure its expedient delivery is a key role for the NDF. In doing so it will provide clear national direction and by focusing growth in key urban areas, will help shape the investment of national utility providers. Focussing investment in a geographically smaller area (as opposed to all-Wales) can help leverage funding and send a clear statement to potential investors.

The NDF is the opportunity to drive national projects from national level and provide a clear spatial strategy for all other Government policies. This is currently missing. Notwithstanding the concerns that a market driven approach does raise, it is important that it is recognised Wales is a poor country and this type of nationally driven, economic focus is required to break the cycle.

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

This option can help overcome local political barriers. It also recognises that you do need to create prosperity to address other environmental, social and cultural objectives. The failure to link economic prosperity to other outcomes and the belief that we can do everything equally prevents us from addressing some of the major issues affecting Wales. This is well intentioned thinking but doesn't provide the necessary leadership and avoids us from having to take difficult decisions. This option would be an important step in moving Wales forward and is what long term strategic decision making is about.

Negative

There was a strong sense that this option was the opposite of long-term planning. It only reflects where Wales is now and does not seek to deliver real change. It supports existing growth patterns and does not provide a spatial strategy for the whole of Wales. It would not be transformational but rather the opposite. Focussing on the strongest urban centres and cities will not address issues outside these immediate areas. It will both reinforce existing inequality and create new inequalities, as areas outside of the preferred growth regions are not supported. Social, environmental and cultural objectives should not be viewed purely through an economic lens and it is unlikely that these objectives can be met if the sole focus is what is attractive to the market. Such an approach is contrary to the Well-being Act. There was clear recognition that economic growth is important and, if it is planned and assessed appropriately, has positive outcomes that provide a wide range of benefits. However, the long-term spatial development of Wales cannot simply be left to the market to determine and the planning system exists to influence growth and how our places should change, to ensure the widest possible benefits. What happens if markets collapse? What is the role of the Government if not to consider and plan for the long-term interests of the whole nation? Environmental quality is not a barrier to overcome. It adds value and is intrinsic to our well-being. This option lacks environmental consideration and risks short term economic gain over long term environmental resilience. It would not ensure the sustainable management of our natural resources. Markets are short term and are not strategically orientated. Strong concerns were expressed regarding the loss of agricultural land to other uses, including potentially the best farming land. This option is too outward looking and is not about Wales. It doesn't play to the strengths of Wales - green space, landscape and biodiversity.

Realistic

This option was considered to be realistic. Some considered that as it would reflect current development patterns and trends, it would be the easiest option to adopt. It was also the easiest option to grasp and it was clear how this option could shape other relevant strategies. It was clear how investment in infrastructure could be prioritised to support this option. Others thought that this approach did not represent the status quo; it would represent a major policy shift but that if we decided to do it, we could.

Table D-6: Alternative Option 2

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

Summary Overview

This option focusses on the whole of Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another. Long term objectives will be met through actions and investment across the whole of Wales and by direct support to local communities to support bottom-up solutions to national issues. This option will deliver strong local communities, providing access to jobs, housing, services and facilities that they need and with a strong focus on people, their well-being and sustainability.

The role of the NDF will be to distribute growth and infrastructure across the whole of Wales with a focus in particular on supporting areas of greatest need and where markets are weaker. It will retain a clear focus on the delivery of national objectives and co-ordinate the actions at the regional and local level to meet these aims.

Why has this option been developed?

There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan. There was also a belief that as well as having a national perspective which considered Wales as a whole, the NDF should relate to local communities and support them to deliver their aspirations. A NDF which considered, for example, south east and north east Wales only would not be a national plan. A NDF which was seen to impose top-down housing, energy or transport policies without taking the opportunity to consider bottom-up solutions as well would not reflect the views of many. It was felt by some that the impact of national decisions on local communities was not recognised enough.

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

There was a view that the NDF should not seek to pick 'winners' or focus too heavily on a one-size fits all approach. Local communities experience different housing issues, language issues, different depopulation and social challenges. The NDF must be flexible enough to allow different, appropriate solutions and create the space for SDPs and LDPs to find solutions.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would recognise the importance of our heritage in shaping Wales and seek to maintain and promote our distinctively Welsh communities. It would require that new development actively contributes to, rather than detracts from, our cultural capital. Our existing cultural assets will be protected, promoted and enhanced and new cultural developments supported. There will be strong support for local scale community projects that could provide cultural and associated benefits. For example, culture led projects benefitting health and wellbeing through the provision of both formal and informal recreation activities.

Housing

Access to housing and in particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. Interventions would seek to support affordable housing over other types of housing where necessary. Support will be given for new and innovative housing designs and self and custom build developments will be facilitated, where they provide additional opportunities for new housing and help meet community housing needs. As well as meeting housing needs, new housing will help sustain local communities and support vital services.

In addition to affordability, lifetime homes and the provision of housing to meet the needs of people at all stages of their lives will be prioritised. The type of housing needed will be an important issue, recognising that we need to build the right type of housing in the right places and not focus only on the number of houses required.

Climate change, decarbonisation & energy

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale energy and transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives. Local ownership of energy projects and decentralised grid and storage infrastructure will be strongly supported.

The functioning of communities and their needs would be the primary focus. Policies would focus on local, place-based solutions and maximising community benefits. Decentralised energy generation and distribution would be supported including community owned renewable energy schemes. For larger scale energy policy, there would be a strong emphasis on assessing the impacts on local communities and ensuring the economic opportunities arising from such investment, directly benefits local communities, in terms of jobs, energy costs and other benefits. Actions to increase energy efficiency, in both new and existing developments will be supported, helping meet wider energy objectives, reduce energy costs and address issues of fuel poverty.

Broadband & digital infrastructure

The provision of modern digital infrastructure would be supported, with an emphasis on ensuring all communities in Wales are connected to the latest and best technology. Areas that may not otherwise be served by the market in a timely manner will be the focus of Government investment and this NDF will support all steps to increase access to digital services and resources.

Economic prosperity & economic regeneration

This NDF would support local employment opportunities, diverse local economies and vibrant local centres. It would encourage local distinctiveness and recognise that economic prosperity helps support well-being. Providing better jobs closer to homes, will both reduce the need to travel and allow those who wish to stay and live in their local communities to do so. Regeneration objectives and tackling deprivation would shape major strategic investment decisions, focussing investment on those areas in greatest need. This NDF would seek to avoid reliance on trickledown economics or prosperity growing outwards from key growth poles and instead promote strong, local centres across all parts of Wales. Poverty will be tackled by focussing on the different issues affecting communities across Wales and shaping responses to meet these needs.

Rural Wales

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

Reversing population decline would be a priority in rural areas. This NDF would seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure through all levels of the planning system, thereby helping to ensure Wales's rural communities retain and attract all ages and all members of our society. Investment decisions, the delivery of new infrastructure and the co-ordination of other key Government strategies would be aligned to support these objectives.

City Regions & Growth Deals

The city regions would be supported and this NDF would place a strong emphasis on ensuring that investment and opportunities within city regions benefit all. Investment would be supported where it maximises the benefits for all communities and where potential positive outcomes are achieved wider than the central regional urban core. Connectivity will be an important feature.

Transport

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives.

The functioning of communities and their needs would be the primary focus. Transport policies would focus on local accessibility, with public transport connecting homes, jobs and key services, and places will be shaped around walking and cycling. Ensuring accessibility to key transport hubs will be a priority. Supporting active travel initiatives would be a key objective. This NDF would seek to tackle the negative consequences around transport choices. Health objectives would be a key influence, supporting healthy transport modes and addressing directly air and noise quality issues. Traffic reduction measures, including potentially significant changes to road networks would be pursued if necessary, to secure benefits for local communities.

Natural Resources

This NDF would strongly support the principles of SMNR, recognising the unsustainable management of our resources will negatively impact upon all communities in Wales. Through actions such as increasing resource efficiency and reducing pollution, the aim is to build greater resilience into our ecosystems and biodiversity and support the delivery of national objectives. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure the long-term economic sustainability of our communities. They also provide resources that are fundamental to the prosperity and security of wider industries and ultimately that of our towns and cities. Securing social, economic, health, cultural and environmental benefits and enhancements for local communities through the SMNR approach will be a key priority.

Welsh Language

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities for every area and planning the provision of new homes so that population change is carefully managed.

Health

The NDF would promote good health and well-being for everyone. Supporting the creation of high-quality places with improved access to integrated community facilities and services, including digital access. The NDF will look to tackle inequalities throughout Wales and deliver a range of high-quality houses and improved access to the natural environment, to support health objectives.

What are the key assumptions that support this option?

- The planning system and locational choices will ensure that all parts of Wales support the development of sustainable settlements.
- Sustainable settlement patterns are key – homes close to jobs and key services and facilities, reducing the need to travel and ensuring sustainable transport options when required. A strong emphasis is placed on maintaining a good range of accessible community facilities.
- Land-use planning principles will be used to ensure the jobs, services, facilities and recreational activities people use will be close to home. Where they cannot be provided locally, they will be easily accessible by sustainable transport options. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- It is accepted there will remain a need for large-scale national projects. A full assessment process will be required, to ensure that alternative options are considered including locally scaled approaches.
- The provision of local, affordable housing is a key issue with strong support for local and self-build housing.

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

- The NDF seeks to enable the most disadvantaged communities to benefit from growth and supports community empowerment and good governance.
- Accessibility is central to decision making and locational choices must maximise accessibility to all members of society.
- Improving health is a key objective and influences all policy decisions. Air quality improvements are directly targeted. Local well-being and quality of life is the key objective in land use decisions.
- Regeneration and tackling deprivation are a key strategic focus. Tackling the legacy of previous development and industry is a priority as well as addressing all areas of poor environmental quality.
- The NDF emphasises digital connectivity, thereby encouraging more flexible and home working, a better work life balance and reducing the need to travel and congestion. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- Community owned renewable energy schemes are prioritised. Initiatives to increase energy efficiency in homes and end fuel poverty are supported by the planning system. Areas where renewable energy is being generated receive direct community benefits and emphasis is placed on schemes being located closer to where people live. Support for distribution and storage networks.
- Strong support for principles of circular economy

What would Wales in 2040 look like?

Cultural Assets

Strong focus on community scaled projects across all parts of Wales has created distinctive communities.

Housing

Dispersed across all of Wales, housing has focussed on meeting community needs and helped build sustainable communities.

Climate change, decarbonisation & energy

Energy needs are met through a dispersed, community scaled approach following a move away from fewer, large scale developments. Communities are energy exporters.

Land use principles have sought to reduce the need to travel and where trips are made, by the most sustainable methods.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge. Investment has focussed on peripheral and rural areas, accepting landscape change.

Economic prosperity & economic regeneration

Public investment has been balanced across all parts of Wales. The focus on ensuring strong local economies through the planning system and key Government strategies has increased prosperity nationally.

Rural Wales

Depopulation has been reversed and there is strong demand for housing in rural areas.

City Regions & Growth Deals

Successful city regions have been planned to ensure the widest possible benefits for their full regions, recognising the needs of communities across the region.

Transport

Communities have been shaped to reduce the need to travel within them and where trips are made, including between settlements, they are done so by sustainable and accessible transport methods.

Natural Resources

Agriculture, forestry, renewable energy, water and tourism have all supported the growth in high quality jobs across the whole of Wales and helped secure the long term economic sustainability of our communities.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met.

Health

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales
Strong focus on integrated community health facilities, ensuring communities can access facilities locally and digitally. Investment in good quality places and increased access to the natural environment,
What did the October 2017 engagement say about this option?
Positive There was welcome support for the principle of developing a fully all Wales spatial strategy. It was identified as important that the NDF process does not start on the assumption of a top-down, directional strategy and that understanding how national issues could be addressed from the local, community level was important. Housing, energy, employment and transport are typically cited as examples of where the top-down approach of the planning system fails to recognise what local communities want and does not properly assess the uneven impacts of these national decisions on all parts of Wales. There was concern that city regions, growth deals and major projects such as the M4 focus on defined, urban parts of Wales only. This option, by consciously focussing on the whole of Wales, is a positive attempt to think beyond the usual areas. There was support for the principle of seeking to focus public investment in the areas of greatest need and ensuring private investment in the strongest market areas is planned to deliver the widest possible benefits. The ability to develop local approaches under a unified national framework was welcomed. Housing and economic growth were frequently given as examples of areas where issues vary greatly across Wales. Focussing only on a single, narrow aspect such as housing numbers rather than the type and quality of housing, does not support the delivery of wider objectives. Community focussed approaches would be more flexible and allow appropriate solutions to be developed. This option was considered to be a good fit with the Well-being Act, seeking not to prioritise one area or one outcome over another but rather seeking to understand how objectives could be met across the whole of Wales.
Negative Whilst the overall aspiration of this option was supported, many thought it lacked focus and it was not clear what the spatial strategy would be. Rather than directing growth and the delivery of infrastructure, this option would create the conditions for bottom-up approaches to be developed but not provide certainty on where or how. It was expressed that this option would be a missed opportunity to positively drive change from the national level. There was uncertainty about what the relationship would be between different tiers of the planning system. LDPs were considered the most appropriate plan to plan for local areas. Climate change, economic prosperity, solutions to housing issues and tackling many of the issues Wales will face between now and 2040 will require big, national solutions. We should not be afraid of setting a clear national spatial strategy and this is the role of Government. Rather than provide a strategy to consider how national issues could be addressed from the bottom-up, there were strong concerns that this option could become a NIMBY charter. A point made frequently was that those most likely to be involved in the planning process do not necessarily represent the wider community and that one of the key drivers for the introduction of the NDF, was the ability to consider and address issues at the national level. Views were expressed that the understanding of the relationship between the planning system and the Well-being Act required careful consideration. Everywhere can't have everything and all goals cannot be met equally in all cases. The aspiration is welcome but this is not realistic and decisions have to be made. A spatial strategy and the development of a NDF should be about making important decisions in the right way.
Realistic Given existing plans, strategies and Government commitments, it was considered that in the short term it would be difficult to move to this spatial approach. In light of this, the option and underlying assumptions have been amended to reflect that, particularly in the short term, large scale projects will be supported, and over the life of the NDF there may be a need for large, nationally scaled projects. The primary focus under this option will, however, be clearly on locally scaled solutions and ensuring that future strategic decisions start from a bottom-up perspective. With this amendment, this option was considered realistic.

Table D-7: Alternative Spatial Option 3

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Summary Overview

This option focuses on decarbonisation and climate change and makes our response to these issues the primary consideration for the NDF. There is overwhelming evidence supporting the need for urgent action on climate change. The planning system has a pivotal role in facilitating the transition to a low carbon society by ensuring decarbonisation is at the forefront of land use choices. Targets for renewable energy and greenhouse gas emissions and emerging carbon budgets will significantly shape this spatial strategy. This NDF focuses particularly on land use, the relationship between different uses and the connectivity between them. It places a strong emphasis on planning how our settlements will grow, interconnect and understanding the consequences that will arise from the choices we make and the opportunities arising from doing things differently.

Existing urban and rural patterns will be adapted to improve their sustainability. This NDF will support major changes to urban form and development patterns, including in existing areas, if they are required to meet objectives and contribute to the realisation of a low-carbon economy.

Why has this option been developed?

Across all the issues and discussion of potential spatial options for the NDF, the strongest consensus emerged around the importance of tasking the NDF with responding to climate change issues and supporting the decarbonisation agenda. It was suggested that this option has no plausible counter view to it (e.g. support carbonisation, worsen climate change issues) and as such must be considered across the NDF process. There was also a clear view that this option was not and should not be a negative option. It offered a positive opportunity to develop our society and economy in new ways and this should be embraced.

There was a belief that land-use planning principles were key and that the planning system should take the lead in 'planning' our future. Problems have been exacerbated by a lack of joined-up thinking, short-term goals and a failure to understand the interrelated consequences of many of our decisions.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. It would support cultural development that helped achieve our decarbonisation objectives.

Housing

This NDF would focus on the location of new development, connectivity between uses and energy efficient, zero carbon sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Housing will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned housing development will not be supported. As a first principle, the NDF will seek to direct housing to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported. This NDF would support housing development in the most sustainable locations, which may be green and brownfield, with a focus on resource efficiency, quality and innovative design.

Climate change, decarbonisation & energy

This NDF will adopt a positive and proactive approach to increasing the generation of renewable and low carbon energy through a range of technologies and support innovation and growth in the renewables sector. The decarbonisation of energy and other sectors will be a key priority. The NDF will direct renewable energy generation to the most appropriate locations and provide a framework to support its delivery. As well as large scale projects, this alternative option will support regional and local scale energy projects, maximising the potential for sustainable projects at all levels. It will also provide flexibility to ensure that new emerging technologies and opportunities are supported.

The storage and transmission of energy will be planned for to support a modern and efficient energy sector. Actions to increase energy efficiency, in both new and existing developments will be supported. Land use patterns and the provision of new infrastructure will be shaped by the potential risks from climate change. This NDF will anticipate the risks from flooding; increases in temperatures; loss of habitats and vegetation; increasing urban heat islands; and harmful effects on ecosystems and ensure future

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

development patterns consider, are shaped by and build resilience to these. There will be an acceptance that some areas will remain vulnerable to potential impacts and the consequences of this planned for. Coastal changes and the potential impacts upon cities, towns and communities will influence spatial choices.

The NDF will promote SUDs as an integral part of new development, encouraging water (including floodwater) to be a more normalised feature of the built environment through planned and managed schemes. Actions to increase energy efficiency, in both new and existing developments will be supported.

Broadband & digital infrastructure

This NDF would fully support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways, support new working practices and reduce the need to travel.

Economic prosperity & economic regeneration

This option will positively support sustainable low-carbon growth. Emerging opportunities in sectors helping deliver decarbonisation objectives will be strongly supported and the framework will support innovation, R&D and the development of new technologies. Green growth and the circular economy will be strongly supported.

This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Employment and regeneration initiatives will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned development will not be supported. Land use choices will reduce the need to travel and ensure connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to these objectives and that they have been planned to support the widest range of benefits. Choices on the location of strategic employment centres will be shaped by existing and proposed centres of populations and sustainable transport networks. Poverty will be tackled by providing modern, high quality housing, addressing fuel poverty, supporting a transition to a prosperous, low-carbon economy and improving well-being for all in Wales.

Rural Wales

This NDF will seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure in rural areas. There will be support for community energy projects which can help subsidise local services and infrastructure. It would support locally focussed communities, which reduce the need to travel and when trips are made, can be done so sustainably. It will require a clear focus on how growth, investment and new infrastructure is planned across the whole of Wales, to ensure that spatial choices support decarbonisation objectives in both rural and urban areas.

City Regions & Growth Deals

This NDF will support the development of connected, accessible and well-planned city regions, which co-ordinate the delivery of growth and infrastructure in a manner that maximises positive outcomes. The delivery of regional transport infrastructure which supports decarbonisation objectives will be a priority and the NDF will provide a clear framework for their delivery. Key projects and infrastructure must be planned in the context of wider social, economic, cultural and environmental uses.

Transport

Land use choices will reduce the need to travel, ensuring that connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to meeting these objectives. This NDF will support actions and investment to decarbonise the transport sector and ensure the land use planning system at all levels is aligned to facilitate delivery. Walking, cycling, electrification and public transport are prioritised. Bus as well as rail services will be important. Major new road investment will be supported where it significantly reduces congestion; supports significant improvements in efficiency; and supports wider objectives including those in relation to air quality and the environment.

Airport expansion may be limited or offset. Investment supports improvements to external rail and sea links. Emerging technologies such as electric cars will be supported where they help decarbonise transport movements. As a first principle this NDF would seek to minimise the need to travel and as a second principle, ensure trips are made in the most sustainable manner.

Natural Resources

This NDF supports the core SMNR principles of improving efficiency, minimising the unsustainable use of resources, reducing pollution and delivering renewable energy. Alongside steps to reduce carbon emissions, this NDF will support actions to build resilience to climate change in our communities, businesses and natural environment. This NDF will support nature-based solutions to strengthen biological diversity, including the provision of green networks and infrastructure. The contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. This NDF will have

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

strong support for the principles of the circular economy and resource efficiency. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.

Welsh Language

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.

Health

This NDF will co-ordinate delivery of infrastructure to reduce the need to travel and provide digital ways of accessing services. Resilience measures for climate change provide opportunities to increase health and well-being including improved air and water quality. The reduction of fuel poverty will have a positive impact on people's health and well-being.

What are the key assumptions that support this option?

- Renewable and low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed across Wales.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- There is a presumption in favour of actions to address climate change.
- There will be strong alignment between land use and transport planning at the national, regional and local levels.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Strong focus on the location of new development, connectivity between uses and energy efficient, sustainable design. Locational choices require that new development is located in sustainable locations.
- Relationship between settlements and regions will be planned in the context of wider social, economic, cultural and environmental objectives and to support the delivery of decarbonisation aims.
- As a first principle, the NDF will seek to direct new development to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported.
- Spatial choices will be shaped by the location of main population centres and sustainable transport infrastructure. As well as reducing transport movements, reducing congestion and emissions will shape key decisions.
- Land use, major projects and infrastructure must be resilient to climate change impacts.
- Options for rail and bus connectivity are actively prioritised. Targeted road improvements are made to accommodate sustainable development. UK and international connections will be rail and sea based in preference to air. The sustainable movement of freight will be a priority considering rail, water and electric vehicles options.
- SUDS and sustainable flood management proposals are developed on a large scale. Infrastructure is provided to ensure a steady supply of water.
- Housing will be provided in the most sustainable and integrated locations, with access to jobs, services and facilities, and sustainable transport options central to the choices on new housing.

What would Wales in 2040 look like?

Cultural Assets

National projects have been developed in the most sustainable accessible locations, planned alongside other land uses.

Housing

Energy efficient, well designed housing has been planned and built to create sustainable, accessible communities.

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Climate change, decarbonisation & energy

There has been an increase in the generation of renewable and low carbon energy across Wales through a range of technologies. There has been strong growth in the renewables and low carbon sectors. Sound planning has ensured key spatial choices have supported the delivery of national objectives and Wales is on its way to exceeding its 2050 decarbonisation targets.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

Economic prosperity & economic regeneration

There has been strong growth in renewable and low-carbon sectors, supporting a transition to a low-carbon society and an increase in prosperity for all parts of Wales. Wales is recognised as a world leader in these fields.

Rural Wales

Spatial choices have supported decarbonisation objectives in both rural and urban areas and supported the delivery of wider social, economic, environmental and cultural goals. Community energy schemes and improved digital and low carbon infrastructure have helped tackle depopulation.

City Regions & Growth Deals

Well planned regions and new infrastructure, have supported prosperous regions which have helped deliver climate change and decarbonisation objectives.

Transport

Strong alignment between national planning and transport strategies has resulted in well planned, sustainable and accessible communities across Wales and supported a switch to low carbon transport and public transport.

Natural Resources

SMNR principles have helped improve efficiency, minimise the unsustainable use of resources, reduce pollution and deliver renewable energy.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met.

Health

Delivery of well-planned and designed places with connected infrastructure, have improved air quality.

What did the October 2017 engagement say about this option?

Positive

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate.

There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader.

There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

Negative

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it.

It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small-scaled actions.

Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment.

Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

Realistic

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table D-8: Alternative Spatial Option 4

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

Summary Overview

This option focuses on the sustainable management of our natural resources. It recognises that unsustainable management will negatively impact upon future generations and provides a positive framework to help realise the social, economic, environmental and cultural value of our natural resources and ensure key ecological networks and habitats are adaptable and resilient to change. Through increasing resource efficiency and reducing pollution, this NDF will help build greater resilience into our ecosystems and biodiversity. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure long term economic sustainability.

This NDF would use baseline evidence to guide development to the most suitable locations, strongly prioritising natural resource implications in spatial decision-making. It will have a strong focus on how decisions are taken and the outcomes that should be achieved, using the NDF's development plan status to firmly embed key principles into the decision-making process at all levels.

Why has this option been developed?

The Environment (Wales) Act positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The Act is intended to help secure Wales' long-term well-being, so that current and future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities.

This option has been developed to test how the national spatial plan can support the delivery of the requirements of the Environment Act.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including for tourism, outdoor recreation, local employment and physical and mental health. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces, that represent both cultural and ecological assets. Development that undermined the integrity of our landscapes or natural resources would be strongly resisted and would be directed towards less culturally sensitive locations.

Housing

This NDF would focus on the location of new development in terms of its relationship to ecological networks, and the need to create attractive and healthy environments for people to live in. It would direct housing away from areas likely to have a significant impact on ecological networks and flooding issues and towards locations that reduce the need to travel. New housing development would embrace the multiple benefits that green infrastructure can provide for health and well-being and would support the creation of and promote access to open space and wider ecological networks.

Climate change, decarbonisation & energy

This alternative would prioritise adaptability to change for both people and species. Networks of green and natural spaces would be enhanced and protected in order to help adapt to climate change. This NDF will anticipate the risks from flooding, air quality, increases in temperatures, loss of habitats and vegetation, increasing urban heat islands and harmful effects on ecosystems and ensure future development patterns consider, are shaped by and build resilience to these.

Habitats vulnerable to development pressure including floodplains, woodlands and urban green infrastructure would be prioritised for proactive and preventative action.

Actions would include steps to safeguard and encourage urban tree coverage, avoid the fragmentation of floodplains through development, secure sustainable drainage

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources
systems, ensure water sensitive design and deliver appropriate soil carbon management. This option would strongly support greater energy efficiency and realising the opportunities across Wales to generate renewable energy.
Broadband & digital infrastructure This NDF would support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways; support new working practices and reduce the need to travel; and support our aspirations for lower carbon living.
Economic prosperity & economic regeneration This NDF would recognise that Wales' abundance of natural resources is one of our greatest economic assets, underpinning our vibrant tourism and leisure sector, agricultural industry, and world-class home-grown food and drink sector. This NDF would realise the economic opportunities of Wales' natural resources (alongside other resources), while building their resilience to create an environment which will nurture the businesses of the future. Economic development would be directed away from areas where there was the potential for conflict with important ecological networks, and new development would incorporate green infrastructure and support the creation of wider ecological networks. Opportunities for green growth and realising economic opportunities from the sustainable management of resources would be supported. Poverty will be addressed by ensuring local communities benefit from Wales's natural resources and by supporting positive energy, housing and economic development.
Rural Wales This NDF would focus on maintaining and supporting our natural resources as the bedrock of our rural economy, particularly our agricultural and tourism sectors. Maintaining healthy and resilient ecosystems and distinctive local landscapes will be important for supporting rural Welsh communities' sense of place and identity. The focus would be to support nature-based solutions that harness the multiple benefits of our natural resources to support the economy and culture of rural communities, and to ensure that ecological networks are managed to support the delivery of cultural, economic, social and environmental objectives. It would support development in rural areas that helped achieve ecological and resilience objectives and seek to resist development that could undermine the integrity of key networks.
City Regions & Growth Deals This NDF will recognise that green spaces and networks are vital if our city regions are to be attractive places to live and work. It would support the development of ecological networks including green infrastructure across well planned city regions. The provision of infrastructure and new development will be planned to respond to the impacts of climate change and support the protection and enhancement of ecological networks and the sustainable management of natural resources. It will support a greater regional understanding of issues, such as for example river catchments, and ensure decisions are planned and taken in the fullest regional context.
Transport This NDF would prioritise development locations that reduce the need to travel and would focus on the role of public transport and interventions that encourage the reduction of air pollution. New transport infrastructure would incorporate green infrastructure and be designed to create green corridors and wider ecological networks and would be located to avoid fragmenting habitats or adversely impacting air or water quality.
Natural Resources The principles of SMNR would shape this NDF, helping deliver key benefits for health and well-being, resource efficiency and security, economic prosperity and community identity, through prioritising the fundamental role that our natural resources play in supporting these and a wide range of other beneficial outcomes. This option will work closely with the Natural Resources Policy. It would also focus on improving the resilience of ecosystems, including their diversity, connectivity, scale, condition and adaptability. Environmental enhancement would be prioritised, and the creation of habitats and networks to allow ecological resilience would be actively progressed. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use. Improving air quality will be a key priority.
Welsh Language Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.
Health This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including reducing pollution, increasing access to natural green spaces, benefitting physical and mental health. Increasing prosperity through green growth will help to reduce inequality in health.

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

What are the key assumptions that support this option?

- Principles of SMNR as a key driver of this alternative and are firmly embedded in the planning system through the NDF.
- Agriculture, forestry, renewable energy, water and tourism are strongly supported.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- Strong links with the Wales Marine Plan and Natural Resources Policy provide a coherent framework for all activity in Wales and provide the focus for considering the environmental effects of development and the assessment of reasonable alternatives.
- Other policy and regulatory areas are aligned, respecting spatial constraints and pursuing sustainable development opportunities.
- All land (including urban) is considered a natural resource capable of supporting biodiversity and integration of green infrastructure, or nature-based solutions, to enhance biodiversity and ecosystem resilience, will be an expectation of development.
- Increasing the extent of innovative green networks and high quality and biodiverse habitats, particularly in city regions, will help foster our connection with nature.
- SUDS and sustainable flood management will be prioritised. Infrastructure is provided to ensure a steady supply of water. River catchments are a key consideration in plan making and decisions.
- Natural green spaces are safeguarded and enhanced including alongside key transport routes to form green networks and across city regions. Green networks take on new spatial forms, including approaches following linear patterns and linking with natural biodiversity networks.
- Green networks seek to deliver strategic benefits for habitat continuity and species movement.
- Impacts on biodiversity, landscapes, water bodies and soil are avoided, mitigated and adapted. Species populations and their habitats will be enhanced.
- Renewable & low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed throughout the country.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Presumption in favour of actions to address climate change

What would Wales in 2040 look like?

Cultural Assets

National projects have been developed based on Wales' distinctive landscape and natural environment.

Housing

Housing has been built across Wales, in locations that maximise the multiple benefits of Wales' natural resources, supporting health and well-being objectives and with no significant impacts on important ecological areas.

Climate change, decarbonisation & energy

Wales has planned for and adapted to climate change risks, ensuring resilience across Wales. There has been an increase in the generation of renewable and low carbon energy.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

Economic prosperity & economic regeneration

There has been strong growth in agriculture, forestry, renewable energy, water and tourism, supporting a transition to a low-carbon society. Wales is recognised as a world leader in these fields.

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

Rural Wales

Rural areas are prosperous, healthy and resilient having benefited from growth and investment in maintaining and supporting our natural resources.

City Regions & Growth Deals

City regions, planned around green infrastructure and natural resources, are attractive, healthy and prosperous. They are exemplars of how growth has been shaped to deliver our well-being objectives.

Transport

Transport solutions have delivered new green networks, supporting health and ecological goals and the sustainable movement of people.

Natural Resources

Wales leads the world in realising the multiple benefits of its natural resources.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met

Health

Delivery of high-quality places with sustainable access to facilities and services. Improved access to nature and a reduction in pollution.

What did the October 2017 engagement say about this option?

Positive

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate. There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader. There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

Negative

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it. It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small scaled actions. Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment. Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

Realistic

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table D-9: Alternative Spatial Option 5

Benchmark Option - Do Not Prepare the NDF

Summary Overview & Why has this option been developed?

This alternative option would involve not preparing a NDF. The existing Wales Spatial Plan would remain the national spatial plan. The WSP does not have development plan status.

The Planning (Wales) Act requires the preparation of a NDF. This option is therefore not realistic.

Benchmark Option - Do Not Prepare the NDF
It does however provide the opportunity to consider what would happen if a NDF were not prepared and how national strategic planning decisions would be taken. It provides an important benchmark against which to understand the other potential options. The WSP remains an important strategic plan and much of the key policy approaches remain valid. One of its key weaknesses is its lack of development plan status and an ability to influence decision making. This situation would remain. The ability of the planning system to respond to the requirements of the Environment Act, Well-being of Future Generations Act and the Welsh Government's decarbonisation objectives would be restricted to actions at the local level and without an overarching strategic view.
Full Overview: How would this option help meet the NDF objectives?
Cultural Assets
Culture would be promoted at community and local levels. There is recognition of links to economic prosperity but overall this would not be a priority area.
Housing
Climate change would be an urgent issue and major development would be determined in the context of its impact upon climate change objectives. Ensuring resilience to sea level rises would be important, reducing risks to both people and property.
Climate change, decarbonisation & energy
Actions at the local level would be required to ensure all development contributed to climate change objectives, with support for example, for active travel and greening spaces initiatives. Energy policy would reflect national policies (e.g. decarbonisation and energy targets) and would be based on a regional approach, with regions expected to utilise their strengths and competitive advantages.
Broadband & digital infrastructure
Broadband coverage would be viewed as a regional issue, with challenges such as 'not spots' a matter for regions to address themselves. High speed broadband would be a priority for areas of high value economic activity. Government intervention would be re-active, addressing issues unable to be addressed by the market.
Economic prosperity & economic regeneration
Regeneration would be a key tool to improving prosperity across Wales. Projects would be regional in scale with the Welsh Government playing a key role in identifying project areas, drivers and setting ambitions for future outcomes. Maximising existing regional strengths is central to economic prosperity objectives and actions at regional and local levels are the primary lever in helping reduce inequality and deliver prosperity to all.
Rural Wales
There would be a very strong focus on rural areas. Delivering accessible community facilities and services to rural areas would be a key priority. European and Government funds will be made available to help achieve this. Transport and jobs are also key issues in helping maintain vibrant rural life and there would be strong support for actions in these areas.
City Regions & Growth Deals
The development of city-regions to drive economic prosperity, around Cardiff, Swansea and in the north east would be supported. Each city region has distinct strengths and these will form the basis of efforts to develop strong regional economies. The regional approach outlined in the WSP for other areas of Wales would be supported.
Transport
Day to day transport issues will be addressed through a bottom-up approach. Issues across an area will be brought together to identify regional priorities and regional issues brought together to identify national priorities. Transport investment is seen as a key tool in supporting regeneration and economic objectives.
Natural Resources
Natural resources are considered from a local perspective. They are local assets which help determine the nature and scale of development appropriate in an area. There is no overriding national policy or approach other than the need to ensure they are used in a sustainable way.
Welsh Language
There is support for a modern bilingual society, where the Welsh language is a community attribute. Planning will help provide spaces for community life to flourish. There is no strong alignment between language and prosperity.
Health
Building sustainable communities through tackling inequality, improving health and eradicating child poverty. Creating and sustaining the right set of services and locating the services within or close to key settlements, accessible by public transport.

Benchmark Option - Do Not Prepare the NDF

Relationship with SDPs/LDPS

The position would remain as it currently stands, with SDPs and LDPS having to have regard to the WSP but with a limited relationship in practice. Strategic development plans would be left to define their own strategic objectives in the absence of an all-Wales context. Issues in relation to renewable energy, depopulation and uneven housing development would be dealt with through LDPS in those areas not covered by a SDP (or where an SDP has not yet been prepared).

What are the key assumptions that support this option?

- No national development plan.
- The local development planning system would be the primary tier of plan making and decision taking. In time in parts of Wales, SDPs may be prepared.
- Current trends will continue and progress towards key Welsh Government targets and objectives would remain on their current trajectories.
- Spatially, the national planning policy position would not be changed to reflect the requirements of the Environment and WCFG Acts.
- Regeneration and rural areas will be a major focus.
- Broadband is a relatively minor consideration.
- Housing would be viewed in isolation and not linked to wider objectives.
- Transport objectives would be linked in part to prosperity objectives but not seen as a central component in the delivery of wider objectives.
- Natural resources and energy would be viewed as regional matters, with no national perspective and no priority status.
- Climate change would be a central and priority issue.

Scoring of Assessment	
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)
+	Minor positive – likely to result in limited progress towards the ISA objective
0	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative – likely to work against the achievement of the ISA objective
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)

Table D-10: Appraisal of options against ISA Objective 1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Children's Rights, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where markets are the strongest. This would provide beneficial effects for these areas. Indirect benefits may arise from the development of skills through employment opportunities within the areas of market focus. However, the ISA objective seeks to achieve high levels of education for all members of society. Whilst the option may lead to significant benefits for some, it is unlikely to contribute towards reducing education inequality, and may lead to greater polarisation, particularly in areas of greatest education deprivation such as the valleys or north west Wales. This may negatively affect those who aren't engaged in industries that may be created as part of the market focus. This option does not address the provision of or access to education or training skills provision. There is an opportunity for more specific reference to education and skills development, including how equality in education provision will be achieved, to be included.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option has a very strong focus on reducing inequalities and meeting local needs, seeking to deliver strong local communities. This bottom up approach includes the delivery and provision of access to services and facilities, which could include education and training facilities and lifelong learning opportunities. Positive effects from this option may arise from the provision of social infrastructure across all areas of Wales. Reversing rural depopulation may benefit rural school viability, which would also be positively reinforced by improvements in digital connectivity. This compares positively against the narrow urban focus considered in Option 1. However, there is potential uncertainty in delivery without the economic drivers and strengths that could be achieved under option 1. This could be strengthened should this option be taken forward as preferred.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option has the potential to include access to education and training, particularly in sectors relating to decarbonisation, however, this is not included within the option in its current form. There is a strong emphasis within the option on local community connectivity and reducing the need to travel. This should lead to positive effects on accessibility to education, leading to minor positive effects, particularly in areas that may currently be isolated from services and facilities.
4: A spatial strategy focussed on the	+/-	The option has the potential to include access to education, skills and training, however, this is not included within the option in its current form. Locating development in sustainable locations could improve accessibility to educational facilities indirectly. However, it is less likely

Alternative Option	Score	Commentary
sustainable management of Wales's natural resources		than option 3 to deliver a reduction in inequalities nationally. Alternatively, it could lead to an exacerbation of education inequalities in more rural areas, should the option lead to an increase in the isolation of rural communities for environmental protection reasons.
5: Benchmark Option: Do not prepare the NDF	+	Without the NDF, it is likely that the WSP and other policy initiatives would continue to form the development plan nationally. Current policy looks to address accessibility issues to facilities such as education and recognises the need for investment in education to enable future economic growth. Therefore, positive effects are predicted against this objective.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative, and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 2 scored highest against ISA Objective 1. The testing identified the importance of ensuring the preferred option included: • The creation of more cohesive, equitable communities (P3, P2, PE9, AS1) • The importance of social infrastructure in placemaking (P3, AS1) • Reversing rural depopulation (R1, R2, R3, R4, PE6) • Improvements in digital connectivity (PE3) In response to the potential uncertainty identified by Arcadis in delivery without the economic drivers and strengths that could be achieved under option 1, the preferred option has a strong focus on supporting economic objectives (P3, PE5, PE6, PE7, PE9). Alternative Option 3 also scored positively and highlighted the importance of the preferred option including: • Local community connectivity and reducing the need to travel (P2, AS4, R1, AS1)

Table D-11: Appraisal of options against ISA Objective 2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The increase in prosperity across the strongest market areas may lead to an increase in health benefits in those areas. However, the option is likely to reduce the potential for access to healthcare facilities, limiting good access only to the strong market areas. This could lead to an increase in inequality, between urban and more rural areas, specifically impacting on children and older people and particularly existing areas of deprivation such as the Valleys and North Wales coast, leading to significant negative effects.

Alternative Option	Score	Commentary
		The provision of new infrastructure, focused in existing strong areas of market demand, may lead to an increase in concentrated pollution, leading to negative effects on the health of urban populations. It would be unlikely that this option would create opportunities to adapt to risks to health from climate change, even in areas of growth, as it would not be a priority. The provision of green infrastructure and open space would be based on market provision, which would potentially lead to a reduction in supply. Negative effects from a loss of green spaces through development may result and would have a limited contribution towards healthy lifestyles.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option focuses on a dispersed approach based on local need, which may reduce inequalities and lead to an increased in health benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment, that may have major beneficial effects for physical and mental health. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change and impacts on health. The delivery of small-scale renewable energy could reduce fuel poverty.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option particularly focuses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability, delivering climate change resilience and the resulting health benefits that may result. There is the potential to achieve large scale health benefits through the decarbonisation of the economy, which could result in an improvement in air quality, water quality, and a reduction in other types of pollution that may affect health. Further, the focus on utilising sustainable locations, improving connectivity and increasing sustainable travel methods should increase access to facilities, leading to multiple direct and indirect health benefits. There is the potential for a decrease in health inequalities in rural areas through the focus on locally focused communities.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has the potential to deliver significant land far reaching health benefits through a reduction in air, water, and other types of pollution that may affect health and delivering climate change resilience. The focus on utilising sustainable locations, connectivity, and an increase in green spaces, could lead to multiple direct and indirect health benefits. However, it is unlikely to lead to significant positive benefits in relation to addressing issues that affect health such as isolation, and ageing population, housing quality.
5: Benchmark Option: Do not prepare the NDF	+	Existing policy seeks to improve the delivery of health services, improve access and tackle inequality, which could lead to positive effects against this objective over time.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 2 and 3 scored highest against ISA Objective 2. The testing identified the importance of ensuring the preferred option included: • Improving accessibility within rural communities and reversing population decline (P3, AS1, AS4, R4) • Increasing access to the natural environment (P2, DN3, DN5) • Sustainable communities, well designed and planned (P2, P3, AS1, AS4, R1) • Adaption to risks from climate change / climate change resilience (P1, P2) • Delivery of small scale renewable energy (P2, PE2) • Decarbonisation of the economy (P1, PE8) • On utilising sustainable locations, improving connectivity and increasing sustainable travel methods (P2, AS4)

Alternative Option	Score	Commentary
		- Focus on rural communities (P2, P3, R4, R5) Alternative Options 4 and 5 also scored positively and highlighted the importance of the Preferred Option including: - Reduction in air, water, and other types of pollution (P1, P2, P3, DN2) - An increase in green spaces (DN3, DN5) - Improve the delivery of health services (P2, R3, R4)

Table D-12: Appraisals of alternative options against ISA Objective 3: To create opportunities for an increase in employment across the country and promote economic inclusion

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+	The option seeks to direct growth to the strongest market areas. This will create opportunities to increase employment but is focused on identified growth areas rather than across every part of Wales. Therefore, it is unlikely to contribute to economic inclusion across the country. The option is likely to lead to significant positive effects in relation to improving access to jobs in growth areas, increasing the number of people satisfied with their jobs, and creating opportunities for investment and growth and development of skills, particularly in relation to city regions.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option could lead to an increase in economic opportunities across Wales, but this may be limited by a lack of clear support for economic growth and the markets. Positive effects of the option include supporting job satisfaction and physical access to employment opportunities, but it is noted that it may not create opportunities for investment and growth. The lack of focus on city regions could result in a limited opportunity.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focusses on the sustainable use of land and improving existing urban and rural patterns, including how they can improve their potential to achieve more sustainable development, and delivering sustainable access to job and facilities. To some extent this reflects current national policy and could create opportunities in a more sustainable employment market and increase skills in this type of economy. Further, it could support specialisation and clusters in certain areas. The option looks to deliver regional transport infrastructure that is well connected, and provides active travel opportunities with wider community benefits, supporting city region and growth deals. It is noted that deliverability may be an issue, including associated costs.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+/-	This option may limit growth and therefore employment opportunities, with opportunities being limited to certain parts of Wales. Therefore, this option may limit the potential for social inclusion, particularly in less developed areas that may be afforded greater environmental protection. The delivery of green infrastructure, climate change resilient networks and access to the natural environment, could create attractive places to live, work and invest, providing a regional context and potential support to city regions and growth deals. Positive effects could be achieved through a potential boost in the green growth economy, which may include employment opportunities across rural Wales.
5: Benchmark Option: Do not prepare the NDF	+/-	A regional focus would remain without the NDF, seeking to achieve economic prosperity, including maximising regional strengths, to reduce inequality and deliver prosperity. Delivery would be achieved through regeneration initiatives and existing WG planning policies such as PPW. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region.

Alternative Option	Score	Commentary
		These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 1, 2 and 3 scored highest against ISA Objective 3. The testing identified the importance of ensuring the preferred option included: • Contribute to economic inclusion across the country (P1, P3, PE3, PE5, PE6, AS1) • Improving access to jobs in growth areas (P1, PE4, PE5, PE6, PE7, AS1) • City regions (PE5, PE6, AS1, R3) • Opportunities for investment and growth (P1, PE1, PE3, PE4, PE5) • Support specialisation and clusters in certain areas (R1, R5) • Regional transport infrastructure (PE8, R3, R4)

Table D-13: Appraisals of alternative options against ISA Objective 4: To create opportunities for sustainable economic growth, diversity and business competitiveness

Relevant impact assessments (in addition to SA & SEA): EQIA, Rural Proofing, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	Through directing growth to the strongest market areas, this option may have positive effects on competitiveness and inward investment, which may lead to positive trickle-down effects in some areas. However, the ISA Objective seeks to achieve sustainable economic growth, which is unlikely to be achieved under this option. Opportunities to become more resilient to climate change may only be delivered where they are compatible with the economic growth targets. The option could help to deliver infrastructure in growth areas or where the market demands. However, it is unlikely that the option would contribute to enhancements to the rural economy and rural diversification.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option is sustainable in principle, if it can be delivered. The option supports local economic diversity and delivers small scale infrastructure projects. Further, it is likely to support SMEs, third sector and micro businesses. This option could contribute to enhancements to the rural economy and rural diversification. However, the potential significance of positive effects could be reduced as it is not a 'powerhouse option', which could potentially limit competitiveness and economic growth and investment.

Alternative Option	Score	Commentary
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focuses on land use and improving existing urban and rural patterns, which could support a sustainable economy and growth in sectors associated with this. This could lead to benefits against this objective including the delivery of digital infrastructure and sustainable travel infrastructure. However, the option is potentially limited by the focus being entirely on green growth and decarbonisation. Associated costs, deliverability and technology advancement may limit progress. Further, it is less supportive of some other growth sectors.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	-	The option supports a narrow approach to sustainable growth with limited impact on national prosperity and economic diversity. It focuses on certain parts of Wales, which are likely to be less environmentally sensitive. This could lead to potentially negative effects as current trends of inequalities and lower than average earnings in Wales are likely to continue. This option would look to deliver resilient economic development when facing the risks from climate change, recognising that Wales' natural resources are one of its greatest economic assets.
5: Benchmark Option: Do not prepare the NDF	+/-	Without the NDF, a regional focus to economic growth would prevail, seeking to reduce inequalities and deliver prosperity. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region. These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral – against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 2 and 3 scored highest against ISA Objective 4. The testing identified the importance of ensuring the Preferred Option included: • Supporting local economic diversity (P3, PE5, PE6, PE9, PE10, AS1, R1) • Support for SMEs, third sector and micro businesses (P3, PE5, PE6, R1) • Enhancements to the rural economy and rural diversification (P3, PE4, PE5, PE6, AS1, R1, R4, R5) • Support for a sustainable economy and growth in sectors associated with this (P1, PE4, PE5, PE6, R1) • The delivery of digital infrastructure and sustainable travel infrastructure (P3, PE8, AS4, R3, R4) In response to the potential to limit competitiveness and economic growth and investment identified by Arcadis by focusing on green growth and decarbonisation, the Preferred Option has a strong focus on supporting a range of growth and investment opportunities (R1, R3, R5, PE5, PE6, PE9)

Table D-14: Appraisals of alternative options against ISA Objective 5: To contribute towards the future well-being of the Welsh language

Relevant impact assessments (in addition to SA & SEA): Welsh Language, Rural Proofing

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option promotes growth in established areas (SE Wales and NE Wales), which could attract Welsh speakers from Welsh speaking communities. This could lead to a dispersal of communities of Welsh speakers leading to an overall dilution. This could be exacerbated by an increase in connectivity with England to these growth areas. Alternatively, it could lead to the creation or strengthening of Welsh speaking communities in the urban areas. The net loss of Welsh speakers from Wales may be reduced as a more dynamic economy provides opportunities for young adults to remain in Wales.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option could support Welsh speaking communities but is reliant on developing appropriate employment opportunities to achieve this. This may be achieved through a strong focus on investment in local opportunities and a reversal of rural de-population, leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
5: Benchmark Option: Do not prepare the NDF	+	Language as a community asset is recognised, but a lack of link to the economy means that the potential impact may be limited. Other initiatives external to planning based on the Welsh Government target, could have a positive effect against this objective. Current trends demonstrate that the number of people using the Welsh languages is increasing.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. Alternative Options 2, 3, 4 and 5 scored highest against ISA Objective 5. The testing identified the importance of ensuring the Preferred Option included: • Strong focus on investment in local opportunities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) • More sustainable communities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) • Seeking to reverse rural de-population leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1, R4, R5)

Table D-15: Appraisals of alternative options against ISA Objective 6: To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	Through this option, economic growth is the main priority; decarbonisation and environmental regulation may only be imposed where they are compatible with the economic growth targets and may limit opportunities to reduce demand and deliver sustainable design. This may lead to some minor benefits, although the reduction of greenhouse gases is not likely to be a priority, so negative effects are likely. Further, the option is likely to lead to an increase in the need to travel as rural growth would have less support.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option has the potential to achieve positive effects through enabling local renewable energy schemes and reducing the need to travel, which could reduce vehicular greenhouse gas emissions over time. Delivering good quality, energy efficient housing potentially reducing energy demand. However, a lack of national backing and strategic direction could minimise its potential, as it is likely that fewer national scale renewable energy schemes would be likely to be delivered.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	This is the key priority of this option – a broad and all-encompassing focus on reducing harmful emissions and developing a sustainable pattern of living through sustainable design and locational choices.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	In this option, although reducing greenhouse gas emissions is not specifically mentioned, it is likely that a focus on the sustainable management of natural resources will have overall significant positive effects on all aspects of the natural environment, although large scale renewable energy generation may be limited. Climate change adaptation is also likely to be achieved through a natural resources approach. Reducing the need to travel through sustainable located development.
5: Benchmark Option: Do not prepare the NDF	+	Government targets are applied. Some positive effects against this objective may be achieved through existing planning policy and other government initiatives. Existing trends show that greenhouse gas emissions have been steadily falling in Wales, although more action is required to meet existing and future targets. The potential to reduce greenhouse gas emissions whilst accommodating new development and economic growth may not be achieved without strategic direction from the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 3 and 4 scored highest against ISA Objective 6. The testing identified the importance of ensuring the Preferred Option included: • Reducing harmful emissions (P1, P2, P3, DN2, DN5, PE8) • Developing a sustainable pattern of living through sustainable design and locational choices (P1, P2, P3, DN2, AS1, R3, R4) • Sustainable management of natural resources (P1, P3) • Reducing the need to travel through sustainable located development (P1, P2, P3) Alternative Options 2 also scored positively and highlighted the importance of the preferred option including: • Enabling local renewable energy schemes (P2, PE2) • Reducing the need to travel (P2, P3, PE3, AS4)

Table D-16: Appraisals of alternative options against ISA Objective 7: To contribute to the reduction and management of flood risk

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option promises protection and resilience in vital economic sectors and areas. However, it may follow that protection and resilience against flood risk would not be offered on a wider basis, which could lead to negative effects in some communities. Further, the city region areas include large areas of land that are subject to high flood risk, which could lead to negative effects. An increase in greenfield development in these areas and a lack of potential provision of sustainable design include sustainable drainage and green infrastructure, could lead to negative effects.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option doesn't specifically mention flood risk. However, the dispersed growth strategy could have a positive impact, as it may reduce the growth of populations in the urban areas of Wales that are at risk of flooding. Further, it is likely to include measures to support other communities that may be at risk of flooding. Sustainable growth may also lead to a reduction in an increase in flood risk.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	Sustainable management of flood risk, and increased resilience in appropriate areas, are at the heart of this option. Sustainable drainage solutions are key, and a positive relationship between built environment and water is encouraged. The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by and build resilience to these. Coastal processes including sea level rise would influence settlement strategy. The option also seeks to build climate change resilience into communities, businesses, and the natural environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option includes significant emphasis on the climate change resilience, based on the Environment (Wales) Act, which positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The option prioritises sustainable drainage systems and sustainable flood management. A strategy focussed on the sustainable management of natural resources is likely to lead to significant positive effects against this objective.
5: Benchmark Option: Do not prepare the NDF	+	Flood risk is a significant issue in Wales including coastal, fluvial and surface water flooding. Without the NDF, the current approach to flood risk management would be maintained, which could help to protect communities and business from flood risk over time. However, the potential for significant national strategic approaches to flood risk to be aligned with development management may be missed.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 3 and 4 scored highest against ISA Objective 7. The testing identified the importance of ensuring the Preferred Option included: • Sustainable management of flood risk (P1, P2, DN1, DN2, PE1, PE8) • Anticipating and adapting to the risks from climate change (P1, P2, DN1, DN2, PE1, PE8) • Sustainable management of natural resources (P1, P2, DN1, DN2, PE1, PE8) • Building climate change resilience into communities, businesses, and the natural environment (P1, P2, DN1, DN2, PE1, PE8)

Table D-17: Appraisals of alternative options against ISA Objective 8: To create opportunities to encourage the protection and improvement of air quality

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option is likely to result in intensification of development in areas around the motorway and trunk road network which have the lowest (worst) air quality levels. A likely consequence of the option is that air quality may become worse in some of the most urban areas and may even result in new Air Quality Management Areas (AQMAs) being created. There is potential for areas of worsened air quality to coincide with more vulnerable communities within the city region focus areas. However, air quality in less developed areas is likely to remain unchanged. The option promotes little investment in reducing the need to travel in less accessible areas (such as rural areas) which suggests that a continued focus on private car journeys would prevail.
2: A spatial strategy focussed on creating strong communities across all Wales	++	This option could reduce travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities. Sustainable communities are proposed which seek to reduce the need to travel and hence may reduce vehicular emissions. Further, it would encourage walking, cycling and working from home. This could lead to improvements in air quality including the development of community owned renewable energy initiatives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option identifies air quality as a priority. Further, the option includes an objective to reduce the need to travel and ensure connectivity and accessibility; these key priorities make a clear link to the need for air quality improvements for all projects.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	Improving air quality is a key priority for the option together with wider environmental protection. As with options 2 and 3, there is a focus on sustainable travel and a development pattern which reduces the need to travel is expected. It is also assumed that this option is relatively lower growth compared to option 1, so the extent of vehicle and industrial emissions is also expected to be lower. However, it is noted that it is not a 'low growth' option by intent. Significant beneficial effects are likely to result from the implementation of the option both directly and indirectly.
5: Benchmark Option: Do not prepare the NDF	+/-	This option would see a continuation of existing trends in air quality. Whilst air quality is good in Wales generally, there are areas, particularly in the south that suffer from poor air quality, notably in relation to road traffic. Some of these areas also correspond with some of the most deprived communities in the south. Over time, air pollution is expected to decline as a result of continued regulation and, in particular the uptake of cleaner vehicle technologies. However, the volume of road traffic is expected to increase in the near future particularly in the city regions (Cardiff, Swansea and north east) which already suffer from the poorest air quality overall. However, the Welsh Government decarbonisation agenda may reduce growth to some degree.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2, 3 and 4 scored highest against ISA Objective 8. The testing identified the importance of ensuring the Preferred Option included: - Reducing travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities (P1, P2, P3, DN2, PE8, R1) - Reducing the need to travel (P1, P2, P3, AS1) - Encouraging walking, cycling and working from home (P1, P2, P3, PE3, AS4) - The development of community owned renewable energy initiatives (P1, P2, PE2)

Table D-18: Appraisals of alternative options against ISA Objective 9: To create opportunities to protect and enhance the quality and quantity of water features and resources

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change		
Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to direct economic growth to the strongest market areas and deliver infrastructure to support this growth. This could have a negative impact on water resources in those areas, not least because the option is likely to involve the development of (potentially large) greenfield sites. Little is expected in terms of the provision of green infrastructure, SuDS etc. The negative impacts on water resources in these growth areas include an impact on water resource, the coast, a physical impact on watercourses from pressures on water use and effluents. Further, climate change could exacerbate impacts. The impact will however depend on the location and delivery of development. Standard mitigation measures will be required for new development, however, and the role of statutory bodies (NRW) and other planning policies (PPW) will still apply. Conversely, less development is likely to take place in more isolated rural areas which would, on the whole, limit the impact on water resources and quality in those areas.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option focuses on a local focus of development in settlements spread across Wales. Housing delivery is expected to include energy and water efficient designs. The option would deliver development across Wales at a smaller scale, which could be within the capacity of natural resources of an area although it is also expected that this would need to involve greenfield sites given the rural nature of much development. This bottom up approach could help to ensure capacity or thresholds not exceeded subject to standard mitigation measures being applied. The option is also heavily focused on resource efficiency and includes both SMNR and Sustainable Development principles.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option looks to deliver sustainable development and promotes sustainable drainage, which would be beneficial for water resources and quality. There are possible impacts on watercourses from hydropower/tidal lagoons and an increase in (sustainable) rural development. However, the option identifies that the contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. The option also supports SMNR principles including water efficiency and reducing pollution. This is likely to improve the sustainability of any new development from a spatial and project specific perspective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option would seek to deliver the SMNR principles including efficient water use and the reduction of pollution, avoiding impacts. It has a very strong focus on preserving the natural environment which would include water quality and resources, despite also promoting a degree of rural development. It recognises how the natural environment underpins economic sustainability. The use of sustainable drainage systems will help to deliver water resources and water quality benefits.
5: Benchmark Option: Do not prepare the NDF	+	This option is focused on natural resources from a local perspective, ensuring they are used in a sustainable way. This could ensure they are within the capacity of natural resources of an area. This locally focused approach would ensure capacity or thresholds are not exceeded. In 2015 39% of water bodies in Wales were classified as being of 'good' ecological status, a slight drop since 2014 but still significantly better than in England. It is anticipated that a continuation of current policies and regulation would help to improve water quality in the future following current development patterns.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		Alternative Option 4 scored highest against ISA Objective 9 and Options 2 and 3 scored positively. The testing identified the importance of ensuring the Preferred Option included: • Efficient use of water and the reduction of pollution (P2, P3, DN1, DN2) • Preserving the natural environment which would include water quality and resources (P2, P3, DN1, DN2) • Supporting SMNR principles (P3, DN1, DN2)

Table D-19: Appraisals of alternative options against ISA Objective 10: To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option has a strong support for delivering digital infrastructure (as do all options) and large infrastructure projects such as the Metro. There could be a negative impact on rural areas, with the focus of the option being on the larger urban areas and city regions. Consequently, this does not address issues of rural isolation. It is not a community focussed option, so any benefits realised would only be secondary to economic aims. These are also only likely to be realised in the city region areas. The option does not address active travel and the reduction of risks from climate change.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option seeks to deliver active travel and reduce private car use, through a community focus, with jobs and services being accessed locally. Digital connectivity is a priority. The option is particularly focussed on addressing areas of need, including providing social infrastructure for more deprived communities and in rural areas thereby reversing population decline. These measures could lead to significant positive effects against this objective.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option seeks to deliver active travel and reduce private car use, through a focus on land use, the relationship between different uses, and the connectivity between them. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects against this objective. Walking, cycling, rail electrification and public transport would be prioritised. All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	This option is not considered to be as strong as options 2 and 3 with regards to connectivity, as the focus relates more to the management of the natural environment. However, there is a potential for active travel to be promoted through the aims of this development option. It also promotes sustainable rural development which can also benefit community retention. All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.
5: Benchmark Option: Do not prepare the NDF	+	Access to services and transport accessibility is currently weakest in rural areas of Wales although the WSP and National and local transport plans continue to provide a strong focus on improving this. Transport currently follows a largely bottom-up approach and transport investment is seen as a key priority for regenerating and connecting communities.
Developing the Preferred Option		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and

Alternative Option	Score	Commentary
(Welsh Government Comment)		neutral –against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 2 and 3 scored highest against ISA Objective 10. The testing identified the importance of ensuring the Preferred Option included: • Supporting active travel (P2, AS4) • Reducing private car use (P1, PE3, AS1, R1) • Ensuring jobs & services are accessed locally (P3, PE3, PE6, AS1, R1, R3, R4, R5) • Providing social infrastructure in deprived communities (P2, P3, PE9, R1, R3, R4) • reversing rural population decline (PE3, PE6, AS1, R1, R4, R5) • Ensuring connectivity between uses (AS1, R1, R3, R4) • Prioritising walking, cycling, rail electrification & public transport (P2, PE8,)

Table D-20: Appraisals of alternative options against ISA Objective 11: To create opportunities within which an improvement in social cohesion and equality can be achieved

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The option is economically focused with benefits only likely to be experienced by some members of the larger urban communities which would benefit from investment. This, is likely to reinforce or exacerbate existing inequalities. The urban focus of the option does not benefit all members of society including children and protected characteristic groups, including those in more rural areas or other communities that would receive little investment under this option. This is likely to make issues of rural de-population and isolation worse.
2: A spatial strategy focussed on creating strong communities across all Wales	++	This option is the opposite of Option 1 and is far more locally focused. It actively seeks reduce inequalities, as it seeks to deliver improved access for all to a range of facilities, services and housing. These benefits could be felt in communities across Wales including more isolated rural areas. Positive effects from the option could also come from delivering good design and increasing access to nature.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option aims to reduce the need to travel and reduce fuel poverty. This includes aims to sustain social infrastructure, housing and employment in rural areas. These are positive measures which work towards achieving social cohesion and maintaining community spirit. However, the option has little focus on children or protected characteristics beyond this.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option could achieve benefits to for social cohesion through creating a strong sense of place and increasing connectivity between communities through green infrastructure. Benefits relating to the reduction in inequalities are unclear, although a reduction in pollution and increase in access to greenspace overall, could lead to a reduction in geographical and subsequent health inequalities for some communities. The option has little focus on children or protected characteristics beyond this.

Alternative Option	Score	Commentary
5: Benchmark Option: Do not prepare the NDF	+	The Welsh planning policy framework seeks to build sustainable communities through tackling inequality, improving health and eradicating child poverty. It is anticipated that this would continue under a no-NDF scenario, although the significance of the potential benefits is unclear, and would benefit from a strategic approach, which could be provided through the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 2 scored highest against ISA Objective 11 and Options 3 and 4 scored positively. The testing identified the importance of ensuring the preferred option included: • Reducing inequality (P2, P3, DN2, PE9, AS1, R1) • Ensuring access for all to facilities, services & housing (P2, P3, PE3, AS1, R1) • Focusing on supporting rural areas (P3, PE2, PE6, R4, R5) • Reducing health inequalities (P1, P2, P3, DN, AS42, R4)

Table D-21: Appraisals of alternative options against ISA Objective 12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where the markets are the strongest (primarily likely to be focussed in the south and north-east). This would lead to the delivery of housing but due to this focus on the strongest market areas, this is unlikely to meet housing needs across much of the rest of Wales beyond local needs only. This is therefore not a balanced option in terms of meeting housing needs. The market focus also has the potential to limit the range and type of housing proposed unless this can be carefully controlled within the NDF.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a strong focus on local housing delivery across Wales. In particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. It also recognises the need to deliver housing through local, self-build initiatives achieving a community led approach. The option performs strongly against multiple elements of the ISA Objective. However, it has not been assigned a major positive assessment as the option may be detrimental to large scale housing delivery where it is required. It appears more focussed on local needs only with the assumption that this would be smaller scale.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	The option seeks to deliver sustainable development and could lead to the development of quality homes with regards to meeting energy efficient design. It is about a sustainable focus towards the delivery of housing being in the right locations and as part of wider social, economic, cultural and environmental uses. This is positive in terms of some aspects of the ISA Objective. However, a potential concern relates to whether sufficient delivery of housing for a full range of needs would be achieved. Meeting a range of housing needs does not seem to be the focus of this option.

Alternative Option	Score	Commentary
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	-	This option is also focussed on identifying sustainable locations for new housing and ensuring high standards of sustainable design in the context of the natural environment. The potential effect of this could be that insufficient housing is delivered of appropriate types and in appropriate areas to meet identified needs.
5: Benchmark Option: Do not prepare the NDF	+/-	Continuation of current planning policy would seek to deliver housing across Wales. However, viability concerns may mean that the focus of development would continue to be on the urban areas, exacerbating current deprivation trends. There is an opportunity for housing to be linked strongly to wider objectives. This opportunity may be missed should the NDF not be developed.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2 scored highest against ISA Objective 12. The testing identified the importance of ensuring the preferred option included: • A focus on delivery across Wales (P2, P3, AS1, AS2, AS3, R2, R3, R4) • Providing good quality, affordable housing to meet people's needs (P2, P3, AS1, AS2, AS3) The testing of the options identified concerns regarding delivery, larger scale house building and meeting identified needs. Parts AS3 and R2 of the preferred option address these issues, seeking through the NDF to provide national and spatial direction for the delivery of housing across Wales.

Table D-22: Appraisals of options against ISA Objective 13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option seeks to direct growth to the strongest market areas and seeks to support economic growth in areas where markets are the strongest. This will include providing the infrastructure required to support growth, which could have a negative effect on landscape and townscape quality; noise and light pollution; and areas of tranquillity. This will take a top down approach, which may not strongly consider local landscape or townscape quality, with a focus on national interests. The option may also lead to the review of landscape designations, where they may prevent growth and the delivery of physical infrastructure. This may include local, national or international designations. Agricultural land could be released for other uses including the best quality land. This could lead to significant negative effects on landscape considerations over the short, medium and longer term. The only reason a major negative assessment has not been made is that this option is likely to lead to very little development in the more rural and existing higher quality landscapes within Wales.
2: A spatial strategy focussed on creating strong communities across all Wales	+/-	The option focusses on a dispersed approach, which, 'does not seek to prioritise one area over another'. Bottom up approaches to local and national development schemes could reduce the ability of the national government to regulate the protection of nationally important landscapes, townscape and seascapes. Further, the potential development of areas across the entire country could lead to a cumulative loss of tranquillity and dark skies and development may occur in slightly more sensitive areas (although major landscape

Alternative Option	Score	Commentary
		protection designations would still exist) than if development were to occur solely within city-regions. However, conversely, the schemes that may be promoted are likely to be of a smaller and more local scale, promoting active travel modes. Further, they could reduce the need for national level infrastructure interventions, through the development of locally sustainable communities that reduce the need for travel. This could provide benefits for landscape assets on a national as well as local level. Positive effects could be achieved through the potential creation of opportunities to promote sensitive, place-responsive design in development, in terms of being reflective of the requirements of the local community.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option particularly focusses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability. Overall, the principles of the option are considered to be in line with the ISA Objective, and could provide opportunities for the protection and enhancement of townscape character and quality including historic townscapes. The NDF will support major changes to urban form and development patterns, to contribute to the realisation of a low-carbon economy. What this means in terms of built development is unclear and could mean the development of increased housing and infrastructure in 'sustainable' locations, thereby potentially having a negative impact on landscape; noise and light pollution; and areas of tranquillity. The option states that the option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments have potential to have significant landscape (and townscape and seascape) and visual impacts although this will depend on the design and location. The option description goes on to state that green networks and infrastructure will be supported. This could have significant positive effects against this objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option seeks to build greater resilience into ecosystems and biodiversity, which could have positive indirect effects on biodiversity. The option goes on to recognise that the natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to enhance landscapes and natural resources for the multiple well-being benefits they provide. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces. Development that would undermine the integrity of landscapes would be strongly resisted and would be directed towards less culturally sensitive locations. This could lead to significant benefits against this objective.
5: Benchmark Option: Do not prepare the NDF	-	Landscape (and townscape/seascape) protection is encouraged through the WSP, PPW and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 4 scored highest against ISA Objective 13. The testing identified the importance of ensuring the Preferred Option included: • Recognising the importance of the natural environment and landscapes (P1, P3, DN1, DN2, DN3, DN4, PE10) • Enhancing natural environment and landscapes (P1, DN1, DN2, DN3, DN4, PE10) • Recognising the importance of local facilities and spaces (P2, DN3, DN5, AS1)

Table D-23: Appraisals of alternative options against ISA Objective 14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings

Relevant impact assessments (in addition to SA & SEA): HIA

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option seeks to direct growth to the strongest market areas. This will include providing the infrastructure required to support growth, which could have a negative effect on any heritage assets in those areas. The option does not focus on heritage protection and as such is unlikely to steer development away from sensitive areas. It is also likely that limited development would occur (other than for local needs) across large areas of Wales, thereby avoiding any potential heritage impacts in those areas. The option may still lead to heritage led regeneration, if this is considered to be economically advantageous, although it is also likely that economic led development could override the value of heritage designations or assets.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has more of a community focus which has potential to lead to existing culture and heritage being recognised and promoted through a community led approach. A minor positive impact is assigned to the ISA Objective as it is considered that there would only be limited progress towards the objective as it is questioned whether a local level focus would deliver national objectives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option has uncertain effects on heritage assets. The focus on renewable energy, energy storage and transmission may affect historic landscapes, whereas locating development in sustainable locations could discount these areas from such development, it will be dependent on the delivery. Positive effects could be delivered through the potential for an increase in sustainable access to the historic environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has uncertain outcomes which would be dependent on the delivery. The option is focused on SMNR principles; however, it is considered that if there were a physical overlap between these areas there could be a positive effect on heritage. Further to this, the option supports tourism, which could have potential heritage benefits if delivered sensitively and appropriately. There is uncertainty over the delivery of renewable energy and its impact on the historic environment. It is considered that there is a greater chance of positive effects from this option than in comparison to option 3.
5: Benchmark Option: Do not prepare the NDF	+	Protection of the historic environment is encouraged through the WSP, PPW and is enforced by Cadw in addition to local authority planning powers. This option looks to conserve and celebrate Wales' unique heritage, recognising the need for high quality environments to create communities. However, new development and infrastructure will continue to cumulatively put pressure on the historic environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2 and 4 scored highest against ISA Objective 14. The testing identified the importance of ensuring the Preferred Option included: • Recognising the importance culture and heritage (DN3, DN6, PE10) • Recognising the importance of historic landscapes (DN3, DN6, PE10) • Recognising and considering the relationship between heritage and other objectives (e.g. energy) (DN3, DN6, PE10)

Table D-24: Appraisals of alternative options against ISA Objective 15: To create the opportunities for the protection and promotion of Welsh culture

Relevant impact assessments (in addition to SA & SEA): HIA

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support growth in economic areas where markets are the strongest could have both positive and negative effects, which are dependent on the location and viability of development. There is potential to have cultural-led regeneration. There is potential that the strategy may not recognise local culture in national projects or ignores areas where they are not economically attractive, which could lead to negative effects against this objective.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a local focus which could support distinctive communities and actively contribute to Welsh cultural capital. There could be, however, fewer opportunities for culture led regeneration due to the dispersed nature of the option and the potential lack of economic viability of schemes.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focuses on improving urban and rural patterns of development, which may lead to an increased local focus which could strengthen Welsh culture in these areas. An indirect effect, through increasing sustainable travel, may increase access to cultural heritage assets and activities. The option raises the question around the potential for re-use of buildings/places leading to cultural access/regeneration to help deliver the decarbonisation agenda.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option seeks to build greater resilience into ecosystems and biodiversity and this protection and enhancement of the natural environment may lead to existing cultural practices being maintained rather than eroded. This option recognises the natural environment and landscape as a distinctive part of Welsh culture.
5: Benchmark Option: Do not prepare the NDF	+	The option focuses the promotion of culture at the local level. Recognising the links to economic prosperity but this is not identified as a priority.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 2, 3 and 4 scored highest against ISA Objective 15. The testing identified the importance of ensuring the Preferred Option included: • Ensuring a local focus (P3, DN6, PE6, R1, R3, R4) • Improving access to cultural heritage assets and activities (P2, P3, DN5, DN6, AS1, AS4, R3, R4) • Recognising the natural environment and landscape as a distinctive part of Welsh culture (DN1, DN3)

Table D-25: Appraisals of alternative options against ISA Objective 16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to direct growth to the strongest market areas and deliver Infrastructure development to support this growth. This could impact on habitats, species and biodiversity in the growth area, especially as large greenfield sites are anticipated to be developed under this option. Mitigation and avoidance measures would be needed. However, it is more likely that the growth areas would be of relatively more limited conservation value due to them already being affected by urbanisation. In addition, those areas outside of the key growth areas would be less likely to receive development (beyond local needs). This would include more rural areas that are, in general terms, often more sensitive or valuable in conservation terms. Significant negative impacts may arise if economic growth takes precedence over internationally/nationally designated sites although it is not clear if this is a potential outcome of the option. Further, the option does not recognise the value of Wales' biodiversity/geodiversity and is unlikely to deliver resilient ecosystems in the growth areas. This may also potentially impact on adaptation to climate change.
2: A spatial strategy focussed on creating strong communities across all Wales	+	Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities. The carrying capacity of the natural environment could be considered by bottom up approach, supporting SMNR principles so will include ecosystem resilience. Opportunities would exist could deliver active travel, including corridors for wildlife. It is shaped by sustainable development principles.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities. The option builds on the resilience of ecosystems and address loss of habitats and vegetation. There are benefits to biodiversity in the long term through adaptation to climate change. The option could have potential local impacts on biodiversity due to renewable energy development however, mitigation could be possible. The option sets out nature-based solutions which will benefit biodiversity and help to deliver ecosystem resilience.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option focuses on building greater resilience to ecosystems and biodiversity with the prioritisation of natural resources implications in decisions. It could create habitats and networks and seeks to avoid any negative impacts on the natural environment. It has a very strong focus on environmental protection.
5: Benchmark Option: Do not prepare the NDF	+	Biodiversity and geodiversity protection is encouraged through the WSP, PPW, national/international law and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 4 scored highest against ISA Objective 16 and Option 2 scored positively. The testing identified the importance of ensuring the Preferred Option included: • Building resilience to ecosystems and habitats (P1, P2, P3, DN1, DN2, DN4)

Alternative Option	Score	Commentary
		Prioritising natural resource implications (P1, P2, DN1, DN2, DN4)

Table D-26: Appraisals of alternative options against ISA Objective 17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The option is not driven by SMNR principles therefore there is potential for development in the growth areas to be led by primarily economic goals rather than those reflecting, for example, resource protection, sustainable materials use, minerals protection etc. This has potential for such development to adversely affect the achievement of this ISA Objective. There are positive messages including supporting the circular economy and the recognition of environmental quality as a strong driver of growth, but this would be likely to be outweighed by the drive for growth in other objective areas.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option strongly supports the principles of SMNR which is assumed to mean that this ISA Objective could be strongly achieved.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option supports the core SMNR principles and nature-based solutions. There is a clear aim to increase resilience in ecosystems and habitats through this option, which could lead to significant positive effects on this ISA Objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	This option is strongly focussed on the sustainable management of natural resources, leading to a direct correlation for the achievement of significant positive effects for this ISA Objective.
5: Benchmark Option: Do not prepare the NDF	+/-	The protection of natural resources is underpinned by policy and guidance in the WSP and PPW. The Environment (Wales) Act 2016 puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way. Part 1 of the Act – Sustainable management of natural resources (SMNR) – enables Wales' resources to be managed in a more proactive, sustainable and joined-up way. However, new development and infrastructure will continue to cumulatively put pressure on resources and not producing an NDF would be an opportunity missed to provide the required levels of strategic guidance (including principles of the SMNR) to development plans.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		Alternative Options 2, 3 and 4 scored highest against ISA Objective 17. The testing identified the importance of ensuring the Preferred Option included: • Support for the principles of SMNR (P1, P2, DN1, DN2, DN3, PE1, PE4, R1) • Support for nature-based solutions (P1, P2, DN1, DN2, DN5) • Increasing resilience in ecosystems & habitats (P2, P3, DN2, DN4)

Appraisal of the Preferred Option (February 2018)

The Interim ISA Report that accompanied the Issues and Options NDF in April 2018 provided an appraisal of the preferred option (appraisals were carried out in February that year), the results of which are presented below.

ISA Objective	Score	Commentary
1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Children's Rights, Economy</i>	+	The Preferred Option for the NDF Preferred Option sets out that 'learning' is part of its foundation. The core element of the Preferred Option is 'Placemaking'. This 'theme' sets out that the NDF and other development plans must 'co-ordinate delivery of infrastructure to ensure essential services, including health and education, are connected and accessible.' Further text sets out that economic inequalities must be addressed, which could include education levels. Strategic policies AS1 and R4 (specifically for rural areas) seek that the development of housing is linked to key facilities, including education. Positive effects in relation to the achievement of a potential increase in levels of participation in education as a result of the Preferred Option are predicted. Economic growth policies (such as PE4, PE5 and PE6) could also lead to indirect positive effects through the growth of skills. PE9 requires that regeneration activities focus on building places that, <i>inter alia</i>, create jobs and enhance skills and employability, which could lead to further positive effects against this objective. It is suggested that further detail could be included to improve the significance of positive effects. This might include the mention of the development of skills in key growth sectors, as part of their strategic development, leading to lifelong learning opportunities. Although this is mentioned as part of the 'placemaking' theme, and under PE9, it is suggested that it would be useful for it to also be included within the strategic policies relating to growth sectors.
Welsh Government Comment		Skills are addressed within Policy PE5 and the infrastructure required to support the growth in economic sectors. These policies will be expanded upon further in the next stage of the NDF, draft plan. Therefore, no change is required.
2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health	++	Part of the foundation of the NDF is the long-term aim of building a Wales that is 'healthy and active'. The overarching 'Placemaking' theme seeks that the focus of the NDF includes 'health and well-being and cohesive communities', which are likely to provide the foundation for significant positive effects against this objective. The NDF seeks to provide a strong policy framework, to ensure that physical and mental health and well-being outcomes, for both current and future generations, are central to spatial decision making. The regional approach seeks to recognise that disadvantaged and deprived communities are not disproportionately impacted by health inequalities and it may lead to an increase in access to health and social care services, especially in rural areas. Added to this, the decarbonisation and climate change agenda seeks to build national resistance to the effects of climate change, which is likely to lead to cumulative and long-term health and well-being benefits. Policies in relation to

ISA Objective	Score	Commentary
inequalities across Wales <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural proofing, Children's Rights</i>		active travel and community connectivity (AS1, AS4, R3 and R4) and green infrastructure (DN5), high quality housing (under the Health and Well-being element of the Placemaking theme and strategic policy AS2, which seek to meet community needs) and other environmental improvements (such as those included in strategic policies DN1, DN2, DN3, DN4, DN6, PE1) and economic sector and regeneration support under strategic policies PE6 and PE9, are likely to have significant benefits against this objective by addressing a range of the overall determinants of health and having particular benefits for vulnerable groups. Active travel initiatives could lead to a decrease in greenhouse gas emissions, air, noise, land and water pollution, leading to indirect benefits, added to the potential direct physical and mental health and well-being benefits arising from formal and informal physical activity. It is recommended that further detail in relation to what will be considered as part of the national green infrastructure could be included within the Preferred Option, specifying that it would incorporate active travel infrastructure, as well as high quality and biodiverse green spaces, to improve communities' access to natural green space.
Welsh Government Comment		Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.
3: To create opportunities for an increase in employment across the country and promote economic inclusion <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy</i>	++	'Sustainable Places' is the goal of the NDF. Connectivity and digital infrastructure are elements of this, which could increase physical access to employment opportunities for an increased number of communities across Wales. The overarching 'placemaking' theme also highlights that economic inclusion is an important principle of the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. This could lead to significant benefits against this objective. The strategic policies under the 'Productive and Enterprising Places' theme could lead to benefits against this objective. Strategic policies PE5, PE6, PE7 and PE9 could lead to economic improvements that could lead to positive effects for employment and economic inclusion PE5 recognises the importance of high value advanced science and technology sectors to the economy, which could create skilled high-income workers. PE6 supports foundational sectors where there are clear opportunities for growth in investment and employment. Strategic policy PE3 (relating to digital infrastructure) could enhance inclusive employment, through providing opportunities for a wider range of communities to participate in employment by providing the infrastructure necessary to support this across the country. Policies relating to support for rural areas, such as R4, could lead to similar benefits. Improvements to the transport network (such as PE8) and improving the connectivity of communities, such as AS1, which supports the aim of providing better jobs closer to home, could also lead to positive effects against this objective. Support for city regions is reflected in policy R3 of the Preferred Option, which could lead to positive effects against this objective. PE6 provides some sector specialisations, although it is unclear as to whether this is the extent of the sectors that the NDF would like to target. It is recommended that similar content for other types of sectors would be useful, should other sectors also be of national importance in the context of the NDF. This could lead to an improvement in the range of employment types across Wales, which could lead to an increase in job satisfaction and skills.
Welsh Government Comment		Policy PE6 has been amended to ensure it addresses growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan. There are no changes required at this stage,
4: To create opportunities for	++	One of the key aims of the Preferred Option is that Wales will become prosperous and secure. A key element of this is the transition to a low carbon economy, which could bring opportunities that would create a wide range of benefits. Another key

ISA Objective	Score	Commentary
sustainable economic growth, diversity and business competitiveness <i>Relevant impact assessments (in addition to SA & SEA): EQIA, Rural Proofing, Climate Change, Economy</i>		element of the NDF is to deliver the physical infrastructure (PE5 and PE8), including digital infrastructure (PE3), to support growth, which could lead to significant positive effects against this objective and encourage inward investment. The provision of a framework to support the transition to a low carbon economy and the circular economy (PE1, PE2, PE3 and PE4) could also lead to significant benefits against this objective. The regional approach, including identifying city regions and growth deal areas, could lead to further economic benefits, providing a strategic focus for investment. The policies within the Preferred Option build upon the overall strategy and includes the need for NDF policies to promote national and foundational growth sectors (PE5, PE6); cross-border spatial economic development (PE7); rural economic development (R4); as well as regeneration activities (PE9), which could cumulatively lead to significant benefits against this objective. Strategic policy DN2 seeks that new development is more resilient to the effects of climate change. Alongside other measures within the Preferred Option, this could lead to positive benefits against this objective. See recommendation under ISA Objective 3 in relation to growth sectors and the encouragement of innovation and inward investment within the regions. This could help to provide greater direction for diversification within the economy and enable the delivery of the decarbonisation agenda more effectively. It is suggested that the content of policy R5 could be widened to support all businesses, as it may not just be rural enterprises that are affected post-Brexit. Further, it is suggested that text relating specifically to the sustainable management of agriculture and rural businesses would be prioritised.
Welsh Government Comment		It is noted that PE5 and PE6 address growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan. It is considered that policy R5 as drafted does cover all businesses and not just rural business. The Preferred Option provides a supportive economic framework recognising the potential impact from Brexit on rural areas. There are no changes required at this stage.
5: To contribute towards the future well-being of the Welsh language <i>Relevant impact assessments (in addition to SA & SEA): Welsh Language, Rural Proofing</i>	+	The 'Placemaking' theme of the Preferred Option sets out that the NDF Preferred Option is focussed on three spatial aspects, one of which includes the Welsh Language. As decisions must demonstrate that they are compatible with the Placemaking theme in the first instance, this could lead to positive effects against this ISA objective. Measures to provide housing and employment and improve the connectivity within communities could reduce outmigration of people from Welsh speaking communities, improving viability and vitality in these areas. This could lead to positive effects against this objective. The goal of the Welsh Government of a million Welsh Speakers by 2050 could be incorporated into the text, as the renewable energy goal is included.
Welsh Government Comment		This goal has been included within the Preferred Option in the Place making section under 'Cohesive Communities & Welsh Language'
6: To create opportunities within which greenhouse gas	+/-	Decarbonisation and climate change is one of the three spatial aspects of the Placemaking theme, and aspects relating to this are integrated throughout the Preferred Option. Measures such as a transition to a low carbon economy (PE4), supporting the Welsh Government's strategic decarbonisation goals, could lead to significant benefits. This could be compounded by the strong focus of

ISA Objective	Score	Commentary
emissions can be reduced and limited and encourage energy efficient and sustainable design <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change, Economy</i>		the Preferred Option to improve the connectivity of communities through active travel measures (AS1, AS4, R3 and R4), the decarbonisation of transport (part of PE8), generation of energy from low carbon energy sources (PE1, PE2), and the implementation of green infrastructure measures (DN5) and other environmental enhancements (DN3 and DN4). However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5 and part of PE8), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, although this is uncertain. Further, although 'high quality' housing is mentioned in the 'Placemaking' theme, this is not included within the strategic policies, which could lead to potential uncertainty in delivery. It is recommended that reference to the sustainable design of built development is included within the Preferred Option. It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives. See recommendations relating to the diversification of the economy under ISA Objective 4.
Welsh Government Comment		The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF. It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage. Response to recommendation for Objective 4 is covered in Objective 4.
7: To contribute to the reduction and management of flood risk <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>	+	A key focus of the Preferred Option is the 'Placemaking' theme, which is to provide the foundation of all spatial choices. Part of this is that the NDF will ensure that the planning system helps to build resilience to the impacts of climate change, which includes flood risk. Further, text relating to cohesive communities specifies that development plans should ensure that communities are resilient to environmental threats such as flooding. Strategic policy DN2 specifically seeks that new development builds resilience to the risks from flooding. This could lead to positive effects against this objective for communities where new development may occur. This may include the building specific measures, as well as wider community flood resilience measures, which could benefit the wider community. These aspects, however, aren't specified in the policy at present due to its strategic nature. Further detail could be provided in relation to the policy relating to green infrastructure, specifying that the development and enhancement of green infrastructure throughout communities could help to reduce existing as well as future flood risk, including within existing communities, not just new development. See also recommendation under ISA Objective 6. Sustainable design of buildings could also help to reduce flood risk.
Welsh Government Comment		Policy DN2 has been redrafted to incorporate avoidance of risk. Resilience to risks of flooding are also covered within the placemaking policy and policy DN2. Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage. Response to recommendation for Objective 6 is covered in Objective 6 above.
8: To create opportunities to	+	One of the key principles of the Preferred Option is to implement the Welsh Government's decarbonisation agenda. Measures such as improving the connectivity of communities nationally (AS1, AS4, part of PE8, R3 and R4), green infrastructure (DN5) and

ISA Objective	Score	Commentary
encourage the protection and improvement of air quality <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>		environmental enhancement measures (DN3 and DN4), and the provision of a framework to provide sustainable transport (AS4 and part of PE8) and low carbon energy generation (PE1 and PE2) should lead to positive effects relating to air quality and therefore associated health impacts, with resulting benefits for human health. Ensuring that communities are resilient to environmental threats such as poor air quality is a key element of the 'Placemaking' theme as well as strategic policy DN2. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective. However, this effect is uncertain. On balance, minor positive effects may result, particularly for local air quality, where road building may help to improve air quality within communities. It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives.
Welsh Government Comment		It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage.
9: To create opportunities to protect and enhance the quality and quantity of water features and resources <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>	+	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4), promoting resource efficiency (DN1) and facilitating green infrastructure (DN5), should lead to positive effects against this objective. Implementing the National Marine Plan (strategic policy PE10) Strategic Resource Areas should lead to support for integrated decision making in the marine environment. Measures such as improving the connectivity of communities nationally and the provision of a framework to provide sustainable transport and reduce the need to travel through improved connectivity (and low carbon energy generation (PE1 and PE2), and support for the transition to a low-carbon economy and the circular economy (PE4, PE8, AS1, AS4, R3 and R4) should also lead to positive effects for water resources overall. It is suggested that Policy DN2 could be made more positive, seeking to reduce/avoid environmental 'risks' as opposed to building community resilience to them. It is recommended that Policy PE10 is moved to the Distinctive & Natural Places section of the Preferred Option, as it is unclear why it is located in Productive and Enterprising Places. Further, it is recommended that reference is made to the Natural Resources Policy for Wales, incorporating the SMNR principles. Policy DN1 could be more specific about the 'natural resources' it refers to using more efficiently, which could include the use of water, as part of a wider ecosystems services and climate change resilient approach.
Welsh Government Comment		Policy DN2 has been redrafted to incorporate avoidance of flood risk. The location of Policy PE10 reflects the structure of the revised PPW. The term Natural Resources are defined within the Environment (Wales) Act 2016. No change required at this stage.
10: To create opportunities for the improved connectivity	++	The creation of opportunities for the improved connectivity of communities, resilience to climate change and sustainable access to facilities are considered within the Preferred Option and provide the basis of many of the strategic policies, leading to potential significant benefits against this objective. Policies relating to the delivery of green infrastructure (DN5); digital infrastructure (PE3);

ISA Objective	Score	Commentary
of communities and sustainable access to basic goods, services and amenities for all groups <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change</i>		decarbonising the transport sector (PE8); housing and connectivity infrastructure (AS1); national active travel infrastructure (AS4); city region and growth deal areas (R3); and rural areas and connectivity (R4), should all contribute to the achievement of the aims of this ISA objective. The requirement for the identification of 'Nationally important roads' is repeated in PE8 and AS5. It is suggested that the content of AS5 be moved to the Productive and Enterprising Places theme, as it is considered that the nationally strategic road network would not necessarily contribute to the enhancement of active places. The 'Productive and Enterprising Places' theme could also consider the role of air and sea travel within the NDF. It is recommended that opportunities for improvement in accessibility to cultural and recreational facilities could be added to the strategic policies, to strengthen benefits against this objective.
Welsh Government Comment		Policy AS5 has been deleted as this is covered by policy PE8. There are a number of policies within the Preferred Option including Placemaking, DN6, AS1 and AS4 that address connectivity and access to cultural and recreational facilities through promotion of assets and delivery of infrastructure. Policy PE8 already addressed ports and airports. No change required at this stage.
11: To create opportunities within which an improvement in social cohesion and equality can be achieved <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights</i>	++	It is considered that the principles of the Preferred Option are generally in line with this ISA Objective and that further specific detail is not necessarily appropriate at this level of plan-making. The overarching 'Placemaking' theme as well as the Preferred Option more generally, includes details relating to the determinants of community cohesion, which can include aspects such as the Welsh Language, housing need, connectivity and community facilities and services. It is considered that measures to improve health and well-being across Wales, including that the regional focus will allow for regional inequalities to be tackled, could lead to positive effects. Further, specific measures to enhance social cohesion and ensuring that existing and future communities are equitable for all; that all member of society have access to services and facilities; and that the delivery of land for housing that meets all society's needs (in the Placemaking theme and strategic policy AS2), should lead to significant benefits against this objective. This could be in relation to all equalities groups, particularly in relation to potential age inequalities, where older or younger groups; as well as those with disabilities, certain health conditions or low incomes, may currently be less able to travel to access services and facilities. Strategic Policy R4 further seeks to retain and attract people to rural communities, which could lead to further benefits against this objective. The NDF could make reference to other aspects of community cohesion, such as improving personal safety and social interaction and integration. Although 'secure' is mentioned within the 3rd paragraph of the NDF, it is not mentioned again within the NDF Preferred Strategy. Further, it is unclear what is meant by 'secure' as this could also mean secure in economic terms. More could also be made of the need to reduce poverty and deprivation inequalities, including that affecting children, as well as to consider the integration of communities including those with different cultural or ethnic identities. Poverty is mentioned in relation to fuel poverty within the Preferred Option but is not specifically mentioned elsewhere.
Welsh Government Comment		The first section of the Preferred Option which sets the context has been reviewed and redrafted and through this redraft the references to secure is no longer included.

ISA Objective	Score	Commentary
		There are a number of policies within the Preferred Option including P3 which deals with community cohesion which will be expanded upon at the next stage of the NDF, the draft plan. Policy R1 addresses deprivation and inequalities and will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.
12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights</i>	+	The Strategic Policies included under the 'Active & Social Places' theme within the Preferred Option, should lead to some positive effects against this ISA Objective. Strategic Policy AS2 seeks that NDF policies will require that strategic housing development will meet the needs of everyone and the types of housing required are considered in the context of locational and numerical considerations, which could lead to positive effects against this objective in that it should meet housing needs. Policy in relation to resilience to climate change, could reduce fuel poverty, leading to further positive effects. Policy AS3 goes on to state that national policy-based population and housing projections will be produced. However, Policy R2 states that NDF policies will identify regional policy passed population and housing projections for each region. Clarity on approach should be provided to ensure efficiency in delivery. The Placemaking theme mentions the need for the delivery of high-quality housing, although this is not included within the strategic policies. See recommendation under ISA objective 6.
Welsh Government Comment		The Preferred Option should be read as a whole and both policies AS3 and R2 apply. It is considered that the wording and location of the policies within the general AS policy and a regional R2 policy provide clarity on the different approaches and no change is required at this stage. The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF. No change is required at this stage.
13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes <i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change</i>	+/-	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4) and facilitating green infrastructure (DN5), should lead to positive effects against this objective. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, particularly in relation to noise pollution in South East Wales. This could be further exacerbated by Policy R3, relating to the development of city regions and growth areas, which could also have negative townscape effects. However, the green infrastructure policy (DN5) could reduce the effects of development on townscape and landscape to some degree. Further potential negative landscape impacts could result from nationally significant transport or renewable energy infrastructure projects. However, impacts may be mitigated on a project level basis or through more specific planning policies. Further, policies relating to the development of more rural areas, such as R1, R2, and R4, could lead to negative effects against the areas of dark skies and tranquil areas. See recommendation under ISA objective 6.
Welsh Government Comment		See response Objective 6.

ISA Objective	Score	Commentary
14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings <i>Relevant impact assessments (in addition to SA & SEA): HIA</i>	+	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes (DN3), could lead to positive effects against this objective, in relation to historic landscapes. Strategic policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate that delivery of new cultural development, which could lead to positive effects against this objective. It is suggested that the significance of the positive effects could be improved through integrating the need for cultural enhancement into the overarching 'placemaking' theme, to improve its prominence. Further, heritage-led regeneration could be included within the regeneration policy (PE9).
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. The policies within the Preferred Option are to be read as a whole and one is not prioritised over another. No change is required at this stage.
15: To create the opportunities for the protection and promotion of Welsh culture <i>Relevant impact assessments (in addition to SA & SEA): HIA</i>	+	Strategic Policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate the delivery of new cultural development, which could lead to positive effects against this objective. It is recommended that the recognition, protection, promotion and enhancement of Welsh Culture is included within the overall 'Placemaking' theme as part of the overall focus of the NDF. Further, it is considered that access to cultural assets could be included as part of policies seeking to improve national connectivity. Further, culture-led regeneration could be included within the regeneration policy (PE9).
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. DN6 also looks to promote historic and cultural assets, which will be expanded upon at the next stage of the NDF, the draft plan. The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity	+/-	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats, as well as strengthening ecosystem resilience and facilitating green infrastructure, should lead to positive effects against this objective. Specifically, strengthening nationally important ecosystem resilience through greater diversity, connectivity, scale, condition and adaptability, could lead to significant positive effects, and enable species to adapt to a changing climate. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective.

ISA Objective	Score	Commentary
<i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change</i>		The 'Placemaking' theme provides the first principle through which all spatial choices are first considered. Within this text is reference to green infrastructure to support healthy lifestyles. It is suggested that the wider benefits and potential for a green infrastructure network could be highlighted within the 'Placemaking' theme, to give it greater status and to ensure that the range of environmental enhancements to be achieved are given prominence. This could then be linked to a range of strategic policies, including active travel and connectivity of communities including health and well-being and access to greenspace, flood risk management, temperature regulation, air and noise quality, water and soil quality and ecosystem connectivity. See recommendation under ISA objective 9 in relation to SMNR principles. It is recommended that policies DN2 and DN4 could consider the role of ecosystems services more widely, not just focussing on designating specific areas as 'nationally important' as this may remove the connectivity, diversity and interconnectedness that the NDF is seeking to strengthen. This could also help to improve mitigation against the potential effects of development on the natural environment and include the protection of geology and soils.
Welsh Government Comment		The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value <i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change, Economy</i>	++	Strategic Policy DN1 states that NDF policies will improve resource efficiency and minimise the unsustainable use of natural resources. It is considered that this is likely to lead to benefits against this objective. Policy R5 states that the NDF policies will provide a framework for responding to the challenges and opportunities arising from exiting the EU over the plan period, including supporting agriculture and businesses. This could help to contribute towards the sustainable management of farmland, forests and the wider countryside. Policy PE4 specifically seeks that nationally important employment, mineral and waste areas are identified, seeking to promote a transition to a low carbon and circular economy. This could lead to significant benefits against this objective. It is unclear if Policy DN1 refers simply to all 'natural resources' and therefore including minerals and waste as well as wind power and water, amongst many, or if it is limited to certain types. Clarity on this could improve the potential for successful policy implementation.
Welsh Government Comment		The term Natural Resources is defined within the Environment (Wales) Act 2016. No change is required at this stage.

Appraisal of the Spatial Strategy (Draft NDF) (April 2019)

The 'spatial strategy' of the NDF is the overall approach taken to the distribution and location of the proposed land-uses and policies. The NDF doesn't provide a chapter specifically focussed on setting out the spatial strategy. Rather, the spatial strategy pursued in the NDF emerges from its policies. The spatial strategy is therefore not repeated here but can instead be found in the NDF and predominantly in Chapter 4. Table D-27 provides an appraisal of the likely impacts of the overall distribution and location of all policies and land-uses proposed in the NDF. *Note: this is different to a 'cumulative effects assessment' or the appraisals of individual policies, as this holistic appraisal is focussed on impacts associated only with the locational aspect of the proposed policies and land-uses.*

Table D-27: Appraisal of the spatial strategy (April 2019)

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	Referencing education with regards to services in the strategy would provide clarity and ensuring facilities are accessible and inclusive.
		The Spatial Strategy looks to create sustainable places which could include the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), for people of all ages and physical accessibility. The Spatial Strategy could support an improvement in educational attainment over the long term for children and young people and increase access to training and grow skills for all members of society, as within urban areas it aims to ensure ‘co-locating homes, jobs and services’ and to capitalise on the advantages of sustainable transport through the various Metro schemes. Focussing on the three main clusters of towns and cities should help to enhance links between the more education deprived areas in Wales and education facilities and opportunities. Focussing growth in these areas may therefore help to encourage improved educational attainment for those in most need.								
2	To contribute to an improvement in		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT ++	The strategy recognises the ambition to improve health.

³ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement	
	physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	The Spatial Strategy could support an improvement in health and well-being in the long term by aiming to improve access to services and also infrastructure for all members of society including children and young people. This could lead to a reduction in inequalities by, for example, ensuring increased access health, education and housing opportunities and which would help to reduce child poverty. Focussing new growth in the three main clusters of towns and cities would be likely to help enhance the links between areas of health deprivation and health facilities and services. The proposed Spatial Strategy would therefore be likely to help improve access to important health services for those most in need. There is a risk that new growth and development, and the likely population increase this would facilitate, could place existing health services and facilities under greater pressure. Whether such services would be placed over-capacity is largely dependent on the distribution of development in relation to services and what their existing capacity status is. It is assumed that new or expanded health services or facilities would be provided to match growing needs. The Strategy notes that the majority of people in Wales live in urban areas. It will be important that they benefit from ecosystems services through increased use of green infrastructure, nature-based solutions and active travel opportunities, which would bring multiple health benefits both physically and mentally. It doesn't, however, specifically mention those who live in rural areas and how they might benefit from improvements in green infrastructure, this could be recognised. People in rural areas will however have good access to a National Forest for Wales and its associated health benefits.									this could be widened to recognise the potential to improve well-being and reduce inequalities. The strategy could include how rural communities could benefit from improvements to green infrastructure.
3	To create opportunities for an increase in employment across the country and promote economic inclusion		SS	Scale: Reg	T/P: P	Cert: L	ST +	MT ++	LT ++	Development in the three clusters of towns and cities should address the imbalance in economic inclusion in existing settlements and should seek to enhance the links between the more economically deprived areas and new economic growth.	
		The towns and cities in the three clusters focussed on in this strategy are generally where the most populous workforces live in Wales and where the most concentrated economy currently is. They are also where some of the highest rates of employment and economic deprivation in Wales can be found. A key element of the Spatial Strategy is to ensure that jobs and homes, alongside essential services and facilities, are co-located. This should lead to positive effects against this objective in the medium and longer terms, through ensuring that land use planning outcomes improve the physical accessibility of jobs and could bring employment opportunities across all working age ranges. The approach taken will be based on improvements regionally, through the development of the three main urban clusters of cities and towns, being: 'Cardiff, Newport and the Valleys'; 'Swansea Bay'; and 'Wrexham and Deeside'.									

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		SS	Scale: Nat	T/P: Perm	Cert: L	ST +	MT ++	LT ++	It is not clear how the Spatial Strategy might contribute to the development of the third sector and sustainable tourism. Specific growth sectors could be specifically mentioned as part of the strategy, to give a formal direction of support.
		The Spatial Strategy seeks that the focus on urban areas will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. This focus could help to create positive effects against this objective in the medium and longer terms. The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective. The Spatial Strategy is clear with regards to the support for the physical infrastructure needed to support sustainable economic growth. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.								
5	To contribute towards the future well-being of the Welsh Language		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	No recommendations.
		The Spatial Strategy recognises the importance of the Welsh language. It states its desire to grow the Welsh language and notes ‘In all parts of Wales, the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving community, Welsh language or economy’. The focus on achieving sustainable and proportionate population and job growth in each region and sub-regional area across Wales can help achieve the Government’s ambitions for the Welsh language. The strategy recognises the inter-relationship between homes, jobs, services and transport, and their influence on the way society operates. The strategy for these issues in combination deliver the best conditions possible for the language to thrive The Strategy will contribute positively towards the future of the Welsh language in all areas of Wales including rural areas. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to the Welsh								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		language as it would likely mean less out-migration in search of economic opportunities, including of people with Welsh language skills. This effect is likely to be more pronounced in rural areas of Wales. There is a risk that new economic development in proximity to the border with England could increase the flow of workers crossing the border to work in Wales, particularly where public transport options are enhanced, and this could potentially dilute rates of Welsh speaking in some locations.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		SS	Scale: Int	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations.
		The Spatial Strategy is fundamentally based on an approach which seeks to encourage sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services, as well as the efficient use of resources. This should lead to positive and significant effects against this objective nationally, as these principles will also be reflected through resulting planning policies at the regional and local levels. The focus on the three clusters of towns and cities would be expected to help ensure that new residents and businesses have good access to the public transport modes on offer in these urban areas. Urban locations generally enable more efficient movements than rural locations, including via active travel modes, as people, jobs and key services and amenities are in greater proximity to each other than is typically seen in rural locations. The strategy could therefore enable a lower-emission way of life than if growth were focussed in areas where sustainable transport options are more limited, although it is accepted that any degree of growth would be likely to be accompanied by some degree of increase in car and HGV use. The Spatial Strategy makes a number of key strategy points, which could contribute to significant positive effects against this objective, including policy directions relating to national important ecological networks, the development of a national forest for Wales, the use of ultra-low emission vehicles, and powering and heating places with renewable energy and district heat networks. This includes the development of priority areas for solar and wind energy generation.								
7	To contribute to the reduction and management of flood risk		SS	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	It is recommended that the strategy consider how a focus on adapting to a changing climate, including flood risk, could be integrated into the national spatial approach to planning for development. This may

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
				development would be expected to conform with PPW as well as NRW advice and this would be likely to reduce the extent to which new development is exposed to flood risk. However, specific mention of adapting to the changing climate within the Spatial Strategy is minimal and potentially limited to the use of natural resources and the development of opportunities to enhance green infrastructure at a strategic scale, and to create and restore habitat networks and green corridors. Although this could contribute to indirect benefits for the reduction and management of flood risk, this has not been specified as a key aim. The focus of the strategy are three clusters or urban areas, much of which is coastal. It is therefore likely that the significant level of growth here could alter local levels of flood risk, such as by resulting in the loss of greenfield land, soils and above-ground vegetation. On the other hand, growth in these locations could be an opportunity to secure new investment for improved flood risk defence schemes in these locations subject to the emerging policy in TAN 15. The risk of flooding should be seen in the context of climate change, which is expected to exacerbate flood risk and alter its distribution. The precise characteristics of how climate change will alter flood risk are largely uncertain but coastal areas will likely witness significant change to flood risk. Overall it is considered that a minor adverse effect over time on the flood risk objective cannot be ruled out, but appropriate micro-siting and avoidance and mitigation measures adopted at Strategic and Local Development Plan stages can mitigate this.						include directing development away from areas of flood risk.
8	To create opportunities to encourage the protection and improvement of air quality		SS	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	The benefits of green infrastructure to air quality, including from the national forest, could be specified. This might then enable specific species of tree to be targeted, to maximise benefits, especially within urban areas. The strategy could specify that it will seek to move away from polluting industries, particularly around Deeside, where it indicates that heavy industry is abundant.
9	To create opportunities to		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	The Spatial Strategy could specifically mention

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement	
	protect and enhance the quality and quantity of water features and resources	The Spatial Strategy states that ‘sustainable growth will involve setting an ambitious strategy for achieving biodiversity and green infrastructure enhancement in our urban areas. Effective 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 in exemplar, future-resilient settlements’. Although water is not specifically mentioned, a nature-based approach could lead to positive effects for water quality and quantity including opportunities to protect and enhance water resources and quality. Water is not, however, specifically mentioned. This may reduce the potential of the strategy to improve water quality over the current deteriorating trend and reduces certainty in the assessment.									waterways as part of the intended green infrastructure network as well as the need for water quality to be improved nationally.
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT ++	No recommendations	
		The Spatial Strategy could support an improvement in creating opportunities for the improved connectivity of communities and sustainable access to goods and services for all members of society including children and young people over the long term. It specifically aims to ensure ‘co-locating homes, jobs and services’ and to capitalise on the advantages of sustainable transport through the various Metro schemes. For rural areas, it refers to active travel infrastructure supporting development in rural settings, the use of Mobile Action Zones supporting rural and isolated communities through enabling electronic communications and digital infrastructure and development within rural areas being ‘complimentary’ in order to ‘support local aspirations and need’. All of these measures could ensure an increase in inclusive access services, helping to facilitate the improved connectivity of communities. For example, children and young people should be better able to keep in touch digitally, particularly in rural locations, and use public transport in order to access services such as education. The Strategy recognises the opportunities Metro schemes will bring to Wales. It states that land in proximity and with good access to Metro stations ‘is an important and finite resource and will play a key role in delivering sustainable urban places’. Metro schemes will bring increased public transport provision to rural areas. Increased provision of public transport in rural areas will mean those living in isolated parts of Wales will have improved connectivity giving them access to basic goods and services, helping to reduce isolation and inequality.									
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	See objective 10. The strategy could be strengthened through expanding the list of important functions of rural areas to include health and	
		The Spatial Strategy facilitates for improvements in terms of sustainable transport, communications etc., which should ensure improved connectivity and better access to services for people The Strategy creates opportunities for social cohesion and equality in the long term. For									

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		children and young people, it could mean they are better able to access services such as opportunities for play and recreation as a result of the Strategy promoting sustainable transport. The Strategy states ‘Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas. Developing our urban areas - some of which may be underperforming - is not the easiest Spatial Strategy to achieve, but it is the right ambition for Wales and supports the Government’s commitment to social justice.’ This helps ensure development occurs in the most sustainable locations, creating places which are inclusive and does not have a negative impact on rural areas. The Strategy recognises that ‘rural areas have an important function as a provider of food, energy and mineral resources’ this could be strengthened to include health and well-being, tourism, renewable energy. The Strategy also specifies that the policies on supporting urban centres, delivering affordable homes, supporting communities through the use of publicly owned land, mobile action zones and the provision of electric vehicle charging infrastructure all apply to Wales’ rural areas. They should be considered as priority issues for the preparation of Strategic and Local Development Plans across the whole of Wales. This could lead to positive indirect effects against this objective.								well-being, tourism and renewable energy.
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations.
		Positive benefits may be derived from the Spatial Strategy with regards to the delivery of affordable housing which would be likely to grow in a major positive impact in the long-term as a result of the focus on facilitating growth. The regeneration of urban areas could lead to an improvement in housing quality and abundance for communities in these areas, which could lead to positive effects in relation to seeking to reduce homelessness and improving the availability of affordable homes of good quality. The Spatial Strategy would also support the maintenance of rural communities, which could ensure that affordable housing is also developed in these areas, as it seeks to support local aspirations and need. The Strategy specifies that affordable housing should be considered as a priority issue for the preparation of Strategic and Local Development Plans across the whole of Wales. The provision of good quality, affordable housing can also help to deliver a range of health benefits including through reducing child poverty.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The Strategy could include seascapes as an integral part of the landscape/townscape consideration. Given the quantity of development
		The Spatial Strategy could lead to benefits for both the landscape and townscapes across Wales. The focus on urban areas could lead to urban regeneration initiatives, leading to positive effects. In turn, this could help protect landscapes in more rural areas from development. In particular,								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
	our landscapes, townscapes and seascapes	aspects of the strategy relating to sustainable and active travel, green infrastructure, and the national forest, could lead to long term significant benefits for the landscape, including helping to maintain areas of tranquillity and reducing noise and light pollution and could help to increase the accessibility of townscapes. In areas designated for landscape importance, the strategy notes that protection against inappropriate development remains in place. This should help to protect landscapes in the short and medium terms. Further, the Strategy states that ‘as the population of Wales becomes increasingly urban, it is clear that the opportunity to optimise well-being benefits from ecosystems will be greatest in these areas. Through the innovative use of nature-based solutions, and by increasing well-integrated green infrastructure in and around urban areas, development can restore natural features and processes into cities and landscapes, maintain and enhance the strategic functioning of our natural resources and ecological networks, and provide locally accessible, high quality green spaces and corridors.’ This could lead to significant positive effects against this objective.						being pursued, careful management of this development will be required to avoid adverse impacts on this Objective.		
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	The regional approach within the Spatial Strategy could specify that the important character of communities (both urban and rural) will need to be reflected in regeneration initiatives.
		It is unclear from the Spatial Strategy if there is an intention to support heritage-led regeneration initiatives, and the conservation and enhancement of the historic environment, historic assets and their settings. The focus on urban areas could lead to urban regeneration initiatives, leading to the potential for positive effects, although this is uncertain. The development of rural areas seeks to focus on local character, which could also lead to positive effects against this objective. In general, the proposed strategy would focus development in urban areas and this would help to avoid impacts on historical landscapes in rural areas. On the other hand, urban locations are often rich in heritage assets and so avoiding adverse impacts on historical assets in every case would require careful management. Through improved connections and potential regeneration initiatives this could achieve increased inclusive access and opportunity for people to understand and enjoy the historic environment.								
15	To create the opportunities for the protection and promotion of Welsh culture		SS	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	See recommendation for objective 14. It is further recommended that the Spatial Strategy include more detail relating to Welsh culture, with detail on how this might be enhanced regionally.
		Aside from ambitions to grow the Welsh language, it is unclear from the Spatial Strategy how the NDF intends to create opportunities for the protection and promotion of Welsh culture. Minor positive effects may be experienced through the protection of rural areas, including the focus on local character, the intention to support local aspirations and needs and steadily grow the population in rural areas which will help to protect and promote welsh culture. There are also opportunities through urban regeneration initiatives for potential positive effects.								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to Welsh culture for smaller settlements in rural areas as it would likely mean less out-migration in search of economic opportunities, including of people who support, facilitate or partake in Welsh cultural activities and places, and this would be likely to help protect cultures and communities.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The policy could mention the need for the protection of geodiversity as an integral part of wider environmental conservation.
		The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits for biodiversity may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. Well integrated green infrastructure and nature-based solutions in urban areas are encouraged, as well as the development of a National Forest for Wales, across multiple sites. The Spatial Strategy generally directs development away from locations in Wales where the more valuable biodiversity, geodiversity and protected areas are found. These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend. All of the above has positives for rural areas, in particular a National Forest for Wales including access for those living in rural areas.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		SS	Scale: Nat	T/P: Temp	Cert: Med	ST ++	MT ++	LT ++	No recommendations.
		The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits against this objective may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. In particular, the conservation of water resources is a key area of focus. These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend.								

APPENDIX E

Draft NDF Policies Assessments Including Reasonable Alternatives (2019)

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Keys for assessments

Tables B-1 to B-5 Keys, terms and effects for assessment tables

Scoring of Assessment		
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)	
+	Minor positive – likely to result in limited progress towards the ISA objective	
0	Neutral outcome	
+/-	Range of possible positive and negative outcomes	
?	Uncertain outcome	
-	Minor negative – likely to work against the achievement of the ISA objective	
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)	
Type of Effect	Definition	
Secondary	Indirect effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.	
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.	
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.	
Key and terms		
Scale	Geographic extent: Local; Sub-regional; Regional/National; or International.	
T/P	Temporary/Permanent	
Cert	Certainty: Low; Medium; or High	
ST	Short Term	
MT	Medium Term	
LT	Long Term	
Future Baseline: Summary of predicted future trends for each ISA Objective, without the implementation of the NDF		
Improving	Static	Declining

The appraisals in this Appendix satisfy the requirements of impact assessments including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language (Wales) Measure 2011 and Standards, Children's Rights Impact Assessment (CRIA), Equalities Impact Assessment (EqIA), Well-

being of Future Generations (WBFG) Act (2015)¹; and Sustainable Management of Natural Resources (SMNR) & the Natural Resources Policy (NRP). Where appropriate, boxes prior to appraisal results indicate which impact assessments other than SA and SEA are particularly relevant to the appraisal.

Appraisals of Alternative Options (February 2018)

During the Issues and Options stage of the NDF, five alternative options were considered for the strategy to be adopted. These are presented in Tables B-5 to B-9 below. Following these, an appraisal table is provided for each ISA Objective, within which the appraisal of the five alternative options against that ISA Objective is shown. These appraisals were originally prepared for the Interim ISA Report published online in April 2018². The final row in each table indicates how preferable elements of each option could be carried through to the preferred option.

Table B-5: Alternative Option 1

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas
Summary Overview This option focuses the long-term growth and development of Wales around the strongest market areas. It seeks to support economic growth in areas where markets are strongest and which have the best potential to grow. This option recognises that many objectives – deprivation, regeneration, physical and mental health, language, resilience of natural resources - are directly linked to economic prosperity. The role of the NDF will be to direct growth to these areas and provide the infrastructure required to support growth. It will take a top-down approach to the delivery of major infrastructure and make clear choices on which parts of Wales will grow and how they should grow. The planning system will be responsive to opportunities for supporting economic growth and will not constrain or delay investment in identified growth areas.
Why has this option been developed? There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan which provided a framework for nationally important infrastructure. The need for greater certainty and speed of delivery were identified as important and it was recognised that the national planning tier is the appropriate level at which to plan for national needs. Local and regional planning cannot easily balance local impacts with national interests. We were told there is a need for a clear top-down approach to dealing with national issues. There was recognition that many of the challenges faced in Wales stem from economic issues and that much health, deprivation, well-being and other issues can be addressed through improving economic circumstances. Over the long term, there is a need to support a dynamic and growing economy and there was recognition that strong businesses and new investment have positive benefits for Wales. There is a need to support economic growth and investment. It was identified that silo thinking and un-coordinated approaches mean that investment is not focussed on a clear goal and decisions made through the planning system lack coherency. A NDF focussed on economic growth, offers the opportunity to ensure all land-use decisions at all levels are working towards a common goal. There is a need to ensure a clear, economic focus. This option has been developed and subject to further engagement in October 2017.
Full Overview: How would this option help meet the NDF objectives? <i>Note: 'objectives' here refers to the 'NDF Objectives' at the time of appraisal, which have since been translated into the NDF Outcomes.</i>
Cultural Assets This NDF supports existing and the provision of new heritage, sporting and arts development assets where they provide economic opportunities. It recognises that these should be economically viable and promotes appropriate housing and commercial uses around them, to maximise economic potential. Culture-led regeneration projects are

¹ Available online at: <http://www.legislation.gov.uk/anaw/2015/2/contents/enacted> [Accessed 10.04.19]

² Interim ISA Report, April 2018, Available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf>

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

supported where they provide direct opportunities for economic growth. Developments at all scales and opportunities for cross-subsidisation with other developments are supported. Cultural projects unable to demonstrate an economic value are not prioritised.

Housing

House building is viewed as a significant economic driver in its own right with large potential multiplier effects for local economies. Housing development which meets market demand is facilitated, helping to attract and retain a skilled labour force. New housing provision is particularly targeted at areas within commuting distance of economic growth areas. Significant new land allocations are made to accommodate development, with release of large sites in and around settlements if necessary. This may include managed release of greenfield land, following policy and capacity reviews. Affordable housing initiatives are progressed in areas where economic growth is particularly concentrated, aiming to meet the needs of key workers. Market housing is directed to areas attractive to the market, with unattractive areas reliant on public investment only. Opportunities for cross-subsidisation of housing and other developments are supported.

Climate change, decarbonisation & energy

Investment in energy is driven by the private sector. Development patterns continue to focus primarily on the most viable technologies including wind energy developments (with large-scale schemes predominating). Off-shore developments would be facilitated through appropriate on-shore infrastructure. Opportunities for green jobs within these sectors are high on the agenda.

Issues arising from climate change, such as rising sea levels and flooding are approached from an economic perspective. Steps will be taken to address these challenges in so far as they minimise risks to growth. Decarbonisation objectives will be supported where they provide economic opportunities and growth. Economic land allocations take climate change into account to minimise risks to business.

Broadband & digital infrastructure

Telecommunication and digital technology is a key priority, with the NDF supporting provision of the required infrastructure through the market, as well as encouraging technological capacity to be built into the design of new buildings, infrastructure (including transport infrastructure) and areas of urban expansion and renewal. Infrastructure will be provided on the basis of market demand only and to serve the areas of greatest growth potential.

Economic prosperity & economic regeneration

This NDF responds to market demand as well as need and is based on active engagement with business and industry, with an emphasis on increasing land supply and minimising business development costs. Significant new land allocations are made to accommodate development, with release of sites in and around settlements. This includes the release of greenfield land, following policy and capacity reviews. This NDF would support commercial development in the most viable locations, including both in-town and out-of-town locations. Town-centre focussed development would not be prioritised over out-of-town and the market would determine the most viable location. Brownfield sites (including those in use) attractive to the market would be released for new economic uses. Enterprise Zones are a key focus of intervention. Existing commitments to community regeneration are reviewed, so that future investment can be targeted at people with the most significant economic potential rather than those with greatest social need. Poverty will be tackled by improving the overall prosperity of Wales rather than focussing on specific areas.

Rural Wales

This NDF supports increasing prosperity in all parts of Wales, though its focus will be on the most profitable urban areas and it will only support significant investment in rural parts of Wales where this is market driven. It will not seek to reverse depopulation and will actively provide opportunities for people to move to more prosperous, better served areas to support growth objectives. Support for agriculture would be primarily focussed on food security. National Parks and AONBs would be supported for their economic value.

City Regions & Growth Deals

Cities are the primary drivers of the economy and the primary focus of economic investment. Wider regions provide both workers and potential consumers and this NDF supports wider regional interventions that improve economic productivity. A larger, dynamic workforce provides a larger employment pool and this is attractive to the market. Whilst this NDF will support the principles of city regions, its focus will be on the most profitable economic core and it will be expected that the benefits of growth will spread across the region over time predicated on accessibility.

Transport

Large scale strategic infrastructure projects are taken forward, such as metro projects, directly through the NDF to allow a high level of growth and facilitate land release. Road and public transport infrastructure are upgraded. Internal (inter-city region) and external links by air, sea and high-speed rail are promoted. International profile is

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

important to promote Wales and attract investment. Projects which seek to promote external connectivity are taken forward. Transport links to key gateways are substantially improved to help stimulate private sector investment, and in response to business needs. Facilitating the easy movement of international freight, through key gateways by road and rail will be a key priority. Expansion of Cardiff Airport if required, improvements to the infrastructure that support it and economic opportunities for growth in and around the airport will be facilitated.

Natural Resources

This NDF supports the realisation of the economic potential of Wales's natural resources. It would also support the principle of the circular economy and ensuring the full economic potential is realised of all resources, including waste. Investment would be driven by the private sector. Environmental quality is recognised as a strong potential driver of growth, making Wales attractive to visitors and potential investors.

Ecological, biodiversity and landscape designations, particularly at the local and regional level, will be reviewed where they prevent growth and the delivery of physical infrastructure. Over the life of the NDF, the role of national and international designations will be reviewed, in particular in light of Brexit, to understand their role in supporting national economic priorities. Agricultural land could be released for other uses including the best quality land.

Welsh Language

This NDF will support all initiatives that support economic growth and by delivering new employment opportunities, help retain Welsh speakers in Wales. Its focus will be on areas with the strongest economic potential and movements of Welsh speakers from weaker to stronger market areas will be supported.

Health

Good health and well-being enable economic potential to be fulfilled. This NDF focuses growth and services in the strongest urban areas. Health facilities will be planned to support growth.

What are the key assumptions that support this option?

- Cities and their regions are viewed as the primary drivers. Growth is focussed in these areas, with more limited growth in mid-Wales, small towns and regeneration areas.
- The identification of national transport projects is driven by their potential to facilitate economic growth in particular in the strongest market areas. Internal connectivity is improved by substantial multi-modal infrastructure investment. External connectivity is actively improved including enhanced air and sea links, and new high speed rail links to England and beyond to Europe. Freight links between continental Europe and Ireland are also improved.
- There are significant levels of investment in transport, energy and digital infrastructure as key drivers of growth, with prioritisation of projects which offer the greatest improvements in connectivity and support the widest range of objectives.
- Public investment in new infrastructure is driven by the desire to facilitate and attract new investment, both in existing strong market areas and areas of the greatest economic potential.
- The identification of Developments of National Significance would be important, providing clear direction from the Governmental, certainty and greater expediency in decision making.
- There will be higher rates of housing and economic development and increased land take overall.
- Greenfield land for development is released, with development focusing on areas that are already most accessible and in strong market areas.
- Planning controls are streamlined in priority investment areas and some environmental regimes, particularly at the local level, are relaxed where legislative requirements provide scope to do so.
- Planning controls are less prescriptive. Wider planning policy, the sequential test and proximity principle for example are relaxed to give wider spatial choices.
- Affordable housing provision focuses on links with the economy, in terms of locational decisions and market sectors (e.g. key worker housing).
- Environmental initiatives focus on place-making and therefore coincide with areas with greatest economic investment potential. Environmental quality is recognised as a driver of growth, but there is reduced emphasis on environmental justice. Multiple benefits are not necessarily pursued.
- Businesses themselves seek to be more sustainable in operational terms, pursue energy efficiency and are assisted in adapting to climate change to reduce potential economic effects.
- The private sector leads investment in energy sector and waste, leading to variation in types and levels of provision.

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas

What would Wales in 2040 look like?

Cultural Assets

National investment in cultural assets is economically driven and has focussed on the strongest market growth areas, as part of a package of wider investment initiatives.

Housing

Both private and social housing has focussed in strongest market growth areas. The NDF has facilitated through SDPs and LDPs, major urban expansion and greenfield release. Parts of Wales outside of these areas deal with local issues only and do not have a national strategic role.

Climate change, decarbonisation & energy

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support their expedient delivery. Areas of greatest potential for wind, solar, tidal and other energy generation are the focus for new development. Grid, transmission and storage infrastructure is facilitated. Strong support has been given to new economic opportunities in these sectors.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery of infrastructure. The market determines investment and is primarily focused on strongest market growth areas.

Economic prosperity & economic regeneration

Has focussed on the strongest market growth areas, driven by the delivery of new transport, energy and telecommunications infrastructure and a clear direction for the land-use system to support growth in these areas.

Rural Wales

Has been supported to ensure food, energy and water security for wider societal benefits. New investment has been limited to that promoted by the market and there has been no active intervention to reverse depopulation and other social trends.

City Regions & Growth Deals

There has been strong support for city regions in Cardiff, Swansea and North East Wales. Investment in new infrastructure has supported their growth, which has been facilitated by alignment of the land-use system at all levels.

Transport

Nationally scaled infrastructure has been delivered directly through the NDF and the planning system is aligned at all levels to support its expedient delivery. The focus has been on supporting the strongest market growth areas and improving international connections that support economic growth.

Natural Resources

Driven by the market, the economic realisation of natural resources has been strongly promoted across the whole of Wales.

Welsh Language

The primary focus has been on improving the economic health of Wales. Opportunities to support the Welsh language have been supported from an economic rather than spatial perspective. Welsh language speakers have moved away from the traditional heartlands in North-West and Mid-West Wales to the strongest market growth areas.

Health

The provision of services and facilities have been planned to support growth areas.

What did the October 2017 engagement say about this option?

Positive

There was a strong sense that cities are economic drivers and it is unrealistic to think national scale growth objectives can be met without a strong and clear focus on them. Providing infrastructure to support cities and their regions is necessary and generally supported. These are ultimately the areas where the majority of people in Wales live and work.

The importance of identifying key infrastructure and providing a framework to ensure its expedient delivery is a key role for the NDF. In doing so it will provide clear national direction and by focusing growth in key urban areas, will help shape the investment of national utility providers. Focussing investment in a geographically smaller area (as opposed to all-Wales) can help leverage funding and send a clear statement to potential investors.

Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas
The NDF is the opportunity to drive national projects from national level and provide a clear spatial strategy for all other Government policies. This is currently missing. Notwithstanding the concerns that a market driven approach does raise, it is important that it is recognised Wales is a poor country and this type of nationally driven, economic focus is required to break the cycle. This option can help overcome local political barriers. It also recognises that you do need to create prosperity to address other environmental, social and cultural objectives. The failure to link economic prosperity to other outcomes and the belief that we can do everything equally prevents us from addressing some of the major issues affecting Wales. This is well intentioned thinking but doesn't provide the necessary leadership and avoids us from having to take difficult decisions. This option would be an important step in moving Wales forward and is what long term strategic decision making is about.
Negative There was a strong sense that this option was the opposite of long-term planning. It only reflects where Wales is now and does not seek to deliver real change. It supports existing growth patterns and does not provide a spatial strategy for the whole of Wales. It would not be transformational but rather the opposite. Focussing on the strongest urban centres and cities will not address issues outside these immediate areas. It will both reinforce existing inequality and create new inequalities, as areas outside of the preferred growth regions are not supported. Social, environmental and cultural objectives should not be viewed purely through an economic lens and it is unlikely that these objectives can be met if the sole focus is what is attractive to the market. Such an approach is contrary to the Well-being Act. There was clear recognition that economic growth is important and, if it is planned and assessed appropriately, has positive outcomes that provide a wide range of benefits. However, the long-term spatial development of Wales cannot simply be left to the market to determine and the planning system exists to influence growth and how our places should change, to ensure the widest possible benefits. What happens if markets collapse? What is the role of the Government if not to consider and plan for the long-term interests of the whole nation? Environmental quality is not a barrier to overcome. It adds value and is intrinsic to our well-being. This option lacks environmental consideration and risks short term economic gain over long term environmental resilience. It would not ensure the sustainable management of our natural resources. Markets are short term and are not strategically orientated. Strong concerns were expressed regarding the loss of agricultural land to other uses, including potentially the best farming land. This option is too outward looking and is not about Wales. It doesn't play to the strengths of Wales - green space, landscape and biodiversity.
Realistic This option was considered to be realistic. Some considered that as it would reflect current development patterns and trends, it would be the easiest option to adopt. It was also the easiest option to grasp and it was clear how this option could shape other relevant strategies. It was clear how investment in infrastructure could be prioritised to support this option. Others thought that this approach did not represent the status quo; it would represent a major policy shift but that if we decided to do it, we could.

Table B-6: Alternative Option 2

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales
Summary Overview This option focusses on the whole of Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another. Long term objectives will be met through actions and investment across the whole of Wales and by direct support to local communities to support bottom-up solutions to national issues. This option will deliver strong local communities, providing access to jobs, housing, services and facilities that they need and with a strong focus on people, their well-being and sustainability. The role of the NDF will be to distribute growth and infrastructure across the whole of Wales with a focus in particular on supporting areas of greatest need and where markets are weaker. It will retain a clear focus on the delivery of national objectives and co-ordinate the actions at the regional and local level to meet these aims.
Why has this option been developed? There was a consensus during the engagement at the start of 2017 on the need for a national spatial plan. There was also a belief that as well as having a national perspective which considered Wales as a whole, the NDF should relate to local communities and support them to deliver their aspirations. A NDF which considered, for

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

example, south east and north east Wales only would not be a national plan. A NDF which was seen to impose top-down housing, energy or transport policies without taking the opportunity to consider bottom-up solutions as well would not reflect the views of many. It was felt by some that the impact of national decisions on local communities was not recognised enough.

There was a view that the NDF should not seek to pick 'winners' or focus too heavily on a one-size fits all approach. Local communities experience different housing issues, language issues, different depopulation and social challenges. The NDF must be flexible enough to allow different, appropriate solutions and create the space for SDPs and LDPs to find solutions.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would recognise the importance of our heritage in shaping Wales and seek to maintain and promote our distinctively Welsh communities. It would require that new development actively contributes to, rather than detracts from, our cultural capital. Our existing cultural assets will be protected, promoted and enhanced and new cultural developments supported. There will be strong support for local scale community projects that could provide cultural and associated benefits. For example, culture led projects benefitting health and wellbeing through the provision of both formal and informal recreation activities.

Housing

Access to housing and in particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. Interventions would seek to support affordable housing over other types of housing where necessary. Support will be given for new and innovative housing designs and self and custom build developments will be facilitated, where they provide additional opportunities for new housing and help meet community housing needs. As well as meeting housing needs, new housing will help sustain local communities and support vital services.

In addition to affordability, lifetime homes and the provision of housing to meet the needs of people at all stages of their lives will be prioritised. The type of housing needed will be an important issue, recognising that we need to build the right type of housing in the right places and not focus only on the number of houses required.

Climate change, decarbonisation & energy

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale energy and transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives. Local ownership of energy projects and decentralised grid and storage infrastructure will be strongly supported.

The functioning of communities and their needs would be the primary focus. Policies would focus on local, place-based solutions and maximising community benefits.

Decentralised energy generation and distribution would be supported including community owned renewable energy schemes. For larger scale energy policy, there would be a strong emphasis on assessing the impacts on local communities and ensuring the economic opportunities arising from such investment, directly benefits local communities, in terms of jobs, energy costs and other benefits. Actions to increase energy efficiency, in both new and existing developments will be supported, helping meet wider energy objectives, reduce energy costs and address issues of fuel poverty.

Broadband & digital infrastructure

The provision of modern digital infrastructure would be supported, with an emphasis on ensuring all communities in Wales are connected to the latest and best technology. Areas that may not otherwise be served by the market in a timely manner will be the focus of Government investment and this NDF will support all steps to increase access to digital services and resources.

Economic prosperity & economic regeneration

This NDF would support local employment opportunities, diverse local economies and vibrant local centres. It would encourage local distinctiveness and recognise that economic prosperity helps support well-being. Providing better jobs closer to homes, will both reduce the need to travel and allow those who wish to stay and live in their local communities to do so. Regeneration objectives and tackling deprivation would shape major strategic investment decisions, focussing investment on those areas in greatest need. This NDF would seek to avoid reliance on trickledown economics or prosperity growing outwards from key growth poles and instead promote strong, local centres across all parts of Wales. Poverty will be tackled by focussing on the different issues affecting communities across Wales and shaping responses to meet these needs.

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

Rural Wales

Reversing population decline would be a priority in rural areas. This NDF would seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure through all levels of the planning system, thereby helping to ensure Wales's rural communities retain and attract all ages and all members of our society. Investment decisions, the delivery of new infrastructure and the co-ordination of other key Government strategies would be aligned to support these objectives.

City Regions & Growth Deals

The city regions would be supported and this NDF would place a strong emphasis on ensuring that investment and opportunities within city regions benefit all. Investment would be supported where it maximises the benefits for all communities and where potential positive outcomes are achieved wider than the central regional urban core. Connectivity will be an important feature.

Transport

This NDF would over the longer-term seek to make a strategic shift from major infrastructure programmes, such as large-scale transport infrastructure and move towards a 'bottom-up' approach. Whilst recognising that there will always be a need for individual projects that will be of a national scale, this option will require that all options are considered fully and that realistic smaller scale, dispersed options are supported where it is realistic to do so and support wider objectives.

The functioning of communities and their needs would be the primary focus. Transport policies would focus on local accessibility, with public transport connecting homes, jobs and key services, and places will be shaped around walking and cycling. Ensuring accessibility to key transport hubs will be a priority. Supporting active travel initiatives would be a key objective. This NDF would seek to tackle the negative consequences around transport choices. Health objectives would be a key influence, supporting healthy transport modes and addressing directly air and noise quality issues. Traffic reduction measures, including potentially significant changes to road networks would be pursued if necessary, to secure benefits for local communities.

Natural Resources

This NDF would strongly support the principles of SMNR, recognising the unsustainable management of our resources will negatively impact upon all communities in Wales. Through actions such as increasing resource efficiency and reducing pollution, the aim is to build greater resilience into our ecosystems and biodiversity and support the delivery of national objectives. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure the long-term economic sustainability of our communities. They also provide resources that are fundamental to the prosperity and security of wider industries and ultimately that of our towns and cities. Securing social, economic, health, cultural and environmental benefits and enhancements for local communities through the SMNR approach will be a key priority.

Welsh Language

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities for every area and planning the provision of new homes so that population change is carefully managed.

Health

The NDF would promote good health and well-being for everyone. Supporting the creation of high-quality places with improved access to integrated community facilities and services, including digital access. The NDF will look to tackle inequalities throughout Wales and deliver a range of high-quality houses and improved access to the natural environment, to support health objectives.

What are the key assumptions that support this option?

- The planning system and locational choices will ensure that all parts of Wales support the development of sustainable settlements.
- Sustainable settlement patterns are key – homes close to jobs and key services and facilities, reducing the need to travel and ensuring sustainable transport options when required. A strong emphasis is placed on maintaining a good range of accessible community facilities.
- Land-use planning principles will be used to ensure the jobs, services, facilities and recreational activities people use will be close to home. Where they cannot be provided locally, they will be easily accessible by sustainable transport options. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- It is accepted there will remain a need for large-scale national projects. A full assessment process will be required, to ensure that alternative options are considered including locally scaled approaches.

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales

- The provision of local, affordable housing is a key issue with strong support for local and self-build housing.
- The NDF seeks to enable the most disadvantaged communities to benefit from growth and supports community empowerment and good governance.
- Accessibility is central to decision making and locational choices must maximise accessibility to all members of society.
- Improving health is a key objective and influences all policy decisions. Air quality improvements are directly targeted. Local well-being and quality of life is the key objective in land use decisions.
- Regeneration and tackling deprivation are a key strategic focus. Tackling the legacy of previous development and industry is a priority as well as addressing all areas of poor environmental quality.
- The NDF emphasises digital connectivity, thereby encouraging more flexible and home working, a better work life balance and reducing the need to travel and congestion. Communities will not be disproportionately disadvantaged because they are outside the largest urban areas.
- Community owned renewable energy schemes are prioritised. Initiatives to increase energy efficiency in homes and end fuel poverty are supported by the planning system. Areas where renewable energy is being generated receive direct community benefits and emphasis is placed on schemes being located closer to where people live. Support for distribution and storage networks.
- Strong support for principles of circular economy

What would Wales in 2040 look like?

Cultural Assets

Strong focus on community scaled projects across all parts of Wales has created distinctive communities.

Housing

Dispersed across all of Wales, housing has focussed on meeting community needs and helped build sustainable communities.

Climate change, decarbonisation & energy

Energy needs are met through a dispersed, community scaled approach following a move away from fewer, large scale developments. Communities are energy exporters. Land use principles have sought to reduce the need to travel and where trips are made, by the most sustainable methods.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge. Investment has focussed on peripheral and rural areas, accepting landscape change.

Economic prosperity & economic regeneration

Public investment has been balanced across all parts of Wales. The focus on ensuring strong local economies through the planning system and key Government strategies has increased prosperity nationally.

Rural Wales

Depopulation has been reversed and there is strong demand for housing in rural areas.

City Regions & Growth Deals

Successful city regions have been planned to ensure the widest possible benefits for their full regions, recognising the needs of communities across the region.

Transport

Communities have been shaped to reduce the need to travel within them and where trips are made, including between settlements, they are done so by sustainable and accessible transport methods.

Natural Resources

Agriculture, forestry, renewable energy, water and tourism have all supported the growth in high quality jobs across the whole of Wales and helped secure the long term economic sustainability of our communities.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met.

Alternative Option 2 – A spatial strategy focussed on creating strong communities across all Wales
Health Strong focus on integrated community health facilities, ensuring communities can access facilities locally and digitally. Investment in good quality places and increased access to the natural environment,
What did the October 2017 engagement say about this option?
Positive There was welcome support for the principle of developing a fully all Wales spatial strategy. It was identified as important that the NDF process does not start on the assumption of a top-down, directional strategy and that understanding how national issues could be addressed from the local, community level was important. Housing, energy, employment and transport are typically cited as examples of where the top-down approach of the planning system fails to recognise what local communities want and does not properly assess the uneven impacts of these national decisions on all parts of Wales. There was concern that city regions, growth deals and major projects such as the M4 focus on defined, urban parts of Wales only. This option, by consciously focussing on the whole of Wales, is a positive attempt to think beyond the usual areas. There was support for the principle of seeking to focus public investment in the areas of greatest need and ensuring private investment in the strongest market areas is planned to deliver the widest possible benefits. The ability to develop local approaches under a unified national framework was welcomed. Housing and economic growth were frequently given as examples of areas where issues vary greatly across Wales. Focussing only on a single, narrow aspect such as housing numbers rather than the type and quality of housing, does not support the delivery of wider objectives. Community focussed approaches would be more flexible and allow appropriate solutions to be developed. This option was considered to be a good fit with the Well-being Act, seeking not to prioritise one area or one outcome over another but rather seeking to understand how objectives could be met across the whole of Wales.
Negative Whilst the overall aspiration of this option was supported, many thought it lacked focus and it was not clear what the spatial strategy would be. Rather than directing growth and the delivery of infrastructure, this option would create the conditions for bottom-up approaches to be developed but not provide certainty on where or how. It was expressed that this option would be a missed opportunity to positively drive change from the national level. There was uncertainty about what the relationship would be between different tiers of the planning system. LDPs were considered the most appropriate plan to plan for local areas. Climate change, economic prosperity, solutions to housing issues and tackling many of the issues Wales will face between now and 2040 will require big, national solutions. We should not be afraid of setting a clear national spatial strategy and this is the role of Government. Rather than provide a strategy to consider how national issues could be addressed from the bottom-up, there were strong concerns that this option could become a NIMBY charter. A point made frequently was that those most likely to be involved in the planning process do not necessarily represent the wider community and that one of the key drivers for the introduction of the NDF, was the ability to consider and address issues at the national level. Views were expressed that the understanding of the relationship between the planning system and the Well-being Act required careful consideration. Everywhere can't have everything and all goals cannot be met equally in all cases. The aspiration is welcome but this is not realistic and decisions have to be made. A spatial strategy and the development of a NDF should be about making important decisions in the right way.
Realistic Given existing plans, strategies and Government commitments, it was considered that in the short term it would be difficult to move to this spatial approach. In light of this, the option and underlying assumptions have been amended to reflect that, particularly in the short term, large scale projects will be supported, and over the life of the NDF there may be a need for large, nationally scaled projects. The primary focus under this option will, however, be clearly on locally scaled solutions and ensuring that future strategic decisions start from a bottom-up perspective. With this amendment, this option was considered realistic.

Table B-7: Alternative Spatial Option 3

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Summary Overview

This option focuses on decarbonisation and climate change and makes our response to these issues the primary consideration for the NDF. There is overwhelming evidence supporting the need for urgent action on climate change. The planning system has a pivotal role in facilitating the transition to a low carbon society by ensuring decarbonisation is at the forefront of land use choices. Targets for renewable energy and greenhouse gas emissions and emerging carbon budgets will significantly shape this spatial strategy. This NDF focuses particularly on land use, the relationship between different uses and the connectivity between them. It places a strong emphasis on planning how our settlements will grow, interconnect and understanding the consequences that will arise from the choices we make and the opportunities arising from doing things differently.

Existing urban and rural patterns will be adapted to improve their sustainability. This NDF will support major changes to urban form and development patterns, including in existing areas, if they are required to meet objectives and contribute to the realisation of a low-carbon economy.

Why has this option been developed?

Across all the issues and discussion of potential spatial options for the NDF, the strongest consensus emerged around the importance of tasking the NDF with responding to climate change issues and supporting the decarbonisation agenda. It was suggested that this option has no plausible counter view to it (e.g. support carbonisation, worsen climate change issues) and as such must be considered across the NDF process. There was also a clear view that this option was not and should not be a negative option. It offered a positive opportunity to develop our society and economy in new ways and this should be embraced.

There was a belief that land-use planning principles were key and that the planning system should take the lead in 'planning' our future. Problems have been exacerbated by a lack of joined-up thinking, short-term goals and a failure to understand the interrelated consequences of many of our decisions.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. It would support cultural development that helped achieve our decarbonisation objectives.

Housing

This NDF would focus on the location of new development, connectivity between uses and energy efficient, zero carbon sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Housing will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned housing development will not be supported. As a first principle, the NDF will seek to direct housing to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported. This NDF would support housing development in the most sustainable locations, which may be green and brownfield, with a focus on resource efficiency, quality and innovative design.

Climate change, decarbonisation & energy

This NDF will adopt a positive and proactive approach to increasing the generation of renewable and low carbon energy through a range of technologies and support innovation and growth in the renewables sector. The decarbonisation of energy and other sectors will be a key priority. The NDF will direct renewable energy generation to the most appropriate locations and provide a framework to support its delivery. As well as large scale projects, this alternative option will support regional and local scale energy projects, maximising the potential for sustainable projects at all levels. It will also provide flexibility to ensure that new emerging technologies and opportunities are supported.

The storage and transmission of energy will be planned for to support a modern and efficient energy sector. Actions to increase energy efficiency, in both new and existing developments will be supported. Land use patterns and the provision of new infrastructure will be shaped by the potential risks from climate change. This NDF will anticipate the risks from flooding; increases in temperatures; loss of habitats and vegetation; increasing urban heat islands; and harmful effects on ecosystems and ensure future

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

development patterns consider, are shaped by and build resilience to these. There will be an acceptance that some areas will remain vulnerable to potential impacts and the consequences of this planned for. Coastal changes and the potential impacts upon cities, towns and communities will influence spatial choices.

The NDF will promote SUDs as an integral part of new development, encouraging water (including floodwater) to be a more normalised feature of the built environment through planned and managed schemes. Actions to increase energy efficiency, in both new and existing developments will be supported.

Broadband & digital infrastructure

This NDF would fully support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways, support new working practices and reduce the need to travel.

Economic prosperity & economic regeneration

This option will positively support sustainable low-carbon growth. Emerging opportunities in sectors helping deliver decarbonisation objectives will be strongly supported and the framework will support innovation, R&D and the development of new technologies. Green growth and the circular economy will be strongly supported.

This NDF would focus on the location of new development, connectivity between uses and energy efficient, sustainable design. It would influence locational choices and require that new development is located in sustainable locations. As well as movement within and across towns and cities, this NDF will focus on the relationship between settlements and regions and would require that decisions are fully informed by their wider context. Employment and regeneration initiatives will be provided in the context of wider social, economic, cultural and environmental uses and will be planned alongside these. Speculative and unplanned development will not be supported. Land use choices will reduce the need to travel and ensure connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to these objectives and that they have been planned to support the widest range of benefits. Choices on the location of strategic employment centres will be shaped by existing and proposed centres of populations and sustainable transport networks. Poverty will be tackled by providing modern, high quality housing, addressing fuel poverty, supporting a transition to a prosperous, low-carbon economy and improving well-being for all in Wales.

Rural Wales

This NDF will seek to address housing, employment and connectivity (digital and transport) issues and sustain social infrastructure in rural areas. There will be support for community energy projects which can help subsidise local services and infrastructure. It would support locally focussed communities, which reduce the need to travel and when trips are made, can be done so sustainably. It will require a clear focus on how growth, investment and new infrastructure is planned across the whole of Wales, to ensure that spatial choices support decarbonisation objectives in both rural and urban areas.

City Regions & Growth Deals

This NDF will support the development of connected, accessible and well-planned city regions, which co-ordinate the delivery of growth and infrastructure in a manner that maximises positive outcomes. The delivery of regional transport infrastructure which supports decarbonisation objectives will be a priority and the NDF will provide a clear framework for their delivery. Key projects and infrastructure must be planned in the context of wider social, economic, cultural and environmental uses.

Transport

Land use choices will reduce the need to travel, ensuring that connectivity and accessibility are key priorities. Major projects will be required to demonstrate their contribution to meeting these objectives. This NDF will support actions and investment to decarbonise the transport sector and ensure the land use planning system at all levels is aligned to facilitate delivery. Walking, cycling, electrification and public transport are prioritised. Bus as well as rail services will be important. Major new road investment will be supported where it significantly reduces congestion; supports significant improvements in efficiency; and supports wider objectives including those in relation to air quality and the environment.

Airport expansion may be limited or offset. Investment supports improvements to external rail and sea links. Emerging technologies such as electric cars will be supported where they help decarbonise transport movements. As a first principle this NDF would seek to minimise the need to travel and as a second principle, ensure trips are made in the most sustainable manner.

Natural Resources

This NDF supports the core SMNR principles of improving efficiency, minimising the unsustainable use of resources, reducing pollution and delivering renewable energy. Alongside steps to reduce carbon emissions, this NDF will support actions to build resilience to climate change in our communities, businesses and natural environment. This NDF will support nature-based solutions to strengthen biological diversity, including the provision of green networks and infrastructure. The contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. This NDF will have

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

strong support for the principles of the circular economy and resource efficiency. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.

Welsh Language

Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.

Health

This NDF will co-ordinate delivery of infrastructure to reduce the need to travel and provide digital ways of accessing services. Resilience measures for climate change provide opportunities to increase health and well-being including improved air and water quality. The reduction of fuel poverty will have a positive impact on people's health and well-being.

What are the key assumptions that support this option?

- Renewable and low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed across Wales.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- There is a presumption in favour of actions to address climate change.
- There will be strong alignment between land use and transport planning at the national, regional and local levels.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Strong focus on the location of new development, connectivity between uses and energy efficient, sustainable design. Locational choices require that new development is located in sustainable locations.
- Relationship between settlements and regions will be planned in the context of wider social, economic, cultural and environmental objectives and to support the delivery of decarbonisation aims.
- As a first principle, the NDF will seek to direct new development to areas that minimise the need to travel; and as a second principle, to areas where trips can be made by sustainable modes of transport. Actions to improve the efficiency of existing transport infrastructure will be supported.
- Spatial choices will be shaped by the location of main population centres and sustainable transport infrastructure. As well as reducing transport movements, reducing congestion and emissions will shape key decisions.
- Land use, major projects and infrastructure must be resilient to climate change impacts.
- Options for rail and bus connectivity are actively prioritised. Targeted road improvements are made to accommodate sustainable development. UK and international connections will be rail and sea based in preference to air. The sustainable movement of freight will be a priority considering rail, water and electric vehicles options.
- SUDS and sustainable flood management proposals are developed on a large scale. Infrastructure is provided to ensure a steady supply of water.
- Housing will be provided in the most sustainable and integrated locations, with access to jobs, services and facilities, and sustainable transport options central to the choices on new housing.

What would Wales in 2040 look like?

Cultural Assets

National projects have been developed in the most sustainable accessible locations, planned alongside other land uses.

Housing

Energy efficient, well designed housing has been planned and built to create sustainable, accessible communities.

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Climate change, decarbonisation & energy

There has been an increase in the generation of renewable and low carbon energy across Wales through a range of technologies. There has been strong growth in the renewables and low carbon sectors. Sound planning has ensured key spatial choices have supported the delivery of national objectives and Wales is on its way to exceeding its 2050 decarbonisation targets.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

Economic prosperity & economic regeneration

There has been strong growth in renewable and low-carbon sectors, supporting a transition to a low-carbon society and an increase in prosperity for all parts of Wales. Wales is recognised as a world leader in these fields.

Rural Wales

Spatial choices have supported decarbonisation objectives in both rural and urban areas and supported the delivery of wider social, economic, environmental and cultural goals. Community energy schemes and improved digital and low carbon infrastructure have helped tackle depopulation.

City Regions & Growth Deals

Well planned regions and new infrastructure, have supported prosperous regions which have helped deliver climate change and decarbonisation objectives.

Transport

Strong alignment between national planning and transport strategies has resulted in well planned, sustainable and accessible communities across Wales and supported a switch to low carbon transport and public transport.

Natural Resources

SMNR principles have helped improve efficiency, minimise the unsustainable use of resources, reduce pollution and deliver renewable energy.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met.

Health

Delivery of well-planned and designed places with connected infrastructure, have improved air quality.

What did the October 2017 engagement say about this option?

Positive

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate.

There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader.

There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

Negative

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it.

It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small-scaled actions.

Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment.

Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

Realistic

Alternative Option 3 – A spatial strategy to deliver decarbonisation and climate change objectives.

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table B-8: Alternative Spatial Option 4

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

Summary Overview

This option focuses on the sustainable management of our natural resources. It recognises that unsustainable management will negatively impact upon future generations and provides a positive framework to help realise the social, economic, environmental and cultural value of our natural resources and ensure key ecological networks and habitats are adapted and resilient to change. Through increasing resource efficiency and reducing pollution, this NDF will help build greater resilience into our ecosystems and biodiversity. Agriculture, forestry, renewable energy, water and tourism provide the opportunity to develop high quality jobs across the whole of Wales and secure long term economic sustainability.

This NDF would use baseline evidence to guide development to the most suitable locations, strongly prioritising natural resource implications in spatial decision-making. It will have a strong focus on how decisions are taken and the outcomes that should be achieved, using the NDF's development plan status to firmly embed key principles into the decision-making process at all levels.

Why has this option been developed?

The Environment (Wales) Act positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The Act is intended to help secure Wales' long-term well-being, so that current and future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities.

This option has been developed to test how the national spatial plan can support the delivery of the requirements of the Environment Act.

This option has been developed and subject to further engagement in October 2017

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including for tourism, outdoor recreation, local employment and physical and mental health. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces, that represent both cultural and ecological assets. Development that undermined the integrity of our landscapes or natural resources would be strongly resisted and would be directed towards less culturally sensitive locations.

Housing

This NDF would focus on the location of new development in terms of its relationship to ecological networks, and the need to create attractive and healthy environments for people to live in. It would direct housing away from areas likely to have a significant impact on ecological networks and flooding issues and towards locations that reduce the need to travel. New housing development would embrace the multiple benefits that green infrastructure can provide for health and well-being and would support the creation of and promote access to open space and wider ecological networks.

Climate change, decarbonisation & energy

This alternative would prioritise adaptability to change for both people and species. Networks of green and natural spaces would be enhanced and protected in order to help adapt to climate change. This NDF will anticipate the risks from flooding, air quality, increases in temperatures, loss of habitats and vegetation, increasing urban heat islands and harmful effects on ecosystems and ensure future development patterns consider, are shaped by and build resilience to these.

Habitats vulnerable to development pressure including floodplains, woodlands and urban green infrastructure would be prioritised for proactive and preventative action.

Actions would include steps to safeguard and encourage urban tree coverage, avoid the fragmentation of floodplains through development, secure sustainable drainage

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources
systems, ensure water sensitive design and deliver appropriate soil carbon management. This option would strongly support greater energy efficiency and realising the opportunities across Wales to generate renewable energy.
Broadband & digital infrastructure This NDF would support the provision of new digital infrastructure, recognising the potential it offers to provide services in new ways; support new working practices and reduce the need to travel; and support our aspirations for lower carbon living.
Economic prosperity & economic regeneration This NDF would recognise that Wales' abundance of natural resources is one of our greatest economic assets, underpinning our vibrant tourism and leisure sector, agricultural industry, and world-class home-grown food and drink sector. This NDF would realise the economic opportunities of Wales' natural resources (alongside other resources), while building their resilience to create an environment which will nurture the businesses of the future. Economic development would be directed away from areas where there was the potential for conflict with important ecological networks, and new development would incorporate green infrastructure and support the creation of wider ecological networks. Opportunities for green growth and realising economic opportunities from the sustainable management of resources would be supported. Poverty will be addressed by ensuring local communities benefit from Wales's natural resources and by supporting positive energy, housing and economic development.
Rural Wales This NDF would focus on maintaining and supporting our natural resources as the bedrock of our rural economy, particularly our agricultural and tourism sectors. Maintaining healthy and resilient ecosystems and distinctive local landscapes will be important for supporting rural Welsh communities' sense of place and identity. The focus would be to support nature-based solutions that harness the multiple benefits of our natural resources to support the economy and culture of rural communities, and to ensure that ecological networks are managed to support the delivery of cultural, economic, social and environmental objectives. It would support development in rural areas that helped achieve ecological and resilience objectives and seek to resist development that could undermine the integrity of key networks.
City Regions & Growth Deals This NDF will recognise that green spaces and networks are vital if our city regions are to be attractive places to live and work. It would support the development of ecological networks including green infrastructure across well planned city regions. The provision of infrastructure and new development will be planned to respond to the impacts of climate change and support the protection and enhancement of ecological networks and the sustainable management of natural resources. It will support a greater regional understanding of issues, such as for example river catchments, and ensure decisions are planned and taken in the fullest regional context.
Transport This NDF would prioritise development locations that reduce the need to travel and would focus on the role of public transport and interventions that encourage the reduction of air pollution. New transport infrastructure would incorporate green infrastructure and be designed to create green corridors and wider ecological networks and would be located to avoid fragmenting habitats or adversely impacting air or water quality.
Natural Resources The principles of SMNR would shape this NDF, helping deliver key benefits for health and well-being, resource efficiency and security, economic prosperity and community identity, through prioritising the fundamental role that our natural resources play in supporting these and a wide range of other beneficial outcomes. This option will work closely with the Natural Resources Policy. It would also focus on improving the resilience of ecosystems, including their diversity, connectivity, scale, condition and adaptability. Environmental enhancement would be prioritised, and the creation of habitats and networks to allow ecological resilience would be actively progressed. Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use. Improving air quality will be a key priority.
Welsh Language Welsh speaking communities will be supported and the consequences of planning decisions fully assessed and understood at the community level. This NDF will support all communities by identifying appropriate employment opportunities and planning the provision of new homes so that population change is carefully managed.
Health This NDF would recognise that our natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging. It would seek to protect and enhance our landscapes and natural resources for the multiple well-being benefits they provide, including reducing pollution, increasing access to natural green spaces, benefitting physical and mental health. Increasing prosperity through green growth will help to reduce inequality in health.

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

What are the key assumptions that support this option?

- Principles of SMNR as a key driver of this alternative and are firmly embedded in the planning system through the NDF.
- Agriculture, forestry, renewable energy, water and tourism are strongly supported.
- Solar, wind and other renewable energy development (including biomass) will be directed away from the best quality agricultural land to ensure this land remains in long term agricultural use.
- Strong links with the Wales Marine Plan and Natural Resources Policy provide a coherent framework for all activity in Wales and provide the focus for considering the environmental effects of development and the assessment of reasonable alternatives.
- Other policy and regulatory areas are aligned, respecting spatial constraints and pursuing sustainable development opportunities.
- All land (including urban) is considered a natural resource capable of supporting biodiversity and integration of green infrastructure, or nature-based solutions, to enhance biodiversity and ecosystem resilience, will be an expectation of development.
- Increasing the extent of innovative green networks and high quality and biodiverse habitats, particularly in city regions, will help foster our connection with nature.
- SUDS and sustainable flood management will be prioritised. Infrastructure is provided to ensure a steady supply of water. River catchments are a key consideration in plan making and decisions.
- Natural green spaces are safeguarded and enhanced including alongside key transport routes to form green networks and across city regions. Green networks take on new spatial forms, including approaches following linear patterns and linking with natural biodiversity networks.
- Green networks seek to deliver strategic benefits for habitat continuity and species movement.
- Impacts on biodiversity, landscapes, water bodies and soil are avoided, mitigated and adapted. Species populations and their habitats will be enhanced.
- Renewable & low carbon energy generation through a range of technologies is positively and proactively pursued and generation from fossil fuels phased out as far as is practicable.
- Renewable energy generation is directed to the most appropriate locations and the NDF facilitates its delivery, supported by smaller scale, community-based schemes distributed throughout the country.
- Energy efficiency is promoted strongly and energy storage and transmission infrastructure is proactively provided, aiming to both unlock renewables potential and to withstand future climate change.
- Presumption in favour of actions to address climate change

What would Wales in 2040 look like?

Cultural Assets

National projects have been developed based on Wales' distinctive landscape and natural environment.

Housing

Housing has been built across Wales, in locations that maximise the multiple benefits of Wales' natural resources, supporting health and well-being objectives and with no significant impacts on important ecological areas.

Climate change, decarbonisation & energy

Wales has planned for and adapted to climate change risks, ensuring resilience across Wales. There has been an increase in the generation of renewable and low carbon energy.

Broadband & digital infrastructure

The planning system is aligned at all levels to support delivery quickly and facilitate new technologies as they emerge.

Economic prosperity & economic regeneration

There has been strong growth in agriculture, forestry, renewable energy, water and tourism, supporting a transition to a low-carbon society. Wales is recognised as a world leader in these fields.

Alternative Option 4 – A spatial strategy focussed on the sustainable management of Wales's natural resources

Rural Wales

Rural areas are prosperous, healthy and resilient having benefited from growth and investment in maintaining and supporting our natural resources.

City Regions & Growth Deals

City regions, planned around green infrastructure and natural resources, are attractive, healthy and prosperous. They are exemplars of how growth has been shaped to deliver our well-being objectives.

Transport

Transport solutions have delivered new green networks, supporting health and ecological goals and the sustainable movement of people.

Natural Resources

Wales leads the world in realising the multiple benefits of its natural resources.

Welsh Language

Strong support and investment in local communities has ensured Welsh language objectives are being met

Health

Delivery of high-quality places with sustainable access to facilities and services. Improved access to nature and a reduction in pollution.

What did the October 2017 engagement say about this option?

Positive

There was little, if any, dissenting opinion on the importance of this option. The majority of discussions focussed on the actions required to deliver it, rather than whether it was appropriate. There was recognition that this option offered a positive opportunity to support and grow the renewable energy and low-carbon sectors in Wales and for Wales to become a world leader. There was a strong feeling that of all the options, this option is the one which the land use planning system is best placed to deliver. Where things are built, how things are built, how places will change and the co-ordination of different actors, are all integral to the planning system.

Negative

Rather than being contrary to the spirit of the option, the negatives that were raised focussed mainly on the challenges of delivering it. It was considered a big, cultural shift was required to deliver this option. The planning system is too focussed on local issues and sites and not used to delivering national, spatial goals. It is important that it is recognised this option will facilitate big, major projects and not just small scaled actions. Viability and cost implications are real and affect investment decisions. It needs to be recognised that some decisions may lead to less investment. Some concern was expressed regarding the potential for different Government strategies to focus in different areas and unintentionally dilute the ability to deliver this objective.

Realistic

Given the strong buy-in from all sectors; the clear commitment from the Welsh Government to achieve climate change and decarbonisation targets; and the development of aligned decarbonisation, transport and planning strategies, it was considered this option is both realistic and deliverable. It was accepted that this option is not without its challenges but notwithstanding this, offers the potential for transformational change.

Table B-9: Alternative Spatial Option 5

Benchmark Option - Do Not Prepare the NDF

Summary Overview & Why has this option been developed?

This alternative option would involve not preparing a NDF. The existing Wales Spatial Plan would remain the national spatial plan. The WSP does not have development plan status.

The Planning (Wales) Act requires the preparation of a NDF. This option is therefore not realistic.

Benchmark Option - Do Not Prepare the NDF

It does however provide the opportunity to consider what would happen if a NDF were not prepared and how national strategic planning decisions would be taken. It provides an important benchmark against which to understand the other potential options.

The WSP remains an important strategic plan and much of the key policy approaches remain valid. One of its key weaknesses is its lack of development plan status and an ability to influence decision making. This situation would remain. The ability of the planning system to respond to the requirements of the Environment Act, Well-being of Future Generations Act and the Welsh Government's decarbonisation objectives would be restricted to actions at the local level and without an overarching strategic view.

Full Overview: How would this option help meet the NDF objectives?

Cultural Assets

Culture would be promoted at community and local levels. There is recognition of links to economic prosperity but overall this would not be a priority area.

Housing

Climate change would be an urgent issue and major development would be determined in the context of its impact upon climate change objectives. Ensuring resilience to sea level rises would be important, reducing risks to both people and property.

Climate change, decarbonisation & energy

Actions at the local level would be required to ensure all development contributed to climate change objectives, with support for example, for active travel and greening spaces initiatives. Energy policy would reflect national policies (e.g. decarbonisation and energy targets) and would be based on a regional approach, with regions expected to utilise their strengths and competitive advantages.

Broadband & digital infrastructure

Broadband coverage would be viewed as a regional issue, with challenges such as 'not spots' a matter for regions to address themselves. High speed broadband would be a priority for areas of high value economic activity. Government intervention would be re-active, addressing issues unable to be addressed by the market.

Economic prosperity & economic regeneration

Regeneration would be a key tool to improving prosperity across Wales. Projects would be regional in scale with the Welsh Government playing a key role in identifying project areas, drivers and setting ambitions for future outcomes. Maximising existing regional strengths is central to economic prosperity objectives and actions at regional and local levels are the primary lever in helping reduce inequality and deliver prosperity to all.

Rural Wales

There would be a very strong focus on rural areas. Delivering accessible community facilities and services to rural areas would be a key priority. European and Government funds will be made available to help achieve this. Transport and jobs are also key issues in helping maintain vibrant rural life and there would be strong support for actions in these areas.

City Regions & Growth Deals

The development of city-regions to drive economic prosperity, around Cardiff, Swansea and in the north east would be supported. Each city region has distinct strengths and these will form the basis of efforts to develop strong regional economies. The regional approach outlined in the WSP for other areas of Wales would be supported.

Transport

Day to day transport issues will be addressed through a bottom-up approach. Issues across an area will be brought together to identify regional priorities and regional issues brought together to identify national priorities. Transport investment is seen as a key tool in supporting regeneration and economic objectives.

Natural Resources

Natural resources are considered from a local perspective. They are local assets which help determine the nature and scale of development appropriate in an area. There is no overriding national policy or approach other than the need to ensure they are used in a sustainable way.

Welsh Language

There is support for a modern bilingual society, where the Welsh language is a community attribute. Planning will help provide spaces for community life to flourish. There is no strong alignment between language and prosperity.

Health

Building sustainable communities through tackling inequality, improving health and eradicating child poverty. Creating and sustaining the right set of services and locating the services within or close to key settlements, accessible by public transport.

Benchmark Option - Do Not Prepare the NDF

Relationship with SDPs/LDPS

The position would remain as it currently stands, with SDPs and LDPS having to have regard to the WSP but with a limited relationship in practice. Strategic development plans would be left to define their own strategic objectives in the absence of an all-Wales context. Issues in relation to renewable energy, depopulation and uneven housing development would be dealt with through LDPS in those areas not covered by a SDP (or where an SDP has not yet been prepared).

What are the key assumptions that support this option?

- No national development plan.
- The local development planning system would be the primary tier of plan making and decision taking. In time in parts of Wales, SDPs may be prepared.
- Current trends will continue and progress towards key Welsh Government targets and objectives would remain on their current trajectories.
- Spatially, the national planning policy position would not be changed to reflect the requirements of the Environment and WCFG Acts.
- Regeneration and rural areas will be a major focus.
- Broadband is a relatively minor consideration.
- Housing would be viewed in isolation and not linked to wider objectives.
- Transport objectives would be linked in part to prosperity objectives but not seen as a central component in the delivery of wider objectives.
- Natural resources and energy would be viewed as regional matters, with no national perspective and no priority status.
- Climate change would be a central and priority issue.

Scoring of Assessment	
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)
+	Minor positive – likely to result in limited progress towards the ISA objective
0	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative – likely to work against the achievement of the ISA objective
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)

Table B-10: Appraisal of options against ISA Objective 1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Children's Rights, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where markets are the strongest. This would provide beneficial effects for these areas. Indirect benefits may arise from the development of skills through employment opportunities within the areas of market focus. However, the ISA objective seeks to achieve high levels of education for all members of society. Whilst the option may lead to significant benefits for some, it is unlikely to contribute towards reducing education inequality, and may lead to greater polarisation, particularly in areas of greatest education deprivation such as the valleys or north west Wales. This may negatively affect those who aren't engaged in industries that may be created as part of the market focus. This option does not address the provision of or access to education or training skills provision. There is an opportunity for more specific reference to education and skills development, including how equality in education provision will be achieved, to be included.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option has a very strong focus on reducing inequalities and meeting local needs, seeking to deliver strong local communities. This bottom up approach includes the delivery and provision of access to services and facilities, which could include education and training facilities and lifelong learning opportunities. Positive effects from this option may arise from the provision of social infrastructure across all areas of Wales. Reversing rural depopulation may benefit rural school viability, which would also be positively reinforced by improvements in digital connectivity. This compares positively against the narrow urban focus considered in Option 1. However, there is potential uncertainty in delivery without the economic drivers and strengths that could be achieved under option 1. This could be strengthened should this option be taken forward as preferred.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option has the potential to include access to education and training, particularly in sectors relating to decarbonisation, however, this is not included within the option in its current form. There is a strong emphasis within the option on local community connectivity and reducing the need to travel. This should lead to positive effects on accessibility to education, leading to minor positive effects, particularly in areas that may currently be isolated from services and facilities.
4: A spatial strategy focussed on the	+/-	The option has the potential to include access to education, skills and training, however, this is not included within the option in its current form. Locating development in sustainable locations could improve accessibility to educational facilities indirectly. However, it is less likely

Alternative Option	Score	Commentary
sustainable management of Wales's natural resources		than option 3 to deliver a reduction in inequalities nationally. Alternatively, it could lead to an exacerbation of education inequalities in more rural areas, should the option lead to an increase in the isolation of rural communities for environmental protection reasons.
5: Benchmark Option: Do not prepare the NDF	+	Without the NDF, it is likely that the WSP and other policy initiatives would continue to form the development plan nationally. Current policy looks to address accessibility issues to facilities such as education and recognises the need for investment in education to enable future economic growth. Therefore, positive effects are predicted against this objective.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative, and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 2 scored highest against ISA Objective 1. The testing identified the importance of ensuring the preferred option included: • The creation of more cohesive, equitable communities (P3, P2, PE9, AS1) • The importance of social infrastructure in placemaking (P3, AS1) • Reversing rural depopulation (R1, R2, R3, R4, PE6) • Improvements in digital connectivity (PE3) In response to the potential uncertainty identified by Arcadis in delivery without the economic drivers and strengths that could be achieved under option 1, the preferred option has a strong focus on supporting economic objectives (P3, PE5, PE6, PE7, PE9). Alternative Option 3 also scored positively and highlighted the importance of the preferred option including: • Local community connectivity and reducing the need to travel (P2, AS4, R1, AS1)

Table B-11: Appraisal of options against ISA Objective 2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The increase in prosperity across the strongest market areas may lead to an increase in health benefits in those areas. However, the option is likely to reduce the potential for access to healthcare facilities, limiting good access only to the strong market areas. This could lead to an increase in inequality, between urban and more rural areas, specifically impacting on children and older people and particularly existing areas of deprivation such as the Valleys and North Wales coast, leading to significant negative effects.

Alternative Option	Score	Commentary
		The provision of new infrastructure, focused in existing strong areas of market demand, may lead to an increase in concentrated pollution, leading to negative effects on the health of urban populations. It would be unlikely that this option would create opportunities to adapt to risks to health from climate change, even in areas of growth, as it would not be a priority. The provision of green infrastructure and open space would be based on market provision, which would potentially lead to a reduction in supply. Negative effects from a loss of green spaces through development may result and would have a limited contribution towards healthy lifestyles.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option focuses on a dispersed approach based on local need, which may reduce inequalities and lead to an increased in health benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment, that may have major beneficial effects for physical and mental health. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change and impacts on health. The delivery of small-scale renewable energy could reduce fuel poverty.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option particularly focuses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability, delivering climate change resilience and the resulting health benefits that may result. There is the potential to achieve large scale health benefits through the decarbonisation of the economy, which could result in an improvement in air quality, water quality, and a reduction in other types of pollution that may affect health. Further, the focus on utilising sustainable locations, improving connectivity and increasing sustainable travel methods should increase access to facilities, leading to multiple direct and indirect health benefits. There is the potential for a decrease in health inequalities in rural areas through the focus on locally focused communities.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has the potential to deliver significant land far reaching health benefits through a reduction in air, water, and other types of pollution that may affect health and delivering climate change resilience. The focus on utilising sustainable locations, connectivity, and an increase in green spaces, could lead to multiple direct and indirect health benefits. However, it is unlikely to lead to significant positive benefits in relation to addressing issues that affect health such as isolation, and ageing population, housing quality.
5: Benchmark Option: Do not prepare the NDF	+	Existing policy seeks to improve the delivery of health services, improve access and tackle inequality, which could lead to positive effects against this objective over time.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 2 and 3 scored highest against ISA Objective 2. The testing identified the importance of ensuring the preferred option included: • Improving accessibility within rural communities and reversing population decline (P3, AS1, AS4, R4) • Increasing access to the natural environment (P2, DN3, DN5) • Sustainable communities, well designed and planned (P2, P3, AS1, AS4, R1) • Adaption to risks from climate change / climate change resilience (P1, P2) • Delivery of small scale renewable energy (P2, PE2) • Decarbonisation of the economy (P1, PE8) • On utilising sustainable locations, improving connectivity and increasing sustainable travel methods (P2, AS4)

Alternative Option	Score	Commentary
		- Focus on rural communities (P2, P3, R4, R5) Alternative Options 4 and 5 also scored positively and highlighted the importance of the Preferred Option including: - Reduction in air, water, and other types of pollution (P1, P2, P3, DN2) - An increase in green spaces (DN3, DN5) - Improve the delivery of health services (P2, R3, R4)

Table B-12: Appraisals of alternative options against ISA Objective 3: To create opportunities for an increase in employment across the country and promote economic inclusion

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+	The option seeks to direct growth to the strongest market areas. This will create opportunities to increase employment but is focused on identified growth areas rather than across every part of Wales. Therefore, it is unlikely to contribute to economic inclusion across the country. The option is likely to lead to significant positive effects in relation to improving access to jobs in growth areas, increasing the number of people satisfied with their jobs, and creating opportunities for investment and growth and development of skills, particularly in relation to city regions.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option could lead to an increase in economic opportunities across Wales, but this may be limited by a lack of clear support for economic growth and the markets. Positive effects of the option include supporting job satisfaction and physical access to employment opportunities, but it is noted that it may not create opportunities for investment and growth. The lack of focus on city regions could result in a limited opportunity.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focusses on the sustainable use of land and improving existing urban and rural patterns, including how they can improve their potential to achieve more sustainable development, and delivering sustainable access to job and facilities. To some extent this reflects current national policy and could create opportunities in a more sustainable employment market and increase skills in this type of economy. Further, it could support specialisation and clusters in certain areas. The option looks to deliver regional transport infrastructure that is well connected, and provides active travel opportunities with wider community benefits, supporting city region and growth deals. It is noted that deliverability may be an issue, including associated costs.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+/-	This option may limit growth and therefore employment opportunities, with opportunities being limited to certain parts of Wales. Therefore, this option may limit the potential for social inclusion, particularly in less developed areas that may be afforded greater environmental protection. The delivery of green infrastructure, climate change resilient networks and access to the natural environment, could create attractive places to live, work and invest, providing a regional context and potential support to city regions and growth deals. Positive effects could be achieved through a potential boost in the green growth economy, which may include employment opportunities across rural Wales.
5: Benchmark Option: Do not prepare the NDF	+/-	A regional focus would remain without the NDF, seeking to achieve economic prosperity, including maximising regional strengths, to reduce inequality and deliver prosperity. Delivery would be achieved through regeneration initiatives and existing WG planning policies such as PPW. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region.

Alternative Option	Score	Commentary
		These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 1, 2 and 3 scored highest against ISA Objective 3. The testing identified the importance of ensuring the preferred option included: • Contribute to economic inclusion across the country (P1, P3, PE3, PE5, PE6, AS1) • Improving access to jobs in growth areas (P1, PE4, PE5, PE6, PE7, AS1) • City regions (PE5, PE6, AS1, R3) • Opportunities for investment and growth (P1, PE1, PE3, PE4, PE5) • Support specialisation and clusters in certain areas (R1, R5) • Regional transport infrastructure (PE8, R3, R4)

Table B-13: Appraisals of alternative options against ISA Objective 4: To create opportunities for sustainable economic growth, diversity and business competitiveness

Relevant impact assessments (in addition to SA & SEA): EQIA, Rural Proofing, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	Through directing growth to the strongest market areas, this option may have positive effects on competitiveness and inward investment, which may lead to positive trickle-down effects in some areas. However, the ISA Objective seeks to achieve sustainable economic growth, which is unlikely to be achieved under this option. Opportunities to become more resilient to climate change may only be delivered where they are compatible with the economic growth targets. The option could help to deliver infrastructure in growth areas or where the market demands. However, it is unlikely that the option would contribute to enhancements to the rural economy and rural diversification.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option is sustainable in principle, if it can be delivered. The option supports local economic diversity and delivers small scale infrastructure projects. Further, it is likely to support SMEs, third sector and micro businesses. This option could contribute to enhancements to the rural economy and rural diversification. However, the potential significance of positive effects could be reduced as it is not a 'powerhouse option', which could potentially limit competitiveness and economic growth and investment.

Alternative Option	Score	Commentary
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focuses on land use and improving existing urban and rural patterns, which could support a sustainable economy and growth in sectors associated with this. This could lead to benefits against this objective including the delivery of digital infrastructure and sustainable travel infrastructure. However, the option is potentially limited by the focus being entirely on green growth and decarbonisation. Associated costs, deliverability and technology advancement may limit progress. Further, it is less supportive of some other growth sectors.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	-	The option supports a narrow approach to sustainable growth with limited impact on national prosperity and economic diversity. It focuses on certain parts of Wales, which are likely to be less environmentally sensitive. This could lead to potentially negative effects as current trends of inequalities and lower than average earnings in Wales are likely to continue. This option would look to deliver resilient economic development when facing the risks from climate change, recognising that Wales' natural resources are one of its greatest economic assets.
5: Benchmark Option: Do not prepare the NDF	+/-	Without the NDF, a regional focus to economic growth would prevail, seeking to reduce inequalities and deliver prosperity. However, current trends indicate that the economic output of Wales has lagged behind the UK and is its worst performing region. These issues relate to relatively low employment rate and low earnings, although these have been increasing. Trends in geographical differences such as higher than average deprivation in the South Wales valley and some North Wales coastal towns are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral – against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 2 and 3 scored highest against ISA Objective 4. The testing identified the importance of ensuring the Preferred Option included: • Supporting local economic diversity (P3, PE5, PE6, PE9, PE10, AS1, R1) • Support for SMEs, third sector and micro businesses (P3, PE5, PE6, R1) • Enhancements to the rural economy and rural diversification (P3, PE4, PE5, PE6, AS1, R1, R4, R5) • Support for a sustainable economy and growth in sectors associated with this (P1, PE4, PE5, PE6, R1) • The delivery of digital infrastructure and sustainable travel infrastructure (P3, PE8, AS4, R3, R4) In response to the potential to limit competitiveness and economic growth and investment identified by Arcadis by focusing on green growth and decarbonisation, the Preferred Option has a strong focus on supporting a range of growth and investment opportunities (R1, R3, R5, PE5, PE6, PE9)

Table B-14: Appraisals of alternative options against ISA Objective 5: To contribute towards the future well-being of the Welsh language

Relevant impact assessments (in addition to SA & SEA): Welsh Language, Rural Proofing

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option promotes growth in established areas (SE Wales and NE Wales), which could attract Welsh speakers from Welsh speaking communities. This could lead to a dispersal of communities of Welsh speakers leading to an overall dilution. This could be exacerbated by an increase in connectivity with England to these growth areas. Alternatively, it could lead to the creation or strengthening of Welsh speaking communities in the urban areas. The net loss of Welsh speakers from Wales may be reduced as a more dynamic economy provides opportunities for young adults to remain in Wales.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option could support Welsh speaking communities but is reliant on developing appropriate employment opportunities to achieve this. This may be achieved through a strong focus on investment in local opportunities and a reversal of rural de-population, leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	Creating more sustainable communities may lead to some positive effects on the Welsh language, through improving the potential for more rural communities to become more viable, thereby potentially reducing the movement of Welsh speakers to other areas.
5: Benchmark Option: Do not prepare the NDF	+	Language as a community asset is recognised, but a lack of link to the economy means that the potential impact may be limited. Other initiatives external to planning based on the Welsh Government target, could have a positive effect against this objective. Current trends demonstrate that the number of people using the Welsh languages is increasing.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. Alternative Options 2, 3, 4 and 5 scored highest against ISA Objective 5. The testing identified the importance of ensuring the Preferred Option included: • Strong focus on investment in local opportunities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) • More sustainable communities (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1) • Seeking to reverse rural de-population leading to an increase in the viability and vitality of rural communities, including those that are Welsh speaking (P3, PE2, PE3, PE6, AS1, AS2, AS3, R1, R4, R5)

Table B-15: Appraisals of alternative options against ISA Objective 6: To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	Through this option, economic growth is the main priority; decarbonisation and environmental regulation may only be imposed where they are compatible with the economic growth targets and may limit opportunities to reduce demand and deliver sustainable design. This may lead to some minor benefits, although the reduction of greenhouse gases is not likely to be a priority, so negative effects are likely. Further, the option is likely to lead to an increase in the need to travel as rural growth would have less support.
2: A spatial strategy focussed on creating strong communities across all Wales	+	This option has the potential to achieve positive effects through enabling local renewable energy schemes and reducing the need to travel, which could reduce vehicular greenhouse gas emissions over time. Delivering good quality, energy efficient housing potentially reducing energy demand. However, a lack of national backing and strategic direction could minimise its potential, as it is likely that fewer national scale renewable energy schemes would be likely to be delivered.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	This is the key priority of this option – a broad and all-encompassing focus on reducing harmful emissions and developing a sustainable pattern of living through sustainable design and locational choices.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	In this option, although reducing greenhouse gas emissions is not specifically mentioned, it is likely that a focus on the sustainable management of natural resources will have overall significant positive effects on all aspects of the natural environment, although large scale renewable energy generation may be limited. Climate change adaptation is also likely to be achieved through a natural resources approach. Reducing the need to travel through sustainable located development.
5: Benchmark Option: Do not prepare the NDF	+	Government targets are applied. Some positive effects against this objective may be achieved through existing planning policy and other government initiatives. Existing trends show that greenhouse gas emissions have been steadily falling in Wales, although more action is required to meet existing and future targets. The potential to reduce greenhouse gas emissions whilst accommodating new development and economic growth may not be achieved without strategic direction from the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Options 3 and 4 scored highest against ISA Objective 6. The testing identified the importance of ensuring the Preferred Option included: - Reducing harmful emissions (P1, P2, P3, DN2, DN5, PE8) - Developing a sustainable pattern of living through sustainable design and locational choices (P1, P2, P3, DN2, AS1, R3, R4) - Sustainable management of natural resources (P1, P3) - Reducing the need to travel through sustainable located development (P1, P2, P3) Alternative Options 2 also scored positively and highlighted the importance of the preferred option including: - Enabling local renewable energy schemes (P2, PE2) - Reducing the need to travel (P2, P3, PE3, AS4)

Table B-16: Appraisals of alternative options against ISA Objective 7: To contribute to the reduction and management of flood risk

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option promises protection and resilience in vital economic sectors and areas. However, it may follow that protection and resilience against flood risk would not be offered on a wider basis, which could lead to negative effects in some communities. Further, the city region areas include large areas of land that are subject to high flood risk, which could lead to negative effects. An increase in greenfield development in these areas and a lack of potential provision of sustainable design include sustainable drainage and green infrastructure, could lead to negative effects.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option doesn't specifically mention flood risk. However, the dispersed growth strategy could have a positive impact, as it may reduce the growth of populations in the urban areas of Wales that are at risk of flooding. Further, it is likely to include measures to support other communities that may be at risk of flooding. Sustainable growth may also lead to a reduction in an increase in flood risk.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	Sustainable management of flood risk, and increased resilience in appropriate areas, are at the heart of this option. Sustainable drainage solutions are key, and a positive relationship between built environment and water is encouraged. The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by and build resilience to these. Coastal processes including sea level rise would influence settlement strategy. The option also seeks to build climate change resilience into communities, businesses, and the natural environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option includes significant emphasis on the climate change resilience, based on the Environment (Wales) Act, which positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate change. The option prioritises sustainable drainage systems and sustainable flood management. A strategy focussed on the sustainable management of natural resources is likely to lead to significant positive effects against this objective.
5: Benchmark Option: Do not prepare the NDF	+	Flood risk is a significant issue in Wales including coastal, fluvial and surface water flooding. Without the NDF, the current approach to flood risk management would be maintained, which could help to protect communities and business from flood risk over time. However, the potential for significant national strategic approaches to flood risk to be aligned with development management may be missed.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 3 and 4 scored highest against ISA Objective 7. The testing identified the importance of ensuring the Preferred Option included: • Sustainable management of flood risk (P1, P2, DN1, DN2, PE1, PE8) • Anticipating and adapting to the risks from climate change (P1, P2, DN1, DN2, PE1, PE8) • Sustainable management of natural resources (P1, P2, DN1, DN2, PE1, PE8) • Building climate change resilience into communities, businesses, and the natural environment (P1, P2, DN1, DN2, PE1, PE8)

Table B-17: Appraisals of alternative options against ISA Objective 8: To create opportunities to encourage the protection and improvement of air quality

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option is likely to result in intensification of development in areas around the motorway and trunk road network which have the lowest (worst) air quality levels. A likely consequence of the option is that air quality may become worse in some of the most urban areas and may even result in new Air Quality Management Areas (AQMAs) being created. There is potential for areas of worsened air quality to coincide with more vulnerable communities within the city region focus areas. However, air quality in less developed areas is likely to remain unchanged. The option promotes little investment in reducing the need to travel in less accessible areas (such as rural areas) which suggests that a continued focus on private car journeys would prevail.
2: A spatial strategy focussed on creating strong communities across all Wales	++	This option could reduce travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities. Sustainable communities are proposed which seek to reduce the need to travel and hence may reduce vehicular emissions. Further, it would encourage walking, cycling and working from home. This could lead to improvements in air quality including the development of community owned renewable energy initiatives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option identifies air quality as a priority. Further, the option includes an objective to reduce the need to travel and ensure connectivity and accessibility; these key priorities make a clear link to the need for air quality improvements for all projects.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	Improving air quality is a key priority for the option together with wider environmental protection. As with options 2 and 3, there is a focus on sustainable travel and a development pattern which reduces the need to travel is expected. It is also assumed that this option is relatively lower growth compared to option 1, so the extent of vehicle and industrial emissions is also expected to be lower. However, it is noted that it is not a 'low growth' option by intent. Significant beneficial effects are likely to result from the implementation of the option both directly and indirectly.
5: Benchmark Option: Do not prepare the NDF	+/-	This option would see a continuation of existing trends in air quality. Whilst air quality is good in Wales generally, there are areas, particularly in the south that suffer from poor air quality, notably in relation to road traffic. Some of these areas also correspond with some of the most deprived communities in the south. Over time, air pollution is expected to decline as a result of continued regulation and, in particular the uptake of cleaner vehicle technologies. However, the volume of road traffic is expected to increase in the near future particularly in the city regions (Cardiff, Swansea and north east) which already suffer from the poorest air quality overall. However, the Welsh Government decarbonisation agenda may reduce growth to some degree.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2, 3 and 4 scored highest against ISA Objective 8. The testing identified the importance of ensuring the Preferred Option included: - Reducing travel along main traffic corridors within the larger urban areas and help disperse this across a wider spread of communities (P1, P2, P3, DN2, PE8, R1) - Reducing the need to travel (P1, P2, P3, AS1) - Encouraging walking, cycling and working from home (P1, P2, P3, PE3, AS4) - The development of community owned renewable energy initiatives (P1, P2, PE2)

Table B-18: Appraisals of alternative options against ISA Objective 9: To create opportunities to protect and enhance the quality and quantity of water features and resources

Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change		
Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to direct economic growth to the strongest market areas and deliver infrastructure to support this growth. This could have a negative impact on water resources in those areas, not least because the option is likely to involve the development of (potentially large) greenfield sites. Little is expected in terms of the provision of green infrastructure, SuDS etc. The negative impacts on water resources in these growth areas include an impact on water resource, the coast, a physical impact on watercourses from pressures on water use and effluents. Further, climate change could exacerbate impacts. The impact will however depend on the location and delivery of development. Standard mitigation measures will be required for new development, however, and the role of statutory bodies (NRW) and other planning policies (PPW) will still apply. Conversely, less development is likely to take place in more isolated rural areas which would, on the whole, limit the impact on water resources and quality in those areas.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option focuses on a local focus of development in settlements spread across Wales. Housing delivery is expected to include energy and water efficient designs. The option would deliver development across Wales at a smaller scale, which could be within the capacity of natural resources of an area although it is also expected that this would need to involve greenfield sites given the rural nature of much development. This bottom up approach could help to ensure capacity or thresholds not exceeded subject to standard mitigation measures being applied. The option is also heavily focused on resource efficiency and includes both SMNR and Sustainable Development principles.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option looks to deliver sustainable development and promotes sustainable drainage, which would be beneficial for water resources and quality. There are possible impacts on watercourses from hydropower/tidal lagoons and an increase in (sustainable) rural development. However, the option identifies that the contribution of rural and upland areas towards water management will be of national importance and the NDF will provide a framework to facilitate appropriate management. The option also supports SMNR principles including water efficiency and reducing pollution. This is likely to improve the sustainability of any new development from a spatial and project specific perspective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option would seek to deliver the SMNR principles including efficient water use and the reduction of pollution, avoiding impacts. It has a very strong focus on preserving the natural environment which would include water quality and resources, despite also promoting a degree of rural development. It recognises how the natural environment underpins economic sustainability. The use of sustainable drainage systems will help to deliver water resources and water quality benefits.
5: Benchmark Option: Do not prepare the NDF	+	This option is focused on natural resources from a local perspective, ensuring they are used in a sustainable way. This could ensure they are within the capacity of natural resources of an area. This locally focused approach would ensure capacity or thresholds are not exceeded. In 2015 39% of water bodies in Wales were classified as being of 'good' ecological status, a slight drop since 2014 but still significantly better than in England. It is anticipated that a continuation of current policies and regulation would help to improve water quality in the future following current development patterns.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		Alternative Option 4 scored highest against ISA Objective 9 and Options 2 and 3 scored positively. The testing identified the importance of ensuring the Preferred Option included: • Efficient use of water and the reduction of pollution (P2, P3, DN1, DN2) • Preserving the natural environment which would include water quality and resources (P2, P3, DN1, DN2) • Supporting SMNR principles (P3, DN1, DN2)

Table B-19: Appraisals of alternative options against ISA Objective 10: To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option has a strong support for delivering digital infrastructure (as do all options) and large infrastructure projects such as the Metro. There could be a negative impact on rural areas, with the focus of the option being on the larger urban areas and city regions. Consequently, this does not address issues of rural isolation. It is not a community focussed option, so any benefits realised would only be secondary to economic aims. These are also only likely to be realised in the city region areas. The option does not address active travel and the reduction of risks from climate change.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option seeks to deliver active travel and reduce private car use, through a community focus, with jobs and services being accessed locally. Digital connectivity is a priority. The option is particularly focussed on addressing areas of need, including providing social infrastructure for more deprived communities and in rural areas thereby reversing population decline. These measures could lead to significant positive effects against this objective.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option seeks to deliver active travel and reduce private car use, through a focus on land use, the relationship between different uses, and the connectivity between them. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects against this objective. Walking, cycling, rail electrification and public transport would be prioritised. All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	This option is not considered to be as strong as options 2 and 3 with regards to connectivity, as the focus relates more to the management of the natural environment. However, there is a potential for active travel to be promoted through the aims of this development option. It also promotes sustainable rural development which can also benefit community retention. All options seek to support the provision of new digital infrastructure which can help to reduce social isolation issues.
5: Benchmark Option: Do not prepare the NDF	+	Access to services and transport accessibility is currently weakest in rural areas of Wales although the WSP and National and local transport plans continue to provide a strong focus on improving this. Transport currently follows a largely bottom-up approach and transport investment is seen as a key priority for regenerating and connecting communities.
Developing the Preferred Option		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the preferred option. All testing results – positive, negative and

Alternative Option	Score	Commentary
(Welsh Government Comment)		neutral –against all the options have been considered in developing the preferred option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 2 and 3 scored highest against ISA Objective 10. The testing identified the importance of ensuring the Preferred Option included: • Supporting active travel (P2, AS4) • Reducing private car use (P1, PE3, AS1, R1) • Ensuring jobs & services are accessed locally (P3, PE3, PE6, AS1, R1, R3, R4, R5) • Providing social infrastructure in deprived communities (P2, P3, PE9, R1, R3, R4) • reversing rural population decline (PE3, PE6, AS1, R1, R4, R5) • Ensuring connectivity between uses (AS1, R1, R3, R4) • Prioritising walking, cycling, rail electrification & public transport (P2, PE8,)

Table B-20: Appraisals of alternative options against ISA Objective 11: To create opportunities within which an improvement in social cohesion and equality can be achieved

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The option is economically focused with benefits only likely to be experienced by some members of the larger urban communities which would benefit from investment. This, is likely to reinforce or exacerbate existing inequalities. The urban focus of the option does not benefit all members of society including children and protected characteristic groups, including those in more rural areas or other communities that would receive little investment under this option. This is likely to make issues of rural de-population and isolation worse.
2: A spatial strategy focussed on creating strong communities across all Wales	++	This option is the opposite of Option 1 and is far more locally focused. It actively seeks reduce inequalities, as it seeks to deliver improved access for all to a range of facilities, services and housing. These benefits could be felt in communities across Wales including more isolated rural areas. Positive effects from the option could also come from delivering good design and increasing access to nature.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option aims to reduce the need to travel and reduce fuel poverty. This includes aims to sustain social infrastructure, housing and employment in rural areas. These are positive measures which work towards achieving social cohesion and maintaining community spirit. However, the option has little focus on children or protected characteristics beyond this.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option could achieve benefits to for social cohesion through creating a strong sense of place and increasing connectivity between communities through green infrastructure. Benefits relating to the reduction in inequalities are unclear, although a reduction in pollution and increase in access to greenspace overall, could lead to a reduction in geographical and subsequent health inequalities for some communities. The option has little focus on children or protected characteristics beyond this.

Alternative Option	Score	Commentary
5: Benchmark Option: Do not prepare the NDF	+	The Welsh planning policy framework seeks to build sustainable communities through tackling inequality, improving health and eradicating child poverty. It is anticipated that this would continue under a no-NDF scenario, although the significance of the potential benefits is unclear, and would benefit from a strategic approach, which could be provided through the NDF.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 2 scored highest against ISA Objective 11 and Options 3 and 4 scored positively. The testing identified the importance of ensuring the preferred option included: • Reducing inequality (P2, P3, DN2, PE9, AS1, R1) • Ensuring access for all to facilities, services & housing (P2, P3, PE3, AS1, R1) • Focusing on supporting rural areas (P3, PE2, PE6, R4, R5) • Reducing health inequalities (P1, P2, P3, DN, AS42, R4)

Table B-21: Appraisals of alternative options against ISA Objective 12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs

Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support economic growth in areas where the markets are the strongest (primarily likely to be focussed in the south and north-east). This would lead to the delivery of housing but due to this focus on the strongest market areas, this is unlikely to meet housing needs across much of the rest of Wales beyond local needs only. This is therefore not a balanced option in terms of meeting housing needs. The market focus also has the potential to limit the range and type of housing proposed unless this can be carefully controlled within the NDF.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a strong focus on local housing delivery across Wales. In particular affordable, energy efficient housing would be a key consideration, ensuring all in the local community have access to good quality, affordable housing. It also recognises the need to deliver housing through local, self-build initiatives achieving a community led approach. The option performs strongly against multiple elements of the ISA Objective. However, it has not been assigned a major positive assessment as the option may be detrimental to large scale housing delivery where it is required. It appears more focussed on local needs only with the assumption that this would be smaller scale.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	The option seeks to deliver sustainable development and could lead to the development of quality homes with regards to meeting energy efficient design. It is about a sustainable focus towards the delivery of housing being in the right locations and as part of wider social, economic, cultural and environmental uses. This is positive in terms of some aspects of the ISA Objective. However, a potential concern relates to whether sufficient delivery of housing for a full range of needs would be achieved. Meeting a range of housing needs does not seem to be the focus of this option.

Alternative Option	Score	Commentary
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	-	This option is also focussed on identifying sustainable locations for new housing and ensuring high standards of sustainable design in the context of the natural environment. The potential effect of this could be that insufficient housing is delivered of appropriate types and in appropriate areas to meet identified needs.
5: Benchmark Option: Do not prepare the NDF	+/-	Continuation of current planning policy would seek to deliver housing across Wales. However, viability concerns may mean that the focus of development would continue to be on the urban areas, exacerbating current deprivation trends. There is an opportunity for housing to be linked strongly to wider objectives. This opportunity may be missed should the NDF not be developed.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2 scored highest against ISA Objective 12. The testing identified the importance of ensuring the preferred option included: • A focus on delivery across Wales (P2, P3, AS1, AS2, AS3, R2, R3, R4) • Providing good quality, affordable housing to meet people's needs (P2, P3, AS1, AS2, AS3) The testing of the options identified concerns regarding delivery, larger scale house building and meeting identified needs. Parts AS3 and R2 of the preferred option address these issues, seeking through the NDF to provide national and spatial direction for the delivery of housing across Wales.

Table B-22: Appraisals of options against ISA Objective 13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscape and seascapes

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option seeks to direct growth to the strongest market areas and seeks to support economic growth in areas where markets are the strongest. This will include providing the infrastructure required to support growth, which could have a negative effect on landscape and townscape quality; noise and light pollution; and areas of tranquillity. This will take a top down approach, which may not strongly consider local landscape or townscape quality, with a focus on national interests. The option may also lead to the review of landscape designations, where they may prevent growth and the delivery of physical infrastructure. This may include local, national or international designations. Agricultural land could be released for other uses including the best quality land. This could lead to significant negative effects on landscape considerations over the short, medium and longer term. The only reason a major negative assessment has not been made is that this option is likely to lead to very little development in the more rural and existing higher quality landscapes within Wales.
2: A spatial strategy focussed on creating strong communities across all Wales	+/-	The option focusses on a dispersed approach, which, 'does not seek to prioritise one area over another'. Bottom up approaches to local and national development schemes could reduce the ability of the national government to regulate the protection of nationally important landscapes, townscape and seascapes. Further, the potential development of areas across the entire country could lead to a cumulative loss of tranquillity and dark skies and development may occur in slightly more sensitive areas (although major landscape

Alternative Option	Score	Commentary
		protection designations would still exist) than if development were to occur solely within city-regions. However, conversely, the schemes that may be promoted are likely to be of a smaller and more local scale, promoting active travel modes. Further, they could reduce the need for national level infrastructure interventions, through the development of locally sustainable communities that reduce the need for travel. This could provide benefits for landscape assets on a national as well as local level. Positive effects could be achieved through the potential creation of opportunities to promote sensitive, place-responsive design in development, in terms of being reflective of the requirements of the local community.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option particularly focusses on land use and improving existing urban and rural patterns, and how they can be adapted to improve their sustainability. Overall, the principles of the option are considered to be in line with the ISA Objective, and could provide opportunities for the protection and enhancement of townscape character and quality including historic townscapes. The NDF will support major changes to urban form and development patterns, to contribute to the realisation of a low-carbon economy. What this means in terms of built development is unclear and could mean the development of increased housing and infrastructure in 'sustainable' locations, thereby potentially having a negative impact on landscape; noise and light pollution; and areas of tranquillity. The option states that the option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments have potential to have significant landscape (and townscape and seascape) and visual impacts although this will depend on the design and location. The option description goes on to state that green networks and infrastructure will be supported. This could have significant positive effects against this objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option seeks to build greater resilience into ecosystems and biodiversity, which could have positive indirect effects on biodiversity. The option goes on to recognise that the natural environment and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales. It would seek to enhance landscapes and natural resources for the multiple well-being benefits they provide. It would particularly support landscapes, and local facilities such as parks, playgrounds and other green spaces. Development that would undermine the integrity of landscapes would be strongly resisted and would be directed towards less culturally sensitive locations. This could lead to significant benefits against this objective.
5: Benchmark Option: Do not prepare the NDF	-	Landscape (and townscape/seascape) protection is encouraged through the WSP, PPW and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the preferred option. Alternative Option 4 scored highest against ISA Objective 13. The testing identified the importance of ensuring the Preferred Option included: • Recognising the importance of the natural environment and landscapes (P1, P3, DN1, DN2, DN3, DN4, PE10) • Enhancing natural environment and landscapes (P1, DN1, DN2, DN3, DN4, PE10) • Recognising the importance of local facilities and spaces (P2, DN3, DN5, AS1)

Table B-23: Appraisals of alternative options against ISA Objective 14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings

Relevant impact assessments (in addition to SA & SEA): HIA

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	-	The option seeks to direct growth to the strongest market areas. This will include providing the infrastructure required to support growth, which could have a negative effect on any heritage assets in those areas. The option does not focus on heritage protection and as such is unlikely to steer development away from sensitive areas. It is also likely that limited development would occur (other than for local needs) across large areas of Wales, thereby avoiding any potential heritage impacts in those areas. The option may still lead to heritage led regeneration, if this is considered to be economically advantageous, although it is also likely that economic led development could override the value of heritage designations or assets.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has more of a community focus which has potential to lead to existing culture and heritage being recognised and promoted through a community led approach. A minor positive impact is assigned to the ISA Objective as it is considered that there would only be limited progress towards the objective as it is questioned whether a local level focus would deliver national objectives.
3: A spatial strategy to deliver decarbonisation and climate change objectives	?	The option has uncertain effects on heritage assets. The focus on renewable energy, energy storage and transmission may affect historic landscapes, whereas locating development in sustainable locations could discount these areas from such development, it will be dependent on the delivery. Positive effects could be delivered through the potential for an increase in sustainable access to the historic environment.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option has uncertain outcomes which would be dependent on the delivery. The option is focused on SMNR principles; however, it is considered that if there were a physical overlap between these areas there could be a positive effect on heritage. Further to this, the option supports tourism, which could have potential heritage benefits if delivered sensitively and appropriately. There is uncertainty over the delivery of renewable energy and its impact on the historic environment. It is considered that there is a greater chance of positive effects from this option than in comparison to option 3.
5: Benchmark Option: Do not prepare the NDF	+	Protection of the historic environment is encouraged through the WSP, PPW and is enforced by Cadw in addition to local authority planning powers. This option looks to conserve and celebrate Wales' unique heritage, recognising the need for high quality environments to create communities. However, new development and infrastructure will continue to cumulatively put pressure on the historic environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The preferred option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 2 and 4 scored highest against ISA Objective 14. The testing identified the importance of ensuring the Preferred Option included: • Recognising the importance culture and heritage (DN3, DN6, PE10) • Recognising the importance of historic landscapes (DN3, DN6, PE10) • Recognising and considering the relationship between heritage and other objectives (e.g. energy) (DN3, DN6, PE10)

Table B-24: Appraisals of alternative options against ISA Objective 15: To create the opportunities for the protection and promotion of Welsh culture

Relevant impact assessments (in addition to SA & SEA): HIA

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to support growth in economic areas where markets are the strongest could have both positive and negative effects, which are dependent on the location and viability of development. There is potential to have cultural-led regeneration. There is potential that the strategy may not recognise local culture in national projects or ignores areas where they are not economically attractive, which could lead to negative effects against this objective.
2: A spatial strategy focussed on creating strong communities across all Wales	+	The option has a local focus which could support distinctive communities and actively contribute to Welsh cultural capital. There could be, however, fewer opportunities for culture led regeneration due to the dispersed nature of the option and the potential lack of economic viability of schemes.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+	The option focuses on improving urban and rural patterns of development, which may lead to an increased local focus which could strengthen Welsh culture in these areas. An indirect effect, through increasing sustainable travel, may increase access to cultural heritage assets and activities. The option raises the question around the potential for re-use of buildings/places leading to cultural access/regeneration to help deliver the decarbonisation agenda.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	+	The option seeks to build greater resilience into ecosystems and biodiversity and this protection and enhancement of the natural environment may lead to existing cultural practices being maintained rather than eroded. This option recognises the natural environment and landscape as a distinctive part of Welsh culture.
5: Benchmark Option: Do not prepare the NDF	+	The option focuses the promotion of culture at the local level. Recognising the links to economic prosperity but this is not identified as a priority.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Options 2, 3 and 4 scored highest against ISA Objective 15. The testing identified the importance of ensuring the Preferred Option included: • Ensuring a local focus (P3, DN6, PE6, R1, R3, R4) • Improving access to cultural heritage assets and activities (P2, P3, DN5, DN6, AS1, AS4, R3, R4) • Recognising the natural environment and landscape as a distinctive part of Welsh culture (DN1, DN3)

Table B-25: Appraisals of alternative options against ISA Objective 16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	+/-	The option seeks to direct growth to the strongest market areas and deliver Infrastructure development to support this growth. This could impact on habitats, species and biodiversity in the growth area, especially as large greenfield sites are anticipated to be developed under this option. Mitigation and avoidance measures would be needed. However, it is more likely that the growth areas would be of relatively more limited conservation value due to them already being affected by urbanisation. In addition, those areas outside of the key growth areas would be less likely to receive development (beyond local needs). This would include more rural areas that are, in general terms, often more sensitive or valuable in conservation terms. Significant negative impacts may arise if economic growth takes precedence over internationally/nationally designated sites although it is not clear if this is a potential outcome of the option. Further, the option does not recognise the value of Wales' biodiversity/geodiversity and is unlikely to deliver resilient ecosystems in the growth areas. This may also potentially impact on adaptation to climate change.
2: A spatial strategy focussed on creating strong communities across all Wales	+	Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities. The carrying capacity of the natural environment could be considered by bottom up approach, supporting SMNR principles so will include ecosystem resilience. Opportunities would exist could deliver active travel, including corridors for wildlife. It is shaped by sustainable development principles.
3: A spatial strategy to deliver decarbonisation and climate change objectives	+/-	Compared to option 1, the option may result in lower levels of growth, although it is noted that this is not a 'low growth' option. There is some uncertainty over whether this might result in cumulatively more impacts on biodiversity/geodiversity as many of these areas could include undeveloped greenfield sites near to existing rural communities. The option builds on the resilience of ecosystems and address loss of habitats and vegetation. There are benefits to biodiversity in the long term through adaptation to climate change. The option could have potential local impacts on biodiversity due to renewable energy development however, mitigation could be possible. The option sets out nature-based solutions which will benefit biodiversity and help to deliver ecosystem resilience.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	The option focuses on building greater resilience to ecosystems and biodiversity with the prioritisation of natural resources implications in decisions. It could create habitats and networks and seeks to avoid any negative impacts on the natural environment. It has a very strong focus on environmental protection.
5: Benchmark Option: Do not prepare the NDF	+	Biodiversity and geodiversity protection is encouraged through the WSP, PPW, national/international law and is enforced by NRW in addition to local authority planning powers. However, new development and infrastructure will continue to cumulatively put pressure on the natural environment in the future and the NDF provides a strong opportunity to provide more strategic direction and protection compared to existing mechanisms.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral –against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option. Alternative Option 4 scored highest against ISA Objective 16 and Option 2 scored positively. The testing identified the importance of ensuring the Preferred Option included: • Building resilience to ecosystems and habitats (P1, P2, P3, DN1, DN2, DN4)

Alternative Option	Score	Commentary
		Prioritising natural resource implications (P1, P2, DN1, DN2, DN4)

Table B-26: Appraisals of alternative options against ISA Objective 17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value

Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change, Economy

Alternative Option	Score	Commentary
1: A spatial strategy focussing growth in the strongest market areas	--	The option is not driven by SMNR principles therefore there is potential for development in the growth areas to be led by primarily economic goals rather than those reflecting, for example, resource protection, sustainable materials use, minerals protection etc. This has potential for such development to adversely affect the achievement of this ISA Objective. There are positive messages including supporting the circular economy and the recognition of environmental quality as a strong driver of growth, but this would be likely to be outweighed by the drive for growth in other objective areas.
2: A spatial strategy focussed on creating strong communities across all Wales	++	The option strongly supports the principles of SMNR which is assumed to mean that this ISA Objective could be strongly achieved.
3: A spatial strategy to deliver decarbonisation and climate change objectives	++	The option supports the core SMNR principles and nature-based solutions. There is a clear aim to increase resilience in ecosystems and habitats through this option, which could lead to significant positive effects on this ISA Objective.
4: A spatial strategy focussed on the sustainable management of Wales's natural resources	++	This option is strongly focussed on the sustainable management of natural resources, leading to a direct correlation for the achievement of significant positive effects for this ISA Objective.
5: Benchmark Option: Do not prepare the NDF	+/-	The protection of natural resources is underpinned by policy and guidance in the WSP and PPW. The Environment (Wales) Act 2016 puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way. Part 1 of the Act – Sustainable management of natural resources (SMNR) – enables Wales' resources to be managed in a more proactive, sustainable and joined-up way. However, new development and infrastructure will continue to cumulatively put pressure on resources and not producing an NDF would be an opportunity missed to provide the required levels of strategic guidance (including principles of the SMNR) to development plans.
Developing the Preferred Option (Welsh Government Comment)		The Preferred Option was developed using the evidence gathered across the NDF process, including public engagement, and through the ISA process. The process is iterative and the testing helped to shape the development of the Preferred Option. All testing results – positive, negative and neutral – against all the options have been considered in developing the Preferred Option. Highlighted here are many of the positive findings and how they have shaped the Preferred Option.

Alternative Option	Score	Commentary
		Alternative Options 2, 3 and 4 scored highest against ISA Objective 17. The testing identified the importance of ensuring the Preferred Option included: • Support for the principles of SMNR (P1, P2, DN1, DN2, DN3, PE1, PE4, R1) • Support for nature-based solutions (P1, P2, DN1, DN2, DN5) • Increasing resilience in ecosystems & habitats (P2, P3, DN2, DN4)

Appraisal of the Preferred Option (February 2018)

The Interim ISA Report that accompanied the Issues and Options NDF in April 2018 provided an appraisal of the preferred option (appraisals were carried out in February that year), the results of which are presented below.

ISA Objective	Score	Commentary
1: To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Children's Rights, Economy</i>	+	The Preferred Option for the NDF Preferred Option sets out that 'learning' is part of its foundation. The core element of the Preferred Option is 'Placemaking'. This 'theme' sets out that the NDF and other development plans must 'co-ordinate delivery of infrastructure to ensure essential services, including health and education, are connected and accessible.' Further text sets out that economic inequalities must be addressed, which could include education levels. Strategic policies AS1 and R4 (specifically for rural areas) seek that the development of housing is linked to key facilities, including education. Positive effects in relation to the achievement of a potential increase in levels of participation in education as a result of the Preferred Option are predicted. Economic growth policies (such as PE4, PE5 and PE6) could also lead to indirect positive effects through the growth of skills. PE9 requires that regeneration activities focus on building places that, <i>inter alia</i>, create jobs and enhance skills and employability, which could lead to further positive effects against this objective. It is suggested that further detail could be included to improve the significance of positive effects. This might include the mention of the development of skills in key growth sectors, as part of their strategic development, leading to lifelong learning opportunities. Although this is mentioned as part of the 'placemaking' theme, and under PE9, it is suggested that it would be useful for it to also be included within the strategic policies relating to growth sectors.
Welsh Government Comment		Skills are addressed within Policy PE5 and the infrastructure required to support the growth in economic sectors. These policies will be expanded upon further in the next stage of the NDF, draft plan. Therefore, no change is required.
2: To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health	++	Part of the foundation of the NDF is the long-term aim of building a Wales that is 'healthy and active'. The overarching 'Placemaking' theme seeks that the focus of the NDF includes 'health and well-being and cohesive communities', which are likely to provide the foundation for significant positive effects against this objective. The NDF seeks to provide a strong policy framework, to ensure that physical and mental health and well-being outcomes, for both current and future generations, are central to spatial decision making. The regional approach seeks to recognise that disadvantaged and deprived communities are not disproportionately impacted by health inequalities and it may lead to an increase in access to health and social care services, especially in rural areas. Added to this, the decarbonisation and climate change agenda seeks to build national resistance to the effects of climate change, which is likely to lead to cumulative and long-term health and well-being benefits. Policies in relation to

ISA Objective	Score	Commentary
inequalities across Wales <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural proofing, Children's Rights</i>		active travel and community connectivity (AS1, AS4, R3 and R4) and green infrastructure (DN5), high quality housing (under the Health and Well-being element of the Placemaking theme and strategic policy AS2, which seek to meet community needs) and other environmental improvements (such as those included in strategic policies DN1, DN2, DN3, DN4, DN6, PE1) and economic sector and regeneration support under strategic policies PE6 and PE9, are likely to have significant benefits against this objective by addressing a range of the overall determinants of health and having particular benefits for vulnerable groups. Active travel initiatives could lead to a decrease in greenhouse gas emissions, air, noise, land and water pollution, leading to indirect benefits, added to the potential direct physical and mental health and well-being benefits arising from formal and informal physical activity. It is recommended that further detail in relation to what will be considered as part of the national green infrastructure could be included within the Preferred Option, specifying that it would incorporate active travel infrastructure, as well as high quality and biodiverse green spaces, to improve communities' access to natural green space.
Welsh Government Comment		Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.
3: To create opportunities for an increase in employment across the country and promote economic inclusion <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change, Economy</i>	++	'Sustainable Places' is the goal of the NDF. Connectivity and digital infrastructure are elements of this, which could increase physical access to employment opportunities for an increased number of communities across Wales. The overarching 'placemaking' theme also highlights that economic inclusion is an important principle of the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. This could lead to significant benefits against this objective. The strategic policies under the 'Productive and Enterprising Places' theme could lead to benefits against this objective. Strategic policies PE5, PE6, PE7 and PE9 could lead to economic improvements that could lead to positive effects for employment and economic inclusion PE5 recognises the importance of high value advanced science and technology sectors to the economy, which could create skilled high-income workers. PE6 supports foundational sectors where there are clear opportunities for growth in investment and employment. Strategic policy PE3 (relating to digital infrastructure) could enhance inclusive employment, through providing opportunities for a wider range of communities to participate in employment by providing the infrastructure necessary to support this across the country. Policies relating to support for rural areas, such as R4, could lead to similar benefits. Improvements to the transport network (such as PE8) and improving the connectivity of communities, such as AS1, which supports the aim of providing better jobs closer to home, could also lead to positive effects against this objective. Support for city regions is reflected in policy R3 of the Preferred Option, which could lead to positive effects against this objective. PE6 provides some sector specialisations, although it is unclear as to whether this is the extent of the sectors that the NDF would like to target. It is recommended that similar content for other types of sectors would be useful, should other sectors also be of national importance in the context of the NDF. This could lead to an improvement in the range of employment types across Wales, which could lead to an increase in job satisfaction and skills.
Welsh Government Comment		Policy PE6 has been amended to ensure it addresses growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan. There are no changes required at this stage,
4: To create opportunities for	++	One of the key aims of the Preferred Option is that Wales will become prosperous and secure. A key element of this is the transition to a low carbon economy, which could bring opportunities that would create a wide range of benefits. Another key

ISA Objective	Score	Commentary
sustainable economic growth, diversity and business competitiveness <i>Relevant impact assessments (in addition to SA & SEA): EQIA, Rural Proofing, Climate Change, Economy</i>		element of the NDF is to deliver the physical infrastructure (PE5 and PE8), including digital infrastructure (PE3), to support growth, which could lead to significant positive effects against this objective and encourage inward investment. The provision of a framework to support the transition to a low carbon economy and the circular economy (PE1, PE2, PE3 and PE4) could also lead to significant benefits against this objective. The regional approach, including identifying city regions and growth deal areas, could lead to further economic benefits, providing a strategic focus for investment. The policies within the Preferred Option build upon the overall strategy and includes the need for NDF policies to promote national and foundational growth sectors (PE5, PE6); cross-border spatial economic development (PE7); rural economic development (R4); as well as regeneration activities (PE9), which could cumulatively lead to significant benefits against this objective. Strategic policy DN2 seeks that new development is more resilient to the effects of climate change. Alongside other measures within the Preferred Option, this could lead to positive benefits against this objective. See recommendation under ISA Objective 3 in relation to growth sectors and the encouragement of innovation and inward investment within the regions. This could help to provide greater direction for diversification within the economy and enable the delivery of the decarbonisation agenda more effectively. It is suggested that the content of policy R5 could be widened to support all businesses, as it may not just be rural enterprises that are affected post-Brexit. Further, it is suggested that text relating specifically to the sustainable management of agriculture and rural businesses would be prioritised.
Welsh Government Comment		It is noted that PE5 and PE6 address growth in economic sectors including the foundational sectors. These will be expanded upon further in the next stage of the NDF, draft plan. It is considered that policy R5 as drafted does cover all businesses and not just rural business. The Preferred Option provides a supportive economic framework recognising the potential impact from Brexit on rural areas. There are no changes required at this stage.
5: To contribute towards the future well-being of the Welsh language <i>Relevant impact assessments (in addition to SA & SEA): Welsh Language, Rural Proofing</i>	+	The 'Placemaking' theme of the Preferred Option sets out that the NDF Preferred Option is focussed on three spatial aspects, one of which includes the Welsh Language. As decisions must demonstrate that they are compatible with the Placemaking theme in the first instance, this could lead to positive effects against this ISA objective. Measures to provide housing and employment and improve the connectivity within communities could reduce outmigration of people from Welsh speaking communities, improving viability and vitality in these areas. This could lead to positive effects against this objective. The goal of the Welsh Government of a million Welsh Speakers by 2050 could be incorporated into the text, as the renewable energy goal is included.
Welsh Government Comment		This goal has been included within the Preferred Option in the Place making section under 'Cohesive Communities & Welsh Language'
6: To create opportunities within which greenhouse gas	+/-	Decarbonisation and climate change is one of the three spatial aspects of the Placemaking theme, and aspects relating to this are integrated throughout the Preferred Option. Measures such as a transition to a low carbon economy (PE4), supporting the Welsh Government's strategic decarbonisation goals, could lead to significant benefits. This could be compounded by the strong focus of

ISA Objective	Score	Commentary
emissions can be reduced and limited and encourage energy efficient and sustainable design <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change, Economy</i>		the Preferred Option to improve the connectivity of communities through active travel measures (AS1, AS4, R3 and R4), the decarbonisation of transport (part of PE8), generation of energy from low carbon energy sources (PE1, PE2), and the implementation of green infrastructure measures (DN5) and other environmental enhancements (DN3 and DN4). However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5 and part of PE8), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, although this is uncertain. Further, although 'high quality' housing is mentioned in the 'Placemaking' theme, this is not included within the strategic policies, which could lead to potential uncertainty in delivery. It is recommended that reference to the sustainable design of built development is included within the Preferred Option. It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives. See recommendations relating to the diversification of the economy under ISA Objective 4.
Welsh Government Comment		The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF. It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage. Response to recommendation for Objective 4 is covered in Objective 4.
7: To contribute to the reduction and management of flood risk <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>	+	A key focus of the Preferred Option is the 'Placemaking' theme, which is to provide the foundation of all spatial choices. Part of this is that the NDF will ensure that the planning system helps to build resilience to the impacts of climate change, which includes flood risk. Further, text relating to cohesive communities specifies that development plans should ensure that communities are resilient to environmental threats such as flooding. Strategic policy DN2 specifically seeks that new development builds resilience to the risks from flooding. This could lead to positive effects against this objective for communities where new development may occur. This may include the building specific measures, as well as wider community flood resilience measures, which could benefit the wider community. These aspects, however, aren't specified in the policy at present due to its strategic nature. Further detail could be provided in relation to the policy relating to green infrastructure, specifying that the development and enhancement of green infrastructure throughout communities could help to reduce existing as well as future flood risk, including within existing communities, not just new development. See also recommendation under ISA Objective 6. Sustainable design of buildings could also help to reduce flood risk.
Welsh Government Comment		Policy DN2 has been redrafted to incorporate avoidance of risk. Resilience to risks of flooding are also covered within the placemaking policy and policy DN2. Green Infrastructure is addressed throughout the Preferred Option. DN5 and AS4 will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage. Response to recommendation for Objective 6 is covered in Objective 6 above.
8: To create opportunities to	+	One of the key principles of the Preferred Option is to implement the Welsh Government's decarbonisation agenda. Measures such as improving the connectivity of communities nationally (AS1, AS4, part of PE8, R3 and R4), green infrastructure (DN5) and

ISA Objective	Score	Commentary
encourage the protection and improvement of air quality <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>		environmental enhancement measures (DN3 and DN4), and the provision of a framework to provide sustainable transport (AS4 and part of PE8) and low carbon energy generation (PE1 and PE2) should lead to positive effects relating to air quality and therefore associated health impacts, with resulting benefits for human health. Ensuring that communities are resilient to environmental threats such as poor air quality is a key element of the 'Placemaking' theme as well as strategic policy DN2. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective. However, this effect is uncertain. On balance, minor positive effects may result, particularly for local air quality, where road building may help to improve air quality within communities. It is recommended that the Preferred Strategy could include a requirement that new road building should include measures to mitigate any long-term impacts, seeking not to contradict NDF health and well-being and climate change objectives.
Welsh Government Comment		It is considered that the Preferred Option should be considered as a whole and seeks to deliver sustainable development including infrastructure that looks to decarbonise the transport sector and improve air quality for example policy PE8. No change required at this stage.
9: To create opportunities to protect and enhance the quality and quantity of water features and resources <i>Relevant impact assessments (in addition to SA & SEA): HIA, Climate Change</i>	+	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4), promoting resource efficiency (DN1) and facilitating green infrastructure (DN5), should lead to positive effects against this objective. Implementing the National Marine Plan (strategic policy PE10) Strategic Resource Areas should lead to support for integrated decision making in the marine environment. Measures such as improving the connectivity of communities nationally and the provision of a framework to provide sustainable transport and reduce the need to travel through improved connectivity (and low carbon energy generation (PE1 and PE2), and support for the transition to a low-carbon economy and the circular economy (PE4, PE8, AS1, AS4, R3 and R4) should also lead to positive effects for water resources overall. It is suggested that Policy DN2 could be made more positive, seeking to reduce/avoid environmental 'risks' as opposed to building community resilience to them. It is recommended that Policy PE10 is moved to the Distinctive & Natural Places section of the Preferred Option, as it is unclear why it is located in Productive and Enterprising Places. Further, it is recommended that reference is made to the Natural Resources Policy for Wales, incorporating the SMNR principles. Policy DN1 could be more specific about the 'natural resources' it refers to using more efficiently, which could include the use of water, as part of a wider ecosystems services and climate change resilient approach.
Welsh Government Comment		Policy DN2 has been redrafted to incorporate avoidance of flood risk. The location of Policy PE10 reflects the structure of the revised PPW. The term Natural Resources are defined within the Environment (Wales) Act 2016. No change required at this stage.
10: To create opportunities for the improved connectivity	++	The creation of opportunities for the improved connectivity of communities, resilience to climate change and sustainable access to facilities are considered within the Preferred Option and provide the basis of many of the strategic policies, leading to potential significant benefits against this objective. Policies relating to the delivery of green infrastructure (DN5); digital infrastructure (PE3);

ISA Objective	Score	Commentary
of communities and sustainable access to basic goods, services and amenities for all groups <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights, Climate Change</i>		decarbonising the transport sector (PE8); housing and connectivity infrastructure (AS1); national active travel infrastructure (AS4); city region and growth deal areas (R3); and rural areas and connectivity (R4), should all contribute to the achievement of the aims of this ISA objective. The requirement for the identification of 'Nationally important roads' is repeated in PE8 and AS5. It is suggested that the content of AS5 be moved to the Productive and Enterprising Places theme, as it is considered that the nationally strategic road network would not necessarily contribute to the enhancement of active places. The 'Productive and Enterprising Places' theme could also consider the role of air and sea travel within the NDF. It is recommended that opportunities for improvement in accessibility to cultural and recreational facilities could be added to the strategic policies, to strengthen benefits against this objective.
Welsh Government Comment		Policy AS5 has been deleted as this is covered by policy PE8. There are a number of policies within the Preferred Option including Placemaking, DN6, AS1 and AS4 that address connectivity and access to cultural and recreational facilities through promotion of assets and delivery of infrastructure. Policy PE8 already addressed ports and airports. No change required at this stage.
11: To create opportunities within which an improvement in social cohesion and equality can be achieved <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights</i>	++	It is considered that the principles of the Preferred Option are generally in line with this ISA Objective and that further specific detail is not necessarily appropriate at this level of plan-making. The overarching 'Placemaking' theme as well as the Preferred Option more generally, includes details relating to the determinants of community cohesion, which can include aspects such as the Welsh Language, housing need, connectivity and community facilities and services. It is considered that measures to improve health and well-being across Wales, including that the regional focus will allow for regional inequalities to be tackled, could lead to positive effects. Further, specific measures to enhance social cohesion and ensuring that existing and future communities are equitable for all; that all member of society have access to services and facilities; and that the delivery of land for housing that meets all society's needs (in the Placemaking theme and strategic policy AS2), should lead to significant benefits against this objective. This could be in relation to all equalities groups, particularly in relation to potential age inequalities, where older or younger groups; as well as those with disabilities, certain health conditions or low incomes, may currently be less able to travel to access services and facilities. Strategic Policy R4 further seeks to retain and attract people to rural communities, which could lead to further benefits against this objective. The NDF could make reference to other aspects of community cohesion, such as improving personal safety and social interaction and integration. Although 'secure' is mentioned within the 3rd paragraph of the NDF, it is not mentioned again within the NDF Preferred Strategy. Further, it is unclear what is meant by 'secure' as this could also mean secure in economic terms. More could also be made of the need to reduce poverty and deprivation inequalities, including that affecting children, as well as to consider the integration of communities including those with different cultural or ethnic identities. Poverty is mentioned in relation to fuel poverty within the Preferred Option but is not specifically mentioned elsewhere.
Welsh Government Comment		The first section of the Preferred Option which sets the context has been reviewed and redrafted and through this redraft the references to secure is no longer included.

ISA Objective	Score	Commentary
		There are a number of policies within the Preferred Option including P3 which deals with community cohesion which will be expanded upon at the next stage of the NDF, the draft plan. Policy R1 addresses deprivation and inequalities and will be expanded upon at the next stage of the NDF, the draft plan. No change required at this stage.
12: To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs <i>Relevant impact assessments (in addition to SA & SEA): EQIA, HIA, Rural Proofing, Children's Rights</i>	+	The Strategic Policies included under the 'Active & Social Places' theme within the Preferred Option, should lead to some positive effects against this ISA Objective. Strategic Policy AS2 seeks that NDF policies will require that strategic housing development will meet the needs of everyone and the types of housing required are considered in the context of locational and numerical considerations, which could lead to positive effects against this objective in that it should meet housing needs. Policy in relation to resilience to climate change, could reduce fuel poverty, leading to further positive effects. Policy AS3 goes on to state that national policy-based population and housing projections will be produced. However, Policy R2 states that NDF policies will identify regional policy passed population and housing projections for each region. Clarity on approach should be provided to ensure efficiency in delivery. The Placemaking theme mentions the need for the delivery of high-quality housing, although this is not included within the strategic policies. See recommendation under ISA objective 6.
Welsh Government Comment		The Preferred Option should be read as a whole and both policies AS3 and R2 apply. It is considered that the wording and location of the policies within the general AS policy and a regional R2 policy provide clarity on the different approaches and no change is required at this stage. The Preferred Option recognises that sustainable places are the goal of the land use planning system in Wales. The elements of achieving sustainable places will be expanded upon at the next stage and are covered within Planning Policy Wales which sits beside the NDF. No change is required at this stage.
13: To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes <i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change</i>	+/-	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats (DN3), as well as strengthening ecosystem resilience (DN4) and facilitating green infrastructure (DN5), should lead to positive effects against this objective. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network (AS5), although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective, particularly in relation to noise pollution in South East Wales. This could be further exacerbated by Policy R3, relating to the development of city regions and growth areas, which could also have negative townscape effects. However, the green infrastructure policy (DN5) could reduce the effects of development on townscape and landscape to some degree. Further potential negative landscape impacts could result from nationally significant transport or renewable energy infrastructure projects. However, impacts may be mitigated on a project level basis or through more specific planning policies. Further, policies relating to the development of more rural areas, such as R1, R2, and R4, could lead to negative effects against the areas of dark skies and tranquil areas. See recommendation under ISA objective 6.
Welsh Government Comment		See response Objective 6.

ISA Objective	Score	Commentary
14: To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings <i>Relevant impact assessments (in addition to SA & SEA): HIA</i>	+	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes (DN3), could lead to positive effects against this objective, in relation to historic landscapes. Strategic policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate that delivery of new cultural development, which could lead to positive effects against this objective. It is suggested that the significance of the positive effects could be improved through integrating the need for cultural enhancement into the overarching 'placemaking' theme, to improve its prominence. Further, heritage-led regeneration could be included within the regeneration policy (PE9).
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. The policies within the Preferred Option are to be read as a whole and one is not prioritised over another. No change is required at this stage.
15: To create the opportunities for the protection and promotion of Welsh culture <i>Relevant impact assessments (in addition to SA & SEA): HIA</i>	+	Strategic Policy DN6 specifically requires the protection, promotion and enhancement of historic and cultural assets and facilitate the delivery of new cultural development, which could lead to positive effects against this objective. It is recommended that the recognition, protection, promotion and enhancement of Welsh Culture is included within the overall 'Placemaking' theme as part of the overall focus of the NDF. Further, it is considered that access to cultural assets could be included as part of policies seeking to improve national connectivity. Further, culture-led regeneration could be included within the regeneration policy (PE9).
Welsh Government Comment		It is considered that policy DN6 and PE6 addresses this through their current drafting, neither would preclude regeneration led by heritage. DN6 also looks to promote historic and cultural assets, which will be expanded upon at the next stage of the NDF, the draft plan. The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
16: To create opportunities for the conservation and enhancement of biodiversity and geodiversity	+/-	Policies included within the 'Distinctive & Natural Places' theme, including the protection and enhancement of nationally important landscapes, seascapes, nature conservation sites and habitats, as well as strengthening ecosystem resilience and facilitating green infrastructure, should lead to positive effects against this objective. Specifically, strengthening nationally important ecosystem resilience through greater diversity, connectivity, scale, condition and adaptability, could lead to significant positive effects, and enable species to adapt to a changing climate. However, the strategy also includes a requirement for improvements to the existing and expansion of the national road network, although to decrease congestion in the short or medium terms, in the long term, this could lead to an increase in traffic volumes, leading to negative effects against this objective.

ISA Objective	Score	Commentary
<i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change</i>		The 'Placemaking' theme provides the first principle through which all spatial choices are first considered. Within this text is reference to green infrastructure to support healthy lifestyles. It is suggested that the wider benefits and potential for a green infrastructure network could be highlighted within the 'Placemaking' theme, to give it greater status and to ensure that the range of environmental enhancements to be achieved are given prominence. This could then be linked to a range of strategic policies, including active travel and connectivity of communities including health and well-being and access to greenspace, flood risk management, temperature regulation, air and noise quality, water and soil quality and ecosystem connectivity. See recommendation under ISA objective 9 in relation to SMNR principles. It is recommended that policies DN2 and DN4 could consider the role of ecosystems services more widely, not just focussing on designating specific areas as 'nationally important' as this may remove the connectivity, diversity and interconnectedness that the NDF is seeking to strengthen. This could also help to improve mitigation against the potential effects of development on the natural environment and include the protection of geology and soils.
Welsh Government Comment		The structure of the Preferred Option reflects the revised PPW structure and the policies within the Preferred Option are to be read as a whole, one is not prioritised over another.
17: To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value <i>Relevant impact assessments (in addition to SA & SEA): HIA, Rural Proofing, Climate Change, Economy</i>	++	Strategic Policy DN1 states that NDF policies will improve resource efficiency and minimise the unsustainable use of natural resources. It is considered that this is likely to lead to benefits against this objective. Policy R5 states that the NDF policies will provide a framework for responding to the challenges and opportunities arising from exiting the EU over the plan period, including supporting agriculture and businesses. This could help to contribute towards the sustainable management of farmland, forests and the wider countryside. Policy PE4 specifically seeks that nationally important employment, mineral and waste areas are identified, seeking to promote a transition to a low carbon and circular economy. This could lead to significant benefits against this objective. It is unclear if Policy DN1 refers simply to all 'natural resources' and therefore including minerals and waste as well as wind power and water, amongst many, or if it is limited to certain types. Clarity on this could improve the potential for successful policy implementation.
Welsh Government Comment		The term Natural Resources is defined within the Environment (Wales) Act 2016. No change is required at this stage.

Appraisal of the Spatial Strategy (Draft NDF) (April 2019)

The 'spatial strategy' of the NDF is the overall approach taken to the distribution and location of the proposed land-uses and policies. The NDF doesn't provide a chapter specifically focussed on setting out the spatial strategy. Rather, the spatial strategy pursued in the NDF emerges from its policies. The spatial strategy is therefore not repeated here but can instead be found in the NDF and predominantly in Chapter 4. Table B-27 provides an appraisal of the likely impacts of the overall distribution and location of all policies and land-uses proposed in the NDF. *Note: this is different to a 'cumulative effects assessment' or the appraisals of individual policies, as this holistic appraisal is focussed on impacts associated only with the locational aspect of the proposed policies and land-uses.*

Table B-27: Appraisal of the spatial strategy (April 2019)

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	Referencing education with regards to services in the strategy would provide clarity and ensuring facilities are accessible and inclusive.
		The Spatial Strategy looks to create sustainable places which could include the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), for people of all ages and physical accessibility. The Spatial Strategy could support an improvement in educational attainment over the long term for children and young people and increase access to training and grow skills for all members of society, as within urban areas it aims to ensure 'co-locating homes, jobs and services' and to capitalise on the advantages of sustainable transport through the various Metro schemes. Focussing on the three main clusters of towns and cities should help to enhance links between the more education deprived areas in Wales and education facilities and opportunities. Focussing growth in these areas may therefore help to encourage improved educational attainment for those in most need.								
2	To contribute to an improvement in		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT ++	The strategy recognises the ambition to improve health.

³ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement	
	physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	The Spatial Strategy could support an improvement in health and well-being in the long term by aiming to improve access to services and also infrastructure for all members of society including children and young people. This could lead to a reduction in inequalities by, for example, ensuring increased access health, education and housing opportunities and which would help to reduce child poverty. Focussing new growth in the three main clusters of towns and cities would be likely to help enhance the links between areas of health deprivation and health facilities and services. The proposed Spatial Strategy would therefore be likely to help improve access to important health services for those most in need. There is a risk that new growth and development, and the likely population increase this would facilitate, could place existing health services and facilities under greater pressure. Whether such services would be placed over-capacity is largely dependent on the distribution of development in relation to services and what their existing capacity status is. It is assumed that new or expanded health services or facilities would be provided to match growing needs. The Strategy notes that the majority of people in Wales live in urban areas. It will be important that they benefit from ecosystems services through increased use of green infrastructure, nature-based solutions and active travel opportunities, which would bring multiple health benefits both physically and mentally. It doesn't, however, specifically mention those who live in rural areas and how they might benefit from improvements in green infrastructure, this could be recognised. People in rural areas will however have good access to a National Forest for Wales and its associated health benefits.									this could be widened to recognise the potential to improve well-being and reduce inequalities. The strategy could include how rural communities could benefit from improvements to green infrastructure.
3	To create opportunities for an increase in employment across the country and promote economic inclusion		SS	Scale: Reg	T/P: P	Cert: L	ST +	MT ++	LT ++	Development in the three clusters of towns and cities should address the imbalance in economic inclusion in existing settlements and should seek to enhance the links between the more economically deprived areas and new economic growth.	
		The towns and cities in the three clusters focussed on in this strategy are generally where the most populous workforces live in Wales and where the most concentrated economy currently is. They are also where some of the highest rates of employment and economic deprivation in Wales can be found. A key element of the Spatial Strategy is to ensure that jobs and homes, alongside essential services and facilities, are co-located. This should lead to positive effects against this objective in the medium and longer terms, through ensuring that land use planning outcomes improve the physical accessibility of jobs and could bring employment opportunities across all working age ranges. The approach taken will be based on improvements regionally, through the development of the three main urban clusters of cities and towns, being: 'Cardiff, Newport and the Valleys; 'Swansea Bay'; and 'Wrexham and Deeside'.									

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		SS	Scale: Nat	T/P: Perm	Cert: L	ST +	MT ++	LT ++	It is not clear how the Spatial Strategy might contribute to the development of the third sector and sustainable tourism. Specific growth sectors could be specifically mentioned as part of the strategy, to give a formal direction of support.
		The Spatial Strategy seeks that the focus on urban areas will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. This focus could help to create positive effects against this objective in the medium and longer terms. The Strategy sets out that ‘Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focussed on retaining and attracting working age population and maintaining and improving access to services’. This could lead to positive effects against this objective. The Spatial Strategy is clear with regards to the support for the physical infrastructure needed to support sustainable economic growth. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs.								
5	To contribute towards the future well-being of the Welsh Language		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	No recommendations.
		The Spatial Strategy recognises the importance of the Welsh language. It states its desire to grow the Welsh language and notes ‘In all parts of Wales, the strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving community, Welsh language or economy’. The focus on achieving sustainable and proportionate population and job growth in each region and sub-regional area across Wales can help achieve the Government’s ambitions for the Welsh language. The strategy recognises the inter-relationship between homes, jobs, services and transport, and their influence on the way society operates. The strategy for these issues in combination deliver the best conditions possible for the language to thrive The Strategy will contribute positively towards the future of the Welsh language in all areas of Wales including rural areas. The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to the Welsh								

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		language as it would likely mean less out-migration in search of economic opportunities, including of people with Welsh language skills. This effect is likely to be more pronounced in rural areas of Wales. There is a risk that new economic development in proximity to the border with England could increase the flow of workers crossing the border to work in Wales, particularly where public transport options are enhanced, and this could potentially dilute rates of Welsh speaking in some locations.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		SS	Scale: Int	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations.
		The Spatial Strategy is fundamentally based on an approach which seeks to encourage sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services, as well as the efficient use of resources. This should lead to positive and significant effects against this objective nationally, as these principles will also be reflected through resulting planning policies at the regional and local levels. The focus on the three clusters of towns and cities would be expected to help ensure that new residents and businesses have good access to the public transport modes on offer in these urban areas. Urban locations generally enable more efficient movements than rural locations, including via active travel modes, as people, jobs and key services and amenities are in greater proximity to each other than is typically seen in rural locations. The strategy could therefore enable a lower-emission way of life than if growth were focussed in areas where sustainable transport options are more limited, although it is accepted that any degree of growth would be likely to be accompanied by some degree of increase in car and HGV use. The Spatial Strategy makes a number of key strategy points, which could contribute to significant positive effects against this objective, including policy directions relating to national important ecological networks, the development of a national forest for Wales, the use of ultra-low emission vehicles, and powering and heating places with renewable energy and district heat networks. This includes the development of priority areas for solar and wind energy generation.								
7	To contribute to the reduction and management of flood risk		SS	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	It is recommended that the strategy consider how a focus on adapting to a changing climate, including flood risk, could be integrated into the national spatial approach to planning for development. This may

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
				development would be expected to conform with PPW as well as NRW advice and this would be likely to reduce the extent to which new development is exposed to flood risk. However, specific mention of adapting to the changing climate within the Spatial Strategy is minimal and potentially limited to the use of natural resources and the development of opportunities to enhance green infrastructure at a strategic scale, and to create and restore habitat networks and green corridors. Although this could contribute to indirect benefits for the reduction and management of flood risk, this has not been specified as a key aim. The focus of the strategy are three clusters or urban areas, much of which is coastal. It is therefore likely that the significant level of growth here could alter local levels of flood risk, such as by resulting in the loss of greenfield land, soils and above-ground vegetation. On the other hand, growth in these locations could be an opportunity to secure new investment for improved flood risk defence schemes in these locations subject to the emerging policy in TAN 15. The risk of flooding should be seen in the context of climate change, which is expected to exacerbate flood risk and alter its distribution. The precise characteristics of how climate change will alter flood risk are largely uncertain but coastal areas will likely witness significant change to flood risk. Overall it is considered that a minor adverse effect over time on the flood risk objective cannot be ruled out, but appropriate micro-siting and avoidance and mitigation measures adopted at Strategic and Local Development Plan stages can mitigate this.						include directing development away from areas of flood risk.
8	To create opportunities to encourage the protection and improvement of air quality		SS	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	The benefits of green infrastructure to air quality, including from the national forest, could be specified. This might then enable specific species of tree to be targeted, to maximise benefits, especially within urban areas. The strategy could specify that it will seek to move away from polluting industries, particularly around Deeside, where it indicates that heavy industry is abundant.
9	To create opportunities to		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	The Spatial Strategy could specifically mention

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement	
	protect and enhance the quality and quantity of water features and resources	The Spatial Strategy states that ‘sustainable growth will involve setting an ambitious strategy for achieving biodiversity and green infrastructure enhancement in our urban areas. Effective 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 in exemplar, future-resilient settlements’. Although water is not specifically mentioned, a nature-based approach could lead to positive effects for water quality and quantity including opportunities to protect and enhance water resources and quality. Water is not, however, specifically mentioned. This may reduce the potential of the strategy to improve water quality over the current deteriorating trend and reduces certainty in the assessment.									waterways as part of the intended green infrastructure network as well as the need for water quality to be improved nationally.
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT ++	No recommendations	
		The Spatial Strategy could support an improvement in creating opportunities for the improved connectivity of communities and sustainable access to goods and services for all members of society including children and young people over the long term. It specifically aims to ensure ‘co-locating homes, jobs and services’ and to capitalise on the advantages of sustainable transport through the various Metro schemes. For rural areas, it refers to active travel infrastructure supporting development in rural settings, the use of Mobile Action Zones supporting rural and isolated communities through enabling electronic communications and digital infrastructure and development within rural areas being ‘complimentary’ in order to ‘support local aspirations and need’. All of these measures could ensure an increase in inclusive access services, helping to facilitate the improved connectivity of communities. For example, children and young people should be better able to keep in touch digitally, particularly in rural locations, and use public transport in order to access services such as education. The Strategy recognises the opportunities Metro schemes will bring to Wales. It states that land in proximity and with good access to Metro stations ‘is an important and finite resource and will play a key role in delivering sustainable urban places’. Metro schemes will bring increased public transport provision to rural areas. Increased provision of public transport in rural areas will mean those living in isolated parts of Wales will have improved connectivity giving them access to basic goods and services, helping to reduce isolation and inequality.									
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		SS	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	See objective 10. The strategy could be strengthened through expanding the list of important functions of rural areas to include health and	
		The Spatial Strategy facilitates for improvements in terms of sustainable transport, communications etc., which should ensure improved connectivity and better access to services for people The Strategy creates opportunities for social cohesion and equality in the long term. For									

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		children and young people, it could mean they are better able to access services such as opportunities for play and recreation as a result of the Strategy promoting sustainable transport. The Strategy states ‘Co-locating homes, jobs and services means focusing on cities and large towns as the main development areas. Developing our urban areas - some of which may be underperforming - is not the easiest Spatial Strategy to achieve, but it is the right ambition for Wales and supports the Government’s commitment to social justice.’ This helps ensure development occurs in the most sustainable locations, creating places which are inclusive and does not have a negative impact on rural areas. The Strategy recognises that ‘rural areas have an important function as a provider of food, energy and mineral resources’ this could be strengthened to include health and well-being, tourism, renewable energy. The Strategy also specifies that the policies on supporting urban centres, delivering affordable homes, supporting communities through the use of publicly owned land, mobile action zones and the provision of electric vehicle charging infrastructure all apply to Wales’ rural areas. They should be considered as priority issues for the preparation of Strategic and Local Development Plans across the whole of Wales. This could lead to positive indirect effects against this objective.								well-being, tourism and renewable energy.
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		SS	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations.
		Positive benefits may be derived from the Spatial Strategy with regards to the delivery of affordable housing which would be likely to grow in a major positive impact in the long-term as a result of the focus on facilitating growth. The regeneration of urban areas could lead to an improvement in housing quality and abundance for communities in these areas, which could lead to positive effects in relation to seeking to reduce homelessness and improving the availability of affordable homes of good quality. The Spatial Strategy would also support the maintenance of rural communities, which could ensure that affordable housing is also developed in these areas, as it seeks to support local aspirations and need. The Strategy specifies that affordable housing should be considered as a priority issue for the preparation of Strategic and Local Development Plans across the whole of Wales. The provision of good quality, affordable housing can also help to deliver a range of health benefits including through reducing child poverty.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The Strategy could include seascapes as an integral part of the landscape/townscape consideration. Given the quantity of development
		The Spatial Strategy could lead to benefits for both the landscape and townscapes across Wales. The focus on urban areas could lead to urban regeneration initiatives, leading to positive effects. In turn, this could help protect landscapes in more rural areas from development. In particular,								

Spatial Strategy (Draft NDF May 2019)											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement	
	our landscapes, townscapes and seascapes	aspects of the strategy relating to sustainable and active travel, green infrastructure, and the national forest, could lead to long term significant benefits for the landscape, including helping to maintain areas of tranquillity and reducing noise and light pollution and could help to increase the accessibility of townscapes. In areas designated for landscape importance, the strategy notes that protection against inappropriate development remains in place. This should help to protect landscapes in the short and medium terms. Further, the Strategy states that ‘as the population of Wales becomes increasingly urban, it is clear that the opportunity to optimise well-being benefits from ecosystems will be greatest in these areas. Through the innovative use of nature-based solutions, and by increasing well-integrated green infrastructure in and around urban areas, development can restore natural features and processes into cities and landscapes, maintain and enhance the strategic functioning of our natural resources and ecological networks, and provide locally accessible, high quality green spaces and corridors.’ This could lead to significant positive effects against this objective.									being pursued, careful management of this development will be required to avoid adverse impacts on this Objective.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		SS	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	The regional approach within the Spatial Strategy could specify that the important character of communities (both urban and rural) will need to be reflected in regeneration initiatives.	
		It is unclear from the Spatial Strategy if there is an intention to support heritage-led regeneration initiatives, and the conservation and enhancement of the historic environment, historic assets and their settings. The focus on urban areas could lead to urban regeneration initiatives, leading to the potential for positive effects, although this is uncertain. The development of rural areas seeks to focus on local character, which could also lead to positive effects against this objective. In general, the proposed strategy would focus development in urban areas and this would help to avoid impacts on historical landscapes in rural areas. On the other hand, urban locations are often rich in heritage assets and so avoiding adverse impacts on historical assets in every case would require careful management. Through improved connections and potential regeneration initiatives this could achieve increased inclusive access and opportunity for people to understand and enjoy the historic environment.									
15	To create the opportunities for the protection and promotion of Welsh culture		SS	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	See recommendation for objective 14. It is further recommended that the Spatial Strategy include more detail relating to Welsh culture, with detail on how this might be enhanced regionally.	
		Aside from ambitions to grow the Welsh language, it is unclear from the Spatial Strategy how the NDF intends to create opportunities for the protection and promotion of Welsh culture. Minor positive effects may be experienced through the protection of rural areas, including the focus on local character, the intention to support local aspirations and needs and steadily grow the population in rural areas which will help to protect and promote welsh culture. There are also opportunities through urban regeneration initiatives for potential positive effects.									

Spatial Strategy (Draft NDF May 2019)										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						Recommendations for Mitigation or Enhancement
		The strategy has the potential to improve economic competitiveness in all regions of Wales and lead to the creation of more and better jobs. Such a trend would be beneficial to Welsh culture for smaller settlements in rural areas as it would likely mean less out-migration in search of economic opportunities, including of people who support, facilitate or partake in Welsh cultural activities and places, and this would be likely to help protect cultures and communities.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		SS	Scale: Nat	T/P: T	Cert: M	ST ++	MT ++	LT ++	The policy could mention the need for the protection of geodiversity as an integral part of wider environmental conservation.
		The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits for biodiversity may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. Well integrated green infrastructure and nature-based solutions in urban areas are encouraged, as well as the development of a National Forest for Wales, across multiple sites. The Spatial Strategy generally directs development away from locations in Wales where the more valuable biodiversity, geodiversity and protected areas are found. These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend. All of the above has positives for rural areas, in particular a National Forest for Wales including access for those living in rural areas.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		SS	Scale: Nat	T/P: Temp	Cert: Med	ST ++	MT ++	LT ++	No recommendations.
		The Spatial Strategy specifically states its intention to provide a long-term context and framework for infrastructure investment and the protection of the environment. Benefits against this objective may be specifically realised through the development of a strategy seeking to focus on resource efficiency, which includes the development of urban areas over greenfield, and a focus on a circular economy. Specifically, the strategy sets out the importance of ecosystems services across Wales, and the need to protect and enhance the value of these areas. In particular, the conservation of water resources is a key area of focus. These aspects of the Spatial Strategy could lead to significant benefits against this objective, which could help reverse the current negative trend.								

Appraisals of Policies (Draft NDF) (May 2019)

The Draft NDF policies have been grouped in accordance with Table B-28. An appraisal table is provided for each policy grouping.

Table B-28: Groupings of draft NDF policies

Policy Group	Policies
1	P1, P2, P4
2	P3
3	P5
4	P6
5	P7
6	P8, P9
7	P10, P11, P12, P13, P14, P15
8	P16
9	P17, P18, P19 P20, P21 P22
10	P23, P24, P25, P26
11	P27, P28, P30, P30, P31, P32, P33

Table B-29: Policies and reasonable alternatives in Policy Grouping 1

Policy Grouping 1	
P1 – Sustainable Urban growth	Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed-use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.
P1RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
P2 – Supporting Urban Centres	Proposals for new public service facilities of a significant scale should be located in town and city centres. A sequential approach must be used to assess development plan allocations and to determine planning applications for developments. Only in exceptional circumstances should public service facilities of a significant scale be approved outside of town and city centres.
P2RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
P4 – Supporting Rural Communities	The Welsh Government supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. The future for rural areas are best planned at the regional and local level. Strategic and Local Development Plans should plan positively to meet the needs of rural communities with regard to housing, transport, businesses, services and diversification in the agricultural sector.
P4RA1 – Flexible settlement boundaries	This option would enable local authorities to operate flexible settlement boundaries to plan positively for rural communities. This could be expanded to reference specific sectors (such as housing, public services, economic development) with specific remits for each of these areas and a policy statement outlining what approach should be adopted.
P4RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all and the NDF would have been silent on this issue, leaving PPW to carry the national policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-30: Appraisal of Policy Grouping 1

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Potential to strengthen links and connectivity to more rural areas to education and skills facilities.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P1 and P2 would help to increase access for all to education and training facilities which would look to be focused in town and city centres, particularly via sustainable transport modes (walking, cycling and public transport). These would be direct effects of Policy P1 that would be likely to grow over time. It is recognised Policy P1 would not impact directly on children and young people in rural areas. Doing nothing approaches would not maximise the opportunities to focus development and improve connections to facilities in these areas and therefore the potential attainment in education for children and young people across Wales. The do-nothing approach would be likely to conform with baseline trends. P4 The policy looks to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services for all. The supporting text recognises the importance of inclusive access within rural communities to facilities and services which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of increasing access to education services within these areas, leading to improvements in educational attainment. Policy P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
2			P1	Scale:	T/P:	Cert:	ST	MT	LT	

⁴ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales			Nat	T	L	+	+	++	Potential to strengthen links and connectivity to more rural areas to improve access to facilities and services and improve connections to the natural environment.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P1 and P2 focus development on town and city centres and creating improved access to facilities, active travel infrastructure and green infrastructure for people of all ages and physical abilities. This could have a positive effect on health both mentally and physically and could improve air quality through reducing the need to travel by car. These would be direct effects of Policy P1 that would be likely to grow over time. Over the long term, Policy P1 could result in increased numbers of children and young people in urban areas being able to walk or cycle in order to access developments with associated services, including education and leisure, through public transport provision. Encouraging the use of walking and cycling to access services should result in health benefits for children and young people within urban communities across Wales. This policy is an urban policy and therefore not applicable to rural areas. Policy P1RA1 - Doing nothing would not result in maximum opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. The do-nothing approach would be likely to conform with baseline trends. P4 The policy recognises the important role of housing, economic growth, services which will have positive impacts on the health and well-being of rural communities, reducing isolation and inequalities for all. Such an approach could result in benefits in terms of enabling children and young people to access services within these areas, leading to improvements in health and well-being. Policy P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approach would be likely to conform with baseline trends.							
3	To create opportunities for an increase in		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Policy P1 could recommend that walking and cycling
			P1RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴					Recommendations	
employment across the country and promote economic inclusion				Nat	T	M	0	0	+	access routes at new developments are incorporated into local Green Infrastructure (GI) networks. Well-connected, attractive and safe GI networks that provide space for pedestrians and cyclists whilst being designed to be of a high biodiversity value (value provided by the species planted throughout the networks as well as the free movement of wildlife they facilitate) can provide a raft of social, economic and environmental benefits, including more accessible employment opportunities for local people.
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			Policy P1 would help to ensure that new higher density development, including developments such as leisure, offices and commercial activities, are located in town and city centres. This would situate significant employment opportunities within locations that are highly accessible for local people, particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. This would be a direct effect of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of employers are encouraged to situate in town and city centres and promote economic inclusion and develop city regions in the process. This should lead to opportunities for young people in particular to access employment. There are clear geographical differences in employment activity in Wales with pockets of higher than average deprivation in the South Wales valleys and in some North Wales coastal towns. It is unclear the extent to which P1 would help to combat this deprivation. The increase in accessibility through the metro scheme and policies P26 and P31 in the NDF which support improvements to the Swansea Bay and South Wales metros could help to reduce inequalities in these areas but this would depend on the implementation. A policy that generates liveable urban areas should generate work opportunities, which helps retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language's traditional strongholds. Policy P1 is aimed at promoting urban centres and therefore has a neutral impact on rural areas. The alternative to this, P1RA1, would be to have no policy, thus leaving PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of commercial land and employment opportunities and promote economic inclusion by recognising that the futures of sustainable rural communities are best planned at the regional and local level.							

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		This could result in benefits in terms of enabling young people in particular to access employment opportunities. P4RA1 could also help to benefit economic inclusion and reducing deprivation as it would enable planning authorities to extent settlement boundaries as needed. Welsh speaking communities in many places retain strong links with rural and agricultural sectors; P4RA1, with flexible boundaries in rural places could enable business development and job creation but offers no certainty. The do-nothing approach would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	See Objective 3.
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			Policy P1 facilitates the development of new major employment locations in town and city centres where they would be likely to have excellent access to customers and employees of all ages. The range of developments cited, including office and commercial activities, would be expected to help diversify economies and could provide opportunities for third sector growth. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure in these locations (including digital infrastructure) and thereby supporting sustainable economic growth. Policy P1 seeks to ensure that developments of a significant scale are approved outside of town and city centres only in exceptional circumstances, which limits the potential for such development to enhance or diversify rural economies, although this could be countered to some extent by Policy P4. These would be direct effects of Policy P1 that would be likely to grow over time. A policy that generates liveable urban areas should generate work opportunities, which could help to retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language's traditional strongholds. P1 and P2 are aimed at promoting urban centres and therefore has a neutral impact on rural areas. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be							

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of business and economic needs. This could encourage diversification of rural economies, such as agriculture, forestry, SMEs, micro businesses and the development of digital connectivity. A positive statement which recognises the value of the rural economy and the need to maintain it. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. This policy provides opportunities to create opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion by recognising that the futures of sustainable rural communities are best planned at the regional and local level. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local needs. Flexible boundaries in rural places could enable business development and job creation but offers no certainty. Requiring local planning authorities to operate flexible settlement boundaries will not give them sufficient autonomy and is not consistent with the proposed approach to regional planning. The do nothing alternative would conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P4RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
P1 and P2 looks to generate liveable urban areas, this should generate work opportunities, which helps retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy is primarily focused on areas outside the language’s traditional strongholds. The alternatives of P1RA1 and P2RA1 would be likely to conform with baseline trends.										

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		P4 is a positive statement which recognises the value of the rural economy and the need to maintain it. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. P4RA1 - Flexible boundaries in rural places could enable development including new homes but offers no certainty.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	See Objective 3.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
Policies P1 and P2 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements for employees, customers and local people. This would contribute to the current trend of falling GHG emissions and improve air quality. This would help to increase access to active travel options and improve healthy lifestyle choices. Concentrating development in urban centres could also increase the viability of improving sustainable design as well the potential generation of energy from systems such as combined heat and power networks. This would be a direct effect of Policy P1 that would grow over time as increasing numbers of new development are situated in accessible locations. The alternative to this, P1RA1 and P2RA2, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and renewable energy generation. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternative would conform with baseline trends.										
7			P1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
	To contribute to the reduction and management of flood risk			Nat	T	L	0	+	+	Adapting to increasing levels of flood risk in Wales could be afforded greater focus in the NDF, particularly with regards to development in and around urban areas where there is extensive flood risk. P1 and P2 could potentially explicitly state that development that avoids land at risk of flooding, or avoids exacerbating flood risk in other locations, would be particularly encouraged.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			The prevalence of flood risk depends on local circumstances and on the specific location of new development. In line with planning law and Welsh Government flood risk management policies, it is expected that residential development would be situated away from flood risk land with which it is incompatible. It is recognised that certain, less vulnerable types of development can still occur in some flood risk areas. Generally speaking, urban areas are more likely to already be protected by flood defence schemes and so focussing development here, as P1 and P2 would do, could help to reduce the risk of flooding for new development. Development would also be less likely to result in the loss of greenfield land or above ground vegetation that helps to reduce surface run-off rates and subsequently flood risk, such as upslope woodland. There is a high degree of uncertainty in this and it should also be noted that some of the larger urban areas in Wales including Cardiff, Swansea, Newport and Deeside have large local areas of land at a medium to high risk of flooding. The alternative of ‘do nothing’ would not result in this direct positive effect and would be likely to conform with baseline declining trends. Policy P4 and its alternatives would be unlikely to have a discernible impact on flooding.							
8	To create opportunities to encourage the protection and improvement of air quality		P1	Scale: Nat	T/P: P	Cert: M	ST +/-	MT +/-	LT +/-	See Objective 3 – high-quality, safe and attractive walking and cycling routes would help to reduce air pollution associated with transport.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P2	Scale: Nat	T/P: P	Cert: M	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P4	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
				Nat	T	M	+	+	+	Policy P1 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development's adverse impact on air quality and also to protect site users from existing pollution. Access to green space and the consideration of green infrastructure could be key to minimising these potential effects and should be specifically designed with this in mind, to help to reduce geographical inequalities.
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
P1 and P2 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements (i.e. walking, cycling and public transport) for employees, customers and local people. This would contribute towards the trend of gradually improving air quality due to a reduction in emissions associated with road traffic and congestion. This would be a direct effect of Policy P1 that would grow over time as increasing numbers of new development are situated in accessible locations. On the other hand, areas of existing poor air quality notably occur in urban areas and adjacent to busy roads and comprise particulate matter (PM) and nitrogen dioxide concentrations. P1 would lead to additional development and traffic movements in these locations, which could make achieving air quality improvement targets more difficult whilst exposing new people to health-damaging pollutants. The alternative to this, P1RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and low-emission design and development. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternative would conform with baseline trends.										
9	To create opportunities to		P1	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	No recommendations.

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
	protect and enhance the quality and quantity of water features and resources		P1RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P2	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P2RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Concentrating development in urban areas, as per P1 and P2, could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focussing development in urban areas, including the potential increased viability of efficient and effective water recycling measures in these areas. Whilst it is expected that new development would only be permitted where there is appropriate capacity available in the local sewerage system, there is some degree of risk that P1 and P2 would contribute to increased pressure on urban sewer systems. Should any systems be rendered over-capacity, this would pose a pollution risk to local water bodies. The do-nothing approach would not result in these direct positive impacts and would be likely to conform with baseline trends. P4 and its alternatives would be unlikely to have a discernible impact on water quality and resources.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	There is an opportunity to ensure links to rural and P4 could be strengthened to include reference to inclusive infrastructure and connections.re isolated communities are
			P1RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
			P2	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P4RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 1											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations	
				Nat	T	M	+	+	+	made to improve inclusive access to goods, facilities and services	
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +		
			P1 and P2 would be likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet people’s needs. They would reduce dependency on the private car and improve access to services and facilities for all. By providing development in sustainable and accessible urban locations this should ensure increased access to goods and services for local people, including for children and young people. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth, creating healthier lifestyle choices. This policy is aimed at promoting urban centres and therefore not applicable to rural areas. P1RA1 and P2RA1, the do-nothing approaches, would not result in opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the opportunity for all, including children and young people in urban areas to sustainably access goods and services. The do-nothing approach would be likely to conform with baseline trends. P4 looks to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services. The supporting text also recognises the importance of inclusive access within rural communities to facilities and services, which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of enabling children and young people to access goods and services within these areas.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P4RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P4RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		

Policy Grouping 1											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴							Recommendations
		P1 and P2, through the provision of improved public transport and access to facilities including active travel and green infrastructure, will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access for all members of the community. P1RA1 and P2RA1 would not result in opportunities being provided to locate development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the ability of all, including children and young people, in urban areas to sustainably access goods and services; therefore, it would likely exacerbate social cohesion and equality. The do-nothing approach would be likely to conform with baseline trends. P4 recognises the needs of rural communities should be met this will encompass all members of society, this will improve well-being in communities and help to reduce loneliness and inequality. The policy approach could result in benefits in terms of enabling children and young people to access services within these areas, creating opportunities for improvements to social cohesion and equality. P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in the alternative there is little certainty involved in the assessment of these. Does not reflect the proposed approach to regional planning. The do-nothing approach would be likely to conform with baseline trends.									
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.	
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++		
			P4RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
			P4RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-		
		Good planning and a commitment to quality urban design can accommodate higher densities in town and city centres without undermining quality of life. P1 and P2 may help to enable planning authorities across Wales to provide enough new housing that satisfies local housing needs. This direct positive effect would be likely to grow in magnitude over time.									

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		The alternative to this P1RA1 of having no policy would be likely to conform with baseline trends. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of satisfying housing need. This should assist in ensuring the consideration of the provision of appropriate services at a regional and local level. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. On the other hand, P4RA1 could enable more flexibility on a regional level in order to deliver new homes. This is not reflective of the proposed approach to regional planning. It is uncertain how housing needs could be satisfied under a do nothing alternative.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	PPW (December 2018) seeks to ensure that high-density and significant scale development in town and city centres enhances existing townscape character and setting and, through high-quality design measures, considerate layout and potentially vernacular architecture, should protect and enhance townscape character and increase the accessibility of places and networks for people
			P1RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P2RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P1 and P2 would help to ensure that higher density and significant developments are situated within town and city centres across Wales. This would be expected to help ensure development is largely in-keeping with the local character and setting, whilst avoiding adverse impacts of large-scale development in more rural or countryside locations with distinct natural characters. This would help to maintain areas of tranquillity and minimise light and noise pollution in rural areas. In some locations, the high density or significant scale development could pose a risk to distinct townscape characters without close consideration of the design and layout of the development. This would be a direct effect of P1 and P2. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as							

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely to be in conformity with the baseline. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternative would conform with baseline trends. P4 has the potential to deliver accessible and inclusive townscapes.								and nature within our townscapes.
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	High-density and significant scale development in town and city centres should seek to pay close consideration to the setting of any nearby heritage assets through high-quality design, considerate layout and potentially vernacular architecture. This should be implemented through PPW. However, the potential for heritage and culture led regeneration should be recognised here.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P1 and P2 would be likely to contribute towards an increasing quantity of high-density and major developments taking place in town and city centres. These centres are often host to sensitive heritage assets such as Listed Buildings and Conservation Areas and can have a rich historic character. New development here therefore poses a risk to the setting of these sensitive assets. However, the new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site, in-comparison to its current impact, on the setting of any nearby assets. The policy could improve access and understanding of these assets. these effects would however be likely to be direct. P1 would also help to direct new development away from greenfield land or relatively rural locations which can often have a high historic value or be set within sensitive historic landscapes. These effects would be likely to be direct. There is an opportunity for heritage and culture led regeneration that could be recognised here which would be well connected through the improvements to infrastructures and this would contribute towards the protection and enhancement of the historic environment.							

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so it is largely uncertain where high-density development would be situated. Impacts on cultural heritage are therefore also uncertain. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternative would conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P1	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	See Objective 14.
			P1RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P2	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P2RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
Policy P1. There is an opportunity for culture and heritage led regeneration within urban centres which would be well connected through the improvements to infrastructures and this would contribute towards the promotion of Welsh culture. Policy P1RA1 would be unlikely to have a discernible impact on Welsh culture. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance and this could help to preserve and take advantage of local Welsh culture assets and features. The policies in this section have the potential to increase access to and understanding of the cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. P4RA2. Requiring local planning authorities to operate flexible settlement boundaries will										

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		not give them sufficient autonomy and is not consistent with Welsh Government's approach to regional planning. The do nothing alternative would conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	These policies could potentially seek to ensure that biodiversity in urban areas and on settlement boundaries is protected and enhanced. Biodiversity value and green infrastructure within urban sites should be protected to help establish and enhance the coherency of ecological networks that extend throughout urban areas and into the countryside in order to enable the free movement of wildlife and to avoid sensitive species or habitats being isolated in islands away from nature.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
P1 and P2 would help to ensure that high-density and major new developments are situated in urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. Policy P1 would therefore help to ensure that high-density and large-scale development taking place across Wales is less likely to adversely affect sensitive species, habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. This would be an indirect effect of P1 and P2. Potential opportunity for urban Green Infrastructure provision through improved access to walking and cycling networks, the effect of this will however depend on its implementation. The alternative to this, P1RA1 and P2RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely to be in conformity with the baseline. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including local biodiversity assets and features. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and										

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						Recommendations
		constraints. Flexible boundaries could potentially pose a risk to biodiversity in rural areas and so would require careful management. The do nothing alternative would conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P1RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P2RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P4	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P4RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P4RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
Developments in town and city centre locations would be likely to have good access to opportunities for using recycled materials, for remediating contaminated land, for using brownfield land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. These direct effects of P1 and P2 would be likely to grow over time as increasing quantities of development situate in town and city locations. The no-policy alternative would not result in these benefits to natural resources and would be likely to conform with baseline trends. Policy P4 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including protecting the most ecologically or agriculturally valuable land and maximising opportunities for reusing materials. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and constraints. Flexible boundaries could potentially pose a risk to valuable soils and previously undeveloped in rural areas and so would require careful management. The do nothing alternative would conform with baseline trends.										

Table B-31: Policies and reasonable alternatives in Policy Grouping 2

Policy Grouping 2	
P3 - Public Investment, Public Buildings and Publicly Owned Land	Welsh Government investments and land holdings will support the delivery of sustainable places. We will work with all public landowners and investors to ensure that new development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport. Strategic and Local Development Plans should review publicly owned land, both redundant and in current use, to identify potential sites for development and re-development, including for mixed use and affordable housing developments that will support the creation of sustainable places.
P3RA1 Apply policy to all agencies and all land-users	This option would apply the policy to all agencies and land-users and not just public landowners and investors.
P3RA2 Apply policy only to newly available sites	This option would apply the policy to new development only and not to the re-development of sites.
P3RA3 Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-32: Appraisal of Policy Grouping 2

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale:	T/P:	Cert:	ST	MT	LT	

⁵ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵					Recommendations	
	to improve opportunities for life			Nat	T	M	0	+	+	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 looks to create sustainable places which includes the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. In the long term, by supporting the public sector releasing land for development in accessible urban locations, this could result in the release of land for education which is readily accessible to all including children and young people in urban areas, including higher education institutions such as colleges. In turn, this would result improvements in educational attainment. This is dependent on those land holdings being released for education opportunities where it may not have otherwise under this Policy. PR3A1, would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	The opportunity to require Green Infrastructure and active travel provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy to increase healthy lifestyle choices.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 through the delivery of key public buildings and facilities in accessible locations will increase access by sustainable modes for everyone which should result in positive health benefits for all and reduce inequalities. The supporting text recognises the need for smaller developments and facilities in accessible locations outside of city and towns centres where they are needed to meet the needs of the community. The development and redevelopment of these sites brings an opportunity to improve connections through green infrastructure and active travel infrastructure, improving healthier lifestyle choices, bringing physical and mental health benefits. The NDF recognises that smaller developments such as GP surgeries and schools may be more appropriate in accessible locations outside of city and town centres which could include rural areas would have a positive effect and help to reduce inequalities.							

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
		PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 would help to ensure that new development is located in town and city centres. Where this development provides employment opportunities, including during the construction and operation phases, it would help to enhance economic inclusion by providing these employment opportunities at locations that are highly accessible for local people via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. This promotes healthy lifestyle choices, can improve air quality and broadens opportunities to access jobs. Situating new development in these locations would also contribute towards the development of Wales' city regions. These would be direct effects of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of developments are encouraged to situate in town and city centres. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. There are clear geographical differences in employment activity in Wales with pockets of higher than average deprivation in the South Wales valleys and in some North Wales coastal towns. It is unclear the extent to which P3 or its alternatives would help to combat this deprivation, given that most new development would be directed towards urban locations. P3RA3, the do-nothing approach, would conform with baseline trends.								
4			P3	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
	To create opportunities for sustainable economic growth, diversity and business competitiveness			Nat	T	H	+	+	++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 encourages the delivery of new development in town and city centre locations where they would be likely to have excellent access to customers and employees and has the potential to increase third sector opportunities to support this growth. The location of new development here would be likely to help deliver physical infrastructure in these locations (including digital infrastructure) and thereby support sustainable economic growth. Overall Policy P3 would be likely to have a positive impact on ISA Objective 4, that increases in magnitude over time as increasing quantities of development are encouraged to be situated in city and town centres, however this is tempered somewhat by the Policy also limiting the potential for new development to enhance or diversify rural economies – this would be countered to some extent by Policy P3, which encourages rural diversification. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		It is considered that policy P3 and its alternatives will have no impact or effect on the Welsh language.								
6	To create opportunities within which greenhouse		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
	gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Policy P3 is concerned with sustainable places and, whilst there is some uncertainty over what this necessarily entails, it is considered to be likely that such development would have a relatively low carbon footprint. Policy P3 would help to ensure that new development is situated in locations that facilitate more sustainable and efficient movements for local people, including by walking, cycling and public transport. This would contribute to Wales' current trend of falling GHG emissions associated with road vehicles. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.							
7	To contribute to the reduction and management of flood risk		P3	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be incorporated into the supporting text for the policy.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			The prevalence of flood risk depends on local circumstances and on the specific location of new development, although in line with the Welsh Government's policy on flood risk management it is expected that development vulnerable to flood risk would not be situated in an area of flood risk with which it is incompatible. Generally speaking however, urban areas are more likely to already be protected by flood defence schemes and so focussing development here, as per P3, P3RA1 and P3RA2, could help to reduce the risk of flooding faced by new development. There is a high degree of uncertainty in this. The provision of green infrastructure e.g. suds can also help to ensure flood							

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
		resilience in development. The alternative of ‘do nothing’ would not result in this direct positive effect and would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P3 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout in order to minimise the development’s adverse impact on air quality and also to protect site users from existing pollution.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 is concerned with sustainable places and, whilst there is some uncertainty over what this necessarily entails, it is considered to be likely that such development would adopt relatively low-emission construction and design techniques. Policy P3 would help to ensure that new development is situated in locations that facilitate higher rates of movement via walking, cycling and public transport. This would contribute towards a reduction in emissions associated with traffic and congestion. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. Areas in Wales of existing poor air quality, and where there are currently air quality improvement targets, are commonly in town and city centre areas. By encouraging new development to be situated in these locations, Policy P3 could potentially make achieving air quality improvement targets more difficult in some cases. However, this is likely preferable to situating new development in countryside locations and introducing air pollutants into areas of good air quality. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P3	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	The opportunity to require Green Infrastructure provision with developments and redevelopments of areas should be
			P3RA1	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P3RA2	Scale: Reg	T/P: P	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Reg	P	H	0	0	-	incorporated into the supporting text for the policy.
				Concentrating development in urban areas could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focussing development in urban area, such as due to more efficient and effective water recycling measures in these areas. There could potentially be a risk that the level of development policy P3 would encourage in urban locations could place additional pressure on the capacity of sewage systems, although it is expected that development would typically only be permitted where there is adequate capacity. PR3A1, would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.						
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations
			P3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			Policy P3 is likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet needs of everyone. It would reduce dependency on the private car and improve access to services and facilities for all. Depending on the location of the sites it is likely to have less of a positive impact for rural and isolated area as it has an urban focus however it does look to link to public transport networks. It would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth and increasing healthier lifestyle choices. The NDF recognises that smaller developments such as GP surgeries and schools may be more appropriate in accessible locations outside of city and town centres which could include rural areas and have positive benefits and reduce inequality of access to services.							

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
		P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		Policy P3 through the provision of improved public transport and access to facilities including active travel and green infrastructure will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access. This impact, depending on the locations of the sites is likely to be less positive for rural and more isolated communities however it does look to link to public transport networks. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	

Policy Grouping 2											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵							Recommendations
				Policy P3 would enable the use of Welsh Government investments and land holdings to support the delivery of sustainable places. Much of this land is in an accessible location where they are well suited to meet the needs of local people. Policy P3 could therefore make a meaningful contribution towards freeing up land throughout Wales for new development for sustainable places, and this would help to ensure that the varied housing needs across Wales can be met. This would likely result in improvements in terms of ensuring everyone, including children and young people have access to adequate housing, helping to reduce poverty and inequality. This depends on if the land holdings are used for the purpose of residential development, about which there is some uncertainty. This would be a direct effect of the policy that would be likely to increase in magnitude over time as more and more public land is utilised for new housing developments. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P3	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	P3 could potentially refer to sustainable place-making principles for new development on Government land holdings. However, this is included within PPW.	
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P3RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			Policy P3 would help to ensure that new development is situated within town and city centres across Wales, this would help to maintain areas of tranquillity and minimise light and noise pollution in rural areas. This would be expected to help ensure development is largely in-keeping with the local character and setting (i.e. not introducing hard-standing or the built form into rural or countryside areas). In some locations, the new development could pose a risk to the local townscape character without close consideration of the design and layout of the development. This may particularly be the case where the Government's land holdings are currently in use by buildings that make a major contribution towards the local character, such as hospitals, council offices, travel hubs or colleges. These would be direct effects of Policy P3.								

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵					Recommendations	
		P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P3	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-	See Objective 13.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P3RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
		Policy P3 would be likely to contribute towards an increasing quantity of new development taking place in town and city centres. These centres are often host to sensitive heritage assets such as Listed Buildings and Conservation Areas and can have a rich historic character. New development here therefore poses a risk to the setting of these sensitive assets. This may be a particular risk where the Government's land holdings are in use by historic buildings or buildings of a distinct character, such as old hospitals, universities, schools or transport hubs. On the other hand, the new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site in-comparison with its current impact on the setting of nearby assets or the local historic character. These would be direct effects of Policy P3. Policy P3 could help to improve access and understanding of these assets. Indirect effects could also result through improved public transport from these urban centres has the potential to improve access to heritage assets in more rural areas. PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.								
15	To create the opportunities for the		P3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P3RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 2									
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵					Recommendations
	protection and promotion of Welsh culture			Nat	T	L	+	+	+
			P3RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +
			P3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
			Supporting text to Policy P3 sets out that the policy applies to major trip-generating developments, such as sports stadia, cultural venues and exhibition spaces, which have the potential to drive regeneration and often rely on public funding. This could lead to significant benefits against this Objective, although this effect is only one of a wide range of other possibilities, so is uncertain and dependent on implementation. PR3A1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3, of a greater magnitude but with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.						
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P3	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -
			Policy P3 would help to ensure that new development is situated in predominantly urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. There is a potential opportunity for Green Infrastructure provision through improved access to walking and cycling networks, this will depend on implementation. P3 refers to 'the delivery of sustainable places' on Government land holdings. This is defined in PPW. Policy P3 would therefore help to ensure that new development taking place across Wales is less likely to adversely affect sensitive species, habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. This would be an indirect effect of Policy P3.						
									No recommendations.

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3 with less certainty. P3RA2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. P3RA3, the do-nothing approach, would conform with baseline trends.						
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P3RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Developments in town and city centre locations and on land owned by the Government would provide opportunities for redeveloping brownfield land. These sites would also be likely to have good access to opportunities for using recycled materials, for remediating contaminated land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. These direct effects of Policy P3 would be likely to grow over time as increasing quantities of development situated in town and city locations. P3RA1, which would apply the same approach but to all agencies and land-users (not just public landowners and investors) would be likely to have similar effects to P3 with less certainty. PR3A2, which would only apply the policy to newly available sites, would be likely to have similar effects but of a lower magnitude. PR3A3, the do-nothing approach, would conform with baseline trends.							

Table B-33: Policies and reasonable alternatives in Policy Grouping 3

Policy Grouping 3	
P5 - Delivering Affordable Homes	The Welsh Government will increase delivery of affordable homes by ensuring that funding for affordable homes is effectively allocated and utilised. Strategic and Local Development Plans should develop strong evidencebased policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, they should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.
P5RA1 – Do nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-34: Appraisal of Policy Grouping 3

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
	To encourage and support improvements in educational attainment		P5	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P5RA1	Scale:	T/P:	Cert:	ST	MT	LT	

⁶ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
1	for all age groups and all sectors of society to help to improve opportunities for life			n/a	n/a	H	0	0	0	
		P5 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P5	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P5 The provision of good quality housing for all, meeting local needs will have multiple health benefits including for older people. The policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales being able to access a good quality homes, including children and young people. Ensuring children and young people have access to a good quality home should contribute to improvements in their health and well-being and a reduction in health inequalities across Wales. Increased access to affordable housing led development in sustainable locations ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will contribute an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. The policy will help facilitate delivery of housing to rural areas. The alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	The sustainability of sites for development should be a primary consideration over where to situate new homes delivered to satisfy local needs.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
		P5 seeks to ensure that affordable housing is delivered to satisfy identified local needs. It is expected that this would lead to affordable homes being situated in locations that enable residents to access employment opportunities, thus leading to a major positive impact in enhancing economic inclusion. The alternative to this approach (P5RA1) of not having the policy would not have as significant an effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
		P5 would be likely to provide a boost to local productivity and to help diversify the local economy by better enabling people at the lower end of the income scale to live nearer to employment opportunities. Increased access to affordable housing led development ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will create opportunities for sustainable economic growth, diversity and business competitiveness. The policy will help facilitate delivery of affordable housing to rural areas. The alternative to this approach (P5RA1) of not having the policy would not have this direct positive effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P5	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P5 the development of an increased supply of affordable housing will directly support people in all communities, including Welsh speaking communities. P5RA1 The alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P5	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P5 seeks to encourage and support the development of affordable homes. The delivery of new homes would be expected to make achieving GHG emissions reduction targets more difficult due to both the construction phase and the occupation phase. New residents would be likely to consume materials and energy, as well as to drive vehicles, that leads to the emission of GHG gases. Development may also result in the loss of green infrastructure elements that currently help to store carbon, although it could alternatively help to increase the presence of green infrastructure at brownfield locations. It is unclear the extent to which affordable housing would adopt sustainable construction methods. It is also unclear if, because the location of new affordable housing would be based on local needs for affordable housing, the extent to which the sustainability of the location (including access to public transport modes) would be a consideration. The alternative to this approach of not having the policy would instead be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P5	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	The NDF could explicitly refer to the need to avoid
			P5RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
				Reg	T	L	0	0	-	delivering affordable homes in the floodplain or on land at a degree of flood risk with which the development type is incompatible.
		P5 seeks to encourage and support the development of affordable homes. The impact of this on flood risk is largely dependent on the location of new development, which is largely uncertain beyond the fact that it would be situated in accordance with identified local needs. The alternative to this approach of not having the policy (P5RA1) would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P5	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
		P5 seeks to encourage and support the development of affordable homes. The delivery of new homes would be expected to make achieving air quality improvement targets more difficult due to both the construction phase and the occupation phase. New residents would be likely to consume materials and energy, as well as to drive vehicles, that leads to some degree of air pollution. Development may also result in the loss of green infrastructure elements that currently help to filter air pollutants, although it could alternatively help to increase the presence of green infrastructure at brownfield locations. It is unclear the extent to which affordable housing would adopt sustainable construction methods. It is also unclear if, because the location of new affordable housing would be based on local needs for affordable housing, the extent to which the sustainability of the location (including access to public transport modes) would be a consideration. The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P5	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		P5 seeks to encourage and support the development of affordable homes. New residents would be likely to increase local rates of water consumption. Development may also result in the loss of green infrastructure elements that currently help to filter protect natural water bodies including from the potential pollution impacts of construction. The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
10	To create opportunities for the improved connectivity of		P5	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	See Objective 3.
			P5RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
	communities and sustainable access to basic goods, services and amenities for all groups			Nat	T	M	0	0	-	
		The policy will help facilitate delivery of affordable housing in areas where there is a local need, including rural areas. Over time this could help to ensure that people of all backgrounds are can live in homes that have access to existing communities, services and amenities although there is some uncertainty over this due to the unknown precise locations of development. The alternative to this approach (P5RA1) would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	See Objective 3.
			P5RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT -	
		P5 - Increased access to affordable housing led development ensuring development is adhering to the plan-led system and not built in isolation of essential infrastructure and services and are responding to identified local needs will create opportunities within which an improvement in social cohesion and equality can be achieved. The policy will help facilitate delivery of affordable housing to rural areas. This policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales being able to access a good quality home, including children and young people. Ensuring access to a good quality home should contribute to improvements in social cohesion and equality, with less disproportionate conditions in terms of the types of accommodation. The alternative to this approach of not having the policy (P5RA1) would not have this direct positive effect and would instead be likely to conform with baseline trends								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P5	Scale: Reg	T/P: T	Cert: H	ST ++	ST ++	ST ++	See Objective 3..
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
		P5 would make a major contribution towards ensuring that there is an adequate provision of affordable housing across Wales in locations where it is needed (with local needs determined by appropriate evidence bases). The policy will therefore directly provide opportunities for the provision of good quality, safe, affordable housing that meets identified needs for families, including for children and young people. The policy will help facilitate delivery of affordable housing to rural areas. The alternative approach to this of not having a policy (P5RA1) would see a continued reliance on market housing development to deliver a proportion of affordable housing. This would be expected to conform with baseline trends.								
13	To create opportunities for the protection and		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
	enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		The impact of new affordable housing on the local landscape or townscape largely depends on the precise location of development, its type, design and layout in relation to the local character. Where new development is situated on brownfield land there is an opportunity to enhance the site's impact on local character. Development on greenfield risks removing existing open space and replacing green areas with the built form and avoiding adverse impacts on local character as a result of this would be difficult to achieve in all cases. Overall it is considered that the new development poses a risk of altering the character and current distinctiveness of areas in Wales where the development is situated, particularly where such development is delivered in rural locations. The alternative to this approach would mean that development would be left to accord with PPW and LDPs but would not be managed in the more strategic manner enabled by the NDF. This development would instead be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
		The impact of new affordable housing on historic areas or assets largely depends on the precise location of development as well as its type, design and layout in relation to the surrounding built form or rural area. Where new development is situated on brownfield land there is an opportunity to enhance the site's impact on the setting of nearby heritage assets, such as by redeveloping a derelict site. Development on greenfield risks removing existing open space and replacing green areas with the built form and avoiding adverse impacts on the setting of sensitive heritage assets as a result of this would be difficult to achieve in all cases. Overall it is considered that the new development poses a risk of altering the setting of heritage assets and historic environments near where affordable housing development is situated. Impacts in rural locations have the potential to be more severe, due to the general discordance of built form with countryside areas, but as heritage assets are typically more numerous in urban locations development in towns and cities could pose a risk to the setting of a greater number of assets than development in rural areas. The alternative to this approach of not having the policy would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P5	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P5RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P5 and its alternative would not be expected to have a discernible impact on Welsh culture.								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			The development of new affordable housing in Wales could potentially pose a risk to biodiversity and geodiversity, particularly when it is on previously undeveloped land and the the development would result in the loss of a greenfield, soils and above-ground vegetation. New development could lead to a reduction ecological connectivity, particularly if it is situatd in rural locations and given that the policy seeks to support new affordable housing in accordance with identified needs it is considered to be likely that some of the affordable homes would be in rural areas. The alternative to this approach of not having the policy (P5RA1) would mean development would be left to accord with PPW and LDPs but would not be managed in the more strategic manner enabled by the NDF. Development would instead be likely to conform with baseline trends.							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P5	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	See Objective 3.
			P5RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P5 would encourage and support the provision of new affordable homes. The construction and occupation of these homes would be likely to necessitate the consumption of natural resources to some extent, including through materials used in construction and resources consumed by new residents. The alternative to this approach of not having the policy (P5RA1) would instead be likely to conform with baseline trends.							

Table B-35: Policies and reasonable alternatives in Policy Grouping 4

Policy Grouping 4	
P6 - Planning in Mobile Action Zones	In Mobile Action Zones, local planning authorities and telecommunications operators will work together to increase mobile coverage collaboratively identifying suitable sites and buildings for new equipment and infrastructure. Considerable weight will be given for the need to increase mobile phone coverage, along with its associated economic benefits. Accordingly, there is a presumption in favour for new mobile telecommunications infrastructure, provided that there are no significant adverse landscape impacts.
P6RA1 – Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-36: Appraisal of Policy Grouping 4

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P6	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Spatial implications of the Policy are relatively uncertain. P6 could potentially include a map or a more detailed spatial element that sets out priority areas where digital infrastructure would be strongly
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
		P6 – Increasing digital connectivity across Wales will open up opportunities for people to access education, training and skills digitally. This is a particular benefit for more isolated and rural communities. This could enable children and young people to be more easily able to access learning opportunities and improve digital literacy levels through technology. Such a Policy could therefore have a positive impact on supporting improvements to educational attainment in the long term.								

⁷ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
		P6RA1 the do-nothing approach would conform with baseline trends, which may lead to restrictive policies being put on mobile telecommunications infrastructure, to the disadvantage of some communities and the economy. .								encouraged, in accordance with areas most at need.
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P6	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P6 – increasing digital connectivity across Wales will open up opportunities for increased access to digital health services, where available and opportunities to work remotely could increase employment opportunities which would bring wider health benefits such as improving air quality through reduce commuting trips, reducing poverty through increasing prosperity for all. This is a particular benefit for more isolated and rural communities. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and in particular rural areas. P6RA1 the do-nothing approach would conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 1.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P6 Identifying Mobile Action Zones so that mobile coverage can be increased in areas of most need would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. This would be likely to contribute towards an improvement in the quality and diversity of employment opportunities on offer to local people in these areas. Opportunities to work remotely could increase employment opportunities for all, in particular benefits for isolated and rural communities. Many areas which suffer from poor mobile signal are rural and are within the Welsh language’s strongholds. Increasing								

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
		economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities P6RA1 would see no such policy being adopted and it is unlikely that mobile communications would significantly improve much in these areas. This do-nothing approach would therefore be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 1.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P6 Identifying Mobile Action Zones so that mobile coverage can be increased in areas of most need would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. Benefits would be particularly noticeable for rural businesses, particularly SMEs, by opening up new markets and increasing productivity. It will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to the creation of opportunities for sustainable economic growth, diversity and business competitiveness in rural areas. Increasing digital connections could also provide opportunities for the third sector. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: P	Cert: H	ST 0	MT 0	LT +	
		P6. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities The do-nothing approach would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P6RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
	reduced and limited and encourage energy efficient and sustainable design			Nat	P	H	0	0	+	
		P6 Enhanced mobile communications can enable people in these areas to carry out more of their actions and interactions, that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce GHG emissions associated with the transport sector. The do-nothing approach (P6RA1) would therefore be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								
8	To create opportunities to encourage the protection and improvement of air quality		P6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		Enhanced mobile communications can enable people in these areas to carry out more of their actions and interactions that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce air pollution associated with the transport sector and result in health benefits, increasing cumulatively over the long term, as working and travel habits change. The do-nothing approach would therefore be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P6	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
		P6 Increasing digital connectivity across Wales will open up opportunities for increased access to facilities and services such as health services, where available, reduce the reliance on the private car for everyone. This is a particular benefit for more isolated and rural communities. It is considered the								

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷					Recommendations	
		policy would create opportunities for the improved connectivity of communities and sustainable access to goods and services including for children and young people. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P6	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
		P6 Increasing digital connectivity can help to reduce loneliness and isolation, reduce the need to travel to work and improve community cohesion. It can help people to live more independent lives and reduce inequalities throughout Wales. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology. In this regard, it is considered the policy would reduce inequalities in terms of digital communication and would therefore create opportunities for improvements in social cohesion and equality. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can create the opportunities within which an improvement in social cohesion and equality can be achieved in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		P6 The enhancement of mobile communications in areas of greatest need could help to ensure that local people in these areas are able to live good quality lives at home. It would also enable them to carry out a wider range of actions online or over the phone, which could reduce the risk of isolation for some people and permit more affordable lifestyles for others. The do-nothing alternative (P6RA1) would not provide these indirect benefits and would be likely to conform with baseline trends.								
13			P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	The provision of new mobile communications infrastructure should be carefully managed and located to help ensure adverse impacts on the local character are avoided.
		P6 There is a risk that the delivery of new infrastructure required for enhancing mobile communications could potentially have an adverse impact on character, such as mobile phone masts which are relatively tall and in rural or open locations can be discordant with the surrounding area. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P6	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	The provision of new mobile communications infrastructure should be carefully managed and located to help ensure adverse impacts on the setting of heritage assets or historic areas are avoided.
			P6RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P6 There is a risk that the delivery of new infrastructure required for enhancing mobile communications could potentially have an adverse impact on character, such as mobile phone masts which are relatively tall and in rural or open locations can be discordant with the surrounding area. The do-nothing approach (P6RA1) would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		Increasing digital connectivity can increase access to digitally available cultural resources. However P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective directly.								
16	To create opportunities for the conservation and enhancement of		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
	biodiversity and geodiversity	P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P6	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P6RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P6 and its alternative would be unlikely to have a discernible impact on this ISA Objective.								

Table B-36: Policies and reasonable alternatives in Policy Grouping 5

Policy Grouping 5	
P7 – Ultra Low Emission Vehicles	The Welsh Government supports the increasing use of ultra low emission vehicles. We will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.
P7RA1 – Identify the locations for a network of rapid charging points	This option would set out the locations for a network of rapid charging points across Wales to enable longer distance travel by electric vehicles.
P7RA 2– Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	
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Table B-37: Appraisal of Policy Grouping 5

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be unlikely to have a discernible impact on this ISA Objective.								
2	To contribute to an improvement in physical, mental and social health and well-being for all,		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P7RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT ++	

⁸ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 5											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations	
	including contributing towards a reduction in health inequalities across Wales		P7RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +		
		P7 This Policy aims to support the uptake of ultra-low emission vehicles in Wales through the rolling out of electric vehicle charging infrastructure. Such a Policy encouraging the use of electronically powered cars rather than those powered by petrol or diesel would support tackling climate change and air quality. Therefore, in the long term, this Policy could reduce reliance on the private car and support improvements in health including for children and young people across Wales. Promoting the decarbonisation of transport and the uptake of low emission vehicles will have a positive effect on rural areas. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and rural areas P7RA1 aims to support the uptake of ultra-low emission vehicles in Wales through the rolling out of electric vehicle charging infrastructure. Such a Policy Alternative encouraging the use of electronically powered cars rather than those powered by petrol or diesel would support tackling climate change and air quality. Therefore, in the long term, this Policy Alternative could support improvements in health across Wales, albeit not with a high level of direct impact. A network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles. The do-nothing scenario (P7RA2) would be likely to conform with baseline trends.									
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P7	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	No recommendations.	
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +		
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
		The provision of electric car charging points throughout Wales, as per P7, could help to ensure people in Wales can travel from place to place including places of employment via sustainable transport modes, although there is some uncertainty over how many charging points would be delivered and where these would be and the benefits in terms of economic inclusion are likely to be negligible in the medium and short-term. The market would in all probability not prioritise rural areas for recharging provision, therefore there would be uncertain effects in rural areas. P7RA1 would ensure that such locations are identified, which could provide further certainty over these benefits. The do-nothing approach (P7RA2) would be likely to conform with baseline trends.									

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P7	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
		P7 and its alternatives could help to ensure that future economic development and economic growth in Wales is sustainable by encouraging more sustainable travel modes. There is greater certainty of this for P7RA1 than for P7. Promoting the decarbonisation of transport and the uptake of low emission vehicles will have a positive effect on rural areas. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas, therefore there would be uncertain effects in rural areas. The do-nothing scenario would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
		P7 and P7RA1 would help encourage Wales' transition towards a more sustainable and low-carbon transport sector. P7RA1 provides greater certainty over this taking place. The do-nothing approach would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 5											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations	
				n/a	n/a	H	0	0	0		
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.									
8	To create opportunities to encourage the protection and improvement of air quality		P7	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	No recommendations.	
			P7RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
			P7RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++		
		P7 and P7RA1 would help encourage Wales' transition towards a more sustainable and low-emission transport sector. P7RA1 provides greater certainty over this taking place. The do-nothing approach would be likely to conform with baseline trends.									
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.	
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.									
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P7	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	No recommendations.	
			P7RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +		
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
		P7 Promoting the decarbonisation of transport and the uptake of low emission vehicles will bring benefits to communities across wales through potentially improving access to goods and services through more sustainable methods. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas, therefore there would be uncertain effects in rural areas. Under P7RA1, a network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles. It could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups including those in rural areas.									

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations
		The do-nothing approach would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P7	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	No recommendations.
			P7RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P7RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P7 Promoting the decarbonisation of transport and the uptake of low emission vehicles will bring benefits to communities across wales through potentially improving access to goods and services through more sustainable methods which can help to reduce inequalities. It could lead to carbon reduction in rural areas and also increased provision for ULEV for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. Under P7RA1, a network of rapid charging points would be a positive policy but would not have the same impact in isolation, as promoting the decarbonisation of transport through ultra-low emission vehicles. It could create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups including those in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.										
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.										
14			P7	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁸						Recommendations
	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings			n/a	n/a	H	0	0	0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
15	To create the opportunities for the protection and promotion of Welsh culture		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		By facilitating a shift towards electric vehicles, P7 and P7RA1 would help to reduce rates of atmospheric nitrogen deposition associated with the transport sector in Wales. It could lead to a carbon reduction rural areas and also increased provision for ULEVs for those living in rural areas. This would eventually help to alleviate harm to sensitive habitats caused by atmospheric nitrogen deposition. This indirect positive impact would be likely to be minor and only discernible in the long-term. The alternative approach of no policy would not contribute towards the shift towards reduced pollution and would instead be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P7	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P7RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P7RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P7 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.								

Table B-38: Policies and reasonable alternatives in Policy Grouping 6

Policy Grouping 6	
P8 - Strategic framework for biodiversity enhancement and ecosystem resilience	To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify: - - areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and - opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being. Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.
P8RA1 – Use GI Mapping to identify and prioritise more site-specific national scale places and networks which require protection or enhancement	This option would identify sites and networks which require protection and or enhancement throughout Wales.
P8RA2 – Direct local authorities to take specific actions through their development plans	This option would set a policy direction to lower tier plans to take specific actions to increase the resilience of ecological networks and services.
P8RA3 – Do Nothing	Do not have a policy.
P9 - National forest for Wales	The Welsh Government is committed to developing a national forest and will identify appropriate delivery sites and mechanisms to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.
P9RA1 – Require Development to contribute to woodland planting targets	This option would set a woodland planting target for Wales and require development to contribute towards achieving this.
P9RA2 – Do Nothing	Do not have a policy.

The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.

Table B-39: Appraisal of Policy Grouping 6

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to education facilities, leading to minor positive benefits in the medium and longer term against this objective. P8, P9, P8RA1, P8RA2 and P9RA1 would enhance opportunities for people across Wales to learn about wildlife and nature, leading to minor positive benefits in the medium and longer term against this objective. P8RA3 and P9RA2, the do-nothing approaches, would be likely to conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	

⁹ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
	health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to improved physical and mental well-being through enhanced access to health facilities, as well as improved access to green space and potential for improvements to air quality. P8, P9, P8RA1, P8RA2 and P9RA1 would enhance opportunities for people across Wales to access a diverse range of natural and semi-natural habitats. This would be expected to provide major physical and mental health benefits for people. Do-nothing approaches would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the diversity,								

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
		quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the diversity, quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. This could also increase benefits for the third sector. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.										
5	To contribute towards the future well-being of the Welsh language		P8	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P8RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P8, P9 and their alternatives would be expected to result in no discernible impact on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	Where Green Infrastructure elements in urban locations are used to support sustainable growth, ecological connectivity, social equality and public well-being, wording could be included in the supporting text to emphasise that coherent and well-manged GI networks in urban locations can provide essential ecosystem services beyond well-being of local people, including facilitating higher rates of low-emission transport (walking and cycling), alleviating flood risk, capturing and storing carbon, filtering air and removing pollutants, protecting below ground natural resources and
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including capturing and storing carbon and this would be likely to be protected and enhanced through these policies. The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.								

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
										protecting and enhancing the local townscape character as well as the setting of nearby heritage assets.
7	To contribute to the reduction and management of flood risk		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6. The new forest proposed in P9 could be strategically located in order to maximise its flood risk alleviation ecosystem service value, for example by ensuring some of the forest covers upland areas or is in an active floodplain.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P9	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		The creation of new, and the protection and enhancement of existing, natural environment structures as is proposed in P8, P8RA1, P8RA2, P9 and P9RA1 could help to provide effective and nature-based flood risk alleviation benefits. This depends on location of these elements in relation to flood risk, but overall it is considered to be likely that these policies would help to provide sustainable flood risk management benefits across Wales. A new National Forest would be likely to provide benefits towards flood risk alleviation, particularly if the forest is partially upslope. P9RA1 may lead to a wider distribution of new tree-planting than the new National Forest, which may increase the certainty and distribution of flood risk alleviation benefits from new tree planting. Do-nothing approaches would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including filtering air and removing pollutants and this would be likely to be protected and enhanced through these policies leading to improvements for human health. The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			Above-ground and below-ground biomass and soils can play an essential role in helping to protect and potentially enhance the quality of natural waters as a result of the natural filtering processes they provide for above and below ground water flow. P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help preserve this function resulting in health benefits. Do-nothing approaches would be likely to conform with baseline trends.							
10			P8	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups			Nat	T	M	0	+	+	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8, P8RA1 and P8RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to education facilities.							
P9 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.										
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P8	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8, P8RA1, P8RA2, P9 and P9RA1 would be likely to help provide opportunities for everyone including children and young people to have access to good quality and clean environments and to pursue living standards that meet their physical and mental needs due to the provision of high quality natural and semi-natural environments.							

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
		The do-nothing alternatives would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P8	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P8RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P8RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P9RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
None of these policies, or their reasonable alternatives, would be expected to lead to discernible impacts on the delivery of housing.										
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
P8, P8RA1, P9 and P9RA1 would be expected to lead to major positive impacts on the character of landscapes and townscapes across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and										

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
		enhanced. These are typically visually attractive elements that positively influence the character of the surrounding area. The provision of a new National Forest (P9) would be likely to make a major positive, distinctive and high-quality change to the character of the area within which it is set. The alternative to this, encouraging higher rates of tree planting across Wales instead of focussing in one location, would be likely to provide minor positive benefits to the character of landscapes and townscapes across Wales. The do-nothing approaches would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	See Objective 6.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to lead to major positive impacts on the setting of heritage assets and historic areas across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and enhanced. These are typically visually attractive elements that positively influence the setting of assets and areas. The provision of a new National Forest (P9) would be likely to make a major positive, distinctive and high-quality change to the setting of any nearby heritage features, although this would require careful positioning of the forest to avoid affected the setting of any heritage assets and potentially diminishing their accessibility. The alternative to this, encouraging higher rates of tree planting across Wales instead of focussing in one location, would be likely to provide minor positive benefits to the setting of assets and features across Wales. There is a high degree of uncertainty behind the identified effects as it largely depends on the distribution of heritage assets and features in relation to the natural environment elements created, protected or enhanced. The do-nothing approaches would be likely to conform with baseline trends.							
15		P8	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
To create the opportunities for the protection and promotion of Welsh culture				Nat	T	M	+	+	+	No recommendations.
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			P9	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
			The sustainable land-uses proposed in P8 P8RA1, P8RA2, P9 and P9RA1 would be expected to help create opportunities for recognising, promoting and enhancing Welsh culture. These policies and alternatives would encourage higher rates of people in Wales exploring the outdoors and taking experience the traditional places and traditions of Wales. Do-nothing approaches would be expected to conform with baseline trends.							
	16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P8	Scale: Nat	T/P: T	Cert: M	ST	MT	LT
P8RA1				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P8RA2				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P8RA3				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P9				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P9RA1				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P9RA2				Scale: Nat	T/P: T	Cert: M	ST	MT	LT	
P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to lead to major positive impacts on the protection and enhancement of biodiversity in Wales.										

Policy Grouping 6											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹							Recommendations
				P8 would help to ensure that ecological networks remain coherent and connected across Wales, thereby better enabling the free movement of species and reducing the risk of isolated islands of habitats of species being ‘cut off from nature’. P8RA1 would specify in the NDF which sites require immediate action. This would be likely to provide similar benefits to biodiversity as P8 but could perhaps provide greater certainty over them taking place. The strategic level at which the NDF operates may be an advantageous scale at which to identify sites for protection or enhancement as it would enable joined up thinking across the country. P8RA2 would see lower tier plans taking specific actions to increase the resilience of ecological networks and services. Local planning authorities may be best placed to make informed choices about how best to tackle bespoke local issues related to local ecological networks, habitats and species. However, it could lead difficulties in ensuring there is joined up thinking across Wales in protecting and enhancing a coherent ecological network. The provision of strategic GI networks throughout urban locations would be an effective means of enabling wildlife to move freely into, throughout and beyond urban areas and to avoid towns and cities becoming ‘dead zones’ in terms of nature. It would also reduce the disruptive impact urban areas can have on ecological connectivity and the distances between habitats. The alternative to this of delivering grey infrastructure instead would be likely to have no biodiversity value and would conform with baseline trends. Delivering a new National Forest would be expected to establish an area in Wales that is of significant biodiversity value and which can be effectively managed to maximise on this. The alternative of encouraging higher rates of tree planting across Wales would also be of high biodiversity value, but certainly to a lower magnitude, although this value would be distributed across all of Wales and could contribute towards improve ecological connectivity. Do nothing approaches would be expected to conform with baseline trends.							various levels, including the national and strategic level, the regional level and local level, to ensure that there is a coherency in the approach across Wales whilst regional and local bespoke needs are taken into consideration. Development should also seek to be in accordance with outcomes of the separate HRA process.
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P8	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See Objective 6.	
			P8RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P8RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P8RA3	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			P9	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P9RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁹						Recommendations
			P9RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		The sustainable land-uses proposed in P8, P8RA1, P8RA2, P9 and P9RA1 would be expected to help protect and enhance the natural resources belowground, including ecologically and agriculturally valuable soils, from the impacts of development. Using this land for these purposes would also reduce the consumption of materials for construction whilst they would not generate any waste. Do-nothing approaches would be likely to conform with baseline trends.								

Table B-40: Policies and reasonable alternatives in Policy Grouping 7

Policy Grouping 7

P10 – Wind and solar energy in Priority Areas

The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change.

When determining planning applications for large scale on-shore wind and solar energy development in Priority Areas, significant weight will be given to the proposal's contribution to reducing Wales' greenhouse gas emissions and meeting our decarbonisation and renewable energy targets.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been minimised:

- landscape and visual impacts;
- cumulative impacts;
- the setting of National Parks and Areas of Outstanding Natural Beauty;
- visual dominance, shadow flicker, reflected light or noise impacts;
- electromagnetic disturbance to existing communications systems; and
- the following identified protected assets:
 - archaeological, architectural or historic assets;
 - nature conservation sites and species; and
 - natural resources or reserves.

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.

Policy Grouping 7	
P11 – Wind and Solar Energy Outside of Priority Areas	Outside of the Priority Areas for Solar and Wind, planning applications for large scale wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below. Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following: • landscape and visual impacts; • cumulative impacts; • the setting of National Parks and Areas of Outstanding Natural Beauty; • visual dominance, shadow flicker, reflected light or noise impacts; • electromagnetic disturbance to existing communications systems; and • the following identified protected assets: - archaeological, architectural or historic assets; - nature conservation sites and species; and - natural resources or reserves. Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.
12 - Wind and Solar Energy in National Parks and Areas of Outstanding Natural Beauty	Large scale on-shore wind and solar energy development is not acceptable within National Parks and Areas of Outstanding Natural Beauty.
P13 – Other Renewable Energy Developments	. Proposals for other large scale renewable energy generation will be determined in accordance with the criteria of Policy P11.
P10/11/12/13RA1 – Identify the best locations for other renewable and low carbon technologies such as hydropower or biomass	This option would widen the policy to identify locations for other renewable and low carbon technologies such as hydropower and biomass.
P10/11/12/13RA2 – Apply policy to all scales of renewable and low carbon development	This option would apply the policy to all scales of renewable energy and low carbon development and not just those above 10MW.
P10/11/12/13RA3 – Let the market decide	This option would provide a framework for the market to develop renewable energy and low carbon technologies in the strongest market areas.
P10/11/12/13RA4 – Do Nothing	Do not have a policy.
P14 – Priority Areas for District Heat Networks	Within Priority Areas for District Heat Networks, planning authorities should identify opportunities for District Heat Networks and ensure they are integrated within new and existing development.

Policy Grouping 7	
P14RA1 – Promote the energy efficiency and sustainable design of individual buildings	This option would promote the energy efficiency and sustainable design of buildings.
P14RA2 – Require district heating networks in certain locations and for certain forms of development	This option would set specific criteria for district heating networks to be delivered.
P14RA3 – Do Nothing	Do not have a policy.
P15 Master planning For District Heat Networks	Large scale, mixed used development should, where feasible, have a District Heat Network. Planning applications for such development should prepare an Energy Masterplan to establish whether a District Heat Network is the most effective energy supply option and, for feasible projects, a plan for its implementation.
P15RA1 – Requirement for a District Heat Network	This option would require that all developments of a certain scale, type and/or in a defined area require a district heat network.
P15RA2 – Do Nothing	Do not have a policy
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-41: Appraisal of Policy Grouping 7

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P10	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	

¹⁰ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			These policies would be expected to result in no discernible impacts on this ISA Objective.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P10	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P12	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P13	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/13RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10, P11 and P13 look to provide policies for which the overall objectives are to facilitate renewable energy, reduce carbon emissions and tackle climate change should help to address overall improvements in health and well-being for communities across Wales, including for children and young people and P12 would retain tranquillity in these areas which provide mental health benefits. P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). P14RA1 could also have a similar effect, but of a slightly lower magnitude. The do-nothing approach would be likely to conform with baseline trends. P12 would prevent wind and solar energy generation in National Parks. This could help to preserve the distinctiveness and quality of National Parks in Wales which could help to protect their ability to provide people across Wales with access to the outdoors and natural habitats (beneficial to physical and mental well-being). P14, P14RA1, P14RA3, P14RA3, P15, P15RA1 and P15RA2 would be unlikely to have a discernible effect on this Objective.							
3	To create opportunities for an increase in employment across		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	It is recommended that P10/11/12/13 could be considered in
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
the country and promote economic inclusion			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	greater detail, widening the policy to include locations for other renewable and low carbon technologies such as hydropower or biomass. It is noted that developments under 10MW will be identified by local planning authorities in their renewable energy assessments. It is suggested that district heating might also be better addressed at a more local level. Ways in which developers might be able to demonstrate the economic benefits to local communities from schemes could be highlighted in the text, to enable implementation.
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.' Policies P10, P11 and P13 state that 'planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...' This could lead to positive effects against this objective, although the significance of the potential employment opportunities is unclear. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). The do-nothing approach would be likely to conform with baseline trends.							
P12, P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.										

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations
			Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with baseline trends.							
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See recommendations under objective 3.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations
		Supporting text to the chapter states that 'large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.' Policies P10, P11 and P13 state that 'planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...' This could lead to positive effects against this objective, although the significance of the potential employment opportunities is unclear. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). The do-nothing approach would be likely to conform with baseline trends. P12, P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P10/11/12/13RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰						Recommendations
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
		Policies P10, P11 and P13 as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. The do-nothing approach would be likely to conform with baseline trends. All other policies would be expected to result in no discernible impact on this Objective. P14, P15 and their alternatives would result in no discernible impacts on this ISA Objective.									
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	See recommendations under objective 3. It is suggested that district heating (P14 and P15) and the associated reasonable alternatives might be better addressed at a more local level.	
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +		
			P10/11/12/13RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +		
			P10/11/12/13RA4	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT +		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +		

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
		Policies P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to reduce greenhouse gas emissions. Supporting text states that there is a presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. Similarly, reasonable alternatives as well as P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to beneficial effects, although these are likely to have an impact of lower significance in themselves. Cumulatively, however, effects could also be significant in the longer term. P14 and P15, as well as their alternatives, could facilitate a more efficient management of heat in Districts across Wales. P12 would have no discernible impact on this Objective. Do-nothing approaches would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P10	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/13RA1	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/13RA2	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P10/11/12/13RA3	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/1 3RA4	Scale: Nat	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		It is unclear if the developments cited in Policies P10, P11 and P13 as well as their alternatives, would be situated in areas of flood risk or would alter flood risk elsewhere as this is determined by the precise location of the development in relation to development characteristics. P12, P14 and P15 and their alternatives would have no discernible impacts on this Objective. It is considered that there is unlikely to be a direct link between the policies in this grouping and flood risk.								
8	To create opportunities to encourage the protection and improvement of air quality		P10	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT +	LT ++	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/13RA4	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
Policies P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to improve air quality. Supporting text states that there is a presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. Similarly, reasonable alternatives P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to beneficial effects, although these are likely to have an impact of lower significance in themselves. Cumulatively, however, effects could also be significant in the longer term. P12, P14 and P15 would be expected to have no discernible impacts on this ISA Objective.										
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P10/11/12/13RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
Renewable energy based around hydroelectricity, which could be facilitated through P13, could potentially pose a risk to water quality as well as hydromorphology where it is located and this may make achieving Water Framework Directive targets more difficult. It is uncertain the extent to which these policies would encourage and facilitate hydroelectric power stations and where these would be located in relation to natural waters. All other policies and alternatives would be expected to result in no discernible impacts on this Objective.										
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰						Recommendations
	amenities for all groups		P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			It is considered that there is unlikely to be a direct link between the policies in this grouping and this ISA Objective.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P10	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +	No recommendations.	
			P11	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P13	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		
			P10/11/12/1 3RA1	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +		

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/1 3RA2	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +	
			P10/11/12/1 3RA3	Scale: T	T/P: Reg	Cert: L	ST 0	MT 0	ST +	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			Supporting text to the chapter states that ‘large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.’ Policies P10, P11 and P13 state that ‘planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...’ This could lead to positive effects against this objective. P10/11/12/13RA1, P10/11/12/13RA2 and P10/11/12/13RA3 could lead to similar benefits. It is considered that there is unlikely to be a direct link between all other policies and this ISA Objective.							
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			It is considered that there is unlikely to be a direct link between the policies in this grouping and affordable housing provision.							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P10	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: Local	T/P: P	Cert: M	ST +	MT +	LT +	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: Local	T/P: P	Cert: M	ST -	MT -	LT -	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰						Recommendations
			P10/11/12/1 3RA2	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	Policy 12 - the policy could be strengthened to include impacts from developments near to the boundary of these areas – in supporting text. Policy P14 could include text to ensure that the design of District Heat Networks is reflective of local character, as far as possible, as part of the criteria for their development within urban areas. If one of the alternative policies were pursued, these should provide robust wording with regards to visual controls as is provided in the preferred policies.	
			P10/11/12/1 3RA3	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -		
			P10/11/12/1 3RA4	Scale: Nat	T/P: P	Cert: L	ST 0	MT 0	LT -		
			P14	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P14RA3	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P15RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P10 has identified Priority Areas for Renewable Energy. The policy includes measures to ensure that landscape and visual impacts are minimised. This suggests that there is likely to be an accepted degree of landscape change, likely mitigated to some extent by the focus on less sensitive landscape areas. Supporting text to the chapter states that ‘there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. However, large scale wind and solar renewable energy development can be visually prominent.’ ‘A strategic Landscape and Visual Impact Assessment has been undertaken and the Priority Areas for Renewable Energy are considered to be the most appropriate locations to accommodate landscape change. There is, therefore, an acceptance of landscape change in these areas. However, the design and micro siting of proposals must minimise the landscape and visual impact.’ P12 would help to protect sensitive landscapes in National Parks. Outside of these areas Policy 11 and P13 are predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no adverse impacts’ by way of (<i>inter alia</i>): landscape and visual...’ it also seeks to prevent large scale onshore wind and solar energy development within National Parks and Areas of Outstanding Natural Beauty, which is essentially already											

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
		required by the existing landscape designations. Supporting text to the chapter states that ‘large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.’ Widening the policies, through P10/11/12/13RA1, could lead to negative landscape effects, particularly in the long term, and the unplanned cumulative impacts of the schemes could be significant. A similar effect is predicted for alternative P10/11/12/13RA12 and P10/11/12/13RA13. Do nothing approaches would be likely to conform with the baseline.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P10	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	See recommendations for objective 13.
			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P12	Scale: Local	T/P: P	Cert: M	ST +	MT +	LT +	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: Local	T/P: P	Cert: M	ST -	MT -	LT -	
			P10/11/12/1 3RA2	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	
			P10/11/12/1 3RA3	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	
			P10/11/12/1 3RA4	Scale: Nat	T/P: P	Cert: L	ST 0	MT 0	LT -	
			P14	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 7											
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations	
				Nat	n/a	H	0	0	0		
			P15RA2	Scale: Nat	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P10 has identified Priority Areas for Renewable Energy. The policy includes measures to ensure that visual impacts and other impacts on protected archaeological, architectural or historic assets are minimised. This may mean that some negative effects for historic assets and their settings remain, although their minimisation could reduce significance. Supporting text to the chapter states that ‘there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. However, it is accepted that large scale renewable energy development can be visually prominent.’ There is to some extent an acceptance of landscape change in these areas and this could subsequently involve visual impacts on the historic environment including historic landscapes. The design and micro siting of proposals could help to minimise impacts on local heritage assets such as nearby Listed Buildings but cumulative impacts on historic environments at the landscape-scale may be difficult to avoid. P12 would help to protect sensitive heritage assets and historic areas in National Parks. Outside of these areas Policy 11 and P13 are predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no unacceptable adverse impacts’ by way of (<i>inter alia</i>): landscape and visual; and the protected assets of archaeological, architectural or historic assets. It also seeks to prevent large scale onshore wind and solar energy development within National Parks and Areas of Outstanding Natural Beauty and in so doing would help to avoid impacts on any historic landscapes in these areas. This could lead to minor positive effects, as it is creating a protective principle against development in these areas of important heritage value. It should be noted that there are a lot of registered historical landscapes outside National Parks and AONBs, but these are assumed to be included under the phrase ‘historical assets’ in the policy. Supporting text to the chapter states that ‘large scale renewable energy schemes can generate direct social and economic benefit to local communities across the country.’ Policy 11 and P13 state that ‘planning applications must demonstrate how opportunities for local social, economic and environmental benefits have been maximised...’ This could lead to positive effects against this objective. through P10/11/12/13RA1, could lead to negative effects on the historic environment, particularly in the long term, and the unplanned cumulative impacts of the schemes could be significant. A similar effect is predicted for alternative P10/11/12/13RA12 and P10/11/12/13RA13. Do nothing approaches would be likely to conform with the baseline. P14, P15 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
15	To create the opportunities for the		P10	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P10, P11 and P13 could be	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
protection and promotion of Welsh culture			P11	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	strengthened by including reference to cultural benefits to encompass all elements of sustainable development.
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			It is considered that there is unlikely to be a direct link between the policies in this grouping and Welsh culture, however there may be indirect links and e.g. cultural value of landscapes, and these policies require developments to maximise social and environmental benefits, which could have a positive benefit for communities.							
16	To create opportunities for the conservation and		P10	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	See Objective 13.
			P11	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations
enhancement of biodiversity and geodiversity				Nat	T	L	+/-	+/-	+/-	
			P12	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P13	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P10/11/12/1 3RA3	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT +	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to improve air quality, which could have beneficial effects against this objective. Supporting text states that there is a presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. There is a potential for negative effects on biodiversity assets, as P10 seeks that impacts on nature conservation sites and species are ‘minimised’. However, outside of these areas P11 and P13 is predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no adverse impacts’ by way of (<i>inter</i>							

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹⁰						Recommendations
		<i>alia</i>) nature conservation sites and species. P10/11/12/13RA1, P10/11/12/13RA2, and P10/11/12/13RA3 could lead to similar impacts. The do-nothing alternatives would be likely to conform with the baseline. P12 could create non-significant benefits for biodiversity in these areas. P14, P15 and their alternatives would be expected to result in no discernible impacts on this Objective. It should be noted that the HRA of the NDF has, as of June 2019, ruled out an LSE on any European site as a result of any policy in the NDF. Adverse effects of P10, P11 and their alternaives would therefore be expected to be minor and discernible but insignificant.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P10	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations.
			P11	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P12	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P13	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/1 3RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/1 3RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/1 3RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P10/11/12/1 3RA4	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT -	
			P14	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P14RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P15RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹⁰					Recommendations
			P15RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to energy generation overall, with the target of 70 per cent of electricity generation to be generated from renewable energy by 2030. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. P10/11/12/13RA1, P10/11/12/13RA1 and P10/11/12/13RA1 would have similar benefits. The do-nothing alternative would conform with baseline trends. P12, P14, P15 and their alternatives would have no discernible impacts on this Objective.								

Table B-42: Policies and reasonable alternatives in Policy Grouping 8

Policy Grouping 8

P16 – Strategic Policies for Regional Planning	Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent LDPs):- - a spatial strategy; - a settlement hierarchy; - the housing provision and requirement; - the gypsy and traveller need; - the employment provision; - the spatial areas for strategic housing and employment growth, renewable energy and the identification of green belts, green corridors and nationally important landscapes; - the location of key services, transport and connectivity infrastructure; - a framework for the sustainable management of natural resources and cultural assets; - ecological networks and opportunities for protecting or enhancing the connectivity of these networks; and - a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal. The Welsh Government requires strategic development plans to come forward in each of the three regions to deliver the requirements of this Policy.
P16RA1 – Mandatory list of policy issues	This option would require regional planning to be undertaken and to cover the policy issues identified.
P16RA2 – Longer or shorter list of policy issues	This option would expand or reduce the topics covered within the policy.
P16RA3 - Approach to Regional Planning	The Welsh Government expects regional plans to come forward in each of the three regions to deliver the requirements of Policy P3.
P16RA4 - Mandatory footprint for regional planning	This option would require regional planning to be undertaken and would set a footprint indicating which areas must produce a SDP and which must produce a Joint LDP.
P16RA5 - Specify which authorities should work together	This option would require regional planning to be undertaken and would specify which authorities must work together.
P16RA6 – Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-43: Appraisal of Policy Grouping 8

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P16	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	Provide clarity on skills and training, in particular related to economic growth could widen term employment provision
			P16RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	The policy could be improved by referring to the ‘consideration of education establishments’ in a regional context (for example, where there may be a regional catchment for establishments such as colleges) where it refers to the “location of key services”.
			P16RA5	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
		Policy P16 the areas listed for inclusion in a regional level plan covers key services which could include education and skills facilities for all. The list specifies employment provision which again for sustainable economic growth should encompass education, training and skills but this is not clear. The Policy would support effective cross boundary provision of services such as housing and employment and, consequently, other linked services such as the provision of education opportunities. This could result in limited benefits in terms of children and young people across regions being able to access education establishments, resulting in increased attainment. Notwithstanding this, it is recognised the planning system at a regional level cannot directly influence the establishment of education services which is the responsibility of education authorities. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities								

¹¹ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P16	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	The policy refers to green belts and corridors but it is unclear whether or not this would encompass green infrastructure in its widest definition. This relationship with GI could be clarified in the supporting text.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			P16 the policy embeds placemaking and looks to deliver key services which will include health facilities and services. The list of topics encompasses a wide variety of determinants of health through placemaking including connectivity, employment, housing provision, natural resources which all can contribute positively to health and well-being for everyone when planned positively. Planning authorities will be able to determine what is best for their rural areas in terms of mental health and social well-being and will not be working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically. The policy specifies that the need for gypsy and travellers should be established which will have appositve impact on the health and well-being of the gypsy and traveller community. The policy would support effective cross boundary provision of services (such as housing and employment) and consideration of environmental issues (such as green belts and corridors) through the planning system. This should result in benefits in terms of sustainably locating services across regions, leading to associated health benefits and reducing							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		inequalities, including for children and young people. The policy could be strengthened to include green infrastructure elements not just green corridors. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA4 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	The supporting text could clarify the definition of 'connectivity infrastructure'- it is proposed this should include a wide definition including digital, green, active travel etc. to maximise benefits.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
		Policy P16 would help to ensure that regional plans are prepared across Wales and that these plans provide for an adequate quantity of employment land to satisfy the anticipated or desired jobs growth in the region. Both Policies would therefore make a direct major contribution towards improving employment opportunities across Wales for all working ages. Through embedding placemaking into the policy this would ensure growth is sustainable for all members of society and would have a								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		positive impact on sustainable growth. It is unclear however if ‘connectivity infrastructure’ includes digital connectivity, this should be clarified in the supporting text. Regional planning may permit a more holistic overview of the relationships between housing, travel, employment delivery and could have a modest positive impact if pattern of development takes language considerations into account. It would also enable rural issues to be looked at holistically. P16RA1, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
		It is expected that the employment provision delivered through regional plans, as set out in Policy P16, would make a major and direct contribution towards delivering significant economic growth and the diversification of regional economies throughout Wales including addressing rural issues								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				holistically. It also creates a framework to enable third sector activities to grow focusing around well-connected areas of growth. Regional planning could have a modest positive impact if pattern of development takes language considerations into account. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.						
5	To contribute towards the future well-being of the Welsh language		P16	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No Recommendations
			P16RA1	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA4	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA5	Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P16RA6	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P16 settlement hierarchies and strategies for distributing growth can support the Welsh language. This policy encourages the creation of regional plans setting growth strategies. The nature of these regional plans may have a positive or negative effect on use of the Welsh language. Planning authorities will be able to determine what is best for their rural areas in contributing towards the future							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		well-being of the Welsh language by not be working in isolation but across local authorities in a collaborative approach, looking at rural issues in a holistic manner. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			It is expected that regional planning detailed in Policy P16, would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. Policy P16 also requires regional plans to consider spatial areas for renewable energy generation. Policy P16 would therefore be likely to directly and positively contribute towards lowering GHG emissions from the transport sector as well as an increase in the amount of renewable energy generated.							

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P16	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	It is recommended that regional development plans are encouraged to collaborate with NRW to maximise flood risk management benefits.
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		It is considered to be likely that the regional planning detailed in Policy P16, would enable local planning authorities to adopt a strategic approach to directing new development away from land at risk of flooding. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened.								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +	
		It is expected that regional planning detailed in Policy P16 would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. Policies P16 would therefore be likely to directly and positively contribute towards reducing air pollution from the transport sector. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to mean that regional plans are not introduced. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	It is recommended that regional plans collaborate with NRW and water companies to
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
	quantity of water features and resources		P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	ensure sustainable management and use of water resources in the region.
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
		It is considered to be likely that the regional planning detailed in Policy P16, would enable local planning authorities to adopt a strategic approach to directing new development away from locations where the development would pose a major risk to the quality or quantity of natural waterbodies. A regional planning approach could also permit studying growth on a catchment basis, which would assist with better understanding how development cumulatively interacts with catchments and affects water supply. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would be likely to conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Nat	T	M	+	+	++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
			Policy P16 looks to deliver accessible, inclusive growth for all. With placemaking as a central principle. This would have a positive benefit to the connectivity and access for all to goods, services and facilities. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring children and young people have access to services such as retail, open space and employment alongside provision of homes. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +	
		Policy P16 with placemaking as a central principle this will help to reduce inequalities and benefit social cohesion. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring children and young people have equal access to services and therefore improvements in social cohesion and equality for these groups across Wales. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA4 and P16RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P16RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		The regional planning detailed in Policy P16, would enable local planning authorities to ensure that regional housing needs can be satisfied. This would be a major and direct positive impact on this ISA Objective. The provision of good quality housing will help to reduce inequalities and has wider health benefits. Planning on a regional basis could result in positives in terms of ensuring families, including children and young people, across Wales have access to good quality and affordable housing. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, by creating opportunities for the provision of good quality, safe, affordable housing by not be working in isolation but across local authorities in a collaborative approach, addressing rural issues in a holistic manner. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. A regional planning approach could enable a more strategic overview of housing market areas, including where they cross over between different counties, as well as a more holistic overview of employment and travel patterns in relation to homes. It may also help to ensure that housing delivery is cognisant of cross-border housing and employment markets in England, where relevant. P16RA2 and P16RA3 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario(P16RA6) would be likely to conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 8											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations	
				Nat	T	H	+	+	+		
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -		
			The regional planning detailed in Policy P16, would enable local planning authorities to help ensure that new development is located appropriately, away from distinct or sensitive landscapes with which it would discord, including Wales's five highly sensitive AONBs and National Parks. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier. Regional level planning is also an effective means of avoiding adverse cumulative impacts on sensitive but unprotected landscapes caused by small scale developments in-combination. The high-level development plans would enable a strategic approach to ensuring new development is directed from the identification of green belts and green corridors would help to protect sensitive and distinctive natural landscapes in many places. These would be direct and positive impacts on this ISA Objective. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.	
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		

Policy Grouping 8											
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
		The regional planning detailed in Policy P16, would enable local planning authorities to help ensure that new development is located appropriately, away from highly sensitive heritage assets or historic areas that it could potentially have an adverse impact on. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier. Regional planning may also offer a more strategic, holistic and effective means of preventing adverse cumulative effects on historic areas and historic landscapes caused by multiple small-scale developments in-combination. This would be a direct positive impact on this ISA Objective. P16RA1, P16RA3, P16RA4 and P163RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P3RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.									
15	To create the opportunities for the protection and promotion of Welsh culture		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	No recommendations.	
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +		
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +		
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT +		
			The regional planning detailed in Policy P16, would enable local planning authorities to situate new development in appropriate locations, such as based on the type, scale and density of locations. The								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
		placemaking principle will ensure sustainable growth and help to promote welsh culture. This would be expected to better enable planning authorities to protect and promote Welsh culture on a regional scale. This would be a direct positive impact on this ISA Objective. Planning authorities will be able to determine what is best for their rural areas by creating opportunities for the protection and promotion of Welsh culture by not be working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA5 and P16RA6 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	Policy P16 currently advises that regional plans should identify green belts and green corridors. It is unclear if the intention is for regional plans to identify existing green corridors, or to identify and seek to establish new green corridors. In order to try and protect and enhance the connectivity of ecological networks across Wales, Policy P16 could potentially refer to ecological
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT +	
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -	
			The regional planning detailed in Policy P16, would enable local planning authorities to direct new development away from areas of high biodiversity value or sensitive designations. The regional plans would also be expected to ‘identify green belts (and) corridors’, which would help to protect biodiversity rich areas as well as connectivity of ecological networks. Regional planning would also be							

Policy Grouping 8									
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹					Recommendations
				a good way of identifying, evaluating and mitigating potential cumulative impacts of development on ecological networks and wildlife corridors, as well as Natura 2000 sites, such as through habitat fragmentation. The placemaking principle will ensure increase accessibility to natural green spaces, maximising health and well-being benefits. The regional level of planning would also permit a close study of the impacts of development on water resources on the catchment scale, which bears significance for habitats and species across Wales reliant on water or sensitive to changes in the water table. These would be direct positive impacts on this ISA Objective. All reasonable alternative options would enforce or mandate local authorities to adopt regional planning. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place. P16RA1, P16RA3, P16RA4 and P16RA5 would enforce or mandate local authorities to adopt regional planning and would determine certain components of the Plans. This would lead to the same effects as those identified for Policies P16 but would provide greater certainty over these effects taking place. P16RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P16 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P16RA6) would be likely to conform with baseline trends.					networks on the whole, such as wording to the effect of 'identification of ecological networks and opportunities for protecting or enhancing the connectivity of these networks'. The policy could encourage collaboration with NRW during the preparation of regional plans and to link with area statements to incorporate SMNR priorities.
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P16	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++
			P16RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++
			P16RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++
			P16RA3	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++
			P16RA4	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++
			P16RA5	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++
			P16RA6	Scale: Nat	T/P: T	Cert: M	ST 0	MT 0	LT -
			The regional planning detailed in Policy P16, seeks to ensure there is a co-ordinated framework for circular economies, including waste treatment and disposal. Although this policy addresses waste						The policy could be strengthened to include reference to pollution.

Policy Grouping 8					
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹	Recommendations
		treatment and disposal it does not address wider pollution issues which would have an impact on human health and the environment. This is addressed within PPW but could be strengthened here. It is expected that planning on a regional scale would also facilitate effective and strategic approaches to making use of brownfield land, remediating contaminated land and avoiding developing on agricultural or ecologically important soils. These would be direct effects of policy P16 that increase in magnitude as regional plans are prepared, adopted and take effect. All reasonable alternative options would enforce or mandate local authorities to adopt regional planning. This would lead to the same effects as those identified for policy P16 but would provide greater certainty over these effects taking place.			

Table B-45: Policies and reasonable alternatives in Policy Grouping 9

Policy Grouping 9	
P17 Wrexham and Deeside	The Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. Wrexham and Deeside's role within the North region and the wider cross-border areas of Cheshire West and Chester and Liverpool City Region should be maintained and enhanced. Strategic and Local Development Plans across the region should recognise Wrexham and Deeside as the focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Wrexham and Deeside's regional role. The Welsh Government will work with cross border authorities to promote Wrexham and Deeside's strategic role and ensure key investment decisions support Wrexham and Deeside and the wider region.
P17RA1 – Name alternative growth focus	This option focusses on the whole of north Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another.
P17RA2 – Do Nothing	Do not have a policy.
P18 - North Wales Coastal Settlements	The Welsh Government supports the built-up coastal arc from Caernarfon to Deeside as the focus for managed growth, reflecting this area's important sub-regional role supporting the primary growth area set of Wrexham and Deeside. Strategic and Local Development Plans across the region should recognise the role of this corridor as a focus for housing, employment and key services.
P18RA1 – Name alternative growth focus	This option focusses on the whole of north Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another.
P18RA2 – Do Nothing	Do not have a policy
P19: Green Belts in North Wales	The Welsh Government supports the role of Strategic Development Plans identifying and establishing green belts to manage urban form and growth in North Wales, particularly around Wrexham and Deeside. The strategic plans should consider the relationship of any new green belts with the green belt in Cheshire West and Chester.
P19RA1 – Directly identify the green belt	This option would directly allocate a green belt within the north wales region.
P19RA2 – Promote green wedge or other policy interventions	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in North Wales.
P19RA3 – Do Nothing	Do not have a policy.
P20: Port of Holyhead	The Welsh Government will work with port operators, local authorities and investors to support the development of the port and facilitate new investment in order to ensure that its strategic gateway role is maintained and enhanced. Investment to improve the Port's capacity to accommodate cruise ships is supported. New development around the Port should be carefully managed to ensure that future expansion and change at the Port is not constrained or compromised.

Policy Grouping 9	
P20RA1 – Facilitate Port development elsewhere	This option would specify the development of other ports within Wales.
P20RA2 – Do Nothing	Do not have a policy.
P21: Transport Links to North West England	The Welsh Government will work with local and regional authorities in North Wales and North West England to ensure transport investments, including in the North Wales Metro, strengthen cross-border transport links. Strategic and Local Development Plans should support improved transport links between North Wales, Chester, Liverpool and Manchester and plan growth to maximise the potential opportunities arising from better regional connectivity.
P21RA1 – Focus only on connections within Wales	This option would focus on transport investments and improved transport links to maximise the potential opportunities arising from better connections within Wales.
P21RA2 – Do Nothing	Do not have a policy.
P22: North West Wales and Energy	The Welsh Government supports North West Wales as a location for new energy development and investment. New energy-related development should support local and regional communities; provide jobs and investment in training and skills; and work with universities and businesses across the region and North West England, to co-ordinate and maximise new investment to support the wider region. In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales' energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region.
P22RA1 – Identify larger or smaller area	This option would specify a larger or small area around Anglesey for new energy development and investment.
P22RA2 – Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-46: Appraisal of Policy Grouping 9

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	

¹² To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P21RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			Policy P17, P18, P20 and P21: focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities and increased connectivity. Promoting the largest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. As well as development at Holyhead Port facility should result in children and young people within the area being better placed to potentially access education opportunities, including for higher education, and therefore resulting educational attainment. P22 This Policy identifies Anglesey as broadly suitable for energy developments. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and skills benefits that such development could offer would increase access to skills and training for adults and young people but may have limited benefits in terms of encouraging educational attainment for children. Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. The do-nothing approaches would be likely to conform with baseline trends. P19 would be unlikely to have a discernible impact on this ISA Objective.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Supporting text should provide clarity on the definition of connectivity infrastructure. Policy P17 could be strengthened to
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
reduction in health inequalities across Wales			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	include facilities and services.
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: Reg	T/P: P	Cert: n/a	ST +	MT +	LT ++	
			P19RA1	Scale: Reg	T/P: P	Cert: n/a	ST +	MT +	LT ++	
			P19RA2	Scale: Reg	T/P: T	Cert: n/a	ST +	MT +	LT +	
			P19RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	LT +	
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P21RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
				P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT +	
		P17, P18, P20, P21 and P22: focus of growth for the region would bring many benefits for all members of society including reducing inequality and poverty through increasing employment and has the potential to support healthy lifestyle choices through well connected places including rural areas, providing services and facilities to a wider area which would achieve multiple health benefits. This policy P17 could be strengthened to include facilities and services. The increase in public transport could reduce the reliance on the car and improve								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
		air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities which will have physical and mental health and well-being benefits. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. Ensuring people are better connected to access services. this would lead to improvements in health and well-being and reducing inequalities for all including children and young people in the area. P22 Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus contributing to decreasing health inequality in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have limited benefits in terms of improvements in health and well-being and reducing inequalities for children and young people in the area. P19 the provision of a green belt retain open spaces around identified urban areas which either currently or potentially would have access for recreation would continue to provide physical and mental health benefits for everyone. Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. Focusing only on connections within wales will not draw wider benefits of connectivity with England and this would be artificially constraining connections. P19RA1 Directly identifying the green belt would not fit with the proposed approach to regional planning. P19RA2 has potential positive and negative effects depending on type and scale of growth in the area. The do-nothing approaches would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P17	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	Between Policies P17 and P22, there could potentially be a reference to ensuring strong interactions between North West Wales and North East England in terms of job markets.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²					Recommendations	
				Reg	T	n/a	0	0	+	Whilst Deeside and Wrexham are the key economic areas in the region, it is important that smaller areas that interlink within this region are not forgotten. It may be appropriate to ensure that there is a robust evidence base for determining which urban areas will benefit from the significant investment.
			P19	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	H	0	0	0	
			P19RA1	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	H	0	0	0	
			P19RA2	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	H	0	0	0	
			P19RA3	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	H	0	0	0	
			P20	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	H	+	++	++	
			P20RA1	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	L	+	+	+	
			P20RA2	Scale:	T/P:	Cert:	ST	MT	LT	
				Nat	T	L	0	+	+	
			P21	Scale:	T/P:	Cert:	ST	MT	LT	
	Nat	T	H	+	++	++				
P21RA1	Scale:	T/P:	Cert:	ST	MT	LT				
	Nat	T	L	+	+	+				
P21RA2	Scale:	T/P:	Cert:	ST	MT	LT				
	Nat	T	L	0	+	+				
P22	Scale:	T/P:	Cert:	ST	MT	LT				
	Nat	T	H	+	++	++				
P22RA1	Scale:	T/P:	Cert:	ST	MT	LT				
	Nat	T	L	+	+	+				
P22RA2	Scale:	T/P:	Cert:	ST	MT	LT				
	Nat	T	L	0	+	+				
Policies P17, P18, P20, P21 and P22 would each be expected to make a major contribution towards increasing employment opportunities in the northern region of Wales for all working ages and in rural areas. These would be in the strategic area of Wrexham and Deeside and at the Port of Holyhead. Deeside has relatively high levels of deprivation and focussing new development here would positively affect efforts to reduce inequality. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from NW heartland areas, to remain in Wales. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should										

Policy Grouping 9				
ISA Objective	Future Baseline	Policy/ option	Summary of Effects ¹²	Recommendations
			result in young people in particular within the area being better placed to access employment opportunities. P18 would help to develop and attract investment and this would be likely to improve economic inclusion and reduce deprivation in these areas. Creating economic opportunities for an increase in employment across the region and promoting economic inclusion. Policy P21 would help to ensure that inclusive transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced, which would be expected to lead to greater economic inclusion for people in the region. Improved connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration and would have a potential mix of positive and negative impacts on the Welsh language depending on implementation. The increases transport links should result in communities including children and young people within the area being better placed to potentially access services, including potential employment opportunities Policy P22 would help to encourage the provision of new jobs and investment in training and skills in Anglesey, which would be likely to lead to major beneficial impacts in terms of improving employment prospects for all working ages, opportunities to learn new skills and reducing deprivation, particularly as the closure of the old Wylfa power station was the loss of a major local employer. New jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity. Promoting economic inclusion in rural areas. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P22 specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities. There are various small towns along the north-coast of Wales with relatively high rates of deprivation and each policy would be likely to help combat this by boosting and improving the range of employment opportunities on offer and making them more accessible to local people. Each alternative to policies P17, P18, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P517 on this region is a means of maximising economic gains. P17RA2 could generate increased opportunities for the Welsh language but starting from a lower base than Wrexham/Deeside increases the risk to the Welsh language. Holyhead Port is an established port that caters to services nowhere else in Wales is able to. Should P20 facilitate development elsewhere, it would be unlikely to maximise potential gains If development is not at Holyhead then it is likely to take place in England. This could lead to out-migration as people seek work and a potential negative impact on the Welsh language. P21RA1 by focussing on internal links could help the north Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts for the Welsh language. Should improvements to transport (P21) focus on connections within Wales, it would conflict	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
		with the clear economic links between areas of North Wales and north west England and miss out on opportunities for economic development and would be artificially constraining connections which are already made. Anglesey Energy is an established brand. If P23 were to focus on a larger or smaller area it would be unlikely to maximise on potential gains. The effect of P22RA1 would depend on the degree of change. The further the area goes from the language heartlands, the more likely the effect could be negative Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. The do nothing approaches (P17RA2, P18RA2, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P17	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	See Objective 3.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA1	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P19RA3	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P20	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P21	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
Policies P17, P18, P20, P21 and P22 would each be expected to make a major contribution towards encouraging economic growth, economic diversification and enhanced business competitiveness in the northern regions of Wales. These policies could provide opportunities for the third sector to support the growth and benefit from improved connections. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from the north Wales heartland areas, to remain in Wales. These would be in the strategic area of Wrexham and Deeside (P17) and at the Port of Holyhead (P20). Policy P21 would help to ensure that transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced including increasing access to and from rural areas, which would be expected to facilitate economic growth and more competitive businesses in the region Improved connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration ,this could result in a potential mix of positive and negative impacts on the Welsh language which will be dependent on the implementation at the lower tier. Policy P22 would help to encourage the provision of training and skills in Anglesey which would enable economic diversification and more competitive businesses having a positive effect on a rural area, supporting local and regional communities with jobs, investments and training and skills and thus promoting sustainable economic growth, diversity and business competitiveness in rural area. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P19, and its reasonable alternatives, are focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Each alternative to policies P17, P18, P20, P21 and P22 would be expected to result in effects of a lower magnitude as they would be unlikely to maximise potential economic gains. Each reasonable alternative is also considered to involve a greater degree of uncertainty of effect. P20RA1 - If development is not at Holyhead then										

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
		it is likely to take place in England. This could lead to out-migration as people seek work and could have a negative impact on the Welsh language. P21RA1, focussing on internal links could help N Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts including the Welsh language. P22RA1, Effect would depend on degree of change. The further the area goes from the language heartlands, the more likely the effect could be negative The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends. P17RA2 Could generate increased opportunities for the Welsh language but starting from lower base than Wrexham/Deeside increases the risk to the Welsh language.								
5	To contribute towards the future well-being of the Welsh language		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P20	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P20RA1	Scale: Nat	T/P: T	Cert: M	ST -/+	MT -/+	LT -/+	
			P20RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P21	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
				Reg	T	H	-/+	-/+	-/+	
			P21RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P22RA2	Scale: Nat	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			Policy P17, P18 and P17RA1 looks to deliver an increase in economic opportunities within north Wales, this would offer greater opportunities for Welsh speakers, especially those from North Wales heartland areas and provide opportunities for them, to remain in Wales. P17RA2, doing nothing could generate increased opportunities but starting from lower base than Wrexham/Deeside increases the risk to the Welsh language. Policy P20 looks to deliver an increase in economic opportunities within north Wales, this would offer greater opportunities for Welsh speakers, especially those from North Wales heartland areas and provide opportunities for them, to remain in Wales. P20RA1, if development is not at Holyhead then it is likely to take place in England. This could lead to out-migration as people seek work and a potential negative impact on the Welsh language. Policy P21 looks to improve connectivity with north west England opens new opportunities for work but could lead to out-migration and pressures from in-migration. This would lead to a potential mix of positive and negative impacts on the Welsh language. P21RA1, focussing on internal links could help N Wales economy, but could limit the opportunities for growth and new jobs, with knock on negative impacts to the Welsh language. Policy P22, new jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity, having a positive impact on the Welsh language. P22RA1, the effect of this policy would depend on degree of change. The further the area goes from the language heartlands, the more likely the effect on the Welsh language could be negative. Policy alternatives P18RA2, P19RA3, P20RA2, P21RA2, P22RA2 would be likely to conform with baseline trends. Policy P19 and its alternatives would have no impact on the Welsh language.							
6	To create opportunities		P17	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	Opportunities to enhance public

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²						Recommendations
within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design			P17RA1	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	transport modes in the Wrexham and Deeside region should be sought out and maximised through these policies.	
			P17RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +		
			P18	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -		
			P18RA1	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality.	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +		
			P19	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +		
			P19RA1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +		
			P19RA2	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +		
			P19RA3	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +		
			P20	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT --		
			P20RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT --		
			P20RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +		
			P21	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -		
			P21RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -		
			P21RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +		
			P22	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++		
			P22RA1	Scale: Nat	T/P: P	Cert: L	ST +	MT ++	LT ++		
			P22RA2	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations	
				Nat	P	L	0	+	+		
		P17 and P18 encourage significant scales of growth in the Wrexham and Deeside, or the north of Wales, strategic area. It is uncertain how energy efficient such development would be; and it is considered to be likely that such growth would lead to some degree of increase in energy consumption and GHG emissions in the region that increases over time as more development takes place here. This is particular the case due to the relatively high car reliance in the region. This could conflict with Wales' current trend of declining GHG emissions. P19 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural carbon sink that help to alleviate GHG emissions in the area. P20 would contribute towards an increase in the capacity of Holyhead Port to accommodate cruise ships. This expansion would be likely to increase energy consumption and GHG emissions at the port, particularly as cruise ships are significant emitters of GHG emissions. This direct effect would increase in magnitude over time as the capacity for cruise ships increases grows over time. Policy P21 seeks to support improvements in transport infrastructure between North Wales, Chester, Liverpool and Manchester. It is unclear what types of infrastructure would be supported in particularly, but it is considered to be likely that these improvements would contribute towards an increase in road transport in the region and a subsequent increase with the associated GHG emissions. Public transport and low-emission travel modes are also likely to be improved and this could help to limit GHG emission increases to some extent. This direct effect would be likely to grow over time. The energy sector at Anglesey supported in Policy P22 includes nationally important generation of low-carbon energy, including tidal and nuclear. The region would be likely to make a major contribution towards low-carbon energy for Wales and Policy P22 contributes towards this. Over time this the energy generated here would be likely to make a major contribution towards low-carbon energy in Wales. The reasonable alternatives identified for P17, P20 and P21 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P6 would be expected to result in the same minor benefits as P19 in terms of providing areas of natural carbon sink. Alternatives to P22 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.									
7	To contribute to the reduction and management of flood risk		P17	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	P17, P20, P21 and P22 could seek to ensure that new development is not situated on the active floodplain. Proposals	
			P17RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?		
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P18	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	should be required to ensure that development would not worsen flood risk in other locations. The enhancement of GI through new development is an opportunities to minimise local flood risk further. Careful consideration should be given to the impacts of climate change in determining the distribution and extent of flood risk.
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -	
			P19	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P19RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P19RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P19RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P20	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P22	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P22RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			There are some extensive swathes of Flood Zones 2 and 3, associated with the River Dee, in the Deeside and Wrexham region. There is also land at risk of flooding in the area of the Port of Holyhead where P20 would seek to encourage new development. It is uncertain if development delivered as a result of P17, P20 or their							

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
				alternatives would coincide with this land at risk of flooding or if such development would result in the loss of greenfield elements that help to alleviate flood risk. The identification and safeguarding of green belts and green corridors (P19) would help to preserve natural flood defence benefits provided by the vegetation. Transport and energy focussed development supported by P21 and P22 could potentially be situated on land at risk of flooding given the presence of extensive flood risk areas in North Wales. However, this is largely dependent on the precise location of development in relation to flood risk areas, which is currently unknown. Given the impacts of climate change in exacerbating flood risk it cannot be ruled out that P21 and P22 would lead to new transport or energy related development being situated on the active floodplain (which could alter the risk of flooding in other locations). Do-nothing approaches would be likely to conform with baseline trends in terms of development and flooding.						
8	To create opportunities to encourage the protection and improvement of air quality		P17	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	See Objective 6.
			P17RA1	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P18	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P18RA1	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +	
			P19	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
			P19RA1	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT +	
			P19RA2	Scale: Nat	T/P: P	Cert: L	ST +	MT +	LT +	
			P19RA3	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P20	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT --	
			P20RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT --	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P20RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P21	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P21RA1	Scale: Nat	T/P: P	Cert: L	ST -	MT -	LT -	
			P21RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: P	Cert: H	ST +	MT ++	LT ++	
			P22RA1	Scale: Nat	T/P: P	Cert: L	ST +	MT ++	LT ++	
			P22RA2	Scale: Nat	T/P: P	Cert: L	ST 0	MT +	LT +	
P17 and P18 encourage significant scales of growth in the Wrexham and Deeside strategic area, or north Wales. It is considered to be likely that such growth would lead to some degree of increase in air pollution emissions in the region that increases over time as more development takes place here. This could conflict with Wales’ current trend of improving air quality. The focused growth has the potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation P19 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural air filtering. P20 would contribute towards an increase in the capacity of Holyhead Port to accommodate cruise ships. This expansion would be likely to increase air pollution at the port, particularly as cruise ships (as well as the trucks, coaches and other vehicles entering the town as a result of cruise ships) are significant sources of pollution. This direct effect would increase in magnitude over time as the capacity for cruise ships increases grows over time. Policy P21 seeks to support improvements in transport infrastructure between North Wales, Chester, Liverpool and Manchester. It is unclear what types of infrastructure would be supported in particularly, but it is considered to be likely that these improvements would contribute towards an increase in road transport in the region and a subsequent increase with the associated pollution emissions. Public transport and low-emission travel modes are also likely to be improved and this could help to limit pollution increases to some extent. This direct effect would be likely to grow over time. The energy sector at Anglesey supported in Policy P22 includes nationally important generation of low-emission energy, including tidal and nuclear. The region would be likely to make a major contribution towards low-emission energy for Wales and Policy P22 contributes towards this. Over time this the energy generated here										

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
		would be likely to make a major contribution towards low-carbon energy in Wales. At the same time, there is a risk that further development here would increase the number of vehicles in regular use in the region to service the power stations and this could limit improvements to the local carbon footprint. There is potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation The reasonable alternatives identified for P17, P20 and P21 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P19 would be expected to result in the same minor benefits as P19 in terms of providing areas of natural air filtering, but with less certainty. Alternatives to P22 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P17	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	No recommendations.
			P17RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -	
			P19	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P19RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P19RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P19RA3	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P20	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT --	
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
			P20RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P21	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P17, P18 and P21, as well as their reasonable alternatives, would be expected to result in no discernible impact on water quality and resources. The economy in Deeside is largely based around the coastal industry. The economy in Holyhead is based around power stations (including nuclear), which need to be near the coast. In each case there could be a risk of pollution or contamination of nearby waters. Given that much of the coastal water in the region is designated as a SAC or SPA, it is particularly important that water quality is protected. Development in these locations could also lead to an increase in the consumption of water used for power generation. P19 would help to protect greenfield land, which currently plays an important role in preserving water quality through natural filtration processes. P19RA1 and P19RA2 would have the same effect but with a greater level of uncertainty and potentially to a lower magnitude due to less high-quality or less appropriate land being designated as green belt, corridor or wedge. Investment and development at the Port would increase the capacity for cruise ships. These ships are notable sources of pollution and so P20 would pose a risk to the quality of waters here. The alternative approach of focussing on a different port would be likely to have a similar direct effect but with less certainty. The do nothing approaches (P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P17 could be strengthened to include facilities and services.
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
goods, services and amenities for all groups				Reg	T	H	+	+	++	
			P18RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -	
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P20	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P20RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P20RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P21RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P22	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P22RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			Policy P17 and P18 look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. The policy could be strengthened to include reference to facilities and services. Policy 19 has the potential to							

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²					Recommendations	
			improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring for all. These benefits would depend on implementation. Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. P20 The policy has the potential to improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring. These benefits would be dependent on the implementation. Such a policy could result in the providing of access to goods and services which could have benefits for children and young people within the local area; for example, educational opportunities and employment opportunities for young people. P21 – The policy looks to increase connectivity this will increase connectivity in the region and increase access to facilities and services for all. Improved transport links to north west England will mean there are opportunities to improve accessibility across the region and in particular rural areas with an increase in public transport provision, access to jobs, services and social infrastructure. This should result in everyone, including children and young people within the area being better placed to potentially access services, including potential employment opportunities for young people. P22 – Depending on the implementation this policy has the potential to increase inclusive access including active travel and green infrastructure which would enable healthier lifestyle choice to be made. Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities. Each alternative to policies P17, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. P21 improvements to the connections are unlikely to be planned and managed with a view on the long-term The do-nothing approaches would be likely to conform with baseline trends.							
11	To create the opportunities within which an improvement in social cohesion		P17	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policy P17 could be strengthened to
			P17RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P17RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²						Recommendations
and equality can be achieved				Reg	T	M	+	+	+	include reference to connections to facilities and services. Policy 21 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.	
			P18	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
			P18RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -		
			P19	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P19RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P19RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P19RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0		
			P20	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
			P20RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
			P20RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
			P21	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++		
			P21RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++		
			P21RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
			P22	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
			P22RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +		
			P22RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +		
			Policy P17 and P18: through the growth and increasing access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment. The policy could be								

Policy Grouping 9									
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²					Recommendations
12	To create opportunities for the provision of good quality, safe, affordable housing that			strengthened to include reference to connections to facilities and services. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should result in creating opportunities within the area for improvements in social cohesion and equality for children and young people. Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. P20, the investment and growth of the port would bring with it health and well-being benefits for the surround area and potentially the region. P21, the investment in connections across the region would improve inclusive access to facilities and services, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. Improved transport links to north west England will mean there are opportunities to improve accessibility across the region and in particular rural areas with an increase in public transport provision, access to jobs, services and social infrastructure. This Policy looks to provide improved planning for transport provision within North Wales and in particular to North West England. This should result in everyone, including children and young people within the area being better placed to potentially access services, resulting in potential improvements in social cohesion and equality. P22, through the growth there is a potential to increase access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment, barrier free and inclusive and benefit rural communities. Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. Each alternative to policies P17, P20, P21 and P22 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focussing P17 on this region is a means of maximising economic gains. The do-nothing approaches would be likely to conform with baseline trends.					No recommendations.
			P17	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++
			P17RA1	Scale: Nat	T/P: T	Cert: M	ST ?	MT ?	LT ?
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -
			P18	Scale:	T/P:	Cert:	ST	MT	LT

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²						Recommendations
meets identified needs				Nat	T	H	++	++	++		
			P18RA1	Scale: Nat	T/P: T	Cert: H	ST ++	MT ++	LT ++		
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT -		
			P19	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P19RA3	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P20	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P20RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P21	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P21RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P21RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P22	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P22RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P17 and P18 would be likely to help ensure that there is significant residential development in the Wrexham and Deeside or north Wales region to meet the needs of the region. Given that this region is the most populous in northern Wales, P17 would make a major contribution towards satisfying housing needs for a large number of people. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
		in terms of co-locating services within that area, including housing, to sustainable transport and connectivity infrastructure. This should result in families, including children and young people, being more readily able to access suitable, affordable housing in sustainable locations across the area. The cross-border nature of housing needs in the region of North-East Wales would be likely to be a key consideration in regional growth proposals here. Alternatives to P17 would also help to satisfy housing needs but, as they would be focussed on areas other than Wrexham/Deeside and whilst there are key areas outside of Wrexham and Deeside, it is uncertain the extent to which housing needs could be satisfied by focussing elsewhere or what the impacts would be. Policy P19 is focussed on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P19 would also be unlikely to have a discernible impact on this ISA Objective. These are key areas of population P19, P20, P21 and P22, and their reasonable alternatives, would be expected to result in no discernible impacts on this ISA Objective. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	Given the sensitive nature and national significance of Anglesey AONB, the policy for development at Anglesey could potentially include wording that refers to ensuring the AONB is protected or enhanced by development in the region.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18RA2	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT -	LT -	
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA3	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹²						Recommendations
				Nat	T	L	0	-	-	
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P17 and P18 would facilitate significant levels of growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the character of natural landscapes to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth would be near smaller settlements – although the approach of focussing in already developed areas would help to ensure significant adverse effects are avoided. This could potentially pose a risk to sensitive landscapes such as Snowdonia National Park, Clwydian Range AONB or the Anglesey AONB that extends along Anglesey’s coastline. This policy has the potential to deliver accessible and inclusive townscape, the benefits of this would however be dependent on implementation. P19 and its alternatives would help to protect greenfield land from development, which would be expected to make a positive contribution towards protecting rural landscapes. The policy would retain tranquil areas and has the potential to achieve both physical and mental health and well-being benefits. P20, P21 and P22 would facilitate new development in relatively rural locations and could be expected to have minor adverse effects on local landscape character. Their reasonable alternatives would also be likely to result in this direct effect. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.							

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²						Recommendations
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -		
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -		
			P18R2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++		
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++		
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P22RA1	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations	
				Nat	T	L	-	-	-		
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P17 and P18 would facilitate significant levels of growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the historic character of areas throughout the region, as well as on the setting of sensitive heritage assets to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth would be near smaller settlements – although the approach of focussing in already developed areas would help to ensure significant adverse effects are avoided. P17, P18, P19, P20, P21 and P22 have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P19 and its alternatives would help to protect greenfield land from development, which would be expected to make a positive contribution towards protecting the character of historic areas and setting of assets as well as historic landscapes. P20, P21 and P22 would facilitate new development in relatively rural locations and could be expected to have minor adverse effects on the setting of sensitive heritage assets. Their reasonable alternatives would also be likely to result in this direct effect. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P17	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	
			P17RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P17RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P18	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P18RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P18RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +		
			P19	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +		
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +		

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P20	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P20RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P20RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P21	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P22	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P22RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			Development In the north-west of Wales would be likely to attract more people to the region. This is unlikely to benefit Welsh culture greatly, although it could enhance access to local Welsh cultural features and activities, but it could potentially pose a risk to Welsh culture as a result of dilution. P17, P18, P19, P20, P21 and P22 have the potential to increase access to cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text. P22 could provide tourists from further afield, such as Europe, with greater access to areas in North Wales, better enabling the region to take advantage of the Welsh culture on offer here. P22RA1 would have the same effect but to a lesser magnitude. P19 could help to protect and enhance important historic landscapes or regions that facilitate traditional Welsh cultural activities. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.							
16	To create opportunities for		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	Where policies support focus on

Policy Grouping 9											
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²						Recommendations
the conservation and enhancement of biodiversity and geodiversity			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	regional level growth, the policies could encourage collaboration of the regional planning with NRW to maximise opportunities for protecting and enhancing biodiversity and SMNR principles.	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -		
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -		
			P18RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++		
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	Where transport links are invested in and strengthened through P21, careful consideration to the impacts of these links on the coherency of the local ecological network should be provided for and transport links that are barriers to the free movement of wildlife in countryside areas should be avoided or mitigated.	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++		
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -		
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -		
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -		
			P22RA2	Scale:	T/P:	Cert:	ST	MT	LT		

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
				Nat	T	L	0	0	-	
		Policies P17, P18, P20, P21 and P22 would facilitate large quantities of new development that pose a risk to areas of high biodiversity value and sensitive biodiversity designations. This could include both marine, coastal and terrestrial designations such as SACs and SPAs associated with the River Dee and Estuary, Snowdonia, or Anglesey coastline. It is likely that many adverse effects on these sensitive and internationally important designations would be cumulative effects caused by numerous developments in-combination. The power station at Anglesey and potential dredging at Holyhead are particular threats to sensitive coastal and marine species. Reasonable alternatives for each of these policies would be likely to have the same effect. P19 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P19RA1 and P19RA2 by not enabled local authorities to determine which land to designate for this purpose. The do nothing approaches (P18RA2, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends. It should be noted that the HRA of the draft NDF has ruled out any LSEs on any European sites as a result of the NDF. The ISA has subsequently identified minor, discernible and insignificant effects on biodiversity.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P17	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	It is recommended that development supported through these policies is encouraged or required to minimise uses of non-renewable resources and to minimise the generation of waste sent to landfill.
			P17RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P17RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P18	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT -	LT -	
			P18RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P19	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT ++	
			P19RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA2	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	
			P19RA3	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/ option		Summary of Effects ¹²					Recommendations
			P20	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P20RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P20RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P21	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P21RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P21RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P22	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P22RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P22RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT -	
Policies P17, P18, P20, P21 and P22 would facilitate large quantities of new development that would be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have the same effect, although focusing on existing developed areas could help to increase opportunities for developing on brownfield land. P19 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P19RA1 and P19RA2 by not enabled local authorities to determine which land to designate for this purpose. The do nothing approaches (P18RA1, P17RA2, P19RA3, P20RA2, P21RA2, P22RA2) would be likely to conform with baseline trends.										

Table B-47: Policies and reasonable alternatives in Policy Grouping 10

Policy Grouping 10	
P23 – Swansea Bay and Llanelli	Swansea Bay and Llanelli will be the main focus for regional scale growth and investment. Regional and local development plans should recognise Swansea Bay and Llanelli as the focus for strategic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from their strategic regional role. The Welsh Government will promote Swansea Bay and Llanelli's strategic role and ensure key investment decisions support it and the wider region.
P23RA1 – Name alternative growth focus	This option would set an alternative focus for growth within the region.
P23RA2 – Do Nothing	Do not have a policy.
P24 – Regional Centres	The towns of Carmarthen, Llandrindod Wells, Newtown, Aberystwyth and the four Haven Towns will be the focus for managed growth, reflecting their important sub-regional functions. Strategic and Local Development Plans should recognise the roles of these settlements as being a focus for housing, employment and key services within their wider areas and consider how they continue as a focal point for sub-regional growth
P24RA1 – Do Nothing	Do not have a policy.
P25 – Haven Waterway	The Welsh Government supports continued operation and future development at Haven Waterway. Strategic and Local Development Plans should support its growth and seek to maximise the benefits it provides to the region and Wales. The Welsh Government will work with operators, local authorities and investors to support and facilitate appropriate new development.
P25RA1 – Facilitate Port development elsewhere	This option would support the growth of ports elsewhere in Wales.
P25RA2 – Do Nothing	Do not have a policy.
P26 – Swansea Bay Metro	The Welsh Government supports the development of the Swansea Bay Metro and will work with agencies to enable its delivery. Strategic and Local Development Plans should support the scheme and plan growth to maximise the potential opportunities arising from better regional connectivity.
P26RA1 – Focus on working with existing infrastructure	This option would only focus on existing infrastructure to maximise better regional connectivity.
P26RA2 – Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-48: Appraisal of Policy Grouping 10

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P26	Scale: Reg	T/P: P	Cert: M	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: M	ST 0	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
P23 and P24, focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities to support this growth and increased connectivity for all. Such an approach could result in benefits in terms of enabling children and young people to access education services within these areas, leading to improvements in educational attainment. P25 The investment into the port has the potential to increase skills and training for all in this area to support the growth of the port. Such development could provide opportunities for young people in terms of developing their skills through employment or apprenticeships, leading to resulting improvements in educational attainment.										

¹³ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
		P26 The policy would improve connections and deliver inclusive access for all to education facilities. Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Supporting text should clarify the definition of connectivity infrastructure. Policy P23 could be strengthened to include facilities and services.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P26	Scale: Reg	T/P: P	Cert: M	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: M	ST 0	MT +	LT +	
	P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +			
P23 and P24 - The focus of growth for the region would bring many benefits for all members of society including the reduction in inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area for all. Such an approach could result in benefits in terms of increasing access services, leading to improvements in health and well-being and reducing inequalities for all. This policy could be strengthened to include facilities and services. P25 The investment in the port would bring many benefits for all members of society including reducing inequality and poverty through economic growth and employment and has the potential to support healthy lifestyle choices through well connected places, this will depend on implementation. Concentrating development in areas that reduces pressure to develop in rural areas.										

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
		P26 The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities for healthier lifestyle choices including access to the natural environment, jobs and facilities which will have physical and mental health and well-being benefits for all. This could also lead to better access for children and young people to services, which would facilitate improvements in their health and well-being. Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P23 and P24 would make a major contribution towards increasing employment opportunities for all working ages and economic inclusion in the most populous and economically important areas of west- and mid- Wales. Alternatives to this would bring economic benefits but potentially to a lesser extent and with less certainty. The do-nothing scenario would prevent these benefits from being realised and employment growth, economic inclusion and impacts on deprivation would be likely to conform with baseline trends. Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased							

Policy Grouping 10					
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³	Recommendations
				opportunities in nearby urban areas could help these communities. This Policy will support the development of the most urban parts of Mid and West Wales as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of enabling young people in particular to access employment opportunities. P23RA1 Increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P23RA2, there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P10. Policy P24 includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. This Policy will support the development of certain settlements in Mid and West Wales as a focus for managed growth; linking services within these areas including housing and employment. Such an approach could result in benefits in terms of enabling young people in particular access employment opportunities. The do nothing alternative would conform with baseline trends. P25 would help to ensure the Haven Waterway continues to develop and attract investment and this would be likely to contribute to improving economic inclusion and reducing deprivation. This growth would in turn provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas creating opportunities for an increase in employment across the region and promoting economic inclusion. Development at the Haven Waterway could facilitate access to employment for some young people in particular at this strategically important location. The area is a nationally important employment region that offers a diverse range of employment opportunities and skills learning whilst supporting existing skills in the area being already focussed around the port. The investment at the port would bring many benefits for all members of society including reducing inequality and poverty through employment. An alternative of focussing on a different port would be likely to bring similar benefits but of a lower magnitude. There is uncertainty behind this as it is unclear if the different port would be in this region or elsewhere. The do-nothing scenario would conform with baseline trends. Investing in the Swansea Metro, as per P26, would help to enhance regional connectivity and to promote greater economic inclusivity, particularly for the more employment deprived communities around Swansea. This is highly likely to lead to better access for children and young people to services, possibly including to potential employment opportunities. Focusing on existing infrastructure would have similar effects but to a lesser magnitude. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and an increase in employment across the country and promote economic inclusion. Policy P26 would increase opportunities to access employment through accessible and inclusive connections. Any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language. P26RA1 A failure to invest in public transport	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
		will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on the existing infrastructure will not benefit rural areas in the same way the Swansea Metro could providing limited public transport provision to rural areas. The do-nothing scenario would be likely to conform with the baseline.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P23 and P24 would make a major contribution towards increasing economic development and diversification in the most populous and economically important areas of west- and mid- Wales. Alternatives to this would bring economic benefits but to a less extent. Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. P23RA1, increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P23RA2.there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P23.							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³					Recommendations	
		P24 this policy includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. P24RA1 a dispersed approach at this scale would mean fewer opportunities to develop or maintain important centres for jobs, culture and social activities. Policies P23, P24, P25 and P26 could provide opportunities for the third sector to support the growth and benefit from improved connections. The do-nothing scenario would prevent these benefits from being realised and employment growth would conform with baseline trends. P25 would help to ensure the Haven Waterway continues to develop and attract investment. The area is a nationally important economic region that hosts a diverse range of competitive businesses. P25 would help to ensure businesses here can continue to successfully compete and diversify. An alternative of focussing on a different port would be likely to bring similar benefits but of a lower magnitude. This policy would help to provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas to create opportunities for sustainable economic growth, diversity and competitiveness an increase in employment across the country and promote economic inclusion. There is uncertainty here as it is unclear if the different port would be in the same region or elsewhere. The do-nothing scenario would conform with baseline trends. Investing in the Swansea Metro, as per P26, would help businesses in the region to be better connected and more able to be competitive. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion. P26. Following on from P23, any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language P26RA1 a failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on existing infrastructure would have similar effects as improved infrastructure is a key element for attracting new investment, but potentially to a lesser magnitude than P26. The do-nothing scenario would be likely to conform with the baseline.								
5	To contribute towards the future well-being of the Welsh language		P23	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	No recommendations.
			P23RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P25	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P23 Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. P23RA1: Increased development opportunities across mid and south west Wales could support communities with high number and proportion of Welsh speakers, though detailed distribution details would be set in regional development plans. P23RA2: There would be less potential to develop a critical mass of Welsh speaking communities if the strategy focussed on less populated areas, especially those away from the heartland areas in the Neath and Swansea valleys. The do-nothing alternative approaches would be likely to conform with baseline trends. P24. This policy includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. P25: Very little link between the economic prospects of the Haven waterway and the well-being of the Welsh language. P26: Following on from P23, any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language. P26RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown							
6	To create opportunities within which greenhouse gas emissions can be		P23	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	These policies, or their supporting text, could potentially seek to encourage a
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
	reduced and limited and encourage energy efficient and sustainable design			Nat	T	L	0	+	+	greater uptake of sustainable transport modes such as by seeking to focus new investment on railway or bus routes. Policies could also encourage the use of low-carbon materials for construction and to use renewable energy. Should an alternative port be focussed on through P25, the Government could seek to ensure that energy generation here is equally focussed on renewable sources of energy.
			P24	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
P23 and P24 and their alternatives would facilitate significant new development that increase GHG emissions. Under P23 and P24 this development would be in more sustainable locations that enable greater rates of efficient and low-emission movements for local people than the do-nothing scenarios, which would conform with baseline trends as GHG emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P25 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that consumes energy and results in GHG emissions. However, the area is a nationally important region for energy generation, including tidal and wind. Further development here would be expected to help boost the local supply of renewable energy. An alternative of focussing on a different port would be likely to also result in extra GHG emissions whilst it is uncertain if it would lead to additional renewable energy generation. The do-nothing scenario would conform with baseline trends. P26 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards falling GHG emissions. The alternatives of focussing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.										
7	To contribute to the reduction and		P23	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	Policies could specifically refer to the need to direct
			P23RA1	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
management of flood risk				Reg	T	L	?	?	?	development away from land at risk of flooding sequentially, particularly land at a degree of flood risk with which the development type is incompatible in line with Welsh Government flood risk management policy.
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P24	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P25	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P26	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT 0	
			There are areas of flood risk, including Flood Zones 2 and 3, in the Swansea Bay and Llanelli region as well as Haven Waterway. It is unclear where the alternative locations for focus would be in the alternatives to P23 and P25. Development here could potentially situate new residents or businesses on land at risk of flooding. Focusing on existing towns and settlements through P24 and its alternative could help to increase the number of people and businesses benefitting from existing flood defence schemes.							
8	To create opportunities to encourage the protection and improvement of air quality		P23	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Nat	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
				Nat	T	H	+	++	++	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P23, P24 and their alternatives would facilitate significant new development that exacerbates air pollution, they may be opportunities to improve air quality through development but the benefits would be dependent on their implementation. Under P23 this development would be in more sustainable locations that enable greater rates of efficient and low-emission movements for local people than the do-nothing scenario, which would conform with baseline trends. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality. P25 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that causes air pollution However, the area is a nationally important region for energy generation, including tidal and wind. Further investment here would be expected to help boost the local supply of low-emission energy. An alternative of focussing on a different port would be likely to also result in extra air pollution whilst it is uncertain if it would lead to additional low-emission energy generation. The do-nothing scenario would conform with baseline trends. P26 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards improving air quality. The alternatives of focussing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P23	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	Appropriate sewage capacity of development should be ensured prior to development in coastal areas.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P24	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25	Scale: Nat	T/P: T	Cert: M	ST -	MT -	LT -	
			P25RA1	Scale: Nat	T/P: T	Cert: L	ST -	MT -	LT -	
			P25RA2	Scale: Nat	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
		Development at Swansea Bay, Haven Waterway and Aberystwyth would pose a risk to the quality of coastal waters. These waters are typically Natura 2000 designations and so are particularly sensitive to quality changes. It is unclear what the sewage capacity is in these regions. P23, P24, P26 and their alternatives would be unlikely to have a discernible impact on water quality and resources. Further investment and development at the Haven Waterway through P25 could pose a risk to the quality of water here due to an increase in movements of polluting ships on the water as well as surface water runoff picking up pollutants or contaminants, including during construction and operation of development. The alternative of focussing on a different port would, uncertainly, be likely to have a similar effect. The do-nothing scenario would conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P23	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	Policies P23 and P24 could be strengthened to include reference to connections to facilities and services. Policy P25 could be strengthened to include reference to inclusive
			P23RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P25	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
				Reg	T	M	+	+	++	infrastructure and connections.
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT	LT	
			P26	Scale: Reg	T/P: P	Cert: H	ST	MT	LT	
			P26RA1	Scale: Reg	T/P: P	Cert: H	ST	MT	LT	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT	LT	
			Policy P23 and P24: The policies look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. P25: The policy has the potential to improve connections through active travel, green infrastructure etc. and the human health and inclusive benefits this would bring for all. Including young people at this strategically important location It would reduce development pressure on rural areas. These benefits would be dependent on the implementation. P26: The policy looks to increase connectivity this will increase connectivity in the region and increase access to facilities and services for all to enable them to have better opportunities which arise from better regional and provides opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.							
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P23	Scale: Reg	T/P: T	Cert: H	ST	MT	LT	Policies P23 and P24 could be strengthened to include reference to connections to facilities and services.
			P23RA1	Scale: Reg	T/P: T	Cert: H	ST	MT	LT	
			P23RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT	LT	
			P24	Scale: Reg	T/P: T	Cert: H	ST	MT	LT	
							+	+	+	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
			P24RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	Policy P26 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.
			P25	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P25RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P26	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT ++	
			P26RA1	Scale: Reg	T/P: P	Cert: H	ST +	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
Policy P23 and P24: through the growth and increasing access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment. Such an approach could result in benefits in terms of improving access to services and therefore creating opportunities for improvements to social cohesion and equality for children and young people. The policy could be strengthened to include reference to connections to facilities and services. P25: The investment and growth of the port would bring with it health and social benefits for the surround area and potentially the region. P26: The investment in connections across the region would improve inclusive access to facilities and services for all including those in rural communities, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. This could lead to notable improvements in access for children and young people to a wider range of services and other communities which were not as easy to access before. This should create opportunities for improvements to social cohesion and equality for children and young people in the area Each alternative to policies P23, P24, P25 and P26 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Does not reflect the proposed approach to regional planning. The do-nothing approaches would be likely to conform with baseline trends.										
12	To create opportunities for the provision of good quality, safe,		P23	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P23RA1	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
	affordable housing that meets identified needs		P23RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P24	Scale: Nat	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P24RA1	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P25	Scale: Nat	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P25RA1	Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	
			P25RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT +/-	LT +/-	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
P23 and P24 would help to ensure significant new residential development is situated near the most populous regions in west and mid Wales. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. Alternatives to this would also contribute towards satisfying housing needs but in less populated areas in locations more isolated from key services. It is uncertain how much new housing would take place in the region and where it would do so under the do-nothing scenario, but with less impetus than new development. The Haven Waterway area is the location of a large number of homes and residential areas. Further investment and development here could facilitate the provision of a significant quantity of new homes and open up new land for potential residential development. provides supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas providing opportunities for the provision of good quality, safe, affordable housing that meets identified needs The alternative to P25 of focussing on a different port could provide similar benefits, but unlikely of the same magnitude and it is uncertain which alternative port would be the focus of this or where in Wales it would be. It is uncertain how housing provision in the region would progress over time. P26 and its alternatives would be unlikely to have a discernible effect on the provision of housing.										
13	To create opportunities for		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Where revising settlement

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	boundaries is permitted, careful consideration to sensitive landscapes and seascapes or biodiversity assets or designations would be required to avoid adverse effects.
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P25RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P23, P24 and their alternatives would result in significant quantities of new development that poses a risk to landscape and seascape character. There could potentially be a risk to National Parks, such as the Pembrokeshire Coast or the Brecon Beacons, as well as the Gower AONB. The do-nothing scenario would conform with trends. P25 would lead to new investment and development at the Haven Waterway region, which could result in adverse impacts on the local character of landscapes and seascapes. However, it would help to ensure that such development is in proximity to existing similar land-uses. Focusing on an alternative port would have similar effects, but with a higher degree of uncertainty. The do-nothing scenario would ultimately conform with baseline trends. The Swansea Metro development, invested in through P26, could alter the character of natural landscapes in some locations. The alternative of focussing on existing infrastructure would be likely to avoid this but would instead mostly conform with baseline trends – as would the do-nothing scenario. P23, P24, P25 and P26 have the potential to deliver accessible and inclusive townscapes.							
14	To create opportunities for		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Where development in regional or local

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
the protection, conservation and enhancement of the historic environment, historic assets and their settings			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	plans is designed to meet the needs of rural communities whilst responding to 'local circumstances', these 'local circumstances' should include the local range of historic assets and areas to ensure they are appropriately accounted for when determining the quantity of growth the area can support.
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P25	Scale: Reg	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P23, P24 and their alternatives would result in significant quantities of new development that pose a risk to the setting of heritage assets and historic areas in large settlements of the region, such as the extensive range of Scheduled Ancient Monuments and Listed Buildings in the region. The do-nothing scenario would conform with trends. The policies in this section have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P25 would lead to new investment and development at the Haven Waterway region, which could potentially alter the setting of local heritage assets or historic areas. Given that such development would be in proximity to existing similar land-uses, these impacts would be minor. Conversely, such development may also be an opportunity to redevelop brownfield sites or enhance their impact on the setting of nearby assets. Focusing on an alternative port could have similar effects, but this is uncertain and depends on the distribution of heritage assets. The do-nothing scenario would ultimately conform with baseline trends. P26 and its alternatives would be expected to result in no discernible impacts on this ISA Objective.							P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text
			15	To create the opportunities for		P23	Scale: n/a	T/P: n/a	Cert: n/a	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
	the protection and promotion of Welsh culture		P23RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	P23 & P24 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text
			P23RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P24	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P24RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P25RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P26	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
P23, P24, P25 and their alternatives would be unlikely to have a discernible impact on Welsh culture. By enhancing regional connectivity, P26 could help the region to take advantage of its local culture and attract visitors from further afield, including rural areas. The alternative of focussing on existing infrastructure would have similar benefits but of a lesser magnitude. The do-nothing scenario would be likely to conform with the baseline.										
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Development near coastal and marine areas should be required to incorporate appropriate avoidance and mitigation measures to prevent adverse impacts on sensitive
			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
			P25	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	habitats, species and designations. The Government should seek to only support development here that would not pose a significant risk to Natura 2000 sites. Flexible boundaries could potentially pose a risk to biodiversity in rural areas and so would require careful management. Development in urban locations should incorporate GI comprised of a diverse range of nature species to help enhance local biodiversity.
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
			P25RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
		P23, P24 and their alternatives would result in significant quantities of new development that pose a risk to biodiversity. The do-nothing scenario would conform with trends. New development and investment at Waterway Haven could potentially pose a risk to Pembrokeshire Marine Special Protection Area due to impacts on water quality. Development at other ports, as per the alternative to P25, could also impact on a sensitive biodiversity designation but this is uncertain. The do-nothing alternative would be likely to conform with baseline trends. New development associated with the Swansea Metro, invested in through P26, could potentially have a minor adverse impact on areas of sensitive biodiversity value as well as regional ecological connectivity. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P23	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	Policies could encourage development to incorporate low-carbon techniques and materials during construction as well as to use renewable energy.
			P23RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P23RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P24	Scale: Reg	T/P: T	Cert: H	ST -	MT -	LT -	
			P24RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	
			P25	Scale:	T/P:	Cert:	ST	MT	LT	

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹³						Recommendations
				Reg	T	M	+/-	+/-	+/-	
			P25RA1	Scale: Reg	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	
			P25RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P26RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P26RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P23 and P24 would facilitate large quantities of new development that would be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have the same effect. The do-nothing scenarios would conform with trends. P25 would lead to new development at Waterway Haven, at which there is considered to be good opportunities for development on brownfield land. However, new development would require the consumption of natural resources and would be likely to increase local generation of waste. Focussing on a different port would be likely to have similarly mixed effects, but with less certainty. The do-nothing scenario would be likely to conform with trends. New development associated with the Swansea Metro, invested in through P26, would require the consumption of resources and would generate waste, particularly during construction. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends.							

Table B-49: Policies and reasonable alternatives in Policy Grouping 11

Policy Grouping 11	
P27 – Cardiff	Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night-time economy and finance. The Welsh Government supports regional development which addresses the opportunities and challenges arising from Cardiff's geographic location and its functions as a Capital City. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage.
P27RA1	This option focusses growth within Cardiff.
P27RA2 – Do Nothing	Do not have a policy.
P28 – Newport	The Welsh Government supports Newport as the focus for regional growth and investment and wishes to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the City. Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. Development in the wider region should be carefully managed to support Newport's growth and, to provide a focus for regional planning. The Welsh Government will work with authorities within the regional and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.
P28RA1 – Name alternative growth focus	This option would set an alternative focus for growth within the region.
P28RA2 – Do Nothing	Do not have a policy.
P29 – The Heads of the Valleys	The Welsh Government supports co-ordinated regeneration and investment in the Heads of the Valleys area to increase prosperity and address social inequalities. The Welsh Government will work with local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing issues in the Heads of the Valleys area. Strategic and Local Development Plans across the full region must identify how they can support, both directly and through a joined-up regional approach, the Heads of the Valleys area to deliver greater prosperity, support regeneration and improve well-being.
P29RA1 – Name alternative growth focus	This option would set an alternative focus for growth within the region.
P29RA2 – Do Nothing	Do not have a policy.
P30 – Green Belts in South East Wales	The Welsh Government requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region. Regional plans should consider the relationship of any new green belts with the green belt around Bristol.
P30RA1- Directly identify the green belt	This option would directly allocate a green belt within the North Wales region.

Policy Grouping 11	
P30RA2 – Promote green wedge or other policy interventions	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in South East Wales.
P30RA3 – Do Nothing	Do not have a policy.
P31 – Growth in sustainable transit orientated settlements	Development and growth in the region should be focussed in places with good active travel and public transport connectivity. Land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development. Strategic and Local Development Plans should plan growth to maximise the potential opportunities arising from better regional connectivity. The Welsh Government supports the development of the South Wales Metro and will work with agencies to enable its delivery.
P31RA1 – Focus on working with existing infrastructure	This option would only focus on existing infrastructure to maximise better regional connectivity.
P31RA2 – Do Nothing	Do not have a policy.
P32 – Cardiff Airport	The Welsh Government supports the growth and development of Cardiff Airport. Proposals to expand the capacity of the airport to provide new and improved airport facilities and passenger services; and to improve transport links to the airport are supported. Improvements to accessibility are supported and should prioritise a modal shift from the private car to sustainable transport modes including public transport. Development of land adjacent to Cardiff Airport and which is part of the Enterprise Zone is supported where it supports the functions of the airport. New development around the airport should be carefully managed to ensure that future expansion and change at the airport is not constrained.
P32RA1 - Restrict growth	This option would restrict the growth of Cardiff airport.
P32RA2 – Do Nothing	Do not have a policy
P33 – Valleys Regional Park	The Welsh Government supports the establishment of the Valleys Regional Park. Strategic and Local Development Plans should embed its principles into their planning frameworks. The Welsh Government will work with local authorities, the third sector and key partners to support the Valleys Regional Park and maximise opportunities for new development.
P33RA1- Focus regeneration on other areas of Wales	This option would set an alternative focus for regeneration within the region
P33RA2 – Do Nothing	Do not have a policy.
The NDF's policies have been developed through a iterative process of evidence gathering, review of key strategies and documents, engagement, consultation and assessment. This process has led to the Draft NDF. As potential policies emerged, these alternative policies were identified alongside them and considered, to help strengthen the testing process. The policy identified in the Draft NDF is that the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Table B-50: Appraisal of Policy Grouping 11

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁴						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	The policy P31 could be strengthened to include access by a range of sustainable transport modes not just public transport
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P27RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	

¹⁴ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

		P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT 0
		P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +
		P31RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +
		P31RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
		P32	Scale: Nat	T/P: T	Cert: M	ST +	MT +	LT +
		P32RA1	Scale: Nat	T/P: T	Cert: M	ST 0	MT +	LT +
		P32RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
		P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
		P33RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +
		P33RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0
		P27 - Retaining and extending the role of Cardiff as the primary national centre for culture, sport, leisure, media, the night-time economy and finance would be expected to help ensure that education facilities in the city, including primary and secondary schooling as well as universities, can continue to offer high-quality education opportunities in accessible locations for the large population in the immediate area. The alternative to this, P27RA1, would lead to a more focussed growth in Cardiff, which could help to ensure that new educational facilities and capacity are delivered sooner. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends. P28, focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities to support this growth and increased connectivity. This could result in benefits in terms of enabling children and young people to access education services within this area, leading to improvements in educational attainment. P31 The policy would improve connections and deliver inclusive access for all to education facilities and could facilitate improvements in educational attainment for the local area. P32 The enterprise zone currently contains proposals for an education campus to increase skills and training which would have a positive benefit it is considered this policy would support improvements in educational attainment for young people. This alongside improving transport connections to this area could improve access for all. The policy could be strengthened to include access by a range of sustainable						

		transport modes not just public transport. P32RA1 would restrict growth of the airport and so would be unlikely to support the delivery of new educational facilities in the airport campus. P29 The policy has the potential to increase access to skills and education, this could result in benefits in terms of improving the social conditions in the Area. This could enable children and young people to better access education services within this Area, leading to improvements in educational attainment. Achieving these benefits would depend on the detail at the lower tier. P33 The delivery of the Valleys Regional Park prospectus recognises the need to develop skills to deliver the project, this will therefore have a positive impact on access to skills and education. Supporting this could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide education opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in educational attainment. Each alternative to policies P28, P31, P29 and P33 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	This policy P28 could be strengthened to include facilities and services. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The policy P31 could be strengthened to include access by a range of sustainable transport modes not just public transport.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT +	LT ++	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST +	MT ++	LT ++	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT +	LT +	

		P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT +
		P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +
		P31RA1	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +
		P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +
		P32	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-
		P32RA1	Scale: Nat	T/P: T	Cert: M	ST +/-	MT +/-	LT +/-
		P32RA2	Scale: Nat	T/P: T	Cert: L	ST 0	MT 0	LT +
		P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++
		P33RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +
		P33RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +
		The focus on growth in Cardiff through P27 could help to combat inequality and poverty by encouraging greater rates of employment. People in Cardiff have excellent access to a range of necessary health services and facilities – P27 would help to see this benefit continue. The alternative, P27RA1, would focus new growth in Cardiff and this could help to ensure new health services and increased capacity are provided for in Cardiff sooner. It is uncertain if delivering more growth in Cardiff could lead to some unintended health impacts as a result of a denser population, greater traffic and more limited access to natural habitats for people. The do-nothing alternative would be likely to conform with baseline trends. P28 The focus of growth for the region would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. This policy could be strengthened to include facilities and services. This Policy will support the development of Newport as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of enabling children and young people to access new services within this area, contributing to an improvement in health and well-being. P28RA1 – could be less impact to P28 depending on implementation, wouldn't support the commitment to the development of Newport. The outcomes of locating development in a named alternative growth focus for a particular area are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from the provision of new services which contribute to						

	improvements in health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned go forward. P28RA2 - Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. P30 – The provision of a green belt retain open spaces around identified urban areas which either currently or potentially would have access for recreation would continue to provide physical and mental health benefits. A policy on green belts in south east Wales will ensure key services and infrastructure support existing built up areas and will be taken on a regional basis ensuring they are located in the most accessible and sustainable locations supporting actions to address inequality and deprivation and thus contributing in a reduction in health inequality in rural areas. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits green belts would bring for the area. P30RA1 – Same as P30 benefits would be stronger in the identified area. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits green belts would bring for the area. P30RA2 - Same as P30 depending on implementation. Other green belt related policy interventions such as green wedges should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for children and young people in terms of the environmental and social benefits such interventions would bring for the area. P30RA3 – potential positive and negative effects depending on type and scale of growth in the area. P31 - The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities which will have physical and mental health and well-being benefits. The south Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity including contributing towards a reduction in health inequalities across Wales. Supporting the development of the South Wales Metro should ensure better connectivity across the South Wales Region. This could lead to better access for children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities. P31 RA1 - Focusing on the existing infrastructure will not benefit rural areas in the same way the south Wales Metro could providing limited public transport provision to rural areas. A focus on developing existing infrastructure should ensure better connectivity across the South Wales Region. This could lead to better access for children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities. P32 The policy looks to improve connectivity to the area but this does not currently include active travel options. The policy could be strengthened to include access by a range of sustainable transport modes	

	including active travel and not just public transport. This would increase healthier lifestyle choices. The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty. Increasing flights at the airport would have a detrimental impact on air quality. P32RA1 A restricted growth policy would undermine the Welsh Government's policy aspiration for developing a nationally strategic transport hub and will not greatly assist to contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities. P29 – The policy looks to increase prosperity and reduce inequalities this will have a significant positive impact on the health of the communities within this area. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The natural environment bring many health benefits both physically and mentally. This policy will contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales by supporting coordinated regeneration and investment in the area to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the Heads of the Valleys Area could result in benefits in terms of improving the social conditions in the Area, leading to improvements in health and well-being for its children and young people. P29RA1 – could be less impact to P29 depending on implementation, wouldn't support the commitment to the development of the northern part of the region. An alternative growth focus would have a similar affect to a do nothing policy; prosperity in the area will stagnate and the social inequalities which are currently in the area will persist, having a detrimental effect on rural areas and wont contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. The outcomes of locating development in a named alternative growth focus for a particular area are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from improvements to their health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned go forward. P29RA2- Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. P33 – The Park would bring opportunities for recreation, increasing access to natural environment, improving well-being embracing cultural identity which will bring with them many health benefits and providing more opportunities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. Supporting the Government's ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in their health and well-being.	

		P33RA1 – could be less impact to P17 depending on implementation, wouldn't support the commitment to the development of the Valleys Regional Park. The outcomes of focusing regeneration on other areas of Wales are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from improvements to their health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned go forward. P33RA2 - Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. A do-nothing policy may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration while contributing to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. Do nothing approaches of P31RA2 and P32RA2 would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST ++	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P28RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P29RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +	
			P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31	Scale:	T/P:	Cert:	ST	MT	LT	

			Reg	T	H	+	+	++
	P31RA1	Scale:	Reg	T/P:	Cert:	ST	MT	LT
			Reg	T	M	+	+	+
	P31RA2	Scale:	Reg	T/P:	Cert:	ST	MT	LT
			Reg	T	L	0	0	+
	P32	Scale:	Nat	T/P:	Cert:	ST	MT	LT
			Nat	T	H	+	++	++
	P32RA1	Scale:	Nat	T/P:	Cert:	ST	MT	LT
			Nat	T	M	0	0	+
	P32RA2	Scale:	Nat	T/P:	Cert:	ST	MT	LT
			Nat	T	M	0	+	+
	P33	Scale:	Reg	T/P:	Cert:	ST	MT	LT
			Reg	T	H	+	+	++
	P33RA1	Scale:	Reg	T/P:	Cert:	ST	MT	LT
			Reg	T	M	+	+	+
	P33RA2	Scale:	Reg	T/P:	Cert:	ST	MT	LT
			Reg	T	L	0	0	+
The retention of Cardiff's existing role through P27 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the employment market in Cardiff. Jobs here are highly accessible for people across the city, as well as those in its immediate region. P27RA1 would focus new growth in Cardiff, and so would be likely to deliver similar economic and employment benefits as P27 but potentially of a higher-magnitude and sooner. P27RA1 would potentially lead to new economic development taking place in Cardiff as opposed to alternative locations in the region, which could potentially limit economic growth in those areas. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends. P28 would encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance for employment, this policy would be likely to lead to major positive impacts on this ISA Objective over time and to significantly enhance economic inclusion for local people, including those in the most deprived areas and children and young people. The growth and connections can provide benefits for all members of society and in rural areas. Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport.								

	P30 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective. P31 would see the Government help to ensure that new development takes place in proximity to sustainable transport modes. This would help to enhance regional connectivity and economic inclusion for all working age ranges. This policy would increase opportunities to access employment through accessible and inclusive connections. any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education P31RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. A focus on existing infrastructure (P31RA1) would have similar direct impacts on this ISA Objective but to a lower magnitude. P32 enforces the Government's commitment to the expansion of Cardiff Airport in order to provide new airport and passenger facilities as well as transport connectivity. Wales' airports are gateways into and out of Wales for people and trade and help to establish Wales' position as an attractive and competitive place to invest, work and live. P27 would therefore be likely to help ensure that businesses and economies in Wales can compete and succeed in national and international markets, therefore better enabling them to offer more stable and high-quality employment opportunities to people in Wales. The expansion and development of the airport would also help to enhance the range and quality of employment opportunities on offer at the airport and in its vicinity, which could include employment for young people (for example, through apprenticeships). The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty. P32RA1 would see the expansion of Cardiff Airport being restricted, and so future economic development and jobs growth associated with its expansion would also be restricted. P32RA2 The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable. P29 would encourage greater prosperity in the Heads of the Valleys area. The proposed investment would be likely to help address unemployment issues in a region of relatively high levels of deprivation. This policy looks to reduce inequalities and increase prosperity for all members of the community. A focus on the Heads of the Valleys could bring renewal and jobs in an area in need of these opportunities. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. P29RA1, which would focus on an unconfirmed alternative location, would be likely to lead to similar benefits for this ISA Objective but to a lesser magnitude with greater uncertainty. Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services and could have a negative impact on the Welsh language. P33 and its alternatives are focussed on a Valleys Regional Park. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help create opportunities for an increase in employment across the country and promote economic	

		inclusion for all. The Valleys Regional Park would be likely to support more empowered communities with greater stewardship over their natural assets and subsequent employment opportunities. The alternative approach of focussing on a different area of Wales (P33RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location. Policy P30 is focussed on green belts in south Wales will ensure key services and infrastructure support existing built up areas and will be taken on a regional basis ensuring they are located in the most accessible and sustainable locations supporting actions to address inequality and deprivation and thus promote economic inclusion in rural areas. And could provide opportunities for young people within the local area to access associated employment opportunities.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	No recommendations.
P27RA1			Scale: Reg	T/P: T	Cert: M	ST ++	MT ++	LT ++		
P27RA2			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +		
P28			Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++		
P28RA1			Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++		
P28RA2			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +		
P29			Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++		
P29RA1			Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++		
P29RA2			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +		
P30			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P30RA1			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P30RA2			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P30RA3			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P31			Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++		
P31RA1			Scale:	T/P:	Cert:	ST	MT	LT		

			Reg	T	M	+	+	+
	P31RA2	Scale:	Reg	T/P:	Cert:	ST	MT	LT
		Reg	Reg	T	L	0	0	+
	P32	Scale:	Nat	T/P:	Cert:	ST	MT	LT
		Nat	Nat	T	H	+	++	++
	P32RA1	Scale:	Nat	T/P:	Cert:	ST	MT	LT
		Nat	Nat	T	M	0	0	+
	P32RA2	Scale:	Nat	T/P:	Cert:	ST	MT	LT
		Nat	Nat	T	M	0	+	+
	P33	Scale:	Reg	T/P:	Cert:	ST	MT	LT
		Reg	Reg	T	H	+	+	++
	P33RA1	Scale:	Reg	T/P:	Cert:	ST	MT	LT
		Reg	Reg	T	M	+	+	+
	P33RA2	Scale:	Reg	T/P:	Cert:	ST	MT	LT
		Reg	Reg	T	L	0	0	+
The retention of Cardiff's role through P27 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the economy in Cardiff. P27RA1 would focus new growth in Cardiff, and so would be likely to deliver similar economic and employment benefits as P27 but potentially of a higher-magnitude and sooner, but potentially in a more focussed location in Cardiff at the expense of a wider area. The do-nothing alternative, P27RA2, would be likely to conform with baseline trends. P28 would encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance to the region's economy, this policy would be likely to lead to major positive impacts on this ISA Objective over time. Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport. Policies P28 & P31 could provide opportunities for the third sector to support the growth and benefit from improved connections. P28RA2 would be likely to also lead to positive impacts for this Objective but to a lesser magnitude and a greater uncertainty as the alternative location is unknown and would be unlikely to be as strategically important as Newport. As with P28 effects are unpredictable though likely to be very small, as the region has few, if any, traditional 'welsh speaking communities'								

	P30 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective. P31 would see the Government help to ensure the development of South Wales Metro. This would help to enhance business competitiveness. Any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education. The South Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion. A focus on existing infrastructure (P31RA1) would have similar direct impacts on this ISA Objective but to a lower magnitude. A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. P32 enforces the Government's commitment to the expansion of Cardiff Airport in order to provide new airport and passenger facilities as well as transport connectivity. Wales' airports are gateways into and out of Wales for people and trade and help to establish Wales' position as an attractive and competitive place to invest, work and live. P32 would therefore be likely to help ensure that businesses and economies in Wales can compete and succeed in national and international markets. The growth of the airport and enterprise zone could deliver opportunities for the third sector to help support this growth. The expansion and development of the airport's Enterprise Zone would also help to enhance innovation and commercial opportunities at the airport and in its vicinity. P32RA1 would see the expansion of Cardiff Airport being restricted, and so future economic development associated with its expansion would also be restricted. The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable P29 would encourage greater prosperity in the Heads of the Valleys area and would have significant positive effects for the third sector which it directly references to support the growth and development in this area. The proposed investment would be likely to help facilitate economic growth. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. will create opportunities for sustainable economic growth, diversity and business competitiveness by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. P29RA1, which would focus on an unconfirmed alternative location, would be likely to lead to similar benefits for this ISA Objective but to a lesser magnitude with greater uncertainty. Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services P33: A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to	

		nature and recreational facilities which will help create opportunities for sustainable economic growth, diversity and business competitiveness. The Valleys Regional Park would be likely to support more empowered communities with greater stewardship over their natural assets and subsequent economic benefits in the region based around a sustainable industry. The policy would however have significant positive effects for the third sector which it directly references to support the delivery of the Park. The alternative approach of focussing on a different area of Wales (P33RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location. The do-nothing scenarios would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +/-	LT +/-	
			P29RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT ?	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA3	Scale: Reg	T/P: T	Cert: n/a	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST 0	MT +	LT +	
			P31RA1	Scale:	T/P:	Cert:	ST	MT	LT	

				Reg	T	H	?	?	?	
			P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT +	
			P32	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P32RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P32RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P33	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST ?	MT ?	LT ?	
			P33RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
P27, P27RA1 and P28: Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. P28RA1 as with P28, effects are unpredictable though likely to be very small, as the region has few, if any, traditional ‘Welsh speaking communities.’ Culture and media play an important role in attracting members of younger age groups to an area, including Welsh speakers to the city and its region. P30, P32 and their alternatives are unlikely to have a discernible impact on this ISA Objective. P31 any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education P31RA1: A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. P29 A focus on the Heads of the Valleys could bring renewal and jobs in an area in need of these opportunities. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area P30RA1: Failure to focus on the Heads of the Valleys would perpetuate the loss of jobs, gradual depopulation and loss of services P33 and P33RA1 It is unclear how the establishment of a park could impact on jobs and on Welsh speaking communities. The do-nothing scenarios would be likely to conform with baseline trends.										
6	To create opportunities within which		P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	No recommendations.
			P27RA1	Scale:	T/P:	Cert:	ST	MT	LT	

greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		Nat	P	M	-	-	-
	P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +
	P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -
	P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -
	P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +
	P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -
	P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -
	P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +
	P30	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P30RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P30RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P30RA3	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P31	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++
	P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
	P31RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P32	Scale: Nat	T/P: P	Cert: M	ST -	MT --	LT --
	P32RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P32RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
	P33	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
	P33RA1	Scale:	T/P:	Cert:	ST	MT	LT

				Nat	P	M	0	+	+		
			P33RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +		
		Policies P27, P28, P29 and their alternatives would be likely to lead to higher levels of economic growth that leads to an increase in energy consumption and GHG emissions. Development focussed in and around Cardiff and Newport would enable relatively low-emission and sustainable transport for businesses and local people due to the existing provision of sustainable transport modes here and the relatively short distances between people, services and areas of employment. Focussing development in more rural locations may require less sustainable lifestyles with higher carbon footprints for new residents. P30, P33 and their alternatives would help to protect areas of natural carbon sink. P31 would help to ensure people in Wales have good access to sustainable transport modes which would support the decarbonisation of transport. The alternative of focussing on existing infrastructure would have a similar effect but to a lesser magnitude (depending on what these other location options would be, which is currently uncertain). The do-nothing scenarios would be likely to conform with baseline trends. P32 would see the expansion of Cardiff Airport and its services being developed. It is expected that this would lead to a net increase in the quantity and regularity of planes flying in and out of Cardiff. Air travel is a significant source of GHG emissions, and the expansion of the airport would discord with Wales' transition to a low-carbon transport sector. It is considered to be likely that over time the increase in air travel would result in a major adverse effect on efforts to reduce Wales' contribution to the causes of climate change. This would be mitigated to a very limited extent by the airport's efforts to encourage higher rates of public transport use for those travelling to and from the airport. P32RA1 would see the expansion of the airport being restricted. This would limit any increases in air travel into and out of Wales and would subsequently help to limit GHG emissions associated with Wales' transport sector. This approach may also enable improvements to alternatives of air travel, such as ports or rail travel, which are lower-emission forms of travel in comparison with air travel. However, restricting growth of the airport could potentially lead to local people travelling across the border into England to access airports further afield for air travel. The do-nothing scenario would neither restrict nor support expansion of Cardiff Airport. It is considered to be likely that air travel at the airport would increase at a slower and steadier rate than under P32.									
7	To contribute to the reduction and management of flood risk		P27	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	Development in areas of flood risk should not only be expected to conform with WG flood risk management policy through careful selection of sites for development and types	
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -		
			P27RA2	Scale: n/a	T/P: n/a	Cert: M	ST 0	MT -	LT -		
			P28	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -		

	P28RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	of development considered to be compatible with these locations, but could also be encouraged to incorporate natural flood risk alleviation design measures such as green infrastructure elements and permeable surfaces, as well as SUDS.
	P28RA2	Scale: n/a	T/P: n/a	Cert: M	ST 0	MT -	LT -	
	P29	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
	P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
	P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P30RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
	P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P31RA2	Scale: Reg	T/P: T	Cert: H	ST 0	MT 0	LT 0	
	P32	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P32RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P33	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
	P33RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
	P31 and its alternatives would be expected to result in no discernible impacts on flood risk.							
P27, P27RA1, P28, P28RA1, P29 and P29RA1 would encourage new development in regions of Wales with a broad extent of Flood Zones 2 and 3. There is a risk that new development could be situated on land at risk of flooding. It is assumed that, in line with Welsh Government policy on flood risk management, that								

		development would not take place in areas of flood risk with which the development type is incompatible. It should also be noted that development in Cardiff and Newport would be likely to benefit from existing flood defence schemes. However, there is a risk that the development and growth in these areas would lead to the loss of greenfields (comprised of infiltrating vegetation and permeable soils that help to reduce flood risk) and could potentially expose businesses or neighbourhoods to flood risk or could alter the extent and distribution of flood risk in the region. Climate change will be likely to exacerbate this issue over the coming years. Policies and alternatives related to the green belt and a new Regional Park (P30 and P33) could help to enhance the local extent of above ground vegetation and GI, which provides a natural flood risk alleviation service. P32 and its alternatives would not be expected to have a discernible impact on this ISA Objective. Whilst there are areas of Flood Zones 2 and 3 north and south of the airport associated with Kenson River as well as the coast, there is considered to be adequate land not at risk of flooding that could accommodate growth and expansion of the airport.																																																																																						
8	To create opportunities to encourage the protection and improvement of air quality		<table><tr><td>P27</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P28</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P29</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: H</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT +</td></tr><tr><td>P30</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P30RA1</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr><tr><td>P30RA2</td><td>Scale: Nat</td><td>T/P: P</td><td>Cert: M</td><td>ST 0</td><td>MT +</td><td>LT +</td></tr></table>	P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +	P30	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P30RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	P30RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +	There is a potential to strengthen the policies P27, P28 and P29 to focus the connectivity on low carbon options to improve air quality.
P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -																																																																																		
P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -																																																																																		
P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +																																																																																		
P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -																																																																																		
P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -																																																																																		
P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +																																																																																		
P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -																																																																																		
P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -																																																																																		
P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT 0	LT +																																																																																		
P30	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +																																																																																		
P30RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +																																																																																		
P30RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +																																																																																		

		P30RA3	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
		P31	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++
		P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
		P31RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
		P32	Scale:	T/P:	Cert:	ST -	MT --	LT --
		P32RA1	Scale:	T/P:	Cert:	ST 0	MT +	LT +
		P32RA2	Scale:	T/P:	Cert:	ST 0	MT -	LT -
		P33	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
		P33RA1	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
		P33RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT +	LT +
		Policies P27, P28, P29 and their alternatives would be likely to lead to higher levels of economic growth that may lead to an increase in air pollution due to associated increases in traffic and resources consumption. Development in and around Cardiff and Newport (P27, P27RA1, P28, P28RA1) would enable relatively low-emission and sustainable transport for businesses and local people due to the provision of sustainable transport options here and the proximity of services, people and jobs. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality. P30, P33 and their alternatives would help to protect areas of natural air filtering. P31 would help to enhance access to sustainable transport modes which would support a movement towards low-emission movements and travel for local people. The alternative of focussing on existing infrastructure would have a similar effect but to a lesser magnitude. The do-nothing scenarios would be likely to conform with baseline trends. P32 would see the expansion of Cardiff Airport and its services being expanded and developed. It is expected that this would lead to a major adverse impact on air quality in Wales. Air travel is a significant source of air pollution and the expansion of the airport would discord with Wales' transition towards improved air quality. This would be mitigated to a very limited extent by the airport's efforts to encourage higher rates of public transport use for those travelling to and from the airport.						

		P32RA1 would see the expansion of the airport being restricted. This would limit any increases in air travel into and out of Wales and would subsequently help to limit air pollution associated with Wales' transport sector. The do-nothing scenario would neither restrict nor support expansion of Cardiff Airport. It is considered to be likely that air travel at the airport would increase at a slower and steadier rate than under P32.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P28	Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -	During the selection of locations for development in Cardiff and Newport, careful consideration should be giving to the potential impacts on natural waterbodies including the Severn Estuary. Development should be encouraged or required to adopt precautionary measures to minimise the risk of contamination or pollution. Should any natural waters be within or adjacent to sites, development should seek to enhance the quality of this water in order to help meet Water Framework Directive Requirements. New homes and businesses built in these regions should incorporate water efficiency measures to better enable people and businesses to
P28RA1			Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -		
P28RA2			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
P28			Scale: Reg	T/P: T	Cert: L	ST 0	MT -	LT -		
P28RA1			Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -		
P28RA2			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
P29			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P29RA1			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P29RA2			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P30			Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +		
P30RA1			Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +		
P30RA2			Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +		
P30RA3			Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -		
P31			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P31RA1			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P31RA2			Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0		
P32			Scale:	T/P:	Cert:	ST	MT	LT		

			Reg	T	L	?	?	?	minimise their water consumption. Development should only be permitted where adequate capacity in the local sewerage system is evident.
		P32RA1	Scale: Reg	T/P: T	Cert: L	ST ?	MT ?	LT ?	
		P32RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
		P33	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
		P33RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT +	LT +	
		P33RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
		P27 would see Cardiff retain its current role and so would be likely to conform with baseline trends in the region, with a steady increase in water consumption. P27RA1 would focus new growth in Cardiff and would be likely to lead to an increase in water consumption. It is unclear if focussed growth in Cardiff could potentially risk the sewage system become near- or over-capacity. The do-nothing approach would be likely to conform with baseline trends. P28 would focus new growth in Newport and would be likely to lead to an increase in water consumption. It is unclear if focussed growth in Newport could potentially risk the sewage system become near- or over-capacity. Newport sits on the River Usk and new development could potentially expose the river to an increased risk of water quality impacts, although focussing growth in the urban region of Newport may be an effective means of reducing the quantity of new development in the countryside and in previously undeveloped locations where the potential impacts on natural waterbodies may be greater (the same potential positive impact can be said for P27). P28RA1 would focus growth in an alternative location in the region. This growth would also be likely to increase the consumption of water, although whether the local sewage system could become near- or over-capacity is uncertain and it is also uncertain as to whether the alternative location could be in proximity to natural waters where there is a risk of pollution and contamination. The do-nothing approach would be likely to conform with baseline trends. Development in the Cardiff and Newport regions (P27, P27RA1, P28, P28RA1) could potentially pose a risk to water quality in the Severn Estuary. P29, P31 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. P30 and its alternatives would help to protect green belt land, whilst P33 would encourage the establishing of a new regional park, which could help to protect the quality of natural waterbodies due to the ecosystem services provided by above-ground vegetation and healthy soils. P32 It is uncertain if the growth and development of the airport could pose a risk to the quality of waters along the coast, which is approximately 500m south of the airport. Construction and operation of development could pose a contamination or pollution risk to waters there.							
10		P27	Scale:	T/P:	Cert:	ST	MT	LT	

To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups				Reg	T	H	+	+	++	Policy P28 could be strengthened to include reference to connections to facilities and services. Policy 31 -The supporting text to the policy recognises the role of the Metro in increasing connections in this area this could be recognised within the policy through a variety of metro and active travel opportunities which would bring about many health benefits.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST	MT	LT	
			P27RA2	Scale: Reg	T/P: T	Cert: M	0	0	-	
			P28	Scale: Reg	T/P: T	Cert: H	+	+	++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	+	+	+	
			P28RA2	Scale: Reg	T/P: T	Cert: M	0	0	-	
			P29	Scale: Reg	T/P: P	Cert: M	+	+	++	
			P29RA1	Scale: Reg	T/P: T	Cert: M	+	+	+	
			P29RA2	Scale: Reg	T/P: T	Cert: M	0	0	-	
			P30	Scale: n/a	T/P: n/a	Cert: n/a	0	0	0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	0	0	0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	0	0	0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: n/a	0	0	0	
			P31	Scale: Reg	T/P: T	Cert: H	+	+	++	
			P31RA1	Scale: Reg	T/P: T	Cert: H	+	+	+	
			P31RA2	Scale: Reg	T/P: T	Cert: M	0	0	-	
			P32	Scale: Reg	T/P: T	Cert: n/a	+	+	+	
			P32RA1	Scale: Reg	T/P: T	Cert: L	0	0	+	
			P32RA2	Scale: Reg	T/P: T	Cert: M	0	0	-	
			P33	Scale:	T/P:	Cert:	ST	MT	LT	

			Reg	T	M	+	+	++
	P33RA1		Scale:	T/P:	Cert:	ST	MT	LT
	P33RA2		Reg	T	M	+	+	+
			Scale:	T/P:	Cert:	ST	MT	LT
			Reg	T	M	0	0	-
Policy P27, P38RA1 and P28: The policies look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. Such an approach could result in benefits in terms of enabling children and young people within the area to access goods and services. The policy could be strengthened to include reference to facilities and services. P28RA1 could be less impact than P28 depending on implementation, wouldn't support the commitment to the development of Newport. P28RA3 Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. P29 as well as its alternatives, would not be expected to have a discernible impact on this ISA Objective. P31 will increase connectivity for people and enhance their access to facilities and services for all. The South Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and provides opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. P32 looks to improve transport connectivity including public transport, this would improve connectivity to the area for everyone and looks to reduce the reliance on the private car. P32RA1 would see the expansion of Cardiff Airport being restricted, and so future improvements to connectivity associated with its expansion would also be restricted. The do-nothing approach would neither encourage nor restrict the airport's expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable. P29 & P33: The supporting text to the policy recognises the role of the Metro in increasing connections in this area this could be recognised within the policy through a variety of metro and active travel inclusive opportunities which would bring about many health benefits. P30 will create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. P30RA2 and P33RA1 could be less impact than P31 and P33 depending on implementation, wouldn't support the commitment to the development of the northern part of the region.								

		Do nothing approaches would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P27	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	P27 and P28 could be strengthened to include reference to connections to facilities and services. Policy 31 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P28	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P30	Scale: Reg	T/P: P	Cert: M	ST +	MT +	LT ++	
			P29	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P29RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: n/a	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT ++	
			P31RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT +	LT +	
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
P32	Scale: Reg	T/P: T	Cert: n/a	ST +	MT +	LT +				
P32RA1	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT +				

	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
	P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT ++
	P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +
	P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
Policy P27, P27RA1 and P28 – Through the growth and increasing access and connections in this area this has the opportunity to increase social cohesion and create a positive built environment. The policy could be strengthened to include reference to connections to facilities and services. This Policy will support the development of Newport as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of providing services which enable improvements in social cohesion and equality for children and young people within the area. P28RA1 – could be less impact to P28 depending on implementation, wouldn't support the commitment to the development of Newport. P28RA2 - Doing nothing may not maximise the opportunities P31 - The investment in connections across the region would improve inclusive access to facilities and services, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. The South Wales Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and provides opportunities within which an improvement in social cohesion and equality can be achieved. Focussing development in proximity to sustainable transport options should help to ensure people of all backgrounds have equal access to services, places and amenities. Supporting the development of the South Wales Metro should ensure better connectivity across the South Wales Region. This could lead to notable improvements in access for children and young people to a wider range of services and other communities which were not as easy to access before. This should create opportunities for improvements to social cohesion and equality for children and young people in the area. P31RA1 would be likely to have similar benefits to P31, but by simply focussing on existing infrastructure these benefits would be of a lower magnitude with potentially less certainty. P32 – The policy growth of Cardiff airport would increase opportunities for jobs and through connected infrastructure this would be accessible for all and help to reduce inequality. P32RA1 would see the expansion of Cardiff Airport being restricted, and so future improvements to connectivity associated with its expansion would also be restricted and therefore its potential to reduce inequality.							

		The do-nothing approach would neither encourage nor restrict the airport’s expansion. Future growth at the airport may still take place, but it is largely uncertain at what scale or pace and the extent to which it would be sustainable. P29 The policy looks to increase prosperity and reduce inequalities this will have a significant positive impact on the health of the communities within this area. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The natural environment bring many health benefits both physically and mentally. This will create the opportunities within which an improvement in social cohesion and equality can be achieved by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the Heads of the Valleys Area could result in benefits in terms of improving the social and economic conditions in the Area, fostering the conditions to support improvements to social cohesion and equality for children and young people. P33 The Park would bring opportunities for recreation, increasing access to natural environment, improving well-being embracing cultural identity which will bring with them many health benefits and providing more opportunities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys’ natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will create the opportunities within which an improvement in social cohesion and equality can be achieved. Supporting the Government’s ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could foster the conditions to support improvements to social cohesion and equality for children and young people. P30RA1 and P33RA1could be less impact to P30 and P33 depending on implementation, wouldn’t support the commitment to the development of the northern part of the region. P30 would be unlikely to have a discernible impact on this ISA Objective. Do-nothing approaches would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P27	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++	No recommendations.
			P27RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P27RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P28	Scale: Reg	T/P: T	Cert: H	ST ++	MT ++	LT ++	
			P28RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P28RA2	Scale: Reg	T/P: T	Cert: L	ST 0	MT 0	LT -	
			P29	Scale:	T/P:	Cert:	ST	MT	LT	

			Reg	T	H	++	++	++	
	P29RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	M	+	++	++		
	P29RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		Reg	T	L	0	0	-		
	P30	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P30RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P30RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P30RA3	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P31	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P31RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P31RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P32	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P32RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P32RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P33	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P33RA1	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P33RA2	Scale:	T/P:	Cert:	ST	MT	LT		
		n/a	n/a	H	0	0	0		
	P27, P28 and their alternatives (P27RA1 and P28RA1) would be expected to help encourage significant housing growth in the strategically important Newport region. Such an approach could result in benefits in terms of providing good quality, affordable housing which meets local needs, including for children and young people, within the local area. P29 could help to ensure there is housing growth in the Heads of the Valleys region. It would create opportunities for the provision of good quality, safe, affordable housing that meets identified needs by supporting coordinated regeneration and investment in the heads of the valleys								

		area to increase prosperity and address social inequalities which will help both urban and rural areas. The alternatives of focusing on alternative locations could encourage housing growth in unconfirmed areas. P30, P31, P32 and P33 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. The do-nothing scenarios would conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P32 and its supporting text could potentially include wording that sets out a commitment to ensuring that the expansion and development at the airport would adopt place-making principles that protect and enhance the character of the surrounding area and the setting of heritage assets. This policy P31 has the potential to deliver accessible and inclusive townscapes.
			P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P30RA2	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++	
			P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P32	Scale:	T/P:	Cert:	ST	MT	LT	

		Reg	T	M	0	-	-
	P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
	P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
	P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
	P33RA1	Scale: Reg	T/P: T	Cert: L	ST +	MT ++	LT ++
	P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -

P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which would help to protect and enhance the landscape character. Their alternatives would be likely to have similar benefits, although there is greater uncertainty over their location.

P27, P27RA1, P28, P28RA1 and P29 would lead to new growth and development that could adversely impact landscape and townscape character depending on the type of development and its location. It is likely that this development would typically be in and around existing urban areas and the built form, and so could be in-keeping with the surrounding character. Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the surrounding character if these sites are in a derelict or run-down condition. P27, P27RA1 and P28 may provide more opportunities for developing in existing built up areas and using previously developed land. There is greater uncertainty over the location of development under P28RA1. P27RA1 would be likely to lead to more growth and development than P27 and this could have impacts on the local character, such as by increased density of developments or settlement boundary extensions into the countryside. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on landscape character. This policy has the potential to deliver accessible and inclusive townscapes.

P31 and P31RA1 would see transport infrastructure enhanced which could also alter the local landscape character depending on the design and scale of the transport infrastructure, however there is potential to deliver accessible and inclusive townscapes.

Do-nothing scenarios, wherein future development is less managed through the NDF and less focussed in certain areas as these policies propose, and it would therefore be likely to conform with baseline trends.

P32 Cardiff Airport sits between the A4226 and the settlement of Rhoose, but it is largely rural and countryside in character to the east of the airport and on the other side of the A4226. Expansion of the Airport and new development here could potentially result in an adverse effect on the surrounding landscapes.

P32RA1 would help to reduce the risk of this taking place. The do-nothing approach would be likely to conform with baseline trends.

14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P28 The opportunity and benefits of heritage led regeneration could be recognised in the supporting text. P27 see objective 13.
			P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	
			P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P30RA2	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++	
			P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P32	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT -	
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT -	LT +	
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	

			P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++	
			P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT +	LT +	
		P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which could help to protect and enhance the setting of historic areas and heritage assets. Their alternatives would be likely to have similar benefits, although there is greater uncertainty over their location. P27, P27RA1, P28, P28RA1 and P29 would lead to new growth and development that could adversely impact the setting of historic areas and heritage assets depending on the type of development and its location. It is likely that this development would typically be in and around existing urban areas and the built form, and so could be in-keeping with the surrounding character and thus have minimal impacts on setting. P27, P27RA1 and P28 may provide more opportunities for developing in existing built up areas and using previously developed land due to their focus on Newport and Cardiff. There is greater uncertainty over the location of development under P28RA1. P27RA1 would be likely to lead to more growth and development than P27 and this could have impacts on the setting of nearby heritage assets or historic environments, such as by increased density of developments or taller buildings altering views. Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the setting of historic areas or assets if these sites are in a derelict or run-down condition. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on the setting of Listed Buildings and SAMS. This policy has the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P31 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets. P32 A range of Grade II and Grade II* Listed Buildings are near the airport, including at Rhoose, Fonmon Castle and Porthkerry. The expansion of the airport could potentially pose a risk to the setting of these sensitive heritage assets. P32RA1 would help to minimise this risk. Under the do-nothing approach of not having a policy, it is considered to be likely that the airport would ultimately expand over time a slower and steadier rate, thus still posing a risk to nearby heritage assets. The do-nothing approach would be likely to conform with baseline trends. Do-nothing scenarios would conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P27	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P27RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P27RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	P28 The opportunity and benefits of

			P28	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	heritage led regeneration could be recognised in the supporting text or added to the Spatial Strategy as an overarching principle.
			P28RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P28RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT 0	
			P30	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA1	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA2	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P30RA3	Scale: n/a	T/P: n/a	Cert: H	ST 0	MT 0	LT 0	
			P31	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P32	Scale: Reg	T/P: T	Cert: L	ST 0	MT +	LT +	
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	
			P33	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT +	LT +	
			P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +	

		P27, P28, P29 and P30 and their alternatives would not be expected to have a discernible impact on this ISA Objective. P31 and P31RA1 would help to enhance connectivity via sustainable modes of transport, which could enable the area to take more advantage of local Welsh cultural assets in attracting visitors. P33 would see a new Regional Park that will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities. A Valleys Regional Park will help create the opportunities for the protection and promotion of Welsh culture. The do-nothing for P31 and P33 would conform with baseline trends. For P33 this may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration to create the opportunities for the protection and promotion of Welsh culture Policies P28, P29, P30 and P33 have the potential to increase access to and understanding of the cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text. P32 It is expected that expanding the airport could potentially enhance opportunities for international visitors to access and appreciate Welsh cultural and heritage assets and activities, although this minor positive effect is very uncertain. P32RA1 would limit this benefit, not maximising the economic impact of one of Wales' most strategic transport hubs and economic drivers, whilst the do-nothing approach would be likely to conform with baseline trends.																																																																	
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		<table><tr><td>P27</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: L</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P27RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr><tr><td>P28</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: L</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P28RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr><tr><td>P29</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA1</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST -</td><td>MT -</td><td>LT -</td></tr><tr><td>P29RA2</td><td>Scale: Reg</td><td>T/P: T</td><td>Cert: M</td><td>ST 0</td><td>MT 0</td><td>LT -</td></tr></table>	P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -	P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -	P29RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -	P32 Cardiff Airport would adopt best-practice to incorporate Green Infrastructure into the development that is not only visually attractive and leaves a positive impression on new visitors to Wales but is also of a high biodiversity value and makes a meaningful contribution towards habitat connectivity.
P27	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -																																																													
P27RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -																																																													
P27RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -																																																													
P28	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -																																																													
P28RA1	Scale: Reg	T/P: T	Cert: L	ST -	MT -	LT -																																																													
P28RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -																																																													
P29	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -																																																													
P29RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -																																																													
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			P30	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
			P30RA1	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++
			P30RA2	Scale: Reg	T/P: T	Cert: H	ST +	MT ++	LT ++
			P30RA3	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P31	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
			P31RA1	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
			P31RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P32	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P33	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
			P33RA1	Scale: Reg	T/P: T	Cert: M	ST +	MT ++	LT ++
			P33RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P30 and P33, as well as their alternatives, would help to protect green belt land and a regional park which could help to protect and enhance important areas of biodiversity value as well as to enhance local ecological connectivity by establishing, protecting and enhancing wildlife corridors. They could also help to protect and enhance important land functionally linked with nearby designations, such as the various SACs coincident with the Brecon Beacons, although it should be noted that the HRA of the Draft NDF ruled out an LSE on these EU sites. P33 and P30 would also help to protect any geodiversity assets in these locations. P27, P28, P29 and their first alternatives would lead to new growth and development that could adversely impact nearby biodiversity designations through a variety of impact pathways, such as increased public access associated disturbances, increased atmospheric nitrogen deposition caused by new traffic or losses of functionally linked land. As much of the new development would be situated on previously undeveloped land, the losses of greenfield and open space could reduce habitat connectivity without concerted efforts to ensure that high quality GI is incorporated into new developments and that space is provided for wildlife to						

		move void of disturbances from humans. Focussing development in Cardiff and Newport through P27, P27RA1 and P28 could help to direct development away from sensitive countryside areas, although brownfield sites can also be of significant biodiversity value and both urban areas are in proximity to European designations at the estuary. There is greater uncertainty of the location of development under P28RA1 but it is likely to be in a more rural location than Newport and impacts on wildlife, geodiversity and ecological connectivity could be more severe. P31 and P31RA1 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets. Do-nothing scenarios would conform with baseline trends. P32 Development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield land around the airport being developed upon. This could pose a risk to any priority species or habitats relying on this land. Within approximately 1km of the airport are several SSSIs, including Barry Woodlands, Cliff Wood – Golden Stair and East Aberthaw Coast. Expansion of the airport could potentially pose a risk to these SSSIS, such as by loss of functionally linked land, an increase in air pollution or an increase in public access associated disturbances. Given the airport's location, which is relatively rural, further development here could introduce a barrier to the movement of wildlife and reduce habitat connectivity. P32RA1 would help to limit the risk posed to nearby areas of biodiversity value. The do-nothing scenario would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P27	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	No recommendations.
			P27RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P28	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P28RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P28RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P29	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -	
			P29RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -	
			P29RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -	
			P30	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +	

			P30RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P30RA2	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P30RA3	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			P31	Scale: Nat	T/P: P	Cert: H	ST +	MT +	LT ++
			P31RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P31RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			P32	Scale: Reg	T/P: T	Cert: M	ST -	MT -	LT -
			P32RA1	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT +
			P32RA2	Scale: Reg	T/P: T	Cert: M	ST 0	MT 0	LT -
			P33	Scale: Nat	T/P: P	Cert: H	ST -	MT -	LT -
			P33RA1	Scale: Nat	T/P: P	Cert: M	ST -	MT -	LT -
			P33RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			P27	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P27RA1	Scale: Nat	T/P: P	Cert: M	ST +	MT +	LT +
			P27RA2	Scale: Nat	T/P: P	Cert: M	ST 0	MT -	LT -
			P27, P28, P31 and P29, as well as their alternatives, would encourage new development that would be likely to require the consumption of natural resources and require using up previously undeveloped land. Focussing development in Cardiff and Newport, through P27, P27RA1 and P28, would be likely to provide good opportunities for utilising previously developed land. P27RA1 would likely require greater land uptake than P27, given its focus on growth. P28RA1 would see development located away from Newport. Whilst uncertain, it is likely that it would be situated in more rural locations where there are less brownfield opportunities and a greater uptake of previously undeveloped land could be expected.						

	P30 and its alternatives would help to protect Green Belt land, whilst P33 would establish a new Regional Park, and both policies would thus help to protect valuable soils in these protected and previously undeveloped locations whilst not generating waste or consuming natural resources. The do-nothing approaches would conform with baseline trends. P32 Development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield land around the airport being developed upon. This development would be expected to require the consumption of natural resources for the construction phase. An increase in locally operating businesses and passengers flying into and out of Cardiff would be likely to lead to a net increase in the generation of waste here. P32RA1 would help to limit these direct adverse effects. The do-nothing scenario would be likely to conform with baseline trends.	

Cumulative Effects Assessment

Table B-51: Cumulative effects assessment of all draft NDF policies in-combination

Cumulative Effects Assessment									
ISA Objective		Future Baseline	Summary of Effects						Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		Scale: Nat	T/P: T	Cert: H	ST +	MT +	LT ++	Where the NDF seeks to encourage and support new employment opportunities, greater emphasis could be placed on those that also offer skills learning and education services.
		The NDF would be expected to positively contribute towards the objective of encouraging and supporting improvements in educational attainment for all people in Wales. These direct and indirect positive effects would, cumulatively, be likely to become significant over time primarily as a result of the likely improvements to existing educational facilities and their enhanced connectivity. Various policies in the NDF, such as P26 or P21, would lead to improvements to the connectivity of existing educational facilities by encouraging investment in transport infrastructure and this should help to ensure people of all backgrounds can access high-quality learning opportunities. Various other policies, such as P1, would be expected to help ensure that new essential services like schools are situated within urban areas where they would be likely to be highly accessible for people in and around these urban areas. A larger number of policies proposed in the NDF would lead to new economic and commercial development and this would benefit the range of education and skills learning on offer in Wales. For example, P17, P20 and P21 would focus new economic development in certain regions in Wales, within which benefits to local services and transport infrastructure would be likely. Improvements to digital infrastructure, which is particularly likely as a result of P6, would better facilitate the learning of new knowledge and skills that equips people for thriving in the modern technical world. It would also enable schools to adopt high-quality learning methods and provide improved opportunities for distance learning. It is unclear if, in some cases, for the focus on encouraging and supporting types of development in particular regions of Wales could result in other regions of Wales missing out on improvements to education facilities and the local transport network.							Where the NDF encourages investment and development of Wales' transport network and infrastructure, emphasis could be placed on the need for safe and convenient walking and cycling routes, ideally integrated into coherent green infrastructure networks, that enhance the accessibility of education facilities via sustainable transport modes.
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations
		The NDF would be expected to lead to long-term significant positive impacts on the objective of improving physical, mental and social health and wellbeing in Wales. Various policies would encourage significant levels of new growth and development in regions across Wales, such as policies P17, P20, P21 and P22 that would encourage and facilitate major new growth in north-Wales. New growth and development can provide benefits to the physical and mental health and wellbeing for all members of society as a result of new employment opportunities reducing inequality and poverty and more improved transport infrastructure improving people's access to services, facilities and the natural environment. The NDF would be likely to provide these health benefits to people in both urban and rural areas throughout Wales.							

		Where policies would encourage the delivery of new housing in Wales, such as policy P5, this would also be highly likely to provide significant benefits to health and wellbeing, including for older people, due to the prominent role the quality of one's living environment plays in determining their physical and mental health. Other policies proposed in the NDF would also have more indirect positive impacts on this objective, such as P6 where enhancements to Wales' digital connectivity would be encouraged with subsequent benefits to digital health services being likely. Policies P8 and P9 would help to ensure that opportunities for the provision of green infrastructure in new developments in Wales are maximised. Access to open spaces and a diverse range of natural or semi-natural habitats is crucial to ensuring good physical and mental wellbeing of all people, and so such policies would be likely to make a major contribution towards this ISA Objective over time. Green infrastructure also plays an important role in improving air quality in Wales, particularly in urban areas where, for example, tree canopies filter out air pollutants associated with the local transport sector. Incorporating green infrastructure into new developments in Wales would help to improve air quality with likely benefits to local people's physical health a consequence.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion	<table><tr><td></td><td>Scale: Nat</td><td>T/P: T</td><td>Cert: L</td><td>ST +</td><td>MT +</td><td>LT ++</td></tr></table> The NDF would be expected to make a major positive contribution towards the creation of new employment opportunities in Wales and improving economic inclusion by enhancing the accessibility of key employment areas. Various policies proposed in the NDF focus on encouraging new development and growth for regions across Wales, including in locations that are highly accessible for people most in need as well as those in more rural locations. For example, the support for regional plans through P4 and P16 would enable regional strategies that are better placed to tackle regional problems and to promote economic inclusion at the regional level. A range of policies, such as P3, encourage new development in urban or central locations where it would be likely to be highly accessible for large numbers of people, including via sustainable transport modes. This is true for Policies P27 and P28, which focus on Cardiff and Newport respectively, as well as P23 and P24 which focus on the most populous areas in mid- and west-Wales, and it is expected that new economic development delivered in these cities would be highly accessible for a large number of people. However, there is some uncertainty over whether focussing on these urban areas would reduce improvements to the employment offering in more rural locations.		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations
	Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++				
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	<table><tr><td></td><td>Scale: Nat</td><td>T/P: T</td><td>Cert: L</td><td>ST +</td><td>MT ++</td><td>LT ++</td></tr></table> Th NDF would be expected to make a major positive contribution towards encouraging sustainable economic growth across Wales, primarily as a result of encouraging new development in various regions across Wales, including economic and commercial development as well as improvements to key infrastructure elements, that should help to ensure businesses in Wales are viable and can successfully compete in regional, national and international markets. Improvements to digital infrastructure, through P6, will help to ensure businesses can operate effectively in the digital world with likely improvements to operational efficiency and greater access to international markets. Improvements to transport infrastructure, which is encouraged in a range of NDF policies including P26 where support is provided to the development of the Swansea Bay Metro, should help to better enable more efficient movements of employees and commercial operations, whilst also better connecting businesses with their customers and opening up new markets.		Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations
	Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++				

		Some policies specifically encourage new growth and development, much of which would likely be commercial floorspace that provides opportunities for a diverse range of new businesses to start-up and compete. Where policies encourage greater rates of renewable energy generation or uptake, it is expected that this would contribute towards more sustainable energy consumption of businesses and economies in Wales. A secondary positive impact on regional and national economies in Wales is the protection provided to cultural and natural assets, such as ecological networks being protected in policies P8 and P9, or the regional valley proposed in P33, which would be likely to provide a boost to the tourism sector whilst also enhancing the attractiveness and vitality of areas in Wales and subsequently encouraging higher footfall rates in central areas. The commitment to expanding Cardiff airport, through P32, could lead to major positive effects on the economy in Wales, not just in Cardiff, by improving the accessibility of Wales for international tourists and customers.							
5	To contribute towards the future well-being of the Welsh language		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	No recommendations
		Proposals in the NDF would be expected to cumulatively make an overall positive contribution towards the future well-being of the Welsh language. New economic development and growth, whilst potentially posing a risk of weakening existing Welsh-speaking communities such as by introducing large numbers of non-Welsh speaking people to the community, is also an opportunity to grow local rates of Welsh speaking through employment and education opportunities. Policy P5 would encourage a significant increase in the provision of affordable housing in Wales which would help to protect the long-term future of communities throughout Wales, including Welsh-speaking communities.							
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	The NDF could seek to specifically encourage and facilitate development that is carbon neutral.
		Policies in the NDF would result in a range of different impacts on GHG emissions in Wales and the type and quantity of energy being consumed. In the short-term, there may be a balance between both positive and negative impacts against this ISA Objective but it is considered to be likely that over time, and in the long-term, the significant levels of growth and development supported by various policies in the NDF would lead to a major net increase in energy consumption in Wales and this would make achieving GHG emission reduction targets more difficult. Policies such as P1 that encourage new employment, housing and strategic development to be situated in urban areas or existing settlements would help to ensure that this new development is relatively sustainable by enabling more efficient and low-emission movements for people (i.e. they are in closer proximity to essential services and have good access to public transport modes). The provision of green infrastructure in developments, and the protection and enhancement of greenfields and natural habitats, would help to protect important carbon sinks throughout Wales, including above-ground vegetation and soils. Policy P7 supports the uptake of low-emission vehicles, which, in-combination with policies such as P26 and P31 that seek to enhance public transport modes, would help to ensure that the transport sector in Wales can continue to transition to one with a lower carbon footprint. Policies P22 and P25 specifically encourages greater generation of renewable energy at Anglesey and the Haven Waterway and this may help to reduce GHG emissions associated with the energy sector in Wales. However, overall the NDF seeks to encourage, support and facilitate significant levels of new economic, residential and strategic development. A secondary impact of the construction, occupation and operation phases of this development across Wales could be a major increase in energy consumption, although this will be mitigated to some extent by the increase proportion of energy that is renewable sourced. There could also be a							

		major increase in car use due to economic and population growth, although this is mitigated to some extent by the focus on development in regions with good public transport options and the underlying trend of vehicles becoming increasingly low-emission.							
7	To contribute to the reduction and management of flood risk		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	Where the NDF encourages the provision of green infrastructure in strategic developments, it could include reference to the importance of GI and permeable surfaces in attenuating flood risk and this should be factored into the decision-making over what GI would be appropriate to include in developments.
		Impact of the NDF on flood risk are mixed because it is largely dependent on the precise location of new development in relation to land at risk of flooding. In general, it is expected that development would conform with planning law and avoid land at a level of flood risk with which the type of development would be incompatible. It is also likely that much of the new development in Wales supported by the NDF would be situated in urban locations or existing settlements where it can benefit from existing flood defence schemes in line with emerging policy in TAN15. There is a risk that development in some locations would lead to a loss of above ground vegetation and permeable soils, replacing it with hard standing and impermeable surfaces, that alters the extent and distribution of ground and surface water flooding.							
8	To create opportunities to encourage the protection and improvement of air quality		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		Similar to GHG emissions, policies in the NDF would result in a range of different impacts on air pollution in Wales. In the short-term, there may be a balance between both positive and negative impacts against this ISA Objective but it is considered to be likely that over time, and in the long-term, the significant levels of growth and development supported by various policies in the NDF would lead to a minor negative impact on efforts to improve air quality in Wales and could make air quality improvement target more difficult in some locations. Policies such as P1 that encourage new employment, housing and strategic development to be situated in urban areas or existing settlements would help to ensure that this new development is relatively sustainable by enabling more efficient and low-emission movements for people (i.e. they are in closer proximity to essential services and have good access to public transport modes). The provision of green infrastructure in developments, and the protection and enhancement of greenfields and natural habitats, would help to protect the important air filtering service provided by above-ground vegetation. Policy P7 supports the uptake of low-emission vehicles, which, in-combination with policies such as P26 and P31 that seek to enhance public transport modes, would help to ensure that the transport sector in Wales can continue to transition to one involving less pollution. Policies P22 and P25 specifically encourage greater generation of renewable energy at Anglesey and the Haven Waterway and this may help to reduce air pollution associated with the energy sector in Wales. However, overall the NDF seeks to encourage, support and facilitate significant levels of new economic, residential and strategic development. A secondary impact of the construction, occupation and operation phases of this development across Wales there could also be a major increase in car use due to economic and population growth, although this is mitigated to some extent by the focus on development in regions with good public transport options and the underlying trend of vehicles becoming increasingly low-emission.							
9	To create opportunities to protect and enhance the quality and quantity of water		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		Impacts of the NDF on the ISA Objective of creating opportunities for protecting and enhancing the quality and quantity of water features and resources in Wales are likely to be mixed, with both minor positive and minor negative impacts expected from different policies.							

	features and resources	It is considered to be likely that the significant growth and development encouraged in the NDF would result in an increase in water consumption for new homes and new businesses. However, the locations targeted for this development are predominantly urban, such as P27 and P28 focussing on Cardiff and Newport or P5 targeting more generally on 'sustainable locations'. It is expected that development in these locations would be unlikely to pose a major risk to the quality of natural waterbodies such as rivers, lakes or the coast in-comparison with development taking place in more rural locations. New development could place extra pressure on the capacity of sewers which in turn could potentially pose a risk to water quality. Where new policies would be likely to lead to an increase in the extent and cover of green infrastructure and vegetation in Wales, such as at the regional park supported through P33 or the continued protection of Green Belt land in P30, the protection and improvement of water quality of local waterbodies is considered to be likely due to the important role vegetation and soil plays in the water cycle.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		Scale: Nat	T/P: T	Cert: L	ST +	MT ++	LT ++	No recommendations
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT ++	No recommendations
12	To create opportunities for the provision of good quality, safe, affordable housing		Scale: Nat	T/P: T	Cert: L	ST ++	MT ++	LT ++	

	that meets identified needs	P17 would help to ensure that there is significant new residential development in Wrexham and Deeside, or the north-Wales region, that satisfies local housing needs and contributes towards the national need. P27, P28 and P29 would have a similar impact in the regions of Cardiff, Newport and Heads of the Valley. Policies P1 and P2 would help to ensure that housing needs in urban areas are generally able to be met, whilst P4 would support residential development in rural communities. P5 would make a major contribution in the long-term towards ensuring that there is an adequate supply of affordable housing in Wales.							
1 3	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		The likely impacts of the NDF on landscapes and townscapes in Wales is largely mixed as it can depend on the precise location of proposed land-uses in relation to the surrounding landscape or townscape. Generally speaking, policies such as P1, P2, P27 or P28 that focus new development in urban areas or existing large settlements would help to ensure that new development is situated within and adjacent to existing built form. This could help to avoid potential impacts of development on natural landscapes in the countryside whilst also providing opportunities for enhancing townscapes by revitalising brownfield sites. Additionally, policies that would protect or enhance green infrastructure or greenfield land, such as P8, P9, P30, P33, would help to protect and enhance the local character and visual attractiveness of nearby townscapes or landscapes. However, a range of policies encourage and support significant levels of new development and there is a risk that in some cases this development would alter the local townscape or landscape character and distinctiveness. Development on the coast, such as is proposed at ports including the Port of Holyhead or Swansea Bay, could potentially alter long distance coastal views. Development in rural locations, as is encouraged through P4, poses a risk to the more natural and distinctive landscapes often found here as well as the character of the rural settlement. Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted.							
1 4	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		Similarly with potential impacts on townscapes, the impacts on cultural heritage assets and historic areas throughout Wales as a result of policies proposed in the NDF are largely mixed, although unlikely to be significant overall. Generally speaking, policies such as P1, P2, P27 or P28 that focus new development in urban areas or existing large settlements would help to ensure that new development is situated within and adjacent to existing built form. This could help to avoid potential impacts of development on the setting of heritage assets in rural areas whilst also providing opportunities for enhancing townscapes by revitalising brownfield sites. However, urban locations are typically home to a greater number of historic assets than countryside areas and, although new development within existing built-up areas is unlikely to have a significant impact, there is a risk of some degree of alteration to the setting of historic assets here. Policies that would protect or enhance green infrastructure or greenfield land, such as P8, P9, P30, P33, would help to protect and enhance the setting of historic assets and areas throughout Wales. Development on the coast, such as is proposed at ports including the Port of Holyhead or Swansea Bay, could potentially alter long distance coastal views which are in some locations a significant facet of nearby historic assets. Development in rural locations, as is encouraged through P4, poses a risk to the setting of any nearby heritage assets or historic areas as it would be difficult to ensure all new development in these locations conforms							

		with the local character. Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted.							
1 5	To create the opportunities for the protection and promotion of Welsh culture		Scale: Nat	T/P: T	Cert: L	ST +	MT +	LT +	No recommendations
		The NDF would be expected to lead to an overall positive impact on the protection and promotion of Welsh culture. Approximately half the policies appraised would be anticipated to lead to negligible effects on this Objective, but the majority of the other half were recorded as having likely positive effects. Various policies would be likely to help protect, enhance and increase the sustainability of cultural places, activities and assets in Wales. For example, the support for regional plans through P4 and P16 would be likely to help ensure that regionally identified needs for rural communities are provided for and this could help to preserve and take advantage of local Welsh culture features and assets. P3 seeks to ensure that Welsh Government investment and land holdings support the delivery of sustainable places, including for major trip-generating developments such as sports stadia and cultural venues. P3 would therefore be likely to help enhance the sustainability of places and buildings that are integral to culture in Wales. P8 and P9 would lead to the protection or creation of biodiversity assets and features, such as the National forest proposed in P9. The countryside and natural environment in Wales is a key facet of its identity and culture and P8 and P9 would help to advance this. In addition to protecting, enhancing and increasing the sustainability of cultural places, activities and assets in Wales, various policies in the NDF would be likely to help improve their accessibility for local, national and international visitors. P3 could provide tourists from further afield, including Europe, with improved access to north Wales whilst P32, which would support the growth of Cardiff Airport, could improve access into south Wales for international tourists. Other policies that would see public transport modes being improved, such as P31 and the South Wales Metro, would also be likely to help improve the accessibility of cultural places, assets and activities.							
1 6	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	Where policies propose, support or encourage new development or growth of existing developments, the policy would include wording that seeks to provide protection for biodiversity and wildlife. To ensure that biodiversity is not just conserved but overall enhanced, these policies should provide strong wording that states that the determination of planning applications would take into consideration any adverse impacts on biodiversity, and these cannot be outweighed by social or economic gains, as well as any foreseen enhancements to local biodiversity.
		The NDF would be expected to lead to both positive and negative impacts on the ISA Objective of creating opportunities for the conservation and enhancement of biodiversity and geodiversity. A range of policies would be likely to help ensure that biodiversity features and ecological networks are protected and enhanced. Cumulatively, there could be significant positive impacts. A range of policies refer to encouraging sustainable development, such as P1 and P2, and it is assumed that this includes a sustainable approach to managing biodiversity and geodiversity in the vicinity of such development. More significantly, P8 sets out a strategic framework for biodiversity enhancement and ecosystem resilience whilst P9 proposes a new national forest for Wales. A coherent ecological network across Wales is essential to enabling the free movement of wildlife and avoiding isolated islands of habitats and species being ‘cut off from nature’. A new national forest would be likely to be a region of significant biodiversity value that provides suitable habitat for a diverse range of protected species. A new Valleys Regional Park is proposed in P33 and this could have similar benefits to this ISA Objective as P9. P19 and P30 support the identification and establishing of Green Belt land. Green Belt land can often be of relatively high biodiversity and geodiversity value and can constitute a significant portion of ecological networks. Supporting Green Belt designations would help to conserve this value. However, a number of policies proposed in the NDF were recorded as being likely to lead to adverse impacts on biodiversity and geodiversity in Wales, primarily as a result of the significant growth and development they encourage and support. This can be seen in the appraisals for Policies P20 – P27 as well as P31 and P32. For example, some policies seek to encourage development and investment at ports and coastal areas in Wales, such							

		as P25 which supports new development and investment at Waterway Haven, and this poses a risk to the highly sensitive biodiversity designations found along much of Wales' coastline, such as the Pembrokeshire Marine SPA near Haven Waterway. Where new development is supported and invested in, there is a subsequent risk to the conservation status of nearby biodiversity assets as a result of, for example, increases in visitor pressure due to the delivery of new homes and jobs or improved transport links; increased atmospheric nitrogen deposition associated with increased car usage; direct loss of habitats or functionally linked land where development takes place; increased water resource consumption leading to water table alterations; and/or increased risk of pollution or contamination of waterbodies. Some of the policies recorded as being likely to have adverse impacts on biodiversity include wording that specifically refers to how the impacts of development on the natural and historic environment will be considered during the determination of planning applications. For example, P22 supports new locations for energy development in North West Wales but also states that <i>'In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further non-renewable energy generation, their contribution towards Wales' energy mix, their impacts on the natural and historic environment and the economic benefits they would bring to the region.'</i> Where policies specifically refer to the consideration of the natural environment like this, it could help to avoid significant adverse impacts on biodiversity. However, such wording is unlikely to avoid adverse impacts on biodiversity in all cases, such as those caused by the loss of greenfield land to new energy projects. It also appears that adverse impacts on biodiversity (and the historic environment) would be weighed against the economic benefits of development and as such there is an inherent acceptance of adverse impacts on biodiversity.							
1 7	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		Scale: Nat	T/P: T	Cert: L	ST +/-	MT +/-	LT +/-	No recommendations
		The NDF would be expected to lead to both positive and negative impacts on the ISA Objective of creating opportunities for the sustainable management and use of natural resources in Wales. Several policies seek to ensure that future development in Wales is sustainable, such as policies P1 and P2, and this would be expected to incorporate a sustainable approach to the management and use of natural resources. P10 and P11 would contribute towards an increasing supply of wind and solar energy in Wales, which should help to increase the sustainability of the generation and consumption of energy resources in Wales. Other policies were recorded as being likely to lead an increased use of previously developed land in Wales and thereby enable a more efficient use of the land and soils resource. For example, P3 would be likely to enable developments in town and city centre locations on land owned by the Government, whilst P1 and P2 also facilitate urban development. Policies that seek to protect and enhance countryside locations or Green Belt land such as P19 and P30, or seek to establish new such biodiverse areas such as the national forest proposed in P9 or more coherent ecological networks as proposed in P8, would be highly likely to help contribute towards a sustainable management and use of the land and soil resource in Wales; not only by protecting it from being directly lost to, or harmed by, development but by also protecting and enhancing the above-ground vegetation cover which helps to improve the fertility and structure of these soils whilst also protecting them from erosion. The conservation and enhancement of vegetation and green infrastructure would also be likely to contribute towards a natural approach to improving air quality in Wales. However, many of the policies proposed in the NDF were recorded as being likely to lead to adverse impacts on natural resources. This is consistently due to the potential and likely impacts of development, including during the construction and operation phases, on natural resources including land, soils, air and water. Whilst the NDF typically encourages a sustainable management of natural resources, it is considered that some adverse impacts							

	on natural resources as a result of development are unavoidable. For example, not all new development in Wales that is supported by the NDF would be on previously developed land, and so some degree of land loss can be expected. Within this previously developed land are likely to be soils that are of at least ecological value and potentially agricultural value. New development would also be likely to lead to some degree of air pollution during the construction phase and, depending on the type of development, also during its operation phase such as that caused by a local increase in car usage. A cumulative impact of all development supported and encourage by the NDF is also likely to be some degree of increase in the consumption of water, due to both the consumption by businesses as well as residential consumption. In addition to water consumption, there could be an increase in the risk and prevalence of pollution or contamination of waters. This is particularly the case where development is supported or encouraged in coastal areas and ports and where an increase cargo ship or barge activity is anticipated. Lastly, whilst the NDF seeks to encourage an increase in the proportion of Wales' energy generation and consumption that stems from renewable sources, it is unclear and potentially unlikely that this will match or exceed the likely increase in energy consumption associated with the significant levels of growth that the NDF seeks to support and encourage. This would potentially make achieving targets of reducing Wales' consumption of non-renewable energy more difficult.	

APPENDIX F

Final NDF Policies Assessments Including Reasonable Alternatives

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Keys for assessments

Effect score	Definition of effect score
++	Strong positive: likely to result in strong progress towards the ISA objective (significant)
+	Minor positive: likely to result in limited progress towards the ISA objective
O	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative: likely to work against the achievement of the ISA objective
--	Strong negative: likely to strongly work against achieving the ISA objective (significant)

Type of Effect	Definition
Secondary	Indirect effects that are not a direct result of the plan (NDF) but occur away from the original effect or as a result of a complex pathway.
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.

Key and terms	Definition
Scale	Geographic extent: Local; Sub-regional; Regional/National; or International.
T/P	Temporary/Permanent
Cert	Certainty: Low; Medium; or High
ST	Short Term
MT	Medium Term
LT	Long Term

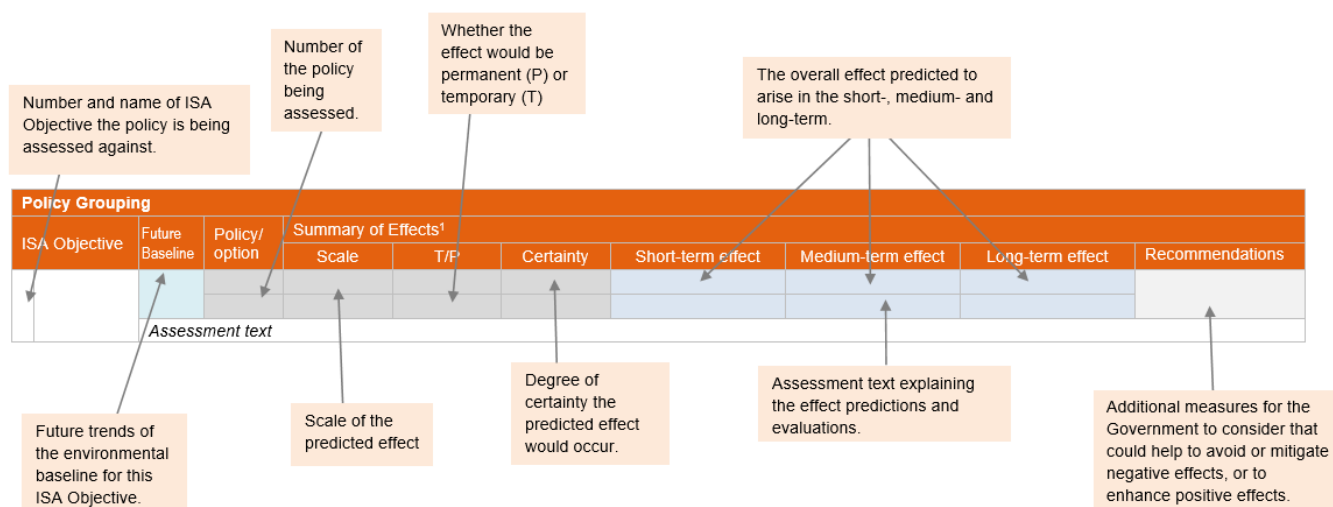
Future Baseline: Predicted future trends for each ISA Objective, without the implementation of the NDF		
Improving	Static	Declining

Impact assessments incorporated into these assessments
Sustainability Appraisal (SA),
Strategic Environmental Assessment (SEA)
Welsh Language (Wales) Measure 2011 and Standards
Children's Rights Impact Assessment (CRIA)
Well-being of Future Generations (WBFG) Act (2015)
Equalities Impact Assessment (EqIA)
Sustainable Management of Natural Resources (SMNR)
Natural Resources Policy (NRP)

Understanding the assessment tables

Figure B-1 provides explanatory notes for using the assessment table results.

Figure B-1: Using and understanding the assessments results tables



Grouping Policies

The NDF policies have been grouped in accordance with Table B-2. An appraisal table is provided for each policy grouping.

Table B-2: Groupings of draft NDF policies

Policy Group	Policies
1	P1, P2, P4, P5, P6
2	P3
3	P7
4	P8
5	P9, P15
6	P10, P11, P12
7	P13, P14
8	P16, P17, P18
9	P19
10	P20, P21, P22, P23, P24
11	P25, P26, P27
12	P28, P29, P30, P31, P32
13	P33, P34, P35, P36

Assessments Results

Policy Grouping 1	
P1 – Where Wales will grow	The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are: • Cardiff, Newport and the Valleys • Swansea Bay and Llanelli • Wrexham and Deeside The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions: • The South West • Mid Wales • The North Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.
P1RA1 – A rural focus for growth	Growth will be focused in the rural parts of Wales.
P1RA2 – A centralised urban focus for growth	Growth will be focused in the urban parts of Wales.
P1RA3 – An equal distribution of growth across Wales	Growth will be equally distributed across Wales.
P1RA4 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P2 – Shaping Urban Growth and Regeneration – Strategic Placemaking	The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles: • Creating a rich mix of uses; • Providing a variety of housing types and tenures; • Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other; • Increasing population density, with development built at urban densities that can support public transport and local facilities; • Establishing a permeable network of streets, with a hierarchy that informs the nature of development; • Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and • Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment. Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.
P2RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.

Policy Grouping 1	
P4 – Supporting Rural Communities	The Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.
P4RA1 – Flexible settlement boundaries	This option would enable local authorities to operate flexible settlement boundaries to plan positively for rural communities. This could be expanded to reference specific sectors (such as housing, public services, economic development) with specific remits for each of these areas and a policy statement outlining what approach should be adopted.
P4RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P5 – Supporting the rural economy	The Welsh Government supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic and Local Development Plans. Strategic and Local Development Plans should plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs.
P5RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy.
P6 – Town Centre First	Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, to the wider region. A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.
P6RA1 - Apply policy to re-development and new sites	This option would apply the policy to re-development as well as new sites.
P6RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹						Recommendations
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P1	Nat	T	M	+	++	++	Could recognise the universities and their role within the supporting text for the regional growth areas not just the National Growth areas.
			P1RA1	Nat	T	M	+/-	+/-	+/-	
			P1RA2	Nat	T	M	+/-	+/-	+/-	
			P1RA3	Nat	T	L	O	+	+	
			P1RA4	Nat	T	H	O	O	+	
			P2	Nat	T	L	+	+	++	
			P2RA1	Nat	T	M	O	O	+	
			P4	Nat	T	L	O	+	+	
			P4RA1	Nat	T	L	O	+	+	
			P4RA2	Nat	T	M	O	O	+	
			P5	Nat	T	L	+	+	++	
			P5RA1	Nat	T	M	O	O	+	
			P6	Nat	T	L	+	+	++	
			P6RA1	Nat	T	L	+	+	++	
			P6RA2	Nat	T	M	O	O	+	
		Over the long term, P1 would help to provide sustainable growth across the whole of Wales which is of an appropriate scale to individual areas in respect of development such as housing, employment and infrastructure and this should result in the co-location of population to appropriate education opportunities. P1 should therefore result in increased numbers of children and young people being readily able to access education opportunities across Wales, including higher education institutions such as colleges. This would also result in opportunities for skills development, training and lifelong learning for all members of the community. Having a rural focus for growth, as per P1RA1 as well as P4, would likely result in children and young people being more able to access education opportunities in rural areas and opportunities for skills training and lifelong learning for all members of society, but there is a potential for a negative impact on accessing such opportunities in urban areas. Having an urban focus for growth, as per P1RA2, P2 and P6, would likely result in children and young people being more able to access education opportunities in urban areas and opportunities for skills training and lifelong learning for all members of society, but there is a potential for a negative impact on accessing such opportunities in rural areas. Equally distributing growth across Wales, as per P1RA3, would likely result in the provision of additional education institutions in support of improving educational attainment. Whilst in some cases they may not be located in the most sustainable locations in terms of being easily accessible across all communities, including for children and young people, it is likely that the equal distribution of growth would deliver minor positive effects on education opportunities for people across Wales. P1RA4 - Doing nothing would likely conform with baseline trends.								

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		P2 and P6, as well as P6RA1, would help to increase access for all to education and training facilities which would look to be focused in town and city centres, particularly via sustainable transport modes (walking, cycling and public transport). These would be direct effects of P2 and P6 that would be likely to grow over time. It is recognised P2 and P6 would not impact directly on children and young people in rural areas. Do nothing approaches (P2RA1 and P6RA2) would not maximise the opportunities to focus development and improve connections to facilities in these areas and therefore the potential attainment in education for children and young people across Wales. The do-nothing approach would be likely to conform with baseline trends. P5 looks to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services for all. The supporting text recognises the importance of inclusive access within rural communities to facilities and services which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of increasing access to education services within these areas, leading to improvements in educational attainment. P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approach P4RA2 would be likely to conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	P1	Nat	T	M	+	+	++	P1 – supporting text could be strengthened to recognise health benefits of the policy.
		P1RA1	Nat	T	M	+/-	+/-	+/-	
		P1RA2	Nat	T	M	+/-	+/-	+/-	
		P1RA3	Nat	T	L	O	+	+	
		P1RA4	Nat	T	H	O	O	+	
		P2	Nat	T	L	+	+	++	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	M	+	+	++	
		P4RA1	Nat	T	L	O	+	+	
		P4RA2	Nat	T	L	O	O	+	
		P5	Nat	T	L	+	+	++	
		P5RA1	Nat	T	M	O	O	+	
		P6	Nat	T	L	+	+	++	
		P6RA1	Nat	T	L	+	+	++	
		P6RA2	Nat	T	M	O	O	+	
Over the long term, providing sustainable growth through P1 across the whole of Wales which is of an appropriate scale to individual areas in respect of development such as housing, employment and infrastructure should result in people being more able to readily access jobs and services, and improving access to open space and nature, provision of green infrastructure, contributing to improvements in health and well-being and a reduction in poverty and health inequalities, including for children and young people. Although the national growth areas are in urban areas, the policy supports sustainable growth in all parts of Wales. In rural areas growth should be of appropriate scale and support local aspirations and need. This could have a positive effect on health inequalities in rural areas where there is increased access to health services. Having a rural focus for growth, as per P1RA1, would likely result in communities being more able to access developments and associated services in rural areas, but potential for a negative impact on accessing such opportunities in urban areas. Resulting in health inequality between rural and urban									

Policy Grouping 1									
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			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		areas. Focusing growth in rural areas could help contribute to improvement to physical, mental and social well-being in rural areas if there is an increased access to services and jobs which would contribute towards a reduction in poverty. However, increasing development in the countryside could have a negative impact on rural areas such as through impacts on air quality, loss of greenfield, however this would be dependent on implementation. Having an urban focus for growth, as per P1RA2, would be likely to result in communities being more able to access developments and associated services and jobs in urban areas, but potential for a negative impact on accessing such opportunities in rural areas. Centralised urban focus would have a negative effect on rural areas because access to health provision would be focused on urban areas. Resulting in health inequality between urban and rural areas. There is a potential negative impact from concentrating growth in urban areas with regards to air quality and resulting health impacts. This would however be dependent on other factors such as a shift to sustainable modes of transport etc. Equally distributing growth across Wales, as per P1RA3, is likely to result in the location of development which may be accessible by some communities, but not all. This would result in some progress towards addressing health inequalities for communities across Wales, but not the greatest proportion as could be targeted if a sustainable approach to providing developments was applied. Overall it is considered to be likely that the equal distribution of growth would deliver minor positive effects in terms of improving access to healthcare facilities for people across Wales. P2 and P6 as well as P6RA1 focus development on town and city centres and creating improved access to facilities, active travel infrastructure and green infrastructure for people of all ages and physical abilities. This could have a positive effect on health both mentally and physically and could improve air quality through reducing the need to travel by car. These direct effects would be likely to grow over time. P4 would deliver similar benefits but for people in more rural locations. Over the long term, P2 could result in increased numbers of children and young people in urban areas being able to walk or cycle in order to access developments with associated services, including education and leisure, through public transport provision. Encouraging the use of walking and cycling to access services should result in health benefits for children and young people within urban communities across Wales. This policy is an urban policy and therefore not applicable to rural areas. Doing nothing would not result in maximum opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. P4 and P5 recognise the important role of housing, economic growth, services which will have positive impacts on the health and well-being of rural communities, reducing isolation and inequalities for all. Such an approach could result in benefits in terms of enabling children and young people to access services within these areas, leading to improvements in health and well-being. P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing alternatives would be likely to conform with baseline trends.							
3	To create opportunities for an increase in employment across the country and promote economic inclusion	P1	Nat	T	H	++	++	++	P2 could recommend that walking and cycling access routes at new developments are incorporated into local Green Infrastructure (GI) networks.
		P1RA1	Nat	T	M	+/-	+/-	+/-	
		P1RA2	Nat	T	M	+/-	+/-	+/-	
		P1RA3	Nat	T	M	+	++	++	
		P1RA4	Nat	T	M	O	O	+	
		P2	Nat	T	H	++	++	++	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	M	+	++	++	
		P4RA1	Nat	T	M	+	++	++	

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		P4RA2	Nat	T	M	O	O	+	
		P5	Nat	T	M	+	++	++	
		P5RA1	Nat	T	M	O	O	+	
		P6	Nat	T	H	++	++	++	
		P6RA1	Nat	T	H	++	++	++	
		P6RA2	Nat	T	M	O	O	+	
The National and Regional Growth areas are economically distinctive and support a wide and diverse range of businesses, enterprises and universities. P1 would help encourage growth in the employment opportunities for all working age categories in these areas, including for young people. Each of the areas is considered to be highly accessible via sustainable transport modes and so P1 would help to improve the physical accessibility of employment opportunities. As these employment opportunities become increasingly diverse it is likely that increasing numbers of people would be satisfied with their job as they are better able to find work more suited to their skills and ambitions. It is also considered to be likely that new investment in these areas would encourage significant growth in the number of skilled workers in both rural and urban areas whilst facilitating the development and regeneration of both urban and rural regions where it may be needed most. P1RA1 would focus new growth in rural parts of Wales. This would be likely to provide significant enhancements to the accessibility of employment opportunities for rural residents whilst also improving their job satisfaction and skills learning opportunities. However, a focus on rural areas would be unlikely to contribute towards developing Wales' city regions and residents of city or urban areas may be unlikely to receive discernible benefits in terms of employment opportunities. P1RA2 would focus new growth in urban locations where new employment opportunities would generally be highly accessible for residents. Enhancements to the quality of jobs on offer to people in urban areas would be likely. However, P1RA2 would limit employment growth in rural areas and would risk restricting opportunities for regeneration in rural areas where regeneration is needed. P1RA3 would distribute growth equally across Wales. This would help to benefit the employment opportunities of rural and urban residents equally. It would help to facilitate regeneration of rural and urban areas but it is unclear if an equal distribution would encourage growth in the areas where it is needed most or where it would provide the most benefits. P1RA4 would do nothing and leave the national policy to be carried through PPW. Whilst it is likely that PPW would help to encourage growth in the number and diversity of employment opportunities for rural and urban areas throughout Wales there is uncertainty over where such growth would take place and whether opportunities for maximising employment growth through new investment would be realised. P2 and P6 would help to ensure that new higher density development, including developments such as leisure, offices and commercial activities, are located in town and city centres. This would situate significant employment opportunities within locations that are highly accessible for local people, particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. This would be a direct effect of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of employers are encouraged to situate in town and city centres and promote economic inclusion and develop city regions in the process. This should lead to opportunities for young people in particular to access employment. P2 also seeks to establish a permeable network of streets, and integrated green infrastructure, that could enhance the accessibility of employment opportunities. P6RA1 would apply the policy to redevelopments as opposed to just new developments and may therefore have similar benefits but potentially of a slightly greater magnitude and certainty. P2RA1 would be leaving PPW to carry the national policy. High-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of commercial land and employment opportunities and promote economic inclusion by recognising that the futures of sustainable rural communities are best planned at the									

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		regional and local level. This could result in benefits in terms of enabling young people in particular to access employment opportunities. P4RA1 could help to benefit economic inclusion and reducing deprivation as it would enable planning authorities to extend settlement boundaries as needed. Welsh speaking communities in many places retain strong links with rural and agricultural sectors; flexible boundaries in rural places could enable business development and job creation but offers no certainty. The do-nothing alternatives would be likely to conform with baseline trends.							
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	P1	Nat	T	H	++	++	++	See Objective 3.
		P1RA1	Nat	T	M	+/-	+/-	+/-	
		P1RA2	Nat	T	M	+/-	+/-	+/-	
		P1RA3	Nat	T	M	+	++	++	
		P1RA4	Nat	T	M	O	O	+	
		P2	Nat	T	H	++	++	++	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	M	+	++	++	
		P4RA1	Nat	T	M	+	++	++	
		P4RA2	Nat	T	M	O	O	+	
		P5	Nat	T	M	+	++	++	
		P5RA1	Nat	T	M	O	O	+	
		P6	Nat	T	H	++	++	++	
		P6RA1	Nat	T	H	++	++	++	
		P6RA2	Nat	T	M	O	O	+	
P1 would encourage economic growth throughout Wales, often in areas where there are opportunities for new investment to deliver big economic returns. The distribution of National and Regional Growth Areas means that a diverse range of existing economic industries would likely benefit, including rural industries and the diversification of this sector, whilst growth in some of the city regions would encourage innovation, start-ups and new technology. It is expected that any new growth would be accompanied by the provision of the necessary infrastructure, including digital and sustainable transport infrastructure, which would better equip businesses and industries in Wales to operate sustainably and withstand future challenges. P1 would also help to ensure that in smaller towns and villages and areas of the countryside where new development is needed to preserve the viability and functioning of these areas, such development would be encouraged in principle. By focusing on rural areas P1RA1 would be likely to encourage significant rural diversification and overall growth of rural industries. It could help to improve inward investment to rural areas where it is needed most whilst also improving the digital connectivity and sustainable transport infrastructure in these areas. P1RA1 could potentially boost the sustainable tourism sector in these locations. However, by not including urban areas within the focus, P1RA1 would limit opportunities for achieving significant economic growth in areas where there are perhaps the greatest opportunities for growth. It could potentially curb innovation and start-up rates in urban areas. By focusing on urban areas P1RA2 would be likely to maximise opportunities for economic growth in locations where there are perhaps the greatest opportunities for economic growth in Wales. Urban areas are often a hotbed of innovation and knowledge sharing with high start-up rates, although the NDF also recognises these important activities in rural areas, and these important facets of a modern economy would be enhanced and developed through P1RA2. It is likely that growth in urban areas would attract further inward investment as well as improvements to digital infrastructure and sustainable transport options. However, P1RA2 would restrict opportunities for diversifying Wales' rural economy as well as improvements to digital infrastructure and sustainable transport options in rural									

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		areas where such improvements are perhaps needed most. P1RA3 would provide equal benefits to rural and urban areas but it is unclear, and perhaps unlikely, that the areas where new growth is delivered are the areas where such growth is most needed or where such growth could deliver the greatest sustainable economic returns. P1RA4 would generally conform with the future baseline trends with steady economic growth in Wales. P2 and P6 facilitate the development of new major employment locations in town and city centres where they would be likely to have excellent access to customers and employees of all ages. The range of developments cited, including commercial activities, would be expected to help diversify economies and could provide opportunities for third sector growth. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure whilst regenerating areas and attracting inward investment at these locations (including digital infrastructure) and thereby supporting sustainable economic growth. P6 seeks to ensure that developments of a significant scale are approved outside of town and city centres only in exceptional circumstances, which limits the potential for such development to enhance or diversify rural economies, although this could be countered to some extent by P4 and P5. These would be direct effects that would be likely to grow over time. P6RA1 would apply the policy to redevelopments as opposed to just new developments and may therefore have similar benefits but potentially of a slightly greater magnitude and certainty. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of business and economic needs. This could encourage diversification of rural economies, such as agriculture, forestry, SMEs, micro businesses and the development of digital connectivity. A positive statement which recognises the value of the rural economy and the need to maintain it. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. This policy provides opportunities to create opportunities for sustainable economic growth, diversity and business competitiveness and increase employment across the country and promote economic inclusion by recognising that the futures of sustainable rural communities are best planned at the regional and local level. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local needs. Flexible boundaries in rural places could enable business development and job creation but offers no certainty. Requiring local planning authorities to operate flexible settlement boundaries will not give them sufficient autonomy and is not consistent with the proposed approach to regional planning. The do nothing alternative would conform with baseline trends.							
5	To contribute towards the future well-being of the Welsh language	P1	Nat	T	M	+/ -	+/ -	+/ -	No recommendations.
		P1RA1	Nat	T	M	-	-	-	
		P1RA2	Nat	T	L	?	?	?	
		P1RA3	Nat	T	L	?	?	?	
		P1RA4	Nat	T	L	O	O	+	
		P2	Nat	T	M	O	+	+	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	L	+/ -	+/ -	+/ -	
		P4RA1	Nat	T	M	+/ -	+/ -	+/ -	
		P4RA2	Nat	T	L	O	O	+	
		P5	Nat	T	M	O	O	+	
		P5RA1	Nat	T	L	O	O	+	
		P6	Nat	T	M	O	+	+	
		P6RA1	Nat	T	M	O	O	+	

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		P6RA2	Nat	T	M	O	O	+	
	P1 is intended as a balanced approach to distributing development, with the main focus on populated urban areas. Urban areas with strong Welsh speaking communities, including Cardiff, Carmarthen, Aberystwyth, Caernarfon and Bangor are identified as locations for growth. More jobs, services and homes in these places should have a positive impact on the vibrancy of their Welsh speaking communities. This policy would be positive for the Welsh language in rural areas as it means development and growth is of an appropriate scale and supports local aspirations. P1RA1 would lead to significant levels of development in rural areas, including those where Welsh is widely spoken. Some communities would be likely to be able to absorb growth and maintain their linguistic character, but there is a risk that high growth in rural areas would have negative implications on the use of Welsh in the majority of rural communities. P1RA2 would see growth focused more centrally on places like Cardiff, Swansea and Deeside. Limiting opportunities for growth in western areas of Wales where the language is widely spoken would be likely to result in limited opportunities for communities to grow. The likely result would be that more Welsh speakers would move to the urban areas for jobs and access to services. The likely effect of P1RA3 are uncertain. P2 and P6 including P6RA1 look to generate liveable urban areas, this should generate work opportunities, which helps retain and grow urban populations. Impacts on the Welsh language will likely be modest and indirect, as the policy will primarily take effect in areas outside the language's traditional strongholds. P4 and P5 are positive statements that recognise the value of rural economies and communities and the work needed to maintain and enhance them. Welsh speaking communities in many places retain strong links with rural and agricultural sectors. P4RA1 - Flexible boundaries in rural places could enable development including new homes but offers no certainty. Effects of do nothing alternatives would be likely to conform with baseline trends.								
	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	P1	Nat	P	H	-	-	--	See Objective 3. Where P1 encourages development that meets local aspirations and need, it could also refer to the need for development that tackles local sustainability challenges. It could potentially also encourage carbon neutral development and net zero homes.
		P1RA1	Nat	P	M	-	--	--	
		P1RA2	Nat	P	M	-	-	--	
		P1RA3	Nat	P	L	-	-	--	
		P1RA4	Nat	P	M	O	O	+	
		P2	Nat	P	M	O	+	+	
		P2RA1	Nat	P	L	O	O	+	
		P4	Nat	P	M	+	+	+	
P4RA1		Nat	P	M	+	+	+		
P4RA2		Nat	P	M	O	O	+		
P5		Nat	P	M	+	+	+		
P5RA1		Nat	P	M	O	O	+		
P6		Nat	P	M	O	+	+		
P6RA1		Nat	P	M	O	+	+		
P6RA2	Nat	P	L	O	O	+			
P1 and its alternatives support new residential, employment and other growth. P1 focuses this growth in areas of existing development where there are the greatest opportunities for efficient and relatively sustainable living for residents and employees. New growth would also help to enhance sustainable									

Policy Grouping 1									
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			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
			transport opportunities for people throughout Wales whilst also reducing their need to travel due to improved digital infrastructure. New development should also be seen in the context of other policies in the NDF, particularly P17 and P18, which seek to encourage energy efficient development and an increase in Wales' generation and consumption of low carbon and renewable energy sources. Overall, the challenge of combatting climate change is clearly placed at the heart of the NDF and it goes to great lengths to enhance the sustainability of new development, such as by increasing the proportion of renewable energy, enhancing energy efficiency, situating new development in sustainable locations and improving the regional and national offering of sustainable transport modes. It is also expected that new development delivered through the NDF would be more sustainable than existing development, such as new homes being more energy efficient than most existing homes, and so situating new residents or businesses in this new development could be more sustainable than relying on existing development. The NDF may therefore be highly likely to help ensure that new development proposals make best efforts to contribute towards tackling the climate change emergency over time. However, whilst at this stage it isn't possible to accurately quantify the overall impact on energy consumption or greenhouse gas emissions in Wales, it is somewhat inevitable that an increase in the number of homes, residents, businesses and employees would overall lead to some degree of increase in energy consumption and associated emissions that would not be entirely mitigable and when adopting a precautionary approach major adverse effect can therefore not be ruled out in the long-term. The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies including transport, economy, environment, decarbonisation, regeneration etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also addresses climate change which will ensure this is considered and reflected in the NDF. This includes ensuring communities are sustainable and resilient. The NDF reflects these and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra-low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy. A focus on rural areas through P1RA1 would situate a significant portion of Wales' new jobs and residents in locations where access to sustainable transport options are generally more limited and, in some locations, not a viable means of commuting or travelling. Development in rural areas would restrict opportunities for more energy efficient development or schemes such as efficient heat networks, although the greater amount of space generally on offer in these locations could allow room for new development to incorporate renewable energy generation technology. A focus on urban areas through P1RA2 would allow for relatively efficient new development that can benefit from the existing local energy distribution networks and sustainable transport options. However, it is unclear the extent to which development in urban areas would be afforded the space and opportunity to incorporate renewable energy generating technologies, although the NDF policy on district heat networks offers greater certainty of more energy efficient development. P1RA3						

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		would be likely to have largely similar effects to P1, with an increase in development in both rural and urban locations. Given the undefined locations of P1RA3 there is less certainty behind this effect. P1RA4 would be expected to conform with future baseline trends. P2 and P6 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements for employees, customers and local people. This would contribute to the current trend of falling Greenhouse Gas emissions and improvements in air quality. This would help to increase access to active travel options and improve healthy lifestyle choices. Concentrating development in urban centres could also increase the viability of improving sustainable design as well the potential generation of energy from systems such as combined heat and power networks. This would be a direct effect of Policy P2 that would grow over time as increasing numbers of new development are situated in accessible locations. The do nothing alternatives, P2RA1 P6RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and renewable energy generation. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternatives would conform with baseline trends.							
7	To contribute to the reduction and management of flood risk	P1	Nat	P	M	O	O	-	P2 and P6 could potentially explicitly state that development that avoids land at risk of flooding, or avoids exacerbating flood risk in other locations, would be particularly encouraged.
		P1RA1	Nat	P	L	-	-	-	
		P1RA2	Nat	P	L	O	O	-	
		P1RA3	Nat	P	L	O	-	-	
		P1RA4	Nat	P	M	O	O	-	
		P2	Nat	P	L	O	+	+	
		P2RA1	Nat	P	M	O	O	-	
		P4	n/a	n/a	H	O	O	O	
		P4RA1	n/a	n/a	H	O	O	O	
		P4RA2	n/a	n/a	H	O	O	O	
		P5	n/a	n/a	H	O	O	O	
		P5RA1	n/a	n/a	H	O	O	O	
		P6	Nat	P	L	O	+	+	
		P6RA1	Nat	P	M	O	+	+	
		P6RA2	Nat	P	M	O	O	-	
P1 would facilitate new growth in locations across Wales. Flood risk is prevalent in many areas in Wales with approximately 245,000 properties in Wales considered to be at risk of tidal, fluvial or pluvial sources, including in National and Regional Growth Areas, and so it is likely that some new development referred to in P1 would face some degree of fluvial or surface water flood risk. However, new development would need to conform with existing planning policy that would help to prevent a significant effect on flood risk, as well as other policies within the NDF that seek to enhance Wales' resilience to the impacts of climate change, such as Policy P8. Furthermore, new development could provide opportunities for improving flood risk defence schemes. P1RA1 could result in a greater proportion of new development being at some degree of flood risk due to the focus on rural areas where there is generally									

Policy Grouping 1										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹							
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations	
		more flood risk and where man made flood defence schemes are less frequent. Rural areas offer excellent opportunities for nature-based flood risk management schemes that new development could invest in, although at the same time new development in rural locations could result in the loss of green infrastructure and therefore diminish flood risk attenuation ecosystem services. P1RA2 may help to ensure that most new development is in urban areas where the extent of flood risk is more limited and where flood management schemes are more prevalent. It would also help to limit the loss of green infrastructure that plays an important role in flood risk attenuation due to brownfield land being more prevalent in urban locations. Incorporating new GI and SuDS elements into urban areas can provide flood risk alleviation benefits. P1RA3 would be likely to have largely similar effects to P1, with an increase in development in both rural and urban locations. Given the undefined locations of P1RA3 there is less certainty behind this effect. P1RA4 would be expected to conform with future baseline trends. Generally speaking, urban areas are more likely to already be protected by flood management schemes and so focusing development here, as P2 and P6 would locate development in areas already benefitting from flood management schemes. Development would also be less likely to result in the loss of greenfield land or above ground vegetation that helps to reduce surface run-off rates and subsequently flood risk, such as upslope woodland. There is a high degree of uncertainty in this and it should also be noted that some of the larger urban areas in Wales including Cardiff, Swansea, Newport and Deeside have large local areas of land at a medium to high risk of flooding. The alternative of 'do nothing' would not result in this direct positive effect and would be likely to conform with baseline declining trends. P6RA1, which would apply the policy of town centres first, would be likely to have a similar effect to P6 but potentially of a greater certainty. P4 and P5 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. P2RA1 would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P1	Nat	P	M	O	-	-	P2 or its supporting text could include a reference to the potential impact of dense development in urban location on air quality and that this should be taken into consideration in the development design and layout. Green space and the consideration of green infrastructure could be key to minimising these potential effects.
		P1RA1	Nat	P	L	-	--	--		
		P1RA2	Nat	P	L	O	-	-		
		P1RA3	Nat	P	L	O	-	--		
		P1RA4	Nat	P	M	O	O	+		
		P2	Nat	P	M	+/-	+/-	+/-		
		P2RA1	Nat	P	M	O	O	+		
		P4	Nat	P	M	+	+	+		
		P4RA1	Nat	P	M	+	+	+		
		P4RA2	Nat	P	M	O	O	+		
		P5	Nat	P	M	+	+	+		
		P5RA1	Nat	P	M	O	O	+		
		P6	Nat	P	M	+/-	+/-	+/-		
		P6RA1	Nat	P	M	+/-	+/-	+/-		
		P6RA2	Nat	P	M	O	O	+		
New residential and employment development is typically associated with new pollution, primarily as a result of the transport movements of residents and employees, their energy consumption as well as activities at home or associated with the business. P1 and its alternatives could therefore risk increasing air pollution where new growth is encouraged. It is expected that most new development encouraged through P1 would be in urban areas where access to										

Policy Grouping 1										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹							
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations	
		sustainable transport opportunities is generally better than elsewhere in the country. The distances people would need to travel to access key services and amenities are also generally shorter. This would likely limit air pollution associated with the movements of new residents and employees. It should also be noted that new development encouraged through P1 could deliver enhancements to sustainable transport options for all local people. However, urban areas are currently the location of some of Wales’ most polluted locations, such as Air Quality Management Areas (AQMAS), and new development in National Growth Areas could make achieving air quality improvement targets at these locations increasingly difficult. It would also expose new residents and employees to some of Wales’ most polluted air. A focus on rural areas through P1RA1 would situate new residents and employees in areas where air pollution is not currently a significant concern, thereby protecting them from some of air pollution’s worst impacts. It could also help to limit new pollution taking place in proximity to AQMAS in Wales. However, residents and employees in rural locations could be expected to result in more new air pollution than they would do in urban locations, as would take place through P1RA2, due to having to travel longer distances to access services and amenities and having more limited sustainable transport options for doing so. An equal distribution of growth between urban and rural areas, as per P1RA3, would likely have largely similar effects to P1. However, there would likely be more development in rural locations through this option than there would be through P1. P1RA4 would be likely to conform with baseline trends. P2 and P6 would help to ensure that major new development is situated in locations that facilitate more sustainable and efficient movements (i.e. walking, cycling and public transport) for employees, customers and local people. The GI element of the policy would also be likely to help mitigate poor air quality to some extent. This would contribute towards the trend of gradually improving air quality due to a reduction in emissions associated with road traffic and congestion. This would be a direct effect of Policy P2 that would grow over time as increasing numbers of new development are situated in accessible locations. On the other hand, areas of existing poor air quality notably occur in urban areas and adjacent to busy roads and comprise particulate matter (PM) and nitrogen dioxide concentrations. P2 would lead to additional development and traffic movements in these locations, which could make achieving air quality improvement targets more difficult whilst exposing new people to health-damaging pollutants. P2RA1 and P6RA2 would leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude. P6RA1, which would apply the policy of town centres first, would be likely to have a similar effect to P6 but potentially of a greater certainty. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of seeking out opportunities for sustainable design and low-emission design and development. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. The do nothing alternative would conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P1	Nat	P	M	O	O	-	No recommendations.
			P1RA1	Nat	P	L	-	-	-	
			P1RA2	Nat	P	L	O	O	-	
			P1RA3	Nat	P	L	O	-	-	
			P1RA4	Nat	P	M	O	O	-	
			P2	Nat	P	M	O	+	+	
			P2RA1	Nat	P	M	O	O	-	
			P4	Nat	n/a	H	O	O	O	
			P4RA1	Nat	n/a	H	O	O	O	

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		P4RA2	Nat	n/a	H	O	O	O	
		P5	Nat	n/a	H	O	O	O	
		P5RA1	Nat	n/a	H	O	O	O	
		P6	Nat	P	M	O	+	+	
		P6RA1	Nat	P	M	O	+	+	
		P6RA2	Nat	P	M	O	O	-	
		New growth and development would likely lead to an increase in water consumption, although as it would need to conform with national planning policy it is expected it would only take place where there is sufficient supply. Effects on the quality of groundwater and surface waterbodies are largely dependent on the precise location of development, which is largely uncertain at this stage. However, P1 would focus new development in National and Regional Growth Areas where there are generally less natural waterbodies in comparison with more rural locations. Growth areas also benefit from existing drainage systems that help to protect water quality, although careful consideration to the potential impacts of new development on the capacity of drainage systems would be required. The risk of green infrastructure, which helps to protect water quality, being lost to development is also reduced by focusing on growth areas instead of rural locations. New development in urban locations also offers opportunity for enhancing the extent and quality of GI in these locations. P1 may therefore present less of a risk to water quality than P1RA1, which focuses on rural areas, but perhaps a slightly greater risk than P1RA2 which would focus solely on urban areas (P1 would facilitate development in rural locations where there is a clear need for it). P1RA3 would distribute development equally between rural and urban areas, so it likely presents a greater risk to water quality than P1. P1RA4 would be expected to conform with baseline trends. Concentrating development in urban areas, as per P2 and P6, could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focusing development in urban areas, including the potential increased viability of efficient and effective water recycling measures in these areas. Whilst it is expected that new development would only be permitted where there is appropriate capacity available in the local sewerage system, there is some degree of risk that P2 and P6 would contribute to increased pressure on urban sewer systems. Should any systems be rendered over-capacity, this would pose a pollution risk to local water bodies. The do-nothing approach would not result in these direct positive impacts and would be likely to conform with baseline trends. P6RA1, which would apply the policy of town centres first, would be likely to have a similar effect to P6 but potentially of a slightly greater certainty. P4, P5 and their alternatives would be unlikely to have a discernible impact on water quality and resources.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and	P1	Nat	T	M	+	++	++	There is an opportunity to ensure links to rural areas by strengthening P5 to include reference to inclusive infrastructure and connections for isolated communities. This
		P1RA1	Nat	T	M	+/-	+/-	+/-	
		P1RA2	Nat	T	M	+/-	+/-	+/-	
		P1RA3	Nat	T	L	?	?	?	
		P1RA4	Nat	T	H	O	O	-	
		P2	Nat	P	H	+	+	++	
		P2RA1	Nat	T	H	O	O	-	
		P4	Nat	T	M	+	+	++	
		P4RA1	Nat	T	M	+	+	+	

Policy Grouping 1										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹							
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations	
amenities for all groups		P4RA2	Nat	T	M	O	O	-	would improve inclusive access to goods, facilities and services.	
		P5	Nat	T	M	+	+	++		
		P5RA1	Nat	T	M	O	O	-		
		P6	Nat	P	H	+	+	++		
		P6RA1	Nat	P	H	+	+	++		
		P6RA2	Nat	T	H	O	O	-		
P1 would provide for sustainable growth that should ensure increased access to goods and services for local people, including for children and young people. Appropriate growth and development in rural areas will create improved connectivity for communities and give them better access to goods and services than they are currently afforded. Having a rural focus for growth, as per P1RA1, would likely result in children and young people being more able to access goods and services in rural areas, but potential for a negative impact on accessing such opportunities in urban areas. A rural focus for growth will create improved connectivity for communities in rural areas and give them better access to services and goods however this might not be the most sustainable way forward. Having an urban focus for growth, as per P1RA2, would likely result in children and young people being more able to access goods and services in urban areas, but potential for a negative impact on accessing such opportunities in rural areas. A centralised urban focus for growth will mean there will not be improved connectivity for communities in rural areas. Equally distributing growth, as per P1RA3, across Wales is likely to result in the location of development which may be accessible by some children and young people across communities, but not all. This would result in some progress towards addressing connectivity and access to services for all members of society across Wales, but not the greatest proportion as could be targeted if a sustainable approach to providing developments was applied. It is unclear if this approach would result in benefits from the status quo if opportunities remained as planned. An equal distribution of growth across wales might mean there is some positive connectivity benefits to rural areas however, focus is more likely to happen in urban areas. P2 and P6, as well as P6RA1, would be likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet people's needs. They would reduce dependency on the private car and improve access to services and facilities for all. By providing development in sustainable and accessible urban locations this should ensure increased access to goods and services for local people, including for children and young people. The location of new businesses in town and city locations would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth, creating healthier lifestyle choices. These policies are aimed at promoting urban centres and therefore not applicable to rural areas. P2RA1 and P6RA2, the do-nothing approaches, would not result in opportunities being provided to located development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the opportunity for all, including children and young people in urban areas to sustainably access goods and services. P4 and P5 look to plan and support rural areas in a sustainable manner, to meet the needs of everyone within rural communities and this includes access to facilities and services. The supporting text also recognises the importance of inclusive access within rural communities to facilities and services, which will help to reduce isolation and inequalities. Such an approach could result in benefits in terms of enabling children and young people to access goods and services within these areas. P4RA1 would be likely to result in similar effects but of a lower magnitude. Do nothing alternatives would be likely to conform with baseline trends.										
11	To create the opportunities		P1	Nat	T	M	+	++	++	No recommendations.
			P1RA1	Nat	T	M	+/-	+/-	+/-	

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						Recommendations
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
within which an improvement in social cohesion and equality can be achieved		P1RA2	Nat	T	M	+/-	+/-	+/-	
		P1RA3	Nat	T	L	?	?	?	
		P1RA4	Nat	T	H	O	O	-	
		P2	Nat	T	M	+	+	++	
		P2RA1	Nat	T	M	O	O	-	
		P4	Nat	T	M	+	+	++	
		P4RA1	Nat	T	M	+	+	+	
		P4RA2	Nat	T	M	O	O	-	
		P5	Nat	T	M	+	+	++	
		P5RA1	Nat	T	M	O	O	-	
		P6	Nat	T	M	+	+	++	
		P6RA1	Nat	T	M	+	+	++	
		P6RA2	Nat	T	M	O	O	-	
Providing for sustainable growth through P1 should help to ensure that communities have greater access to goods and services and therefore help to achieve social cohesion and equality objectives. Development and growth of an appropriate scale to support local aspirations in rural areas will create opportunities for social cohesion and equality. It would help to reduce loneliness and isolation and create barrier free safe communities. Having a rural focus for growth, as per P1RA1, would likely result in all members of society having better access to goods and services in rural areas, help to achieve social cohesion and equality objectives in those areas, but potential for a negative impact on accessing such opportunities and achieving those objectives in urban areas. A rural focus for growth might mean rural areas grow too quickly and are not of an appropriate scale this could be at the detriment of social cohesion and equality. Having an urban focus for growth, as per P1RA2, would likely result in communities being more able to access goods and services in urban areas, help to achieve social cohesion and equality objectives in those areas, but potential for a negative impact on accessing such opportunities and achieving those objectives in rural areas. A centralised approach is unlikely to have much effect on social cohesion in rural areas. Equally distributing growth across Wales, as per P1RA3, would be likely to result in increasing access to goods and services by some children and young people across communities, but not all, as it would not distribute it in a proportionate way to where it is most needed. This would therefore likely exacerbate social cohesion and equality. An equal distribution across Wales is difficult to predict for rural areas but is likely to be more urban focused which would have little effect on rural areas, this would be dependent on implementation. Doing nothing as per P1RA4 would not result in maximum opportunities being provided to locate development across Wales in a sustainable manner. This would potentially restrict the ability to sustainably access goods and services; therefore, it would likely exacerbate social cohesion and equality issues. Doing nothing would be business as usual for rural areas and there is unlikely to be increased opportunities for social cohesion and equality. P2 and P6 and P6RA1, through the provision of improved public transport and access to facilities including active travel and green infrastructure, will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access for all members of the community. P2RA1 and P6RA2 would not result in opportunities being provided to locate development within sustainable locations in urban areas that are easily accessible through walking and cycling and public transport. This would not maximise the ability of all, including children and young people, in urban areas									

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		to sustainably access goods and services; therefore, it would likely exacerbate social cohesion and equality. These do-nothing approaches would be likely to conform with baseline trends. P4 and P5 recognise the needs of rural communities and economies should be met. This will encompass all members of society, will improve well-being in communities and help to reduce loneliness and inequality. The policy approach could result in benefits in terms of enabling children and young people to access services within these areas, creating opportunities for improvements to social cohesion and equality. P4RA1 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in the alternative there is little certainty involved in the assessment of these. Such an approach would not reflect the proposed approach to regional planning. The do-nothing approach would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P1	Nat	P	H	+	++	++	No recommendations.
			P1RA1	Nat	P	M	+/-	+/-	+/-	
			P1RA2	Nat	P	M	+/-	+/-	+/-	
			P1RA3	Nat	P	M	+	+	++	
			P1RA4	Nat	P	M	O	O	-	
			P2	Nat	P	M	+	+	++	
			P2RA1	Nat	P	M	O	O	-	
			P4	Nat	P	M	+	++	++	
			P4RA1	Nat	P	M	O	+/-	+/-	
			P4RA2	Nat	P	M	O	O	-	
			P5	Nat	P	M	+	++	++	
			P5RA1	Nat	P	M	O	O	-	
			P6	n/a	n/a	H	O	O	O	
			P6RA1	n/a	n/a	H	O	O	O	
			P6RA2	n/a	n/a	H	O	O	O	
The National and Regional Growth Areas have been identified based on their strategic importance for growth and regeneration in Wales. They present excellent opportunities for delivering significant levels of new housing that helps to ensure that Wales’ growing and varied housing needs can be satisfied. P1 would focus growth in these areas and maximise on these opportunities whilst also permitting development in countryside or rural locations should there be a clear need for it. It would therefore contribute towards satisfying housing needs in both rural and urban areas. P1RA1 would help to ensure that housing needs in rural locations can be met. However, the demand for new housing is greatest in urban areas, particularly those associated with the National and Regional Growth Areas, and P1RA1 would risk making it difficult or impossible to satisfy this need. P1RA2 would help to ensure that housing needs in urban locations can be met but would risk preventing rural residential development that is necessary to ensure that long-term functioning and viability of rural settlements. P1RA3 would have similar effects to P1 but would likely see more development in rural areas than P1. It may therefore be less likely to help ensure that Wales’ housing needs can be met going forwards. P1RA4 would be likely to conform with baseline trends. Good planning and a commitment to quality urban design can accommodate higher densities in town and city centres without undermining quality of life. P2 may help to enable planning authorities across Wales to provide enough new housing that satisfies local housing needs. This direct positive effect would be likely to grow in magnitude over time. The alternative to this P2RA1 of having no policy would be likely to conform with baseline trends.										

Policy Grouping 1									
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			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities, including in terms of satisfying housing need. This should assist in ensuring the consideration of the provision of appropriate services at a regional and local level. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local opportunities. On the other hand, P4RA1 could enable more flexibility on a regional level in order to deliver new homes. This is not reflective of the proposed approach to regional planning. It is uncertain how housing needs could be satisfied under a do nothing alternative. P6 and its alternatives would be unlikely to have a discernible effect on this ISA Objective. Do nothing alternatives would conform with baseline trends.							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	P1	Nat	T	H	O	+	+	No recommendations.
		P1RA1	Nat	T	M	O	-	--	
		P1RA2	Nat	T	M	O	+	++	
		P1RA3	Nat	T	M	O	-	-	
		P1RA4	Nat	T	M	O	O	-	
		P2	Nat	T	M	O	+	++	
		P2RA1	Nat	T	L	O	O	-	
		P4	Nat	T	M	+	+	+	
		P4RA1	Nat	T	M	+	+	+	
		P4RA2	Nat	T	L	O	O	-	
		P5	Nat	T	M	+	+	+	
		P5RA1	Nat	T	L	O	O	-	
		P6	Nat	T	H	O	+	+	
		P6RA1	Nat	T	H	O	+	+	
		P6RA2	Nat	T	L	O	O	-	
Focusing development in National and Regional Growth Areas through P1 would help to direct the majority of new development away from countryside locations where some of Wales' most distinctive, sensitive and tranquil landscapes are found. Additionally, development in urban locations would provide significant opportunities for regeneration and enhancing townscape character, although this would depend upon the implementation of development and there is a risk that in some cases new development could potentially pose a risk to the local character. P1RA1 could potentially cause significant harm to natural landscapes throughout Wales due to focusing development in rural locations, whilst limiting opportunities for regenerating urban townscapes. P1RA2 would have a similar effect to P1 but potentially of slightly greater magnitude due to the assumption that slightly more development would take place in rural locations under P1 than it would under P1RA2. P1RA3 would have a similar effect to P1RA1 but of lesser magnitude given that approximately half of new development could be directed away from rural locations under P1RA3. P1RA4 would be likely to conform with baseline trends. P2 and P6 would help to ensure that higher density and significant developments are situated within town and city centres across Wales. This would be expected to help ensure development is largely in-keeping with the local character and setting, whilst avoiding adverse impacts of large-scale development in more rural or countryside locations with distinct natural characters. This would help to maintain areas of tranquillity and minimise light and noise pollution									

Policy Grouping 1									
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			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		in rural areas. P2 seeks to incorporate integrated green infrastructure at new developments and this would further help to protect and enhance local character. In some locations, high density or significant scale development could pose a risk to distinct townscape characters without close consideration of the design and layout of the development. This would be a direct effect of P2 and P6. Both policies, particularly P2, would help to encourage the regeneration of urban locations and brownfield. The do nothing alternatives, P2RA1 and P6RA1, would be to leave PPW to carry the national policy. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely to be in conformity with the baseline. P6RA2 would have similar effects to P6. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternatives would conform with baseline trends. P4 and P5 have the potential to deliver accessible and inclusive townscapes.							
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	P1	Nat	T	M	+	+	+	The potential for heritage and culture led regeneration could be recognised here notably in P2.
		P1RA1	Nat	T	L	+/-	+/-	+/-	
		P1RA2	Nat	T	L	+	+	+	
		P1RA3	Nat	T	L	+/-	+/-	+/-	
		P1RA4	Nat	T	M	O	O	+	
		P2	Nat	T	M	O	+	+	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	M	+	+	+	
		P4RA1	Nat	T	M	+	+	+	
		P4RA2	Nat	T	M	O	O	+	
		P5	Nat	T	M	+	+	+	
		P5RA1	Nat	T	M	O	O	+	
		P6	Nat	T	H	+/-	+/-	+/-	
		P6RA1	Nat	T	H	+/-	+/-	+/-	
		P6RA2	Nat	T	M	O	O	+	
Focusing development in National and Regional Growth Areas would help to direct the majority of new development away from countryside locations where adverse effects on sensitive heritage assets are more difficult to avoid. On the other hand, heritage assets and historic areas are more prevalent in urban areas where P1 would focus development than they are in rural areas. It may therefore be likely to alter the setting of these assets although given the significant opportunities for redeveloping brownfield sites and regenerating townscapes it could benefit the historic environment. Whilst the overall effects depend on implementation, minor positive effects are considered to be likely overall, in part due to the various policies in the NDF, particularly the policies focused on Wales' four regions, that seek to conserve and enhance Wales' distinct heritage assets, as well as the need to conform with national planning policy. P1RA1 could potentially avoid most of Wales' heritage assets and historic areas by focusing on rural areas but, where effects on the historic environment do take place, they may be of a greater magnitude, more negative and more difficult to avoid or mitigate through development management. P1RA2 would have a similar effect to P1 but potentially of slightly greater magnitude due to the assumption that slightly more development									

Policy Grouping 1									
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			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		would take place in rural locations under P1 than it would under P1RA2. P1RA3 would have a similar effect to P1RA1 but of lesser magnitude given that approximately half of new development could be directed away from rural locations under P1RA3. P1RA4 would be likely to conform with baseline trends. P2 and P6 would be likely to contribute towards an increasing quantity of high-density and major developments taking place in town and city centres. These centres are often host to sensitive heritage assets such as Listed Buildings and Conservation Areas and can have a rich historic character. New development here therefore poses a risk to the setting of these sensitive assets. However, the new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site, in-comparison to its current impact, on the setting of any nearby assets. Both policies encourage regenerating brownfield which could enhance the setting of sensitive heritage assets or historic areas, particularly P2 which has a focus on regeneration. The policy could improve access and understanding of these assets. These effects would however be likely to be direct. P2 and P6 would also help to generally direct new development away from greenfield land or relatively rural locations which can often have a high historic value or be set within sensitive historic landscapes. P6RA1 would have similar effects but potentially of a slightly greater magnitude due to focusing new development, but also redevelopments, in these areas. These effects would be direct. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstances. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local constraints. The do nothing alternatives would conform with baseline trends.							
15	To create the opportunities for the protection and promotion of Welsh culture	P1	Nat	T	M	O	+	+	See Objective 14.
		P1RA1	Nat	T	M	O	+	+	
		P1RA2	Nat	T	M	O	+	+	
		P1RA3	Nat	T	M	O	+	+	
		P1RA4	Nat	T	M	O	O	+	
		P2	Nat	T	M	O	+	+	
		P2RA1	Nat	T	M	O	O	+	
		P4	Nat	T	M	O	+	+	
		P4RA1	Nat	T	M	O	+	+	
		P4RA2	Nat	T	M	O	O	+	
		P5	Nat	T	M	O	+	+	
		P5RA1	Nat	T	M	O	O	+	
		P6	Nat	T	M	O	+	+	
		P6RA1	Nat	T	M	O	+	+	
		P6RA2	Nat	T	M	O	O	+	
P1 would seek to encourage sustainable development throughout Wales and in many cases, this could provide a boost to important Welsh cultural activities and industries, better enabling them to succeed and thrive and preserving them for future generations to appreciate. A rural focus, as per P1RA1, would be particularly beneficial for rural Welsh culture, including increasing sustainable form of access, whilst an urban focus, as per P1RA2, would be particularly beneficial for Welsh cultural activities and assets in urban locations. P1RA3 would offer a more equal distribution and so could be likely to deliver a combination of the benefits identified in P1RA1 and P1RA2. These effects are somewhat dependent on the implementation of new development.									

Policy Grouping 1										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
		which at this stage is largely uncertain, but the commitments to conserving and enhancing Wales' culture that is evidence in the NDF, and particularly in the policies focused on Wales' four regions, as well as the need to conform with national planning law, make overall minor positive effects appear likely. Growing and regenerating towns and cities, as per P2, would be likely to lead to benefits for cultural assets and activities in these locations, better preserving them for future generations. P4, P4RA1 and P5 seek to support and enhance rural economies and communities and so, much like P1RA1, cultural activities and assets in rural locations would be likely to benefit through new investment and helping to ensure their long-term survival. P6 and P6RA1 could have similar benefits for cultural activities and assets in urban locations, much like P1RA2. Do nothing alternatives would be likely to conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P1	Nat	P	M	+	+	++	Policies could potentially seek to ensure that biodiversity, and geodiversity where relevant, in urban areas and on settlement boundaries is protected and enhanced.
			P1RA1	Nat	P	L	+/-	+/-	+/-	
			P1RA2	Nat	P	L	+	++	++	
			P1RA3	Nat	P	L	+/-	+/-	+/-	
			P1RA4	Nat	P	M	O	O	-	
			P2	Nat	P	M	+	+	+	
			P2RA1	Nat	P	M	O	O	-	
			P4	Nat	P	M	+	+	+	
			P4RA1	Nat	P	M	+	+	+	
			P4RA2	Nat	P	M	O	O	-	
			P5	Nat	P	M	+	+	+	
			P5RA1	Nat	P	M	O	O	-	
			P6	Nat	P	M	+	+	+	
			P6RA1	Nat	P	M	+	+	+	
			P6RA2	Nat	P	M	O	O	-	
P1 would focus new development National and Regional Growth Areas and in so doing would help to direct development away from most of Wales' important and sensitive biodiversity and geodiversity designations. The Growth Areas are predominantly urban regions of Wales and so there is generally less scope for adverse impacts on biodiversity designations, biodiversity features and the connectivity of the wider ecological network. Given the significant brownfield opportunities P1 could potentially better enable net gains for biodiversity and improvements to geodiversity by protecting and enhancing the biodiversity and geodiversity through development proposals. P1RA1 would focus new development in rural and countryside locations where effects on sensitive biodiversity and geodiversity designations and features, as well as the connectivity of the wider ecological network, would be increasingly difficult to avoid or mitigate. P1RA2 would have similar effects to P1 given the focus on urban areas, but potentially of a slightly greater magnitude given the reduced development in rural locations. New development in urban locations provides opportunities for enhancing the biodiversity and geodiversity value of land through development proposals, such as by incorporating biodiverse GI elements. Effects of P1RA3 would be a combination of P1RA1 and P1RA2. P1RA4 would be likely to conform with baseline trends.										
P2 and P6 would help to ensure that high-density and major new developments are situated in urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. Policy P2 would therefore help to ensure that high-density and large-scale development taking place across Wales is less likely to adversely affect sensitive species										

Policy Grouping 1										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹							
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations	
		habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. The integrated GI network sought in P2 would be likely to help enhance the biodiversity net gain opportunities of new development whilst also enhancing wider ecological connectivity. The do nothing alternatives, P2RA1 and P6RA2, would be to leave PPW to carry the national policy. P6RA1 would be likely to have similar effects to P6. This issue would therefore not be reinforced through the NDF and so high-density development might be less likely to be situated within town and city centres. The identified benefits on this ISA Objective of situating this development in town and city centres, as described above, are more uncertain and of a reduced magnitude and the effects of the alternative are likely to be in conformity with the baseline. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including local biodiversity assets and features. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and constraints. Flexible boundaries could potentially pose a risk to biodiversity and geodiversity in rural areas and so would require careful management. The do nothing alternative would conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P1	Nat	P	M	+	+	++	No recommendations.
			P1RA1	Nat	P	L	-	--	--	
			P1RA2	Nat	P	L	+	++	++	
			P1RA3	Nat	P	L	+/-	+/-	+/-	
			P1RA4	Nat	P	M	O	O	-	
			P2	Nat	P	M	+	+	++	
			P2RA1	Nat	P	M	O	O	-	
			P4	Nat	P	M	+	+	+	
			P4RA1	Nat	P	M	+	+	+	
			P4RA2	Nat	P	M	O	O	-	
			P5	Nat	P	M	+	+	+	
			P5RA1	Nat	P	M	O	O	-	
			P6	Nat	P	M	+	+	++	
			P6RA1	Nat	P	M	+	+	++	
			P6RA2	Nat	P	M	O	O	-	
			By focusing development in National and Regional Growth Areas, P1 could facilitate significant use of recycled and secondary materials during construction, as well as opportunities for managing the land resource efficiently by re-using PDL and remediating contaminated land. P1 would generally help to reduce the risk of new development taking place on woodland, grassland or peatland or agriculturally and ecologically valuable soils. Development in rural locations, which P1RA1 would focus on, would make it increasingly difficult to sustainably manage natural resources due to the likely development on greenfield and the limited opportunities for using recycled or secondary materials, although it is recognised that in countryside locations there could be greater opportunities for using locally sourced materials. P1RA2 would be expected to have largely similar effects to P1 but potentially of a lower certainty. Effects of P1RA3 would be a combination of P1RA1 and P1RA2. P1RA4 would be expected to conform with baseline trends. Developments in town and city centre locations would be likely to have good access to opportunities for using recycled materials, for remediating contaminated land, for using brownfield land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. These direct							

Policy Grouping 1									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
			effects of P2 and P6 would be likely to grow over time as increasing quantities of development situate in town and city locations. The no-policy alternatives would not result in these benefits to natural resources and would be likely to conform with baseline trends. P6RA1 would be likely to have similar effects to P6. P4 and P5 would help to ensure that regional and local plans provide for the needs of rural communities whilst responding to local circumstance, including protecting the most ecologically or agriculturally valuable land and maximising opportunities for reusing materials. P4RA1 would have a similar effect but potentially of a lower magnitude because setting out specific remits for certain types of development could make it more difficult for local and regional plans to respond to bespoke local assets and constraints. Flexible boundaries could potentially pose a risk to valuable soils and previously undeveloped in rural areas and so would require careful management. The do nothing alternatives would conform with baseline trends.						

Policy Grouping 2	
P3 - Supporting Urban Growth and Regeneration - Public Sector Leadership	The Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will assemble land, invest in infrastructure and prepare sites for development. We will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. The public sector must show leadership and apply placemaking principles. The public sector's use of land, developments, investments and actions must build sustainable places that improve health and well-being. Planning authorities must take a proactive role and work in collaboration with the Welsh Government and other public sector bodies to identify the best locations for growth and regeneration, and provide certainty about how they should be developed.
P3RA1 Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ²						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P3	Nat	T	H	+	++	++	No recommendations.
			P3RA1	Nat	T	M	O	O	+	
		Policy P3 looks to create sustainable places which includes the delivery of education facilities in accessible locations particularly via sustainable transport modes (walking, cycling and public transport), including for people of all ages and physical accessibility. In the long term, by supporting the public sector releasing land for development in accessible urban locations, this could result in the release of land for education institutions which is readily accessible to all including children and young people in urban areas. In turn, this would result improvements in educational attainment. This is dependent on those land holdings being released for education opportunities where it may not have otherwise under this Policy. P3RA1, the do-nothing approach, would conform with baseline trends.								
2			P3	Nat	T	H	+	++	++	No recommendations.

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ²						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P3RA1	Nat	T	M	O	O	+	
		Policy P3 through the delivery of key public buildings and facilities in accessible locations will increase access by sustainable modes for everyone which should result in positive health benefits for all and reduce inequalities. The policy looks to deliver sustainable places that improve the health and well-being of current and future generations. The development and redevelopment of these sites brings an opportunity to improve connections through green infrastructure and active travel infrastructure, improving healthier lifestyle choices, bringing physical and mental health benefits. The NDF recognises (P6) that facilities such as GP surgeries and primary schools may be more appropriate in accessible locations within neighbourhoods particularly in or adjacent to local centres. This could include towns within rural areas. This would have a positive effect and help to reduce inequalities. P3RA1, the do-nothing approach, would conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P3	Nat	T	H	+	++	++	No recommendations.
			P3RA1	Nat	T	M	O	O	+	
		Policy P3 would help to ensure that new development is located in the best locations for growth and regeneration. Where this development provides employment opportunities, including during the construction and operation phases, this approach could encourage regeneration in more deprived areas, leading to significant positive effects for the promotion of economic inclusion. This may be a direct result of the implementation of the policy, which sets out that the 'Welsh Government will assemble land, invest in infrastructure and prepare sites for development.' This could also encourage inwards investment, where these costs may otherwise have made sites unviable. Enabling development that supports the delivery of urban growth and regeneration, could also contribute towards the development of Wales' city regions. These would be direct effects of the policy that over time would be likely to grow into a significant positive effect as increasing numbers of developments are encouraged. P3RA1, the do-nothing approach, would conform with baseline trends. Market forces may lead to the increase in employment over time, in the strongest areas.								
4	To create opportunities for sustainable economic growth, diversity and business competitive-ness		P3	Nat	T	H	+	++	++	No recommendations.
			P3RA1	Nat	T	M	O	O	+	
		Policy P3 encourages the delivery of new development in the best location for growth and regeneration. The policy directly sets out that the Welsh Government would assemble, land, invest in infrastructure and prepare sites for development, which could have significant positive effects against this objective in the medium and long terms, including specifically for SMEs and RSLs. Increases in magnitude over time are likely, as increasing quantities of development are encouraged to situate in urban areas in particular. This may be tempered somewhat by the lack of specific mention of rural areas. However, where there is certainty in the delivery of sites, as it required by the policy, rural regeneration sites would not necessarily be excluded from the benefits of this policy. P3RA1, the do-nothing approach, would conform with baseline trends. Market forces may lead to the increase in economic investment over time, in the strongest areas.								
5	To contribute towards the		P3	Reg	T	H	+	+	+	No recommendations.
			P3RA1	Reg	T	H	O	O	+	

Policy Grouping 2										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ²						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	future well-being of the Welsh language	P3 The spread of public land across Wales is good, therefore opportunities for development will be well-spread, in a way that is less likely to occur without the public sector taking a proactive role. As many strongly Welsh speaking communities are in less affluent areas and where market forces are not as strong, there is real potential for this policy to offer widespread development opportunities, e.g. in coastal and market towns. The do nothing option would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P3	Nat	T	H	+	++	++	See Objective 7.
			P3RA1	Nat	T	M	O	O	+	
		Policy P3 is concerned with the development and regeneration of the ‘best’ locations for growth. As this involves ‘placemaking’, the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability, it is considered to be likely that such development would have a relatively low carbon footprint. This would contribute to Wales’ current trend of falling Greenhouse Gas emissions associated with road vehicles. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. The direct investment from Welsh Government in infrastructure could help to encourage more sustainable developments in the medium to longer terms, with cumulative effects becoming more significant over time. P3RA1, the do-nothing approach, would conform with baseline trends, which may lead to some long term benefits.								
7	To contribute to the reduction and management of flood risk		P3	Nat	T	M	O	+	+	P3 could provide greater emphasis on the need for ‘sustainable’ growth and regeneration to capture the variety of environmental risks and opportunities in new development.
			P3RA1	Nat	T	M	O	O	-	
		The prevalence of flood risk depends on local circumstances and on the specific location of new development, although in line with the Welsh Government’s policy on flood risk management it is expected that development vulnerable to flood risk would not be situated in an area of flood risk with which it is incompatible. Setting out that development would be encouraged in the ‘best’ locations for development supports this assertion. Generally speaking however, urban areas are more likely to already be protected by flood defence schemes and so focusing development here, could help to reduce the risk of flooding faced by new development. There is a high degree of uncertainty in this. Supporting text highlights that opportunities to create ecological networks, provide ecosystem services and green infrastructure, this could lead to benefits in minimising the risk of flooding in these schemes. The alternative of ‘do nothing’ would not result in this direct positive effect and would be likely to conform with baseline trends.								
8	To create opportunities to		P3	Nat	T	H	+	++	++	See Objective 7.
			P3RA1	Nat	T	M	O	O	+	

Policy Grouping 2									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ²						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	encourage the protection and improvement of air quality	Policy P3 is concerned with the development and regeneration of the ‘best’ locations for growth. As this involves ‘placemaking’, the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability, it is considered to be likely that such development would adopt relatively low-emission construction and design techniques. Policy P3 would help to ensure that new development is situated in locations that facilitate higher rates of movement via walking, cycling and public transport. This would contribute towards a reduction in emissions associated with traffic and congestion. This would be a direct effect of Policy P3 that would grow over time as increasing numbers of new development are situated in accessible locations. Areas in Wales of existing poor air quality, and where there are currently air quality improvement targets, are commonly in urban areas. By encouraging new development to be situated in these locations, Policy P3 could potentially make achieving air quality improvement targets more difficult in some cases. However, the encouragement of maximising green infrastructure in developments in urban locations and ensuring developments are resource efficient, could help to encourage positive effects over time. Moreover, this is likely preferable to situating new development in countryside locations and introducing air pollutants into areas of good air quality.							
		P3RA1, the do-nothing approach, would conform with baseline trends, which are improving, although effects are unlikely to be significant.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	P3	Reg	P	L	O	+	+	See Objective 7.
		P3RA1	Reg	P	M	O	O	-	
		Concentrating development in urban areas could help to reduce the quantity of new development taking place on rural or previously undeveloped sites, where the risk of adversely impacting water quality (such as via contamination run-off or reduced infiltration rates of run-off) is greater. In terms of water resources, there could also potentially be benefits of focusing development in urban areas, such as due to more efficient and effective water recycling measures in these areas. There could potentially be a risk that the level of development policy P3 would encourage in urban locations could place additional pressure on the capacity of sewage systems, although it is expected that development would typically only be permitted where there is adequate capacity. Supporting text highlights that opportunities to create ecological networks, provide ecosystem services and green infrastructure, this could lead to benefits for water quality.							
		P3RA1 the do-nothing approach, would conform with baseline trends.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	P3	Nat	T	H	+	++	++	Policy could be strengthened to maximise public transport and active travel opportunities
		P3RA1	Nat	T	M	O	O	-	
		Policy P3 is likely to have direct positive impact on the provision and accessibility of inclusive public transport services that meet needs of everyone. It would reduce dependency on the private car and improve access to services and facilities for all. Depending on the location of the sites it is likely to have less of a positive impact for rural and isolated area as it has an urban focus however it does look to link to public transport networks. It would be likely to help deliver physical infrastructure in these locations, including digital infrastructure and thereby supporting sustainable economic growth and increasing healthier lifestyle choices.							
		The NDF recognises (P6) that facilities such as GP surgeries and primary schools may be more appropriate in accessible locations within neighbourhoods particularly in or adjacent to local centres. This could include towns within rural areas and have positive benefits and reduce inequality of access to services.							
		P3RA1, the do-nothing approach, would conform with baseline trends.							
11		P3	Nat	T	H	+	++	++	See Objective 10.

Policy Grouping 2									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ²						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
To create the opportunities within which an improvement in social cohesion and equality can be achieved		P3RA1	Nat	T	M	O	O	+	
		Policy P3 through the provision of improved public transport and access to facilities including active travel and green infrastructure will have a direct positive impact on social cohesion, health and inequality in town and city centres through supporting sustainable economic growth and increasing opportunities for participation in communities through improved access. This impact, depending on the locations of the sites is likely to be less positive for rural and more isolated communities however it does look to link to public transport networks. P3RA1, the do-nothing approach, would conform with baseline trends.							
12 To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P3	Nat	T	M	+	++	++	No recommendations.
		P3RA1	Nat	T	M	O	O	+	
		Policy P3 would see the Welsh Government enabling the delivery of urban growth and regeneration in the 'best locations'. Much of this land, through the principle of placemaking is likely to be in accessible locations that are well suited to meet the needs of local people. Policy P3 could therefore make a meaningful contribution towards freeing up land throughout Wales for new development for sustainable places, and this would help to ensure that the varied housing needs across Wales can be met. This would likely result in improvements in terms of ensuring everyone, including children and young people have access to adequate housing, helping to reduce poverty and inequality. The supporting text specifically sets out the intention that land would be used for mixed-uses, including housing. This would be a direct effect of the policy that would be likely to increase in magnitude over time as more and more public land is utilised for new housing developments. P3RA1, the do-nothing approach, would conform with baseline trends.							
13 To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P3	Nat	T	M	+	+	++	See Objective 7.
		P3RA1	Nat	T	L	O	O	-	
		Policy P3 is concerned with the development and regeneration of the 'best' locations for growth. As this involves 'placemaking', the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability, this could help to maintain areas of tranquillity and minimise light and noise pollution in rural areas. This would be expected to help ensure development is largely in-keeping with the local character and setting (i.e. not introducing hard-standing or the built form into rural or countryside areas). In some locations, the new development could pose a risk to the local townscape character, although the prioritisation of design quality as set out in the supporting text, would mitigate this. P3RA1, the do-nothing approach, would conform with baseline trends, which are currently declining.							
14 To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P3	Nat	T	M	+	+	+	No recommendations.
		P3RA1	Nat	T	L	O	+	+	
		Policy P3 is concerned with the development and regeneration of the 'best' locations for growth. As this involves 'placemaking', the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability. Supporting text sets out that placemaking would include the development of a masterplan and design code, which could lead to positive effects on historic assets. Although new development could pose a risk to the setting of these sensitive assets, new development is also an opportunity to deliver development of a high-quality design that respects the local setting and enhances the impact of the site in-comparison with its current impact on the setting of nearby assets or the local historic character. Policy P3 could help to improve access and understanding of these assets. Indirect effects could also result through improved public transport from these urban centres has the potential to improve access to heritage assets in more rural areas. P3RA1, the do-nothing approach, would conform with baseline trends, which are improving.							

Policy Grouping 2									
ISA Objective		Future Baseline	Policy/option	Summary of Effects ²					
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect
15	To create the opportunities for the protection and promotion of Welsh culture		P3	Nat	T	L	+	+	+
			P3RA1	n/a	n/a	H	O	O	O
		Policy P3 is concerned with the development and regeneration of the 'best' locations for growth. As this involves 'placemaking', the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability. This could lead to benefits against this Objective, although this will be dependent on the location and nature of the developments, so is uncertain and dependent on implementation. P3RA1, the do-nothing approach, would conform with baseline trends.							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P3	Nat	T	M	+	+	+
			P3RA1	Nat	T	M	O	-	-
		Policy P3 would help to ensure that new development is situated in predominantly urban locations. Whilst urban locations can have areas of a high biodiversity value, sensitive biodiversity designations, species and habitats are more commonly found in rural and countryside locations. Supporting text highlights that opportunities to create ecological networks, provide ecosystem services and green infrastructure, could lead to benefits towards this objective in urban locations. Policy P3 would therefore help to ensure that new development taking place across Wales is less likely to adversely affect sensitive species, habitats or designations and also less likely to disrupt ecological networks by increasing the distances between habitats. This would be an indirect effect of Policy P3. P3RA1, the do-nothing approach, would conform with baseline trends.							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P3	Nat	T	H	+	++	++
			P3RA1	Nat	T	M	O	O	+
		Policy P3 is concerned with the development and regeneration of the 'best' locations for growth. As this involves 'placemaking', the formation of walkable and mixed-use neighbourhoods, through prioritising design quality, innovation and sustainability. The development of urban locations would provide opportunities for redeveloping brownfield land. These sites would also be likely to have good access to opportunities for using recycled materials, for remediating contaminated land and for avoiding the loss of agriculturally and ecologically important soils in more rural locations. Further, supporting text specifically sets out that the Welsh Government seeks to ensure that developments are resource efficient and reflect the principles of a circular economy. These significant direct effects of Policy P3 would be likely to grow over time as increasing quantities of development situated in town and city locations. P3RA1, the do-nothing approach, would conform with baseline trends.							

Policy Grouping 3	
P7 - Delivering Affordable Homes	The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.
P7RA1 – Do nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ³						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on this ISA Objective as whether new homes are affordable or not would be unlikely to discernibly influence local education opportunities. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								
2	To contribute to an improvement in physical, mental and		P7	Nat	P	H	+	++	++	No recommendations.
			P7RA1	Nat	T	H	O	O	+	
		The provision of good quality housing for all, as per P7, and meeting local needs would have multiple health benefits including for older people. The policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
3	social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	being able to access a good quality homes, including children and young people. Ensuring children and young people have access to a good quality home should contribute to improvements in their health and well-being and a reduction in health inequalities across Wales. Increased access to affordable housing led development in sustainable locations; ensuring development is adhering to the plan-led system; not built in isolation of essential infrastructure and services; and responds to identified local needs will contribute to an improvement in physical, mental and social health and well-being for all and contribute towards a reduction in health inequalities across Wales. The policy will help facilitate delivery of housing to rural areas. The alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.								
		P7	Nat	T	L	+	+	++	No recommendations.	
		P7RA1	Nat	T	L	O	O	+		
	To create opportunities for an increase in employment across the country and promote economic inclusion	P7 seeks to ensure that affordable housing is delivered to satisfy identified local needs. It is expected that this would lead to affordable homes being situated in locations that enable residents to access employment opportunities, thus leading to a major positive impact in enhancing economic inclusion. The alternative to this approach (P7RA1) of not having the policy would not have as significant an effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitive-ness		P7	Nat	T	L	+	+	+	No recommendations.
		P7RA1	Nat	T	L	O	O	+		
			P7 could provide a boost to local productivity and to help diversify the local economy by better enabling people at the lower end of the income scale to live nearer to employment opportunities. Increased access to affordable housing-led development responding to identified local needs could create opportunities for sustainable economic growth, diversity and business competitiveness. The alternative to this approach (P7RA1) of not having the policy would not have this direct positive effect, that grows in magnitude over time, and would instead be likely to conform with baseline trends.							
5	To contribute towards the future well-being of the Welsh language		P7	Nat	T	H	+	+	++	No recommendations.
		P7RA1	Nat	T	H	O	O	+		
			P7, the development of an increased supply of affordable housing will directly support people in all communities including Welsh speaking communities. Satisfying affordable housing needs could better enable Welsh speakers to live in the communities they grew up in, which could potentially have some benefits. P7RA1, the alternative to this approach of not having the policy would not have this direct positive effect and would instead be likely to conform with baseline trends.							
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage		P7	n/a	n/a	H	O	O	O	No recommendations.
		P7RA1	n/a	n/a	H	O	O	O		
			Whilst new homes and new development can lead to increases in energy consumption and emissions, the principle of encouraging a higher proportion of new homes to be affordable would be unlikely to have a discernible effect on this ISA Objective. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.							

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	energy efficient and sustainable design									
7	To contribute to the reduction and management of flood risk		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		Whilst new affordable housing could potentially be implemented in a way that alters flood risk or situates residents in areas of flood risk, P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on flood risk. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								
8	To create opportunities to encourage the protection and improvement of air quality		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on air quality. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on water resources. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording. It is uncertain if affordable homes would result in a greater or lesser risk to water quality and other types of housing, or if they would consume greater or lesser quantities of water, but it is considered that any difference would be negligible.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P7	Nat	T	L	O	+	+	No recommendations.
			P7RA1	Nat	T	M	O	O	-	
		P7 would help facilitate delivery of affordable housing in areas where there is a local need, including rural areas. Over time this could help to ensure that people of all backgrounds can live in homes that have access to existing communities, services and amenities although there is some uncertainty over this due to the unknown precise locations of development. The alternative to this approach (P7RA1) would be likely to conform with baseline trends.								
11			P7	Nat	T	H	+	+	++	

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P7RA1	Nat	T	H	O	O	-	No recommendations.
		P7 would increase access to affordable housing led development ensuring development is adhering to the plan-led system; not built in isolation of essential infrastructure and services; responds to identified local needs; and therefore creates opportunities within which an improvement in social cohesion and equality can be achieved. The policy will help facilitate delivery of affordable housing to rural areas. This policy is intended to assist in increasing the scale and pace of affordable homes delivery. It should assist in an increase in the numbers of families across Wales being able to access a good quality home, including children and young people. Ensuring access to a good quality home should contribute to improvements in social cohesion and equality, with less disproportionate conditions in terms of the types of accommodation. The alternative to this approach of not having the policy (P7RA1) would not have this direct positive effect and would instead be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P7	Reg	T	H	++	++	++	No recommendations.
			P7RA1	Reg	T	L	O	-	-	
		P7 would make a major contribution towards ensuring that there is an adequate provision of affordable housing across Wales in locations where it is needed (with local needs determined by appropriate evidence bases). The policy will therefore directly provide opportunities for the provision of good quality, safe, affordable housing that meets identified needs for families, including for children and young people. The policy will help facilitate delivery of affordable housing to rural areas. The alternative approach to this of not having a policy (P7RA1) would see a continued reliance on market housing development to deliver a proportion of affordable housing. This would be expected to conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on landscapes or townscapes. Whilst there could potentially be differences in the likely effects on local character depending on whether new homes are affordable or of another type, this difference would entirely depend on implementation but is likely to be negligible. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on cultural heritage. Whilst there could potentially be differences in the likely effects on local cultural heritage depending on whether new homes are affordable or of another type, this difference would entirely depend on implementation but would be likely to be negligible. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								

Policy Grouping 3										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ³						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	and their settings									
15	To create the opportunities for the protection and promotion of Welsh culture		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternative would not be expected to have a discernible impact on Welsh culture.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on biodiversity or geodiversity. Whether new homes are affordable or of another type is not considered to be relevant to whether the housing would have an effect on biodiversity or geodiversity. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P7	n/a	n/a	H	O	O	O	No recommendations.
			P7RA1	n/a	n/a	H	O	O	O	
		P7 and its alternatives are intended to help increase the proportion of new homes that are affordable, rather than being intended to increase the total number of homes being delivered, and so they would be unlikely to have a discernible impact on natural resources. Whether new homes are affordable or of another type is not considered to be relevant to whether the housing would have an effect on natural resources. This represents a change in the assessment outcome compared with the draft appraisal based on a change in interpretation of the policy wording.								

Policy Grouping 4	
P8 - Flooding	Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.
P8RA1 – Manage flooding in all growth areas	Ensure flood risk management is delivered throughout all National and Regional Growth Areas.
P8RA2 – Do nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P8	n/a	n/a	H	O	O	O	No recommendations.
			P8RA1	n/a	n/a	H	O	O	O	
			P8RA2	n/a	n/a	H	O	O	O	
		P8 and its alternatives would be unlikely to have a discernible impact on this ISA Objective.								
2			P8	Nat	P	M	O	+	++	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales			P8RA1	Nat	P	M	O	+	+	No recommendations.
			P8RA2	Nat	P	M	O	O	+	
	P8 would result in positive impacts on society including in deprived areas within the growth areas and those areas at risk of flooding. This would bring multiple health benefits including the opportunity to increase access to green infrastructure and deliver active travel opportunities through nature-based solutions. Reducing the level of flood risk faced by local people would also be beneficial to their physical and mental health. This would also create opportunities for communities to adapt to and become more resilient to the risk from climate change. P8RA1 would have similar impacts but would be likely to result in more highly engineered options therefore not delivering access to nature or active travel opportunities. P8RA2 the do noting scenario would be likely to conform with baseline trends and would not necessarily be as focused on deprived areas within the growth areas identified.									
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P8	Nat	P	M	+	+	++	No recommendations.
			P8RA1	Nat	P	L	+	+	+	
			P8RA2	Nat	P	M	O	O	+	
		Ambitions for economic growth and development in National and Regional Growth Areas will depend, in part, on managing flood risk in these areas in order to protect existing development, and land with the potential for future development, from damage caused by flooding. P8 and P8RA1 would help to ensure that this flood risk management takes place. P8 would pursue this flood risk management within the confines of PPW, which provides robust planning policy for protecting existing development from flood risk. P8RA1 would see flood risk management efforts go above and beyond PPW and so could provide more effective schemes than that which would be delivered through P8, although it is uncertain the extent to which it would be feasible to achieve this. The do-nothing alternative would conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitive-ness		P8	Nat	P	M	+	+	++	No recommendations.
			P8RA1	Nat	P	L	+	+	+	
			P8RA2	Nat	P	M	O	O	+	
		Enhancing flood risk management in National and Regional Growth Areas would help to protect the vital economic functioning of these areas in the long-term and better equip businesses and industries to be resilient to the potential impacts of climate change. The policy has a focus on brownfield and would be likely to better enable future development in these areas and this development would likely contribute towards further economic growth. For P8 and P8RA1, it is unclear how the focus on National and Regional Growth Areas might affect more rural parts of Wales where flood risk and particularly surface water flood risk is a threat to rural land-uses. P8RA1 would seek to go above and beyond PPW and so could result in large-scale engineered flood defence schemes that could potentially enable new economic development to succeed for the foreseeable future. It could potentially encourage fewer nature-based solutions than P8, which can enhance the amenity and character of the local area whilst attracting visitors. The do-nothing alternative would conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P8	n/a	n/a	H	O	O	O	No recommendations.
			P8RA1	n/a	n/a	H	O	O	O	
			P8RA2	n/a	n/a	H	O	O	O	
		P8 and its alternatives would be unlikely to have a discernible impact on this ISA Objective.								
6			P8	Nat	P	M	O	O	+	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P8RA1	Nat	P	L	O	O	-	No recommendations.
			P8RA2	Nat	P	M	O	O	+	
		The effects of new flood risk management schemes on energy consumption and greenhouse gas emissions primarily depends on the type of flood defence scheme being employed and the measures used to implement them. Generally, it is considered to be likely that P8 would help to encourage more flood risk management schemes to be nature-based than P8RA1 would, due to the priority it affords these solutions, as well as the policy's focus on delivering social, economic and environmental benefits. This more sustainable design that supports the wider natural environment would likely strengthen the carbon sink capacity of the wider natural environment. In comparison, P8RA1 may be more likely to encourage hard-engineered solutions comprised of materials with relatively high carbon footprints and which require high-emission construction practices. The do-nothing alternative would conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P8	Nat	P	M	++	++	++	No recommendations.
			P8RA1	Nat	P	L	++	++	++	
			P8RA2	Nat	P	M	O	O	-	
P8 is designed to ensure that National and Regional Growth Areas benefit from flood risk management that enables and supports sustainable growth. In addition to reducing flood risk, enhancing the awareness of flood risk and delivering social, economic and environmental benefits, P8 would enhance the resilience of existing and new development to the impacts of climate change. P8RA1 would likely have similar effects but potentially of a slightly greater magnitude (although both P8 and P8RA1 would be likely to have significant positive effects from the short-term and into the long-term) but with less certainty. It is unclear if P8 or P8RA1 would have a discernible impact on the sustainable management of flood risk in parts of Wales outside of National and Regional Growth Areas. The do-nothing alternative would conform with baseline trends.										
8	To create opportunities to encourage the protection and improvement of air quality		P8	n/a	n/a	H	O	O	O	No recommendations.
			P8RA1	n/a	n/a	H	O	O	O	
			P8RA2	n/a	n/a	H	O	O	O	
		P8 and its alternatives would be unlikely to have a discernible effect on this ISA Objective.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P8	Nat	P	M	O	+	+	No recommendations.
			P8RA1	Nat	P	L	O	+/-	+/-	
			P8RA2	Nat	P	M	O	O	-	
		Flooding is a key cause of coastal erosion and sedimentation of waters. It can also increase the risk and magnitude of pollution events, such as those caused by high levels of surface water run-off. P8 and P8RA1 would help to enhance the extent and efficacy of flood risk defence schemes that help to protect water quality from potentially adverse impacts. P8 would be particularly beneficial to water quality by prioritising nature-based solutions that provide an important water filtration ecosystem services, such as water filtering by trees, soils and below-ground roots. P8RA1 may encourage a greater prevalence flood risk defence schemes that themselves can pose a risk to water quality, such as engineered solutions comprised of materials that can be harmful to marine life. The do-nothing alternative would conform with baseline trends.								

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P8	Nat	T	M	O	O	+	No recommendations.
			P8RA1	Nat	T	L	O	O	+	
			P8RA2	Nat	T	M	O	O	-	
		P8 and P8RA1 could potentially provide a minor boost to the connectivity of local areas by providing new transport networks integrated with flood risk defence schemes. For example, new defence schemes can be designed in a way to provide space for cyclists and pedestrians, particularly where these defences are nature-based solutions. In some cases, the engineered solutions that would likely arise through P8RA1 could provide opportunities for new transport opportunities such as roads. New footpaths, cycle paths and roads could better connect residents and employees in National and Regional Growth Areas with key services and amenities. The do-nothing alternative would conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P8	Nat	T	M	O	+	++	No recommendations.
			P8RA1	Nat	T	L	O	+	+	
			P8RA2	Nat	T	M	O	O	-	
		P8 would result in positive impacts on society including in deprived areas within areas of the growth areas that are at a risk of flooding, including in rural areas. P8RA1 would have similar impacts but would be likely to result in more highly engineered options therefore not delivering access to nature or active travel opportunities. P8RA2 the do nothing scenario would be likely to conform with baseline trends and would not necessarily be as focused on deprived areas within the growth areas identified.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P8	Nat	T	M	O	+	+	No recommendations.
			P8RA1	Nat	T	L	O	+	+	
			P8RA2	Nat	T	M	O	O	-	
		P8 and P8RA1 would help to ensure that land is available for residential development in National and Regional Growth Areas and is not rendered inappropriate for residential development due to flood risk. Both policies would also be likely to help protect existing residential development and to enhance its resilience to the future impacts of climate change, for residents including children and young people. The do-nothing alternative would conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P8	Nat	P	M	O	+	+	No recommendations.
			P8RA1	Nat	P	L	O	-	-	
			P8RA2	Nat	P	M	O	O	-	
		P8 focuses on nature-based flood risk solutions that deliver social, economic and environmental benefits. In combination with other national planning policies, it is likely that such solutions would be of a sensitive design and high visual amenity value that make a positive contribution to the local character and that help to link the urban built form with natural landscapes. Effects of P8RA1 largely depend on the design of flood risk management schemes but, given the focus on flood risk management beyond PPW and the more intensive use of engineered defence schemes, there is a risk of P8RA1 detracting from the character of landscapes and townscapes in National and Regional Growth Areas. The do-nothing alternative would conform with baseline trends.								
14	To create opportunities for		P8	Nat	P	M	O	+	+	No recommendations.
			P8RA1	Nat	P	L	O	+/-	+/-	

Policy Grouping 4										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁴						
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
	the protection, conservation and enhancement of the historic environment, historic assets and their settings		P8RA2	Nat	P	M	O	O	+	
		P8 focuses on nature-based flood risk solutions that deliver social, economic and environmental benefits. It is likely that such solutions would be of a sensitive design and high visual amenity value that make a positive contribution to the setting of nearby heritage assets and historic areas. Effects of P8RA1 largely depend on the design of flood risk defence schemes but, given the focus on flood risk defence beyond PPW and the more intensive use of engineered defence schemes, there is a risk of P8RA1 detracting from the setting of heritage assets and historic areas. Both P8 and P8RA1 would be likely to help protect important heritage assets and historic areas from the impacts of flooding, enhancing their resilience to the impacts of climate change and preserving them for future generations. The do-nothing alternative would conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P8	Nat	T	L	O	+	+	No recommendations.
			P8RA1	Nat	T	L	O	O	+	
			P8RA2	Nat	T	L	O	O	+	
		Wales’ cultural and heritage assets in National and Regional Growth Areas would be better protected from the impacts of flooding and they would be more resilient to the impacts of climate change. P8 and P8RA1 would also help to protect land and to reduce rates of coastal erosion that could pose a long-term threat to the future functioning of Wales’ cultural activities. P8’s focus on nature-based solutions and sensitive design would be likely to lead to flood risk management schemes that respect local Welsh cultural places and activities. The do-nothing alternative would conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P8	Nat	P	M	O	O	-	No recommendations.
			P8RA1	Nat	P	L	O	O	-	
			P8RA2	Nat	P	M	O	O	-	
		It is expected that P8 and P8RA1 would conform with Wales’ Flood and Coastal Erosion Risk Management Strategy (FCERMS), which is currently subject to a detailed Habitats Regulations Assessment that is proceeding to IROPI (Imperative Reasons of Overriding Public Interest). The FCERMS has gone to IROPI because defending existing coastal communities can lead to coastal squeeze and a subsequent loss of intertidal habitats. These losses are being offset by compensatory habitat. Nature-based flood risk solutions of a relatively high biodiversity value that improve the connectivity of the wider ecological network could provide further mitigation to some extent. However, overall it is considered that a minor adverse effect on biodiversity and geodiversity in the long-term cannot be ruled out at this stage. This is unlikely to include any adverse effects on Natura 2000/ Ramsar sites as the policy includes wording aimed at the protection of internationally designated sites: <i>It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated)</i> . The HRA of the NDF has ruled out an adverse effect on a Natura 2000/ Ramsar site as a result of P8. P8RA1 would be likely to result in a greater prevalence of hard and engineered solutions that are not only of limited, if any, biodiversity value but which can also pose a risk to local species and habitats, such as due to the materials and construction methods employed to build them. Such solutions can also fragment habitats and act as a barrier to the movement of wildlife. The do-nothing alternative would conform with baseline trends.								
			P8	Nat	P	M	O	+	++	No recommendations.
	P8RA1	Nat	P	L	O	+/-	+/-			
	P8RA2	Nat	P	M	O	O	-			
17	To create opportunities for the sustainable management and use of natural resources, taking into account their	Both P8 and P8RA1 would help to focus development on brownfield rather than greenfield areas within National and Regional Growth Areas and to ensure that it is viable for new development. Both P8 and P8RA1 also offer opportunities for remediating contaminated land in these areas.								

Policy Grouping 4									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁴						
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	Recommendations
benefits and intrinsic value			P8 seeks to ensure that new flood risk management schemes in National and Regional Growth Areas sustainably manage natural resources through the use of nature-based solutions, such as new forest, that help to protect and enhance important natural resources such as woodland and soils. P8RA1 could potentially result in the direct loss of some habitats whilst potentially fragmenting habitats. Hard engineered solutions would also require the consumption of new material resources, much of which are unlikely to be recycled or reused. The do-nothing alternative would conform with baseline trends.						

Policy Grouping 5	
P9 – Resilient Ecological Networks and Green Infrastructure	To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to: • identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and • identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.
P9RA1 – Use GI Mapping to identify and prioritise more site-specific national scale places and networks which require protection or enhancement	This option would identify sites and networks which require protection and or enhancement throughout Wales.
P9RA2 – Direct local authorities to take specific actions through their development plans	This option would set a policy direction to lower tier plans to take specific actions to increase the resilience of ecological networks and services.
P9RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P15 - National forest	The Welsh Government is committed to developing a national forest through the identification of appropriate sites and mechanisms. Action to safeguard proposed locations for the national forest will be supported.
P15RA1 – Require Development to contribute to woodland planting targets	This option would set a woodland planting target for Wales and require development to contribute towards achieving this.
P15RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Certainty	Short-term effect	Medium-term effect		Long-term effect
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P9	Nat	T	M	O	+	+	No recommendations.
			P9RA1	Nat	T	M	O	+	+	
			P9RA2	Nat	T	M	O	+	+	
			P9RA3	n/a	n/a	H	O	O	O	
			P15	Nat	T	M	O	O	+	
			P15RA1	Nat	T	M	O	O	+	
			P15RA2	n/a	n/a	H	O	O	O	
			P9, P9RA1 and P9RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to education facilities, leading to minor positive benefits in the medium and longer term against this objective. P9, P15, P9RA1, P9RA2 and P15RA1 would enhance opportunities for people across Wales to learn about wildlife and nature, leading to minor positive benefits in the medium and longer term against this objective. P9RA3 and P15RA2, the do-nothing approaches, would be likely to conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P9	Nat	T	M	O	+	++	No recommendations.
			P9RA1	Nat	T	M	O	+	++	
			P9RA2	Nat	T	M	O	+	++	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	O	+	++	
			P15RA1	Nat	T	M	O	+	++	
			P15RA2	Nat	T	M	O	O	+	
			P9, P9RA1 and P9RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to improved physical and mental well-being through enhanced access to health facilities, as well as improved access to green space and potential for improvements to air quality. P9, P15, P9RA1, P9RA2 and P15RA1 would enhance opportunities for people across Wales to access a diverse range of natural and semi-natural habitats. This would be expected to provide significant physical and mental health benefits for people. Do-nothing approaches would be likely to conform with baseline trends.							
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	+	
			P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks. Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the							

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
		diversity, quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	+	
		P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. This would be expected to provide a boost to increasing the diversity, quantity, quality and distribution of employment opportunities in this sector, providing people in locations throughout Wales with the opportunity to gain meaningful and sustainable employment in fields such as conservation, woodland management and eco-tourism, particularly in rural areas. This could also increase benefits for the third sector. Do-nothing scenarios would be likely to conform with baseline trends in terms of employment opportunities related to ecology.								
5	To contribute towards the future well-being of the Welsh language		P9	n/a	n/a	H	O	O	O	No recommendations.
			P9RA1	n/a	n/a	H	O	O	O	
			P9RA2	n/a	n/a	H	O	O	O	
			P9RA3	n/a	n/a	H	O	O	O	
			P15	n/a	n/a	H	O	O	O	
			P15RA1	n/a	n/a	H	O	O	O	
			P15RA2	n/a	n/a	H	O	O	O	
		P9, P15 and their alternatives would be expected to result in no discernible impact on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	+	
		P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including capturing and storing carbon and this would be likely to be protected and enhanced through these policies. The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.								

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
7	To contribute to the reduction and management of flood risk		P9	Nat	T	M	+	+	+	The new forest referenced in P15 could be strategically located to maximise its flood risk alleviation value.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	-	
			P15	Nat	T	L	+	+	++	
			P15RA1	Nat	T	H	+	+	++	
			P15RA2	Nat	T	M	O	O	-	
The creation of new, and the protection and enhancement of existing, natural environment structures as is proposed in P9, P9RA1, P9RA2, P15 and P15RA1 could help to provide effective and nature-based flood risk alleviation benefits. This depends on location of these elements in relation to flood risk, but overall it is considered to be likely that these policies would provide sustainable flood risk management benefits across Wales. A new National Forest would be likely to provide benefits towards flood risk alleviation, particularly if the forest is partially upslope. P15RA1 may lead to a wider distribution of new tree-planting than the new National Forest, which may increase the certainty and distribution of flood risk alleviation benefits from new tree planting. Do-nothing approaches would be likely to conform with baseline trends.										
8	To create opportunities to encourage the protection and improvement of air quality		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	+	
P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help provide a major boost to the provision of new, and the protection and enhancement of existing, ecological networks, Green Infrastructure elements and forests and woodlands throughout Wales. These natural environment features provide important natural ecosystem services including filtering air and removing pollutants and this would be likely to be protected and enhanced through these policies leading to improvements for human health. The do-nothing approaches would not provide new, or protect or enhance existing, natural environment elements and would be likely to conform with baseline trends.										
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	+	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	+	
Above-ground and below-ground biomass and soils can play an essential role in helping to protect and potentially enhance the quality of natural waters as a result of the natural filtering processes they provide for above and below ground water flow. P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help preserve this function resulting in health benefits. Do-nothing approaches would be likely to conform with baseline trends.										

Policy Grouping 5									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
10 To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P9	Nat	T	M	O	+	+	No recommendations.
		P9RA1	Nat	T	M	O	+	+	
		P9RA2	Nat	T	M	O	+	+	
		P9RA3	n/a	n/a	H	O	O	O	
		P15	n/a	n/a	H	O	O	O	
		P15RA1	n/a	n/a	H	O	O	O	
		P15RA2	n/a	n/a	H	O	O	O	
	P9, P9RA1 and P9RA2 would be likely to lead to opportunities where strategic green infrastructure could be maximised as part of development proposals. This could indirectly lead to enhanced access to facilities and services. P15 and its alternatives would be expected to result in no discernible impacts on this ISA Objective. Do nothing approaches would be likely to conform with baseline trends.								
11 To create the opportunities within which an improvement in social cohesion and equality can be achieved		P9	Nat	T	M	O	+	+	No recommendations.
		P9RA1	Nat	T	M	O	+	+	
		P9RA2	Nat	T	M	O	+	+	
		P9RA3	n/a	n/a	H	O	O	O	
		P15	Nat	T	M	O	+	+	
		P15RA1	Nat	T	M	O	+	+	
		P15RA2	n/a	n/a	H	O	O	O	
	P9, P9RA1, P9RA2, P15 and P15RA1 would be likely to help provide opportunities for everyone including children and young people to have access to good quality and clean environments and to pursue living standards that meet their physical and mental needs due to the provision of high quality natural and semi-natural environments. The do-nothing alternatives would be likely to conform with baseline trends.								
12 To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P9	n/a	n/a	H	O	O	O	No recommendations.
		P9RA1	n/a	n/a	H	O	O	O	
		P9RA2	n/a	n/a	H	O	O	O	
		P9RA3	n/a	n/a	H	O	O	O	
		P15	n/a	n/a	H	O	O	O	
		P15RA1	n/a	n/a	H	O	O	O	
		P15RA2	n/a	n/a	H	O	O	O	
	None of these policies, or their reasonable alternatives, would be expected to lead to discernible impacts on the delivery of housing.								
13 To create opportunities for the		P9	Nat	T	M	+	+	++	No recommendations.
		P9RA1	Nat	T	M	+	+	++	
		P9RA2	Nat	T	M	+	+	++	

Policy Grouping 5									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P9RA3	Nat	T	M	O	O	-	
		P15	Nat	T	M	+	++	++	
		P15RA1	Nat	T	M	+	++	++	
		P15RA2	Nat	T	M	O	O	-	
		P9, P9RA1, P15 and P15RA1 would be expected to lead to major positive impacts on the character of landscapes and townscapes across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and enhanced. These are typically visually attractive elements that positively influence the character of the surrounding area. The provision of a new National Forest (P15) would be likely to make a major positive, distinctive and high-quality change to the character of the area within which it is set. The alternative to this, encouraging higher rates of tree planting across Wales instead of focusing in one location, would be likely to provide minor positive benefits to the character of landscapes and townscapes across Wales. The do-nothing approaches would be likely to conform with baseline trends.							
14 To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P9	Nat	T	M	+	+	++	No recommendations.
		P9RA1	Nat	T	M	+	+	++	
		P9RA2	Nat	T	M	+	+	++	
		P9RA3	Nat	T	M	O	O	+	
		P15	Nat	T	M	+	+	++	
		P15RA1	Nat	T	M	+	+	++	
		P15RA2	Nat	T	M	O	O	+	
		P9, P9RA1, P9RA2, P15 and P15RA1 would be expected to lead to major positive impacts on the setting of heritage assets and historic areas across Wales. These policies would seek to ensure that natural environment elements including ecological networks, Green Infrastructure in urban areas and trees are protected and enhanced. These are typically visually attractive elements that positively influence the setting of assets and areas whilst improving their accessibility. The provision of a new National Forest (P15) would be likely to make a major positive, distinctive and high-quality change to the setting of any nearby heritage features, although this would require careful positioning of the forest to avoid affecting the setting of any heritage assets and potentially diminishing their accessibility. The alternative to this, encouraging higher rates of tree planting across Wales instead of focusing in one location, would be likely to provide minor positive benefits to the setting of assets and features across Wales. There is a high degree of uncertainty behind the identified effects as it largely depends on the distribution of heritage assets and features in relation to the natural environment elements created, protected or enhanced. The do-nothing approaches would be likely to conform with baseline trends.							
15 To create the opportunities for the protection and promotion of Welsh culture		P9	Nat	T	M	+	+	+	No recommendations.
		P9RA1	Nat	T	M	+	+	+	
		P9RA2	Nat	T	M	+	+	+	
		P9RA3	Nat	T	M	O	O	+	
		P15	Nat	T	M	+	+	+	
		P15RA1	Nat	T	M	+	+	+	
		P15RA2	Nat	T	M	O	O	+	

Policy Grouping 5									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
		The sustainable land-uses proposed in P9 P9RA1, P9RA2, P15 and P15RA1 would be expected to help create opportunities for recognising, promoting and enhancing Welsh culture. These policies and alternatives would encourage higher rates of people in Wales exploring the outdoors and taking experience the traditional places and traditions of Wales. Do-nothing approaches would be expected to conform with baseline trends.							
16 To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P9	Nat	T	M	+	++	++	P15 could emphasise the importance of maximising the ecosystem services value of the new National Forest and also ensure that it enhances ecosystem connectivity that is supported in P9.
		P9RA1	Nat	T	M	+	++	++	
		P9RA2	Nat	T	M	+	++	++	
		P9RA3	Nat	T	M	O	O	-	
		P15	Nat	T	L	+	++	++	
		P15RA1	Nat	T	L	+	++	++	
		P15RA2	Nat	T	M	O	O	-	
		P9, P9RA1, P9RA2, P15 and P15RA1 would be expected to lead to major positive impacts on the protection and enhancement of biodiversity in Wales. P9 would help to ensure that ecological networks remain coherent and connected across Wales, thereby better enabling the free movement of species and reducing the risk of isolated islands of habitats of species being ‘cut off from nature’. P9RA1 would specify in the NDF which sites require immediate action. This would be likely to provide similar benefits to biodiversity as P9 but could perhaps provide greater certainty over them taking place. The strategic level at which the NDF operates may be an advantageous scale at which to identify sites for protection or enhancement as it would enable joined up thinking across the country. P9RA2 would see lower tier plans taking specific actions to increase the resilience of ecological networks and services. Local planning authorities may be best placed to make informed choices about how best to tackle bespoke local issues related to local ecological networks, habitats and species. However, it could lead to difficulties in ensuring there is joined up thinking across Wales in protecting and enhancing a coherent ecological network. The provision of strategic GI networks throughout urban locations would be an effective means of enabling wildlife to move freely into, throughout and beyond urban areas and to avoid towns and cities becoming ‘dead zones’ in terms of nature. It would also reduce the disruptive impact urban areas can have on ecological connectivity and the distances between habitats. The alternative to this of delivering grey infrastructure instead would be likely to have no biodiversity value and would conform with baseline trends. Delivering a new National Forest would be expected to establish areas in Wales that are of significant biodiversity value and which can be effectively managed to maximise on this. The positive effects are somewhat dependent on implementation. The HRA has ruled out significant adverse effects on a Natura 2000 site as a result of the National Forest but also recognises the following risks: <i>“The creation of a National Forest for Wales is considered to be a positive policy, with many environmental benefits; however, if areas of forest are planted in unsuitable locations, the policy could potentially lead to detrimental impacts on existing habitats and species associated with Natura 2000/ Ramsar sites, such as open habitats like heathland or grassland, where woodland cover is not beneficial. Whilst planting woodland in such habitats within Natura 2000/ Ramsar sites would clearly be contrary to their conservation objectives, it is also possible that planting woodland adjacent to such sites could also have adverse effects, especially if species from those sites depend upon similarly-open habitats beyond the site boundaries (e.g. for foraging or roosting). Windblown seeds from new woodland can also result in regeneration that becomes a management problem on nearby Natura 2000/ Ramsar sites (most notably on sites with heathland or wetland habitats are qualifying features). Planting woodland adjacent to these sites could also provide cover for predators of the qualifying species (in particular ground nesting birds) or could potentially affect the hydrology of the landscape (in particular groundwater dependant ecosystems), which</i>							

Policy Grouping 5										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Certainty	Short-term effect	Medium-term effect	Long-term effect	
		<i>could adversely affect wetland sites. Increasing the number of visitors to areas of new woodland planting could also have detrimental impacts associated with recreational pressure (such as disturbance from increased human presence and dog walkers).”</i> Overall it is considered that the new National Forest is an opportunity to deliver significant net gains for biodiversity but as this is dependent on implementation the effect is of low certainty. The alternative of encouraging higher rates of tree planting across Wales would also be of high biodiversity value, but certainly to a lower magnitude, although this value would be distributed across all of Wales and could contribute towards improve ecological connectivity. Do nothing approaches would be expected to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P9	Nat	T	M	+	+	+	No recommendations.
			P9RA1	Nat	T	M	+	+	+	
			P9RA2	Nat	T	M	+	+	+	
			P9RA3	Nat	T	M	O	O	-	
			P15	Nat	T	M	+	+	+	
			P15RA1	Nat	T	M	+	+	+	
			P15RA2	Nat	T	M	O	O	-	
		The sustainable land-uses proposed in P9, P9RA1, P9RA2, P15 and P15RA1 would be expected to help protect and enhance the natural resources below ground, including ecologically and agriculturally valuable soils, from the impacts of development. Using this land for these purposes would also reduce the consumption of materials for construction whilst they would not generate any waste. Do-nothing approaches would be likely to conform with baseline trends.								

Policy Grouping 6	
P10 – International Connectivity	The Welsh Government identifies the following Strategic Gateways to facilitate international connectivity: • Cardiff Airport; • Holyhead Port; • Haven Waterway, including the Ports of Milford Haven and Pembroke Dock; and • Fishguard Port. The Welsh Government will work with the operators, investors and local authorities to support the Strategic Gateways and maintain their international connectivity roles. Strategic and Local Development Plans should support the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales. New development around the Strategic Gateways should be carefully managed to ensure their operation is not constrained or compromised.
P10RA1 – Growth at Cardiff Airport, Holyhead Port and Haven Waterway	This option would support the growth and development of the Strategic Gateways by maximising the benefits they provide to their respective regions and Wales and facilitating existing and future international connectivity.
P10RA2 – Limited Growth at Cardiff Airport, Holyhead Port and Haven Waterway	This option would restrict development at Cardiff airport, Haven waterway, Fishguard Port and Holyhead port
P10RA3 – Free Ports	
P10RA4 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P11 – National Connectivity	The Welsh Government will support and invest in improving national connectivity. Our priorities are to encourage longer-distance trips to be made by public transport, while making longer journeys possible by electric vehicles. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity: • Rail Network – Transform the rail network and improve the quality of rail services for passengers. • Bus Network – invest in the development of the national bus network, fully integrated with regional and local bus networks, to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Strategic Road Network - invest in road improvements to reduce journey times, deliver a safer and more resilient road network, and improve air and noise quality. Create a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales. • National Cycle Network – Revitalise the National Cycle Network to create a network of traffic-free paths connecting cities, towns and countryside across Wales. Planning authorities should support developments associated with improvements to national connectivity and, where appropriate, maximise the opportunities that arise from them. Planning authorities must ensure that, where appropriate new development contributes towards the improvement and development of the National Cycle Network and key links to and from it.
P11RA1 – Identify Locations for The Networks	This option would identify the locations for the networks as listed in the policy.

P11RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P12 – Regional Connectivity	The Welsh Government will support and invest in improving regional connectivity. In urban areas, to support sustainable growth and regeneration, our priorities are improving and integrating active travel and public transport. In rural areas our priorities are supporting the uptake of ultra low emission vehicles and diversifying and sustaining local bus services. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity: • Active Travel – Prioritise walking and cycling for all local travel by supporting the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday journeys. • Bus – Improve the legislative framework for how local bus services are planned and delivered and invest in the development of integrated regional and local bus networks to increase modal share of bus travel and improve access by bus to a wider range of trip destinations. • Metros – Develop the South East Metro, South West Metro and North Wales Metro to create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail. • Ultra-Low Emission Vehicles – Support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas. Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations. Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement. Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and development with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces p to have electric vehicle charging points.
P12RA1 – Identify Locations for the Proposed Improvements to Connectivity	This option would identify the locations for the proposed improvement as listed in the policy.
P12RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P10	Reg	T	M	+	+	++	P10 could offer greater clarity over whether new growth and development at the Strategic Gateways, which is considered to be necessary in order to 'maintain' their function/capacity, would be supported.
			P10RA1	Reg	T	M	++	++	++	
			P10RA2	Reg	T	M	O	+	+	
			P10RA3	Reg	T	M	?	?	?	
			P10RA4	Reg	T	H	O	+	+	
			P11	Nat	T	M	O	+	+	
			P11RA1	Nat	T	M	O	+	++	
			P11RA2	Nat	T	H	O	O	O	
			P12	Reg	T	M	O	+	++	
			P12RA1	Reg	T	M	O	+	++	
			P12RA2	Reg	T	H	O	O	O	
		P10 – The Cardiff Airport and Bro Tathan enterprise zone supports education opportunities to increase skills and training for all which would have an increasingly positive benefit in the long term, including for children and young people. It is considered that the growth of the Strategic Gateways under P10RA1 would further support improvements in educational attainment for young people and provide opportunities for skills and training for all. P10 and P10RA1 – The inclusion of Holyhead Port could have a positive effect on skills and training and provide opportunities for further education facilities and increased connectivity. This should result in all members of society being better placed to potentially access education opportunities, including for higher education, skills and training and therefore resulting in increased educational attainment. This effect is likely to be more significant under P10RA1, which supports the growth of the Strategic Gateways. P10 and P10RA1 – The investment at Haven Waterway has the potential to increase skills and training for all in this area and the supporting text recognises the need for a high-skills chain. Such development could provide opportunities for young people in terms of developing their skills through employment or apprenticeships, leading to resulting improvements in education attainment. This effect is likely to be more significant under P10RA1, which supports the growth of the Strategic Gateways. P10RA2 would restrict growth at the Strategic Gateways and so would be likely to result in similar effects but of a lower magnitude as P10. P10RA3 would facilitate growth in other ports within Wales which would have an uncertain impact on education, training and skills provision. P11 & P12 could provide some benefits in enabling the public transport connections to better facilitate all members of society including children and young people in accessing education facilities and training and lifelong learning opportunities. P11RA1 and P12RA1 could provide some benefits in enabling the public transport connections to better facilitate children and young people in accessing education facilities. This option would give more certainty as to the spatial implementation of the policy. The do-nothing approaches (P10RA4, P11RA2 and P12RA2) would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including		P10	Reg	T	M	?	?	?	P10 could be strengthened to include delivery of green infrastructure, active travel and sustainable
			P10RA1	Reg	T	M	+/-	+/-	+/-	
			P10RA2	Reg	T	M	O	+/-	+/-	
			P10RA3	Reg	T	M	?	?	?	
			P10RA4	Reg	T	H	O	+	+	
			P11	Nat	T	M	+	+	++	

⁵ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
contributing towards a reduction in health inequalities across Wales		P11RA1	Nat	T	M	+	+	++	transport. See Objective 1.
		P11RA2	Nat	T	H	O	+	+	
		P12	Reg	T	M	+	+	++	
		P12RA1	Reg	T	M	+	+	++	
		P12RA2	Reg	T	H	O	+	+	
		P10 – It is unlikely this policy will have a significant effect on the reduction of health inequalities. It does however recognise the impact on the wider region and any potential benefits would be somewhat dependent on implementation. P10RA1 The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty through increased employment. Growth at the airport including increasing flights and traffic could have a detrimental impact on air quality. The development of the Ports would bring many benefits for all members of society including reducing inequality and poverty through increasing employment has the potential to support healthy lifestyle choices through well connected places, this will depend on implementation. Concentrating development in these Strategic Gateways could reduce the pressure to develop in rural areas. The potential economic development benefits through improvements to the wider region could bring multiple health benefits such as employment and reducing poverty. P10RA2 would restrict growth of the Strategic Gateways and so would be likely to result in similar effects but of a lower magnitude. P10RA3 would facilitate growth in other ports within Wales which would have an uncertain impact on health and well-being. The do-nothing approaches (P10RA4, P11RA2 and P12RA2) would be likely to conform with baseline trends. P11 & P12 would seek to improve connectivity through public transport, including enabling walking and cycling provision, should have very positive effects in terms of health and well-being impacts for all members of society including children and young people. This policy will help with health inequalities in rural areas as it will mean less of a reliance on the private vehicle and more emphasis on active travel and public transport, but it will also give rural areas better access to the National Cycle Network. It could improve air quality in areas through reducing reliance on the private vehicle however P12 looks to deliver higher density of development in urban areas which could lead to an increase in air pollution. P11 & P12 would increase access to recreational and cultural activities which are beneficial for both mental and physical health. They would reduce inequality of access to services and facilities in both rural and urban areas. P12 also aims to support the uptake of ultra-low emission vehicles in Wales through infrastructure provision and requiring car parking spaces with charging infrastructure for non-residential uses. This policy could be widened to include residential development. Such a Policy encouraging the use of electronically powered cars rather than those powered by petrol or diesel would support tackling climate change and air quality. Therefore, in the long term, this policy could reduce reliance on the private car and support improvements in health including for children and young people across Wales. Promoting the decarbonisation of transport and the uptake of low emission vehicles will have a positive effect on rural areas. It could lead to carbon reduction in rural areas and also increased provision for ultra-low electric vehicles for those living in rural areas. However, there is a chance that the market will not prioritise rural areas in favour of urban areas. The policy could contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and rural areas Identification of the routes and networks, as per P11RA1 and P12RA1, would have very positive effects in terms of health and well-being impacts for all members of society including children and young people. This option would give more certainty as to the spatial implementation of the policy.							
3 To create opportunities for an increase in employment across the		P10	Reg	T	H	+	+	++	An integrated approach between the NDF and the emerging Wales Transport Strategy would help to ensure
		P10RA1	Reg	T	H	+	++	++	
		P10RA2	Reg	T	M	O	-	-	
		P10RA3	Reg	T	M	+	++	++	
		P10RA4	Reg	T	M	O	O	+	

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
country and promote economic inclusion		P11	Nat	T	M	+	++	++	that people are connected with employment areas and opportunities. See Objective 1.
		P11RA1	Nat	T	H	+	++	++	
		P11RA2	Nat	T	M	O	O	+	
		P12	Reg	T	M	+	++	++	
		P12RA1	Reg	T	H	+	++	++	
		P12RA2	Reg	T	M	O	O	+	
		P10 would help to protect the capacity and function of Strategic Gateways, which are gateways into and out of Wales for people and trade. P10 would therefore help to ensure that Wales remains an attractive and competitive place to invest, work and live with reliable international connections. Important economic and employment areas associated with the Strategic Gateways would remain able to compete and succeed in national and international markets, and therefore better able to offer stable and high-quality employment opportunities to people in Wales, which may improve economic inclusion. Effects on rural areas are unlikely to be significant, although, should the transport connections to and from Strategic Gateways be improved as a means of preserving their capacity/function, this could potentially help to enhance access to jobs and employment areas for people living in rural areas. This effect, however, is uncertain. An integrated approach between the NDF and the emerging Wales Transport Strategy would help to ensure that people throughout Wales are better connected with key employment areas and a diverse range of employment opportunities, particularly those in Strategic Gateways. P10RA1 encourages the expansion of the Strategic Gateways, which would help to enhance the range and quality of employment opportunities on offer in the vicinity of these locations, improving the potential significance of the effect, which could include employment for young people (for example, through apprenticeships). The growth of the airport and associated jobs for all could help to reduce inequality and reduce levels of poverty from an employment perspective. P10RA2 would restrict growth at Strategic Gateways and would therefore be likely to have the opposite effects to P10RA1. P10RA3 would lead to freeports that are able to develop and expand as they like. This could deliver similar employment benefits to P10RA1 but with more limited strategic oversight and management. P11 seeks to enhance connectivity within Wales and in so doing would be likely to provide people with more efficient and more sustainable access to places of employment, including for young people. This would include improvements to pedestrian, rail and electric vehicle access. The provision of electric car charging points throughout Wales could help to ensure people in Wales can travel from place to place including places of employment via sustainable transport modes, although there is some uncertainty over how many charging points would be delivered and where these would be and the benefits in terms of economic inclusion are likely to be negligible in the medium and short-term. The market would in all probability not prioritise rural areas for recharging provision, therefore there would be uncertain effects in rural areas. P11RA1 would ensure that such locations are identified, which could provide further certainty over these benefits. P12 seeks to enhance regional connectivity in Wales with a focus on active travel, bus, metro, and electric vehicles. This would be expected to make a major contribution towards improving the sustainability and accessibility of employment opportunities, whilst better enabling employers to thrive, throughout Wales and particularly in National and Regional Growth Areas. This would particularly benefit areas of relatively high levels of deprivation by reducing inequality. P12RA1 would be likely to result in similar effects potentially with greater certainty due to locations being identified. Do nothing alternatives would be likely to conform with baseline trends.							
4 To create opportunities for sustainable economic growth, diversity and		P10	Reg	T	H	+	+	++	See Objectives 1 & 3.
		P10RA1	Reg	T	H	+	++	++	
		P10RA2	Reg	T	M	O	-	-	
		P10RA3	Reg	T	M	+	++	++	
		P10RA4	Reg	T	M	O	O	+	
		P11	Nat	T	M	+	++	++	

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
business competitiveness		P11RA1	Nat	T	H	+	++	++	
		P11RA2	Nat	T	M	O	O	+	
		P12	Reg	T	H	+	++	++	
		P12RA1	Reg	T	M	+	+	++	
		P12RA2	Reg	T	M	O	O	+	
P10 would help to protect the capacity and function of Strategic Gateways, which are gateways into and out of Wales for people and trade. P10 would therefore help to ensure that Wales remains an attractive and competitive place to invest, work and live with reliable international connections. Important economic and employment areas associated with the Strategic Gateways would remain able to compete and succeed in national and international markets, and therefore be better able to contribute towards economic growth in Wales. Effects on rural economies are unlikely to be significant, although improvements to transport connections to and from Strategic Gateways could potentially enhance the accessibility of employment areas for people living in rural locations and subsequently provide a minor boost to these rural economies. P10RA1 could make a significantly positive contribution to increasing employment and promoting economic inclusion. The expansion and development of the Strategic Gateways would also help to boost the functioning of businesses in the vicinity of these locations. The growth of the Strategic Gateways and associated jobs for all could help to reduce inequality and reduce levels of poverty. P10RA2 would restrict growth at Strategic Gateways and would therefore be likely to have the opposite effects to P10RA1. P10RA3 would lead to freeports that are able to develop and expand as they like. This could deliver similar employment benefits to P10RA1 but with more limited strategic oversight and management. P11 seeks to enhance connectivity within Wales and in so doing would be likely to provide businesses with more efficient and more sustainable access to markets, customer and employees. This would include improvements to pedestrian, rail and electric vehicle access. The provision of electric car charging points throughout Wales could help to ensure people in Wales can travel from place to place including places of employment via sustainable transport modes, although there is some uncertainty over how many charging points would be delivered and where these would be and the benefits in terms of economic inclusion are likely to be negligible in the medium and short-term. The market would in all probability not prioritise rural areas for recharging provision, therefore there would be uncertain effects in rural areas. P11RA1 would ensure that such locations are identified, which could provide further certainty over these benefits. P12 seeks to enhance regional connectivity in Wales with a focus on active travel, bus, metro and electric vehicles. This would be expected to make a major contribution towards improving the sustainability and accessibility of local businesses that play a vital role in regional economies, whilst better enabling businesses to grow sustainably and resilient to the impacts of climate change, throughout Wales but particularly in National and Regional Growth Areas. This would particularly benefit areas of relatively high levels of deprivation by reducing inequality. P12RA1 would be likely to result in similar effects but of a lower magnitude. Do nothing alternatives would be likely to conform with baseline trends.									
5	To contribute towards the future well-being of the Welsh language	P10	Reg	T	M	O	+	+	See Objectives 1 & 3.
		P10RA1	Reg	T	M	O	+	+	
		P10RA2	Reg	T	M	O	O	+	
		P10RA3	Reg	T	M	O	O	+	
		P10RA4	Reg	T	M	O	O	+	
		P11	Nat	T	M	O	+	+	
		P11RA1	Nat	T	L	?	?	?	
		P11RA2	Nat	T	M	O	O	O	
		P12	Reg	T	M	O	+	+	
		P12RA1	Reg	T	L	?	?	?	

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		P12RA2	Reg	T	M	O	O	+	
		P10 would be unlikely to have a direct effect. The policy means Strategic Gateways could provide additional employment opportunities, and for those in western areas the opportunities could include people living in communities where Welsh is widely spoken. This could reduce the outflow of working age population from areas of the country where a small number of large employers are particularly significant to the economy. Any loss of Welsh speakers from their communities is likely to weaken the language on a community level. P10RA1 would be likely to have the same impact as P10. Under P10RA2 the potential indirect positive effects of P10 would be lost. It would be unlikely to create any direct effect. Under P10RA3, developing other ports would involve more significant levels of change – leading to more short-term construction jobs. Other ports are on north or south coast and generally further from the main areas with Welsh speaking communities so are unlikely to have direct impacts. P10RA4 would be unlikely to result in any direct impacts, but opportunities to develop new jobs (with potential positive benefit to Welsh speaking communities) would be lost. P11 would help to make places and communities more connected by sustainable and public transport is good for all parts of Wales. Welsh speaking communities would be more likely to be able to attract and retain jobs and population. P11RA1 would have an uncertain impact, which would depend on the locations chosen. P11RA2, the do-nothing scenario, results in a lesser focus on improving transport infrastructure and would be likely to conform with baseline trends. Under P12, investment in better regional/local transport would make places more connected, with better access to jobs and services. This is important to maintaining Welsh speaking communities and encouraging more people to stay in Wales. P12RA1 would result in an uncertain impact, which would depend on the locations chosen. P12RA2, the do-nothing scenario, results in a lesser focus on improving transport infrastructure and would be likely to conform with baseline trends.							
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	P10	Reg	P	H	-	-	--	See Objectives 1 & 3. Policy could also seek to enhance sustainable transport links to and from Gateways. Policy could include wording to the effect of 'efforts to decarbonise international travel associated with the Gateways would be supported in principle'.
		P10RA1	Reg	P	H	-	--	--	
		P10RA2	Reg	P	M	O	+/-	+/-	
		P10RA3	Reg	P	H	--	--	--	
		P10RA4	Reg	P	M	O	O	+	
		P11	Nat	P	M	+	+	++	
		P11RA1	Nat	P	H	+	+	++	
		P11RA2	Nat	P	H	O	O	+	
		P12	Reg	P	M	+	+	++	
		P12RA1	Reg	P	H	+	+	++	
		P12RA2	Reg	P	H	O	O	+	
		P10 would help to ensure that the international connectivity role played by Strategic Gateways in Wales is maintained. Certain activities associated with the Strategic Gateways, such as air travel, ships, or the importation of gas, are known to be sources of greenhouse gas emissions. Whilst P10 does not directly support the growth or expansion of these Gateways, growth or expansion could potentially be necessary, over the course of the NDF period, in order to maintain their international connectivity roles. For example, over the next few years Cardiff Airport may need to expand and grow in order to enable it to continue providing a competitive and successful service. Any such growth or expansion would be likely to increase, to some extent, the intensity or frequency of activities associated with the Gateways that are sources of greenhouse gas emissions. Supporting text for the policy makes clear the requirement for any new development at the Gateways to conform with certain commitments including Wales' carbon budgets. It should also be noted that the expansion of Strategic Gateways would only take place if there was the necessary demand for such expansion. For example, there is an increasing							

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
			demand being placed on the services provided by Cardiff Airport. If the airport were to not expand its capacity in the future, there would likely be an increase in the number of people in Wales travelling to alternative airport options, such as Bristol Airport, instead of using Cardiff Airport. For P10 overall it is considered that the scale of any potential growth of the Strategic Gateways would be limited (and it is not directly encouraged by this policy), whilst the increase in greenhouse gas emissions associated with this growth would also be limited due to the compliance with Wales' carbon budgets, and so in the medium and short term there would likely be only minor effects on this Objective. However, over the long-term, as emissions accumulate, it is not possible to entirely rule out a potential major effect on this Objective, given the scale of the Strategic Gateways and the level of greenhouse gas emissions associated with their activities (particularly when considering the Strategic Gateways in-combination). P10RA1 would see the expansion of Cardiff Airport and its services being developed. It is expected that this would lead to a net increase in the quantity and regularity of aircraft flying in and out of Cardiff. Air travel is a significant source of greenhouse gas emissions, and the expansion of the airport would discord with Wales' transition to a low-carbon transport sector. It is considered to be likely that over time the increase in air travel would result in a major adverse effect on efforts to reduce Wales' contribution to the causes of climate change. . The policy also facilitates the expansion of other Strategic Gateways to improve international connectivity, including Holyhead Port, and it is likely that this expansion would increase energy consumption and greenhouse gas emissions associated with other forms of movement such as port activities which can be significant sources of greenhouse gas emissions. This direct effect would increase in magnitude over time. P10RA2 would see the expansion of the airport and ports being restricted. This would help to limit greenhouse gas emissions associated with Wales' transport sector. This approach may also enable improvements to alternatives of air travel, such as ports or rail travel, which are lower-emission forms of travel in comparison with air travel. However, restricting growth of the airport or ports could potentially lead to local people travelling across the border into England to access airports further afield for air travel. P10RA3 would enable freeports which could potentially expand significantly more than under P10RA1, thereby leading to more severe effects on energy and greenhouse gas emissions. P10RA1 could be seen as the controlled growth option. P11 and P12 would help to significantly enhance the efficiency and sustainability of Wales' transport sector, with a focus on enhancing active travel, rail, metro, bus and electric vehicle links. P11RA1 and P12RA1 would have similar benefits but potentially of a greater certainty with more strategic thinking due to the identification of specific locations. Do nothing alternatives would be likely to conform with baseline trends.							
7	To contribute to the reduction and management of flood risk		P10	Reg	T	L	O	O	-	See Objectives 1 & 3.
			P10RA1	Reg	T	M	-	-	-	
			P10RA2	n/a	n/a	H	O	O	O	
			P10RA3	Reg	T	L	-	-	-	
			P10RA4	Reg	T	L	O	O	-	
			P11	n/a	n/a	H	O	O	O	
			P11RA1	n/a	n/a	H	O	O	O	
			P11RA2	n/a	n/a	H	O	O	O	
			P12	n/a	n/a	H	O	O	O	
			P12RA1	n/a	n/a	H	O	O	O	
			P12RA2	n/a	n/a	H	O	O	O	
		P10 could potentially lead to a limited amount of new development at Strategic Gateways. Depending on the implementation of this, there could potentially be some degree of impact on local flood risk. P10RA2 does not encourage any new development or growth and so would be unlikely to have a discernible impact on flood risk. Whilst there are areas of Flood Zones 2 and 3 north and south of the airport associated with Kenson River as well as the coast, there is considered to be adequate land at low risk of flooding, which could accommodate growth and expansion of the airport, as proposed in P10RA1. There is								

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		also land at risk of flooding in the area of the Port of Holyhead where P10RA1 would seek to encourage new development. It is uncertain if development delivered as a result of P10 or its alternatives would coincide with this land at risk of flooding or if such development would result in the loss of greenfield elements that help to alleviate flood risk. P10RA3, which would enable free ports, could have similar impacts to P10RA1. P10RA4 would be likely to conform with baseline trends in terms of development and flooding. P11 and P12 and their alternatives would be unlikely to have a discernible impact on flood risk.							
8	To create opportunities to encourage the protection and improvement of air quality	P10	Reg	P	H	-	-	--	See Objective 6.
		P10RA1	Reg	P	H	-	--	--	
		P10RA2	Reg	P	M	O	+/-	+/-	
		P10RA3	Reg	P	H	--	--	--	
		P10RA4	Reg	P	M	O	O	+	
		P11	Nat	T	M	+	+	++	
		P11RA1	Nat	T	H	+	+	++	
		P11RA2	Nat	T	H	O	O	+	
		P12	Reg	T	M	+	+	++	
		P12RA1	Reg	T	H	+	+	++	
		P12RA2	Reg	T	H	O	O	+	
P10 would help to ensure that the international connectivity role played by Strategic Gateways in Wales is maintained. Certain activities associated with the Strategic Gateways, such as air travel, ships, or the importation of gas, are known to be sources of air pollution. Whilst P10 does not directly support the growth or expansion of these Gateways, growth or expansion could potentially be necessary, over the course of the NDF period, in order to maintain their international connectivity roles. For example, over the next few years Cardiff Airport may need to expand and grow in order to enable it to continue providing a competitive and successful service. Any such growth or expansion would be likely to increase, to some extent, the intensity or frequency of activities associated with the Gateways that are sources of air pollution. Supporting text for the policy makes clear the requirement for any new development at the Gateways to conform with certain commitments including Wales' carbon budgets, which, in complying with this, would also be likely to help minimise air pollution. It should also be noted that the expansion of Strategic Gateways would only take place if there was the necessary demand for such expansion. For example, there is an increasing demand being placed on the services provided by Cardiff Airport. If the airport were to not expand its capacity in the future, there would likely be an increase in the number of people in Wales travelling to alternative airport options, such as Bristol Airport, instead of using Cardiff Airport. For P10 overall it is considered that the scale of any potential growth of the Strategic Gateways would be limited (and it is not directly encouraged by this policy), whilst the increase in air pollution associated with this growth would also be limited due to the compliance with Wales' carbon budgets, and so in the medium and short term there would likely be only minor effects on this Objective. However, over the long-term, as pollutants accumulate, it is not possible to entirely rule out a potential major effect on this Objective, given the scale of the Strategic Gateways and the level of air pollution associated with their activities (particularly when considering the Strategic Gateways in-combination). P10RA1 would see the expansion of Cardiff Airport and its services being developed. It is expected that this would lead to a net increase in the quantity and regularity of planes flying in and out of Cardiff. Air travel is a significant source of air pollution, and the expansion of the airport would discord with Wales' transition to a low-emission transport sector. It is considered to be likely that over time the increase in air travel would result in a major adverse effect on efforts to reduce Wales' contribution to the causes of climate change. The policy also facilitates the expansion of other strategic gateways to improve international connectivity, including Holyhead Port, and it is likely that this expansion would increase air pollution associated with other forms of movement such as port activities which can be significant sources of pollution. This direct effect would increase in magnitude over time.									

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
			P10RA2 would see the expansion of the airport and ports being restricted. This would help to limit pollution associated with Wales' transport sector. This approach may also enable improvements to alternatives of air travel, such as ports or rail travel, which are lower-emission forms of travel in comparison with air travel. However, restricting growth of the airport or ports could potentially lead to local people travelling across the border into England to access airports further afield for air travel. P10RA3 would enable freeports which could potentially expand significantly more than under P10RA1. P10RA1 could be seen as the controlled growth option. P11 and P12 would help to significantly enhance the efficiency and sustainability of Wales' transport sector, with a focus on enhancing active travel, rail, metro, bus, and electric vehicle links. P11RA1 and P12RA1 would have similar benefits but potentially of a greater certainty with more strategic thinking due to the identification of specific locations. Do nothing alternatives would be likely to conform with baseline trends.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P10	Reg	T	M	O	-	-	See Objectives 1, 3 & 6.
			P10RA1	Reg	T	M	-	-	-	
			P10RA2	n/a	n/a	H	O	O	O	
			P10RA3	Reg	T	M	O	-	--	
			P10RA4	Reg	T	M	O	O	-	
			P11	n/a	n/a	H	O	O	O	
			P11RA1	n/a	n/a	H	O	O	O	
			P11RA2	n/a	n/a	H	O	O	O	
			P12	n/a	n/a	H	O	O	O	
			P12RA1	n/a	n/a	H	O	O	O	
			P12RA2	n/a	n/a	H	O	O	O	
				Some activities associated with Strategic Gateways in Wales, such as port activities or ship movements, pose a risk to water quality. P10 does not encourage new growth or development of Strategic Gateways but does seek to maintain their existing role. In so doing, the policy makes it likely that the adverse effects of Strategic Gateways water quality continue during the NDF period. It is unclear the extent to which new growth would be needed to take place at the Strategic Gateways in order to maintain their current function in terms of supporting international travel. Any such growth would be likely to increase the risk of water pollution associated with the Gateways and the international travel they facilitate. This could increase in significance over time, as levels of development increase. For P10RA1, it is uncertain if the growth and development of the airport could pose a risk to the quality of waters along the coast, which is approximately 500m south of the airport. Construction and operation of development could pose a contamination or pollution risk to waters there. Investment and development at Holyhead and Haven Waterway would increase the capacity for ship movements and port activities. These can be notable sources of pollution and so P10RA1 would pose a risk to the quality of waters here. The do nothing alternatives would be likely to conform with baseline trends. P10RA3, which would enable free ports, could have similar impacts to P10RA1. Freeports could potentially expand to such an extent that avoiding major adverse impacts on water quality becomes increasingly difficult. P10RA2 does not propose any new development and so would be unlikely to have any discernible impact on water resources. New transport infrastructure delivered regionally or national through P11, P11RA1, P12 or P12RA1 could pose a risk to water quality depending on its implementation.						
10	To create opportunities for the improved		P10	Reg	T	M	?	?	?	See Objectives 1 & 3.
			P10RA1	Reg	T	M	+/-	+/-	+/-	
			P10RA2	Reg	T	M	+/-	+/-	+/-	

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P10RA3	Reg	T	M	+/-	+/-	+/-	
		P10RA4	Reg	T	M	O	O	-	
		P11	Nat	T	M	+	++	++	
		P11RA1	Nat	T	H	+	++	++	
		P11RA2	Nat	T	M	O	O	-	
		P12	Reg	T	M	+	++	++	
		P12RA1	Reg	T	H	+	++	++	
		P12RA2	Reg	T	M	O	O	-	
P10 recognises the wider regional benefits from the Strategic Gateways, however this would be dependent on implementation. Connectivity to the Strategic Gateways could be improved which could increase access to services and recreational opportunities in a sustainable manner across the region, including rural areas, although it is unlikely that effects will be significant. P10RA1 has the potential to provide people with more integrated and inclusive transport options that help to meet their needs for international travel. Improvements to these Strategic Gateways could enhance the accessibility of international recreational and cultural places for local people. Air travel and various port activities are not considered to be sustainable modes of transport and they would require significant enhancements to their overall sustainability if they are to be a reliable mode of transport and access for future generations. It is unlikely this policy will have a discernible effect on rural areas. P10RA2 would limit the accessibility of international places and spaces for local people via air and sea but could potentially encourage a greater update of more sustainable modes of transport, such as bus or rail, for reaching other areas of the UK. P10RA3 would have similar effects to P10RA1 but potentially of a slightly greater magnitude given the somewhat unchecked expansion of the Strategic Gateways. P11 and P12 would be expected to significantly enhance the sustainable access of key services, amenities, recreation and cultural spaces for people throughout Wales, including for accessing key areas regionally as well as locally, due to the proposed improvements to cycle and rail networks as well as electric vehicle charging infrastructure, bus routes and metros. P11RA1 and P12RA1 would have similar effects but potentially with greater certainty due to the precise locations for improvements being identified. Do nothing alternatives (P10RA4, P11RA2 and P12RA2) would be likely to conform with baseline trends.									
11 To create the opportunities within which an improvement in social cohesion and equality can be achieved		P10	Reg	T	M	?	?	?	See Objectives 1 & 3.
		P10RA1	Reg	T	M	O	+	++	
		P10RA2	Reg	T	M	O	O	-	
		P10RA3	Reg	T	M	O	+	+	
		P10RA4	Reg	T	M	O	O	-	
		P11	Nat	T	M	O	+	++	
		P11RA1	Nat	T	H	O	+	++	
		P11RA2	Nat	T	M	O	O	-	
		P12	Reg	T	M	O	+	++	
		P12RA1	Reg	T	H	O	+	++	
		P12RA2	Reg	T	M	O	O	-	
		P10 recognises the wider regional benefits from the Strategic Gateways, however this would be dependent on implementation. Connectivity to the Strategic Gateways could be improved which could increase access to services and recreational opportunities in a sustainable manner across the region including rural areas although it is unlikely that effects would be significant.							

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		P10RA1 would help to enhance the accessibility of Strategic Gateways in Wales for all people, this could include the accessibility of important cultural and economic areas associated with these Gateways. P10RA2 could potentially risk limiting the accessibility of these areas, thereby exacerbating inequalities associated with inconsistent accessibility standards, whilst P10RA3 would be likely to have largely similar effects to P10RA1 but with less certainty – it is unclear if free ports would be as committed to ensuring high standards of accessibility for all people via sustainable modes. P11 and P12 would be expected to significantly enhance the accessibility of local and regional areas of cultural, social and economic importance for all people from all backgrounds, predominantly via sustainable modes of movement. P11RA1 and P12RA1 would have similar effects but potentially with slightly more certainty. Do nothing alternatives would be likely to conform with baseline trends.							
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	P10	n/a	n/a	H	O	O	O	See Objective 1.
		P10RA1	n/a	n/a	H	O	O	O	
		P10RA2	n/a	n/a	H	O	O	O	
		P10RA3	n/a	n/a	H	O	O	O	
		P10RA4	n/a	n/a	H	O	O	O	
		P11	n/a	n/a	H	O	+	+	
		P11RA1	n/a	n/a	H	O	+	+	
		P11RA2	n/a	n/a	H	O	O	-	
		P12	n/a	n/a	H	O	+	+	
		P12RA1	n/a	n/a	H	O	+	+	
		P12RA2	n/a	n/a	H	O	O	-	
		P10 and its alternatives would be unlikely to have a discernible effect on the delivery of new homes. P11, P11RA1, P12 and P12RA1 would deliver new transport infrastructure that could potentially open up new parts of Wales and help to make them viable for new residential development.							
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes, and seascapes	P10	Reg	T	M	O	O	-	See Objective 1. Could potentially include wording to ensure that development at Strategic Gateways protects and enhances the character of the surrounding area.
		P10RA1	Reg	T	M	O	-	-	
		P10RA2	Reg	T	M	O	O	+	
		P10RA3	Reg	T	M	O	-	-	
		P10RA4	Reg	T	M	O	O	-	
		P11	Nat	T	L	?	?	?	
		P11RA1	Nat	T	L	?	?	?	
		P11RA2	Nat	T	M	O	O	-	
		P12	Reg	T	L	?	?	?	
		P12RA1	Reg	T	L	?	?	?	
		P12RA2	Reg	T	M	O	O	-	
		It is currently unclear the extent to which new development at the Strategic Gateways would be required in order to maintain their function going forwards, as supported in P10. Any such development could pose a risk to the setting of local historic areas or historic assets and at this stage adverse effects cannot be ruled out. P10RA1 and P10RA3 would result in the expansion of Strategic Gateways. This could potentially pose a risk to the local landscape character in each case given their somewhat rural locations and, in the case of the Port and Haven Waterway, potential effects on the character of the local coastline. Any							

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
			expansion would be likely to conform with planning policy that seeks to protect landscape character, although adverse impacts would be difficult to entirely avoid. This is particularly the case for P10RA3 which may encourage more growth than P10RA1.P10RA2 would limit growth at Strategic Gateways and, in so doing, would help to minimise the risk of adverse effects the character of local townscapes, landscapes and seascapes from adverse impacts. P11, P11RA1, P12 and P12RA1 would encourage the expansion of key sustainable transport modes including rail, metro, bus and electric vehicle charging infrastructure. It is possible that this could adversely impact on the local character but at the same time could be an opportunity to enhance the visual amenity of public transport infrastructure throughout Wales. Effects of each policy largely depend on the precise location and details of any new development. Do nothing alternatives would be likely to conform with baseline trends.							
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P10	Reg	T	M	O	O	-	See Objective 1. The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.
			P10RA1	Reg	T	M	O	-	-	
			P10RA2	Reg	T	M	O	O	+	
			P10RA3	Reg	T	M	O	-	-	
			P10RA4	Reg	T	M	O	O	-	
			P11	Nat	T	L	?	?	?	
			P11RA1	Nat	T	L	?	?	?	
			P11RA2	Nat	T	M	O	O	-	
			P12	Reg	T	L	?	?	?	
			P12RA1	Reg	T	L	?	?	?	
			P12RA2	Reg	T	M	O	O	-	
			It is currently unclear the extent to which new development at the Strategic Gateways would be required in order to maintain their function going forwards, as supported in P10. Any such development could pose a risk to the setting of local historic areas or historic assets and at this stage adverse effects cannot be ruled out. P10RA1 and P10RA3 would result in the expansion of Strategic Gateways. This could potentially pose a risk to the setting of nearby heritage assets or historic areas in each case given their somewhat rural locations and, in the case of the Port and Haven Waterway, potential effects on the character of the local coastline including the historic coastline. There are heritage assets of significant value and sensitivity in proximity to strategic gateways, such as the Grade I Listed Building ‘St Cybi’s Church’ near Holyhead Harbour, the Bulwark’s Camp Scheduled Ancient Monument near Cardiff Airport and the Eastington Manor House Scheduled Ancient Monument, as well as the Grade I Listed Building ‘The Tower at Eastington Manor House’ within the Monument, near Haven Waterway. Any expansion would be likely to conform with planning policy that seeks to protect the historic environment, although adverse impacts would be difficult to entirely avoid. This is particularly the case for P10RA3 which may encourage more growth than P10RA1. P10RA2 would limit growth at the Strategic Gateways and, in so doing, would help to protect sensitive townscapes, landscapes and seascapes from adverse impacts caused by new development. P11, P11RA1, P12 and P12RA1 would encourage the expansion of key sustainable transport modes including rail, metro, bus and electric vehicle charging infrastructure. It is possible that this could adversely impact on the local character but at the same time could be an opportunity to enhance the visual amenity of public transport infrastructure throughout Wales. Do nothing alternatives would be likely to conform with baseline trends.							
15	To create the opportunities for the		P10	Reg	T	M	+	+	+	See Objectives 1 & 3. The opportunity and benefits of heritage led regeneration could be
			P10RA1	Reg	T	M	O	+	+	
			P10RA2	Reg	T	M	O	O	-	
			P10RA3	Reg	T	M	O	+	+	

Policy Grouping 6										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
protection and promotion of Welsh culture		P10RA4	Reg	T	M	O	O	+	recognised in the supporting text.	
		P11	Nat	T	M	O	+	+		
		P11RA1	Nat	T	M	O	+	+		
		P11RA2	Nat	T	H	O	O	+		
		P12	Reg	T	M	O	+	+		
		P12RA1	Reg	T	M	O	+	+		
		P12RA2	Reg	T	H	O	O	+		
P10 does not explicitly encourage or support new development at Strategic Gateways, and it is unclear the extent to which such growth would be required in order for the Gateways to maintain their function. However, any new growth or expansion at the Gateways could help to increase the accessibility of Wales to international tourists, which could promote and enhance Wales’ culture. The policy supports the maintenance of their important role in international connectivity and so the benefits they currently provide to Wales’ culture would be safeguarded going forwards. P10RA1 and P10RA3 would help to enhance opportunities for international visitors to access and appreciate Welsh cultural and heritage assets and activities, although this minor positive effect is very uncertain. P10RA2 could potentially limit the accessibility of Welsh culture for international visitors. P11, P11RA1, P12 and P12RA1 would help to enhance the accessibility of Welsh cultural assets and places, better enabling people to visit, appreciate and contribute. Do nothing alternatives would be likely to conform with baseline trends.										
To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P10	Reg	T	M	O	O	-	Cardiff Airport should adopt best-practice to incorporate Green Infrastructure into the development that is visually attractive and of a high biodiversity value. See Objective 1.	
		P10RA1	Reg	T	H	O	-	-		
		P10RA2	Reg	T	M	O	O	+		
		P10RA3	Reg	T	M	O	-	-		
		P10RA4	Reg	T	M	O	O	-		
		P11	Nat	T	L	O	+/-	+/-		
		P11RA1	Nat	T	L	O	+/-	+/-		
		P11RA2	Nat	T	M	O	O	-		
		P12	Reg	T	L	O	+/-	+/-		
		P12RA1	Reg	T	L	O	+/-	+/-		
		P12RA2	Reg	T	M	O	O	-		
P10 does not explicitly encourage or support the growth or expansion of Strategic Gateways. It would therefore be unlikely to have a significant effect on biodiversity. However, some development may be necessary at a Strategic Gateway in order for them to maintain their function. Activities associated with the Strategic Gateways, such as ship movements at ports, can have negative effects on local wildlife and designations. There are opportunities to increase access to the natural environment through improving active travel and green infrastructure provision in these areas Through P10RA1, development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield around the airport being developed upon, such as the new Enterprise Zone, which is currently mostly greenfield. This could pose a risk to any priority species or habitats relying on this land. Within approximately 1km of the airport are several SSSIs, including Barry Woodlands, Cliff Wood – Golden Stair and East Aberthaw Coast. Expansion of the airport could potentially pose a risk to these SSSIs, such as by loss of functionally linked land, an increase in air pollution or an increase in public access associated disturbances. Given the airport’s location, which is relatively rural, further development here could introduce a barrier to the movement of wildlife and reduce habitat connectivity. Development at other Strategic Gateways could potentially pose a risk to sensitive biodiversity assets and features including marine, coastal, and terrestrial designations such as SACs and SPAs associated with the River Dee and Estuary, Snowdonia, or Anglesey coastline. It is likely that many adverse effects										

Policy Grouping 6									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁵						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		on these sensitive and internationally important designations would be cumulative effects caused by numerous developments in-combination. P10RA2 would help to minimise these effects whilst P10RA3 could potentially exacerbate them further. New development through P10RA1 or its alternatives could provide opportunities to enhance green infrastructure coverage and deliver biodiversity net gains through development proposals. The do nothing alternatives would be likely to conform with baseline trends. The effects of P11, P11RA1, P12 and P12RA1 on biodiversity largely depend on their precise design and locations. It is likely that in some cases biodiversity assets could be adversely effected to a minor extent by the expansion of sustainable transport infrastructure but, at the same time, it is recognised that reductions in air pollution and carbon emissions associated with Wales' transport sector would be beneficial to species and habitats.							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	P10	Reg	T	L	O	O	-	See Objective 1.
		P10RA1	Reg	T	H	O	-	-	
		P10RA2	Reg	T	M	O	O	+	
		P10RA3	Reg	T	M	O	-	-	
		P10RA4	Reg	T	M	O	O	-	
		P11	Nat	T	L	O	+/-	+/-	
		P11RA1	Nat	T	L	O	+/-	+/-	
		P11RA2	Nat	T	M	O	O	-	
		P12	Reg	T	L	O	+/-	+/-	
		P12RA1	Reg	T	L	O	+/-	+/-	
		P12RA2	Reg	T	M	O	O	-	
The effects of P10 are dependent on implementation of the policy as it is unclear if some development would be necessary at any Strategic Gateway in order for them to maintain their function. Any new development would be likely to lead to an increase in the consumption of natural resources. Through P10RA1, development at, and expansion of, Cardiff Airport would eventually be likely to see greenfield land around the airport being developed upon. This development would be expected to require the consumption of natural resources for the construction phase. An increase in locally operating businesses and passengers flying into and out of Cardiff would be likely to lead to a net increase in the generation of waste here. P10RA2 would help to limit these direct adverse effects. The do-nothing scenario would be likely to conform with baseline trends. At the Port and Haven Waterway expansion would potentially facilitate large quantities of new development that would be expected to consume natural resources, increase local generation of waste, and require large areas of previously undeveloped land. P10RA2 could help to limit these effects whilst P10RA3 could exacerbate them further. The impacts of P11, P12 and their alternatives on natural resources largely depends on their precise location and scale. It is recognised that some greenfield would be likely to be lost due to expanding transport infrastructure, and that the construction of this infrastructure would require new resources. However, this sustainable transport infrastructure would contribute towards a reduction of natural resources in Wales' transport sector. It is recognised that the NDF sets out in P19 on Strategic Policies for Regional Planning the need for regionally co-ordinated frameworks for minerals extraction and the circular economy, including waste treatment and disposal, and this may help to minimise adverse effects on this ISA Objective. Do nothing alternatives would be likely to conform with baseline trends.									

Policy Grouping 7	
P13 – Supporting Digital Communications	The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this. New developments should include the provision of Gigabit capable broadband infrastructure from the outset. Development Plans should include policies supporting this requirement.
P13RA1 –Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P14 - Planning in Mobile Action Zones	The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings. The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage. The Welsh Government, planning authorities and mobile telecommunications operators must work together to achieve increases in mobile coverage within Mobile Action Zones.
P14RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve		P13	Nat	T	L	+	+	++	Spatial implications of digital communications infrastructure are relatively uncertain. P14 could potentially include a map.
			P13RA1	Nat	T	M	O	O	+	
			P14	Nat	T	L	+	+	++	
			P14RA1	Nat	T	M	O	O	+	
		P13 and P14 – Increasing digital connectivity across Wales will open up opportunities for people to access education, training and skills digitally. This is a particular benefit for more isolated and rural communities. This could enable children and young people to be more easily able to access learning								

⁶ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
	opportunities for life	opportunities and improve digital literacy levels through technology. Such a Policy could therefore have a positive impact on supporting improvements to educational attainment in the long term. Positive effects increasing over time. P13RA1 and P14RA1 the do-nothing approach is likely also not to preclude the provision of digital infrastructure, which could lead to providing learning opportunities for children and young people. Not considered as positive as having a policy in the NDF, likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	P13	Nat	P	M	+	+	++	No recommendations.	
		P13RA1	Nat	T	M	O	O	+		
		P14	Nat	P	M	+	+	++		
		P14RA1	Nat	T	M	O	O	+		
		P13 and P14 – increasing digital connectivity across Wales will open up opportunities for increased access to digital health services, where available and opportunities to work remotely could increase employment opportunities which would bring wider health benefits such as improving air quality through reduce commuting trips, reducing poverty through increasing prosperity for all. This is a particular benefit for more isolated and rural communities. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales and in particular rural areas. Positive effects increasing over time. P14RA1 and P13RA1 - the do-nothing approach would conform with baseline trends. Likely also not to preclude the provision of digital infrastructure, which could lead to providing access to services leading to health and well-being benefits. Not considered as positive as having a policy in the NDF, likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion	P13	Nat	T	M	+	+	++	See Objective 1.	
		P13RA1	Nat	T	M	O	O	+		
		P14	Nat	T	M	+	+	++		
		P14RA1	Nat	T	M	O	O	+		
		P13 and P14 would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. This would be likely to contribute towards an improvement in the quality and diversity of employment opportunities on offer to local people in these areas. Opportunities to work remotely could increase employment opportunities for all, including young people, in particular providing benefits for isolated and rural communities. Many areas which suffer from poor mobile signal are rural and are within the Welsh language’s strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities. Do nothing alternatives would see no such policy being adopted and it would therefore be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	P13	Nat	T	M	+	+	++	See Objective 1.	
		P13RA1	Nat	T	M	O	O	+		
		P14	Nat	T	M	+	+	++		
		P14RA1	Nat	T	M	O	O	+		
		P13 and P14 would be expected to make a major contribution towards ensuring that businesses in these areas can be increasingly creative, entrepreneurial and able to compete in modern economies. Benefits would be particularly noticeable for rural businesses, particularly SMEs, by opening up new markets and increasing productivity. P13 and P14 would support modern life, facilitating people to work from home, allowing businesses to be located anywhere								

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. P13 and P14 would be likely to contribute to the creation of opportunities for sustainable economic growth, diversity and business competitiveness in rural areas. Increasing digital connections could also provide opportunities for the third sector. Many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities. The do-nothing alternatives would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P13	Nat	T	M	+	+	++	No recommendations.
			P13RA1	Nat	P	L	O	O	+	
			P14	Nat	T	M	+	+	++	
			P14RA1	Nat	P	H	O	O	+	
		P13 would encourage development of modern economy. Opportunities for flexible working, enhanced connectivity, efficiencies in rural economy will have positive impact on use of Welsh (everywhere) and on rural Welsh speaking communities. This policy could allow those with limited knowledge of the Welsh language an opportunity to learn via online learning tools which could contribute to the future well-being of the Welsh language. Under P14, many areas which suffer from poor mobile signal are rural and are within the Welsh language's strongholds. Increasing economic competitiveness and connectivity in these areas is likely to benefit Welsh speaking communities. The do-nothing alternatives would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P13	Nat	T	M	O	+	+	No recommendations.
			P13RA1	Nat	P	H	O	O	+	
			P14	Nat	T	M	O	+	+	
			P14RA1	Nat	P	H	O	O	+	
		Enhanced digital connectivity and mobile coverage would be likely to better enable to carry out a greater proportion of their actions and interactions that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce greenhouse gas emissions associated with the transport sector. The do-nothing alternatives would therefore be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk		P13	n/a	n/a	H	O	O	O	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	n/a	n/a	H	O	O	O	
			P14RA1	n/a	n/a	H	O	O	O	
		P13, P14 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
8	To create opportunities to encourage the protection and improvement of air quality		P13	Nat	T	M	+	+	++	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	Nat	T	M	+	+	++	
			P14RA1	n/a	n/a	H	O	O	O	
		Enhanced digital connectivity and mobile communications, as proposed by P13 and P14, would be likely to better enable people to carry out more of their actions and interactions that would typically have required them to travel from their homes to other places, online or over the phone. This would help to reduce air pollution associated with the transport sector and result in health benefits, increasing cumulatively over the long term, as working and travel habits change. The do-nothing approach would therefore be likely to conform with baseline trends.								

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶					Recommendations	
				Scale	T/P	Certainty	Short-term effects	Medium-term effects		Long-term effects
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P13	n/a	n/a	H	O	O	O	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	n/a	n/a	H	O	O	O	
			P14RA1	n/a	n/a	H	O	O	O	
		P13, P14 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P13	Nat	P	H	+	++	++	No recommendations.
			P13RA1	Nat	T	H	O	O	-	
			P14	Nat	P	H	+	++	++	
			P14RA1	Nat	T	H	O	O	-	
		Increasing digital and mobile connectivity across Wales would be likely to open up opportunities for increased access to facilities and services such as health services, where available, reduce the reliance on the private car for everyone. This is a particular benefit for more isolated and rural communities. P13 and P14 would create opportunities for the improved connectivity of communities and sustainable access to goods and services including for children and young people and would support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can contribute to create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The do-nothing alternatives would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P13	Nat	T	H	+	+	++	No recommendations.
			P13RA1	Nat	T	H	O	O	-	
			P14	Nat	T	H	+	+	++	
			P14RA1	Nat	T	H	O	O	-	
		P13 and P14 Improving digital connectivity can help to reduce loneliness and isolation, reduce the need to travel to work and improve community cohesion. It can help people to live more independent lives and reduce inequalities throughout Wales. This could enable children and young people to keep in touch with others and be more easily able to access learning opportunities and improve digital literacy levels through technology. In this regard, it is considered the policy would reduce inequalities in terms of digital communication and would therefore create opportunities for improvements in social cohesion and equality. This policy will support modern life, allowing people to work from home, allowing businesses to be located anywhere while offering access to entertainment services and providing a lifeline to rural areas allowing virtual access to services. It can create the opportunities within which an improvement in social cohesion and equality can be achieved in rural areas. The do-nothing approach would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P13	Nat	T	M	O	+	+	No recommendations.
			P13RA1	Nat	T	M	O	O	-	
			P14	Nat	T	M	O	+	+	
			P14RA1	Nat	T	M	O	O	-	
		The enhancement of digital connectivity and mobile communications in areas of the greatest need, as proposed in P13 and P14, could help to ensure that local people in rural areas are able to live good quality lives at home. It would also enable them to carry out a wider range of actions online or over the phone, which could reduce the risk of isolation for some people and permit more affordable lifestyles for others. The do-nothing alternatives (P13RA1 and P14RA1) would not provide these indirect benefits and would be likely to conform with baseline trends.								

Policy Grouping 7										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P13	Nat	T	M	O	-	-	No recommendations.
			P13RA1	Nat	T	M	O	O	+	
			P14	Nat	T	M	O	-	-	
			P14RA1	Nat	T	M	O	O	-	
		There is a risk that the delivery of new infrastructure required for enhancing digital connectivity and mobile communications, as per P13 and P14, could potentially have an adverse impact on character, such as mobile phone masts which are relatively tall and in rural or open locations can be discordant with the surrounding area. However, the supporting text sets out the need to carefully plan to manage any environmental impact on sensitive designated landscapes, which could minimise the significance of negative effects. The do-nothing approach (P14RA1) would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P13	Nat	T	M	O	-	-	New mobile infrastructure should avoid adverse impacts on heritage assets and historic areas.
			P13RA1	Nat	T	M	O	O	+	
			P14	Nat	T	M	O	-	-	
			P14RA1	Nat	T	M	O	O	+	
		There is a risk that the delivery of new infrastructure required for enhancing digital connectivity and mobile communications, as per P13 and P14, could potentially have an adverse impact on the setting of heritage assets or the character of historic areas, such as new masts that are relatively tall and in rural or open locations can be discordant with the surrounding area. The do-nothing alternatives would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P13	n/a	n/a	H	O	O	O	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	n/a	n/a	H	O	O	O	
			P14RA1	n/a	n/a	H	O	O	O	
		P13, P14 and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P13	n/a	n/a	H	O	O	O	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	n/a	n/a	H	O	O	O	
			P14RA1	n/a	n/a	H	O	O	O	
		P13, P14 and their alternatives and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								
17	To create opportunities for the sustainable management and		P13	n/a	n/a	H	O	O	O	No recommendations.
			P13RA1	n/a	n/a	H	O	O	O	
			P14	n/a	n/a	H	O	O	O	

Policy Grouping 7									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ⁶						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
use of natural resources, taking into account their benefits and intrinsic value		P14RA1	n/a	n/a	H	O	O	O	
	P13, P14 and their alternatives and their alternatives would be unlikely to have a discernible impact on this ISA Objective.								

Policy Grouping 8	
P16 – Heat Networks	Within Priority Areas for District Heat Networks planning authorities should identify opportunities for District Heat Networks and plan positively for their implementation. Large scale mixed-use development should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. Planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.
P16RA1 – Promote the energy efficiency and sustainable design of individual buildings & Requirement for a District Heat Network	This option would promote the energy efficiency and sustainable design of buildings.
P16RA2 – Require district heating networks in certain locations and for certain forms of development	This option would set specific criteria for district heating networks to be delivered.
P16RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P17 – Renewable and Low Carbon Energy and Associated Infrastructure	The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net economic benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure.

Policy Grouping 8	
P18 – Renewable and Low Carbon Energy Developments of National Significance	Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to Policy 17 and the following criteria: 1. Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty); 2. The proposal is designed to minimise its visual impact on nearby communities and individual dwellings, and the cumulative impact of the proposal, with other existing or proposed development, is acceptable; 3. There are no adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species; 4. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity; 5. There are no unacceptable adverse impacts on statutorily protected built heritage assets; 6. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance; 7. There are no unacceptable impacts on the operations of defence facilities and operations (include aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T); 8. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation; 9. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources; 10. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime including the removal of infrastructure and effective restoration.
P17/18RA1 – Identify the best locations for other renewable and low carbon technologies such as solar, hydropower or biomass	This option would widen the policy to identify locations for other renewable and low carbon technologies such as solar, hydropower and biomass.
P17/18RA2 – Apply policy to DNS of renewable and low carbon development	This option would apply the policy to renewable energy and low carbon development above 10MW.
P17/18RA3 – Let the market decide	This option would provide a framework for the market to develop renewable energy and low carbon technologies in the strongest market areas.
P17/18RA4 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	n/a	n/a	H	O	O	O	
			P18	n/a	n/a	H	O	O	O	
			P17/18RA1	n/a	n/a	H	O	O	O	
			P17/18RA2	n/a	n/a	H	O	O	O	
			P17/18RA3	n/a	n/a	H	O	O	O	
			P17/18RA4	n/a	n/a	H	O	O	O	
These policies would be expected to result in no discernible impacts on this ISA Objective.										
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	Nat	T	M	O	+	+	
			P18	Nat	T	M	O	+	+	
			P17/18RA1	Nat	T	M	O	+	+	
			P17/18RA2	Nat	T	M	O	+	+	
			P17/18RA3	Nat	T	M	O	+	+	
			P17/18RA4	Nat	T	M	O	O	+	
P17 and P18 look to provide policies for which the overall objectives are to facilitate renewable energy, reduce carbon emissions and tackle climate change. The policies should help to address overall improvements in health and well-being for communities across Wales, including for children and young people and would retain tranquillity in these areas which provide mental health benefits. They would prevent wind and solar energy generation in National Parks. This could help to preserve the distinctiveness and quality of National Parks in Wales which could help to protect their ability to provide people across Wales with access to the outdoors and natural habitats (beneficial to physical and mental well-being). A study from Public Health Wales looked at health impacts of wind turbine noise ⁸ and concluded that ‘there is no evidence to suggest that noise from wind turbines has a direct physiological impact on health’. It										

⁸ <https://phw.nhs.wales/services-and-teams/environmental-public-health/health-impacts-of-wind-turbine-noise/>

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		recognised that ' <i>annoyance from wind turbine operation may cause stress and anxiety which can, in turn, affect quality of life</i> '. The impact of turbines, which would include health, would be addressed on a case by case basis through planning process. P17/18RA1, P17/18RA2 and P17/18RA3 would be likely to have similar effects, although potentially of a slightly greater magnitude (still not significant). With regards to P17/18RA3, the absence of criteria for following new renewable energy development could result in there being less support for new renewable energy developments as there is no clear criteria for them to satisfy to gain support, and it could therefore risk less renewable energy development taking place. P16 and its reasonable alternatives would be unlikely to have a discernible effect on this Objective. The do nothing alternative would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	Nat	T	M	O	+/-	+/-	
			P18	Nat	T	M	O	+/-	+/-	
			P17/18RA1	Nat	T	M	O	+/-	+/-	
			P17/18RA2	Nat	T	M	O	+/-	+/-	
			P17/18RA3	Nat	T	M	O	+/-	+/-	
			P17/18RA4	Nat	T	M	O	O	+	
		P16 and its alternatives would be unlikely to have a discernible effect on this ISA Objective. Large scale renewable energy schemes can generate direct employment benefits during the construction phase for communities across Wales. P17 and P18 look to encourage renewable energy development that delivers economic benefits and could therefore help to maximise employment opportunities associated with the renewable energy sector. P17/18RA1, P17/18RA2 and P17/18RA3 would have similar effects but potentially of a slightly greater magnitude (still not significant). However, there could be a risk of new renewable energy development, such as wind turbines, having an adverse effect on local tourism, depending on the implementation and location of new development. There has been a study produced on the potential economic impact of wind farms on tourism in Wales ⁹ . This concluded that there are no significant impacts on tourism to date, although the study recognised that low level impacts could occur in remoter parts of Powys but that impact is uncertain and would be looked at on a case by case basis through planning process. The do nothing alternative would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	Nat	T	M	O	+/-	+/-	
			P18	Nat	T	M	O	+/-	+/-	
			P17/18RA1	Nat	T	M	O	+/-	+/-	
			P17/18RA2	Nat	T	M	O	+/-	+/-	
			P17/18RA3	Nat	T	M	O	+/-	+/-	

⁹ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷					Recommendations	
				Scale	T/P	Certainty	Short-term effects	Medium-term effects		Long-term effects
			P17/18RA4	Nat	T	M	O	O	+	
		P16 and its alternatives would be unlikely to have a discernible effect on this ISA Objective. Large scale renewable energy schemes can generate direct social and economic benefit to local communities across Wales. P17 and P18 look to encourage renewable energy development that delivers economic benefits and could therefore help to maximise the potential economic gains from supporting the renewable energy sector and enhancing the sustainability of Wales' energy consumption. P17 and P18 could potentially deliver indirect benefits to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. P17/18RA1, P17/18R2 and P17/18RA3 would be likely to have similar effects but potentially of a slightly greater magnitude, but not significant. However, there could be a risk of new renewable energy development, such as wind turbines, having an adverse effect on local tourism, depending on the implementation and location of new development. There has been a study produced on the potential economic impact of wind farms on tourism in Wales. This concluded that there are no significant impacts on tourism to date. The study recognised that low level impacts could occur in remoter parts of Powys but that impact is uncertain and would be looked at on a case by case basis through planning process. The do-nothing alternative would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	Nat	T	M	+	+	+	
			P18	Nat	T	M	+	+	+	
			P17/18RA1	Nat	T	M	+	+	+	
			P17/18RA2	Nat	T	M	+	+	+	
			P17/18RA3	Nat	T	M	O	O	+	
			P17/18RA4	Nat	T	M	O	O	+	
		Policies P17 and P18 as well as P17/18RA1, P17/18RA2 and P17/18RA3 would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership, although these benefits would be very minor. The do-nothing approach would be likely to conform with baseline trends. P16 and its alternatives would result in no discernible impacts on this ISA Objective.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P16	Nat	T	M	+	+	++	No recommendations.
			P16RA1	Nat	T	M	+	+	++	
			P16RA2	Nat	T	H	+	+	++	
			P16RA3	Nat	T	M	O	O	+	
			P17	Nat	T	M	+	++	++	
			P18	Nat	T	M	+	++	++	
			P17/18RA1	Nat	T	M	+	++	++	
			P17/18RA2	Nat	T	M	+	++	++	
			P17/18RA3	Nat	T	M	+/-	+/-	+/-	
			P17/18RA4	Nat	T	M	O	O	+	
		P16, as well as its alternatives, could facilitate a more efficient management of heat in Districts across Wales. This would help to reduce greenhouse gas emissions associated with Wales' energy consumption. P16RA1 would have similar effects but likely be of a slightly greater magnitude. P16RA2 would also have similar effects to P16 but potentially with greater certainty.								

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		P17 and P18 would create the opportunities within which renewable and low carbon energy generation could help to make a tangible contribution towards reducing greenhouse gas emissions associated with Wales' energy consumption. The policy sets out a presumption in favour of large-scale wind energy development (including repowering) in the Pre-Assessed Areas for Wind Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. P17/18RA1, P17/18R2 and P17/18RA3 would be likely to have similar effects but potentially of a slightly greater magnitude. P17/18RA3 could risk less renewable energy development being supported as there is no clear criteria which would guarantee support. The do-nothing alternatives would be likely to conform with baseline trends.								
7	To contribute to the reduction and management of flood risk	P16	n/a	n/a	H	O	O	O	P18 could include a requirement for new renewable development and associated infrastructure to avoid unacceptable impacts on the water environment.	
		P16RA1	n/a	n/a	H	O	O	O		
		P16RA2	n/a	n/a	H	O	O	O		
		P16RA3	n/a	n/a	H	O	O	O		
		P17	Nat	T	L	O	O	+		
		P18	Nat	T	L	O	O	+		
		P17/18RA1	Nat	T	L	O	O	+		
		P17/18RA2	Nat	T	L	O	O	+		
		P17/18RA3	Nat	T	L	O	O	+		
		P17/18RA4	Nat	T	L	O	O	-		
P16 and its alternatives would be unlikely to have a discernible effect on this ISA Objective. It is uncertain if the renewable energy associated development cited in P17 and P18, as well as their alternatives, would be situated in areas of flood risk or would alter flood risk elsewhere as this is determined by the precise location of the development. The development of renewable energy is a positive contribution to tackling the global issue of climate change and its consequences.										
8	To create opportunities to encourage the protection and improvement of air quality	P16	Nat	T	M	O	+	+	No recommendations.	
		P16RA1	Nat	T	M	O	+	+		
		P16RA2	Nat	T	M	O	+	+		
		P16RA3	Nat	T	M	O	O	+		
		P17	Nat	T	M	+	+	++		
		P18	Nat	T	M	+	+	++		
		P17/18RA1	Nat	T	M	+	+	++		
		P17/18RA2	Nat	T	M	+	+	++		
		P17/18RA3	Nat	T	M	+	+	++		
		P17/18RA4	Nat	T	M	O	O	+		
More energy efficient heat networks delivered through P16, P16RA1 and P16RA2 could potentially help to alleviate air pollution associated with Wales' energy consumption. P17 and P18 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to improve air quality. The policy sets out a presumption in favour of large-scale wind energy (including repowering) development in the Pre-Assessed Areas for Wind Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect. Similarly, reasonable alternatives P17/18RA1, P17/18RA2 and P17/18RA3										

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		could lead to beneficial effects, although these are likely to have an impact of lower significance in themselves. However, cumulative effects could also be significant in the longer term. Do nothing alternatives would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P16	Reg	n/a	H	O	O	O	See Objective 7.
			P16RA1	Reg	n/a	H	O	O	O	
			P16RA2	Reg	n/a	H	O	O	O	
			P16RA3	Reg	n/a	H	O	O	O	
			P17	Nat	T	L	O	O	-	
			P18	Nat	n/a	H	O	O	O	
			P17/18RA1	Nat	T	L	O	O	-	
			P17/18RA2	Nat	T	L	O	O	-	
			P17/18RA3	Nat	T	L	O	O	-	
			P17/18RA4	Nat	n/a	H	O	O	O	
Renewable energy based around hydroelectricity, which could be facilitated through P17, could potentially pose a risk to water quality as well as hydromorphology. It is uncertain the extent to which these policies would encourage and facilitate hydroelectric power stations and where these would be located in relation to natural waters. All other policies and alternatives would be expected to result in no discernible impacts on this Objective.										
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P16	Reg	n/a	H	O	O	O	No recommendations.
			P16RA1	Reg	n/a	H	O	O	O	
			P16RA2	Reg	n/a	H	O	O	O	
			P16RA3	Reg	n/a	H	O	O	O	
			P17	Nat	n/a	H	O	O	O	
			P18	Nat	n/a	H	O	O	O	
			P17/18RA1	Nat	n/a	H	O	O	O	
			P17/18RA2	Nat	n/a	H	O	O	O	
			P17/18RA3	Nat	n/a	H	O	O	O	
			P17/18RA4	Nat	n/a	H	O	O	O	
It is considered that there is unlikely to be a direct link between the policies in this grouping and this ISA Objective.										
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P16	Reg	n/a	H	O	O	O	P17 could refer to all types of benefits, including cultural, not just in an economic context. P17 or P18 could encourage small scale community schemes that enhance cohesion.
			P16RA1	Reg	n/a	H	O	O	O	
			P16RA2	Reg	n/a	H	O	O	O	
			P16RA3	Reg	n/a	H	O	O	O	
			P17	Nat	T	L	O	O	+	
			P18	Nat	T	L	O	O	+	
			P17/18RA1	Nat	T	L	O	O	+	
			P17/18RA2	Nat	T	L	O	O	+	
	P17/18RA3	Nat	T	L	O	O	+			

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
			P17/18RA4	Nat	T	L	O	O	O	
		Supporting text states that 'Proposals should ensure.... Development brings with it positive social, environmental, cultural and economic benefits.' Policies P17 and P18 state that 'Proposals should describe the net economic benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.' This could lead to positive effects against this objective. P17/18RA1, P17/18RA2 and P17/18 RA3 could lead to similar benefits. Do nothing alternative likely to conform with baseline trends. It is considered that there is unlikely to be a direct link between all other policies and this ISA Objective.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P16	n/a	n/a	H	O	O	O	No recommendations.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	n/a	n/a	H	O	O	O	
			P18	n/a	n/a	H	O	O	O	
			P17/18RA1	n/a	n/a	H	O	O	O	
			P17/18RA2	n/a	n/a	H	O	O	O	
			P17/18RA3	n/a	n/a	H	O	O	O	
			P17/18RA4	n/a	n/a	H	O	O	O	
		It is considered that there is unlikely to be a direct link between the policies in this grouping and this ISA Objective.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P16	n/a	n/a	H	O	O	O	P17 or P18 could potentially be strengthened by including reference to cultural benefits to encompass all elements of sustainable development.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	
			P16RA3	n/a	n/a	H	O	O	O	
			P17	Nat	T	M	O	-	-	
			P18	Nat	T	M	O	-	-	
			P17/18RA1	Nat	T	M	O	-	-	
			P17/18RA2	Nat	T	M	O	-	-	
			P17/18RA3	Nat	T	M	O	-	-	
			P17/18RA4	Nat	T	M	O	O	-	
		P16 and its alternatives would be unlikely to have a discernible impact on this ISA Objective. P17 seeks to encourage new renewable energy generation development, which would conform with the requirements of P18 which includes measures to ensure that unacceptable adverse landscape and visual impacts are prevented. This would help to minimise the risk of new wind turbines drastically altering the landscape character or sense of place where they are situated. However, this depends somewhat on implementation and it is considered that in some cases it would not be feasible to entirely prevent a minor alteration to the local character as a result of, for example, new wind turbines. This may be particularly the case in Pre-Assessed Areas that are in proximity to settlements where alterations to character could impact on the greatest number of people. The avoidance of 'unacceptable adverse impacts' suggests that in some cases adverse impacts would be permitted. P17/18RA1, P17/18RA2 and P17/18RA3 would have similar effects to P17.								
14	To create opportunities for the protection,		P16	n/a	n/a	H	O	O	O	See Objective 13.
			P16RA1	n/a	n/a	H	O	O	O	
			P16RA2	n/a	n/a	H	O	O	O	

Policy Grouping 8									
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷					Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	
conservation and enhancement of the historic environment, historic assets and their settings		P16RA3	n/a	n/a	H	O	O	O	
		P17	Nat	T	M	O	-	-	
		P18	Nat	T	M	O	-	-	
		P17/18RA1	Nat	T	M	O	-	-	
		P17/18RA2	Nat	T	M	O	-	-	
		P17/18RA3	Nat	T	M	O	-	-	
		P17/18RA4	Nat	T	M	O	O	-	
		P16 and its alternatives would be unlikely to have a discernible impact on this ISA Objective. P17 seeks to encourage new renewable energy generation development, which would conform with the requirements of P18 which includes measures to ensure that adverse impacts on cultural heritage are avoided. It is expected that in most cases new renewable energy generation development would avoid adverse impacts on sensitive heritage assets and historic areas. In addition to protecting archaeological, architectural and historic assets, the policies avoid development in AONBs and National Parks and in so doing would help to avoid affecting the historic landscapes in these areas. However, it is considered to be unlikely that in all cases an adverse impact on cultural heritage, such as new wind turbines altering the setting of a sensitive heritage asset, could be entirely avoided in all cases and so a minor adverse effect in the long-term, caused by P17 and mitigated to some extent by P18, cannot be ruled out. P17/18RA1, P17/18RA2 and P17/18RA3 would have similar effects to P17.							
15 To create the opportunities for the protection and promotion of Welsh culture		P16	n/a	n/a	H	O	O	O	No recommendations.
		P16RA1	n/a	n/a	H	O	O	O	
		P16RA2	n/a	n/a	H	O	O	O	
		P16RA3	n/a	n/a	H	O	O	O	
		P17	n/a	n/a	H	O	O	O	
		P18	n/a	n/a	H	O	O	O	
		P17/18RA1	n/a	n/a	H	O	O	O	
		P17/18RA2	n/a	n/a	H	O	O	O	
		P17/18RA3	n/a	n/a	H	O	O	O	
		P17/18RA4	n/a	n/a	H	O	O	O	
It is considered that there is unlikely to be a direct link between the policies in this grouping and this ISA Objective.									
16 To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P16	n/a	n/a	H	O	O	O	P18 could include the need to protect Wales' geodiversity from unacceptable impacts.
		P16RA1	n/a	n/a	H	O	O	O	
		P16RA2	n/a	n/a	H	O	O	O	
		P16RA3	n/a	n/a	H	O	O	O	
		P17	Nat	T	M	O	+/-	+/-	
		P18	Nat	T	M	O	+/-	+/-	
		P17/18RA1	Nat	T	M	O	+/-	+/-	
		P17/18RA2	Nat	T	M	O	+/-	+/-	
		P17/18RA3	Nat	T	M	O	+/-	+/-	
		P17/18RA4	Nat	T	M	O	O	-	
P16 would be unlikely to have a discernible effect on this ISA Objective.									

Policy Grouping 8										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ⁷						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		Whilst new renewable energy generation development delivered through P17 could pose a risk to nearby species or habitats, P18 seeks to prevent this in each case whilst maximising environmental benefits. The HRA of the NDF has ruled out a significant adverse effect on a Natura 2000 site as a result of new renewable energy infrastructure proposed in P17 and P18, but identifies the following risks that are dependent on implementation: <i>‘mortality as a result of collision with turbine blades or associated infrastructure (in particular impacts on upland raptors and waders, as well as bats), disturbance/ displacement of qualifying species, loss/ damage to sensitive habitat under the footprint of development and infrastructure (in particular sensitive upland habitats in more rural locations), and potential implications on water quality if sited near designated watercourses or groundwater dependant ecosystems.’</i> Alternatives to P17/18 would have similar risks and benefits. Do nothing alternatives would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P16	Nat	T	M	O	+	+	See Objective 13.
			P16RA1	Nat	T	M	O	+	+	
			P16RA2	Nat	T	M	O	+	+	
			P16RA3	Nat	T	M	O	O	-	
			P17	Nat	T	M	O	+	++	
			P18	Nat	T	M	O	+	++	
			P17/18RA1	Nat	T	M	O	+	++	
			P17/18RA2	Nat	T	M	O	+	++	
			P17/18RA3	Nat	T	M	O	+	++	
			P17/18RA4	Nat	T	M	O	O	-	
			All three policies and their alternatives would create the opportunities within which energy in Wales is more efficiently managed. Renewable and low carbon energy generation can help to make a tangible contribution to energy generation overall, with the target of 70% of electricity generation to be generated from renewable energy by 2030. This could lead to significant effects in the medium and longer terms in the case of P17 and P18, as schemes are developed, leading to a cumulative effect. New renewable energy development could result in the consumption or loss of natural resources, for example the highly valuable peatland in North Wales, as turbines require large and deep foundations.							

Policy Grouping 9	
P19 – Strategic Policies for Regional Planning	Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent Local Development Plans): - a spatial strategy; - a settlement hierarchy; - the housing provision and requirement; - the gypsy and traveller need; - the employment provision; - the spatial areas for strategic housing, employment growth and renewable energy; - the identification of green belts, green corridors and nationally important landscapes where required; - the location of key services, transport and connectivity infrastructure; - a framework for the sustainable management of natural resources and cultural assets; - ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure; and - a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal. The Welsh Government requires the adoption of Strategic Development Plans in the North, Mid Wales, South West and South East regions.
P19RA1 – Mandatory list of policy issues	This option would require regional planning to be undertaken and cover the policy issues identified.
P19RA2 – Longer or shorter list of policy issues	This option would expand or reduce the topics covered within the policy.
P19RA3 - Approach to Regional Planning	The Welsh Government expects regional plans to come forward in each of the four regions to deliver the requirements of Policy P3.
P19RA4 - Mandatory footprint for regional planning	This option would require regional planning to be undertaken and would set a footprint indicating which areas must produce a SDP and which must produce a Joint LDP.
P19RA5 - Specify which authorities should work together	This option would require regional planning to be undertaken and would specify which authorities must work together.
P19RA6 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P19	Nat	T	L	+	+	+	Provide clarity on whether employment provision would include skills and education - could refer to the 'consideration of education establishments' in a regional context.
			P19RA1	Nat	T	L	+	+	+	
			P19RA2	Nat	T	L	+	+	+	
			P19RA3	Nat	T	L	+	+	+	
			P19RA4	Nat	T	L	+	+	+	
			P19RA5	Nat	T	L	+	+	+	
			P19RA6	Nat	T	M	O	O	+	
			Under P19, the areas listed for inclusion in a regional level plan covers key services which could include education and skills facilities for all. The list specifies employment provision which would be likely to encompass education, training and skills but this is not certain. The Policy would support effective cross boundary provision of services such as housing and employment and, consequently, other linked services such as the provision of education opportunities. This could result in limited benefits in terms of children and young people across regions being able to access education establishments, resulting in increased attainment. Notwithstanding this, it is recognised the planning system at a regional level cannot directly influence the establishment of education services as it is the responsibility of education authorities. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would likely result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P19	Nat	T	H	+	+	+	P19 refers to green belts and corridors, but it is unclear whether or not this would encompass GI in its widest definition - relationship with GI could be clarified.
			P19RA1	Nat	T	H	+	+	+	
			P19RA2	Nat	T	H	+	+	+	
			P19RA3	Nat	T	H	+	+	+	
			P19RA4	Nat	T	H	+	+	+	
			P19RA5	Nat	T	H	+	+	+	
			P19RA6	Nat	T	M	O	O	+	
			P19 embeds placemaking and looks to deliver key services which will include health facilities and services. The list of topics encompasses a wide variety of determinants of health through placemaking including connectivity, employment, housing provision, natural resources which all can contribute positively to health and well-being for everyone when planned positively. Planning authorities will be able to determine what is best for their rural areas in terms of mental health and social well-being and will not be working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically. The policy specifies that the need for gypsy and travellers should be established which will have appositive impact on the health and well-being of the gypsy							

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
			and traveller community. The policy would support effective cross boundary provision of services (such as employment) and consideration of environmental issues (such as green belts and corridors) through the planning system. This should result in benefits in terms of sustainably locating services across regions, leading to associated health benefits and reducing inequalities, including for children and young people. The policy could be strengthened to include green infrastructure elements not just green corridors. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would result in the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P19	Nat	T	M	+	++	++	Supporting text could clarify the definition of 'connectivity infrastructure'- this should include digital, green, active travel etc. to maximise benefits.
			P19RA1	Nat	T	H	+	++	++	
			P19RA2	Nat	T	L	+	++	++	
			P19RA3	Nat	T	L	+	++	++	
			P19RA4	Nat	T	M	+	++	++	
			P19RA5	Nat	T	M	+	++	++	
			P19RA6	Nat	T	M	O	O	+	
			P19 would help to ensure that regional plans are prepared across Wales and that these plans provide for an adequate quantity of employment land to satisfy the anticipated or desired jobs growth in the region. Both Policies would therefore make a direct major contribution towards improving employment opportunities across Wales for all working ages. Through embedding placemaking into the policy this would ensure growth is sustainable for all members of society and would have a positive impact on sustainable growth. It is unclear however if 'connectivity infrastructure' includes digital connectivity, this should be clarified in the supporting text. P19 and its alternatives could help to enhance cross-boundary cooperation and therefore help to address the employment needs of more deprived communities. Regional planning may permit a more holistic overview of the relationships between housing, travel, employment delivery. P19RA1, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA3 would expect regional plans to come forward naturally for each region and would deliver similar effects to P19 but potentially of lower certainty. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would likely result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
4	To create opportunities for sustainable economic growth, diversity and		P19	Nat	T	M	+	++	++	P19 could include consideration of cross-border cooperation with English authorities.
			P19RA1	Nat	T	H	+	++	++	
			P19RA2	Nat	T	L	+	++	++	
			P19RA3	Nat	T	M	+	++	++	
			P19RA4	Nat	T	M	+	++	++	

Policy Grouping 9									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
business competitiveness		P19RA5	Nat	T	M	+	++	++	
		P19RA6	Nat	T	M	O	O	+	
It is expected that the employment provision delivered through regional plans, as set out in P19, would make a major and direct contribution towards delivering significant economic growth and the diversification of regional economies throughout Wales including addressing rural issues holistically. It also creates a framework to enable third sector activities to grow focusing around well-connected areas of growth. Regional planning could have a modest positive impact if the pattern of development takes language considerations into account. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P19 but would provide greater certainty over these effects taking place. P19RA4 and P19RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.									
5	To contribute towards the future well-being of the Welsh language	P19	Nat	T	L	+/-	+/-	+/-	No recommendations.
		P19RA1	Nat	T	L	+/-	+/-	+/-	
		P19RA2	Nat	T	L	+/-	+/-	+/-	
		P19RA3	Nat	T	L	+/-	+/-	+/-	
		P19RA4	Nat	T	L	+/-	+/-	+/-	
		P19RA5	Nat	T	L	+/-	+/-	+/-	
		P19RA6	Nat	T	M	O	O	+	
		P19 settlement hierarchies and strategies for distributing growth can support the Welsh language. This policy encourages the creation of regional plans setting growth strategies. The nature of these regional plans may have a positive or negative effect on use of the Welsh language. Planning authorities will be able to determine what is best for their rural areas in contributing towards the future well-being of the Welsh language by not be working in isolation but across local authorities in a collaborative approach, looking at rural issues in a holistic manner. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for Policy P19 but would provide greater certainty over these effects taking place. P19RA4 and P19RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
6	To create opportunities within which greenhouse gas emissions can be	P19	Nat	T	M	+	+	+	P19 could include greenhouse gas emissions as a fundamental element of regional plans.
		P19RA1	Nat	T	H	+	+	+	
		P19RA2	Nat	T	L	+	+	+	
		P19RA3	Nat	T	H	+	+	+	
		P19RA4	Nat	T	H	+	+	+	

Policy Grouping 9									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
reduced and limited and encourage energy efficient and sustainable design		P19RA5	Nat	T	H	+	+	+	
		P19RA6	Nat	T	M	O	O	+	
	It is expected that regional planning detailed in Policy P19, would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. P19 also requires regional plans to consider spatial areas for renewable energy generation. Policy P19 would therefore be likely to directly and positively contribute towards lowering greenhouse gas emissions from the transport sector as well as an increase in the amount of renewable energy generated. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.								
7 To contribute to the reduction and management of flood risk		P19	Nat	T	L	+	+	+	It is recommended that regional development plans are encouraged to collaborate with NRW to maximise flood risk management benefits.
		P19RA1	Nat	T	M	+	+	+	
		P19RA2	Nat	T	M	+	+	+	
		P19RA3	Nat	T	L	+	+	+	
		P19RA4	Nat	T	M	+	+	+	
		P19RA5	Nat	T	M	+	+	+	
		P19RA6	Nat	T	M	O	O	-	
	It is considered to be likely that the regional planning detailed in P19, would enable local planning authorities to adopt a strategic approach to directing new development away from land at risk of flooding. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would likely mean that the introduction of regional plans is less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
8 To create opportunities to encourage the protection and improvement of air quality		P19	Nat	T	M	+	+	+	No recommendations.
		P19RA1	Nat	T	H	+	+	+	
		P19RA2	Nat	T	L	+	+	+	
		P19RA3	Nat	T	H	+	+	+	
		P19RA4	Nat	T	H	+	+	+	
		P19RA5	Nat	T	H	+	+	+	
		P19RA6	Nat	T	M	O	O	+	
	It is expected that regional planning detailed in P19 would enable more sustainable development that allows more efficient and sustainable forms of movement for local people due to the strategic planning of the location of different types of development. P19 would therefore be likely to directly and positively contribute towards reducing air pollution from the transport sector.								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would likely mean that the introduction of regional plans is less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on this ISA Objective would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	P19	Nat	T	M	+	+	+	It is recommended that regional plans collaborate with NRW and water companies to ensure sustainable management and use of water resources.	
		P19RA1	Nat	T	H	+	+	+		
		P19RA2	Nat	T	L	+	+	+		
		P19RA3	Nat	T	H	+	+	+		
		P19RA4	Nat	T	H	+	+	+		
		P19RA5	Nat	T	H	+	+	+		
		P19RA6	Nat	T	M	O	O	-		
		It is considered to be likely that the regional planning detailed in P19, would enable local planning authorities to adopt a strategic approach to directing new development away from locations where the development would pose a major risk to the quality or quantity of natural waterbodies. A regional planning approach could also permit studying growth on a catchment basis, which would assist with better understanding how development cumulatively interacts with catchments and affects water supply. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would likely result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would be likely to conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	P19	Nat	T	M	+	++	++	No recommendations.	
		P19RA1	Nat	T	M	+	++	++		
		P19RA2	Nat	T	M	+	+	++		
		P19RA3	Nat	T	M	+	++	++		
		P19RA4	Nat	T	M	+	++	++		
		P19RA5	Nat	T	M	+	+	++		
		P19RA6	Nat	T	M	O	O	-		
		P19 looks to deliver accessible, inclusive growth for all. With placemaking as a central principle. This would have a positive benefit to the connectivity and access for all to goods, services and facilities. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring people of all ages have access to services such as retail, open space and employment alongside provision of homes. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA4 and P19RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically.								

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans and would result in regional plans remaining optional and their introduction being less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
			P19	Nat	T	M	+	++	++	No recommendations
			P19RA1	Nat	T	M	+	++	++	
			P19RA2	Nat	T	M	+	+	++	
			P19RA3	Nat	T	M	+	++	++	
			P19RA4	Nat	T	M	+	++	++	
			P19RA5	Nat	T	M	+	+	++	
			P19RA6	Nat	T	M	0	0	-	
			P19 has placemaking as a central principle, which would help to reduce inequalities and benefit social cohesion. The detail would however be provided in the lower tier plans. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, looking at these issues in a holistic manner. Improved planning on a regional basis could result in positives in terms of ensuring people of all ages, have equal access to services and therefore improvements in social cohesion and equality for these groups across Wales. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA4 and P19RA5 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-nothing scenario (P19RA6) would not provide a clear steer to regional plans, which are a new tier of development plans. The production of regional plans would remain optional and the introduction of regional plans are less likely. This would enable the continued autonomy of LPAs and LDPs, through which impacts on economic growth would be likely to conform with baseline trends.							
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P19	Nat	T	M	+	++	++	P19 could include cross-boundary cooperation with English authorities.
			P19RA1	Nat	T	H	+	++	++	
			P19RA2	Nat	T	L	+	++	++	
			P19RA3	Nat	T	H	+	++	++	
			P19RA4	Nat	T	H	+	++	++	
			P19RA5	Nat	T	H	+	++	++	
			P19RA6	Nat	T	M	O	O	-	
			The regional planning detailed in P19, would enable local planning authorities to ensure that regional housing needs can be satisfied. This would be a major and direct positive impact on this ISA Objective. The provision of good quality housing will help to reduce inequalities and has wider health benefits. Planning on a regional basis could result in positives in terms of ensuring families, including children and young people, across Wales have access to good quality and affordable housing. Planning authorities will be able to determine what is best for their rural areas in the context of national policy support, by creating opportunities for the provision of good quality, safe, affordable housing by not be working in isolation but across local authorities in a collaborative approach, addressing rural issues in a holistic manner.							

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
				Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
		P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for P19 but would provide greater certainty over these effects taking place. A regional planning approach could enable a more strategic overview of housing market areas, including where they cross over between different local authorities, as well as a more holistic overview of employment and travel patterns in relation to homes. It may also help to ensure that housing delivery is cognisant of cross-border housing and employment markets in England, where relevant. P19RA2 and P19RA3 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would be likely to conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P19	Nat	T	M	+	+	+	No recommendations.
			P19RA1	Nat	T	H	+	+	+	
			P19RA2	Nat	T	L	+	+	+	
			P19RA3	Nat	T	H	+	+	+	
			P19RA4	Nat	T	H	+	+	+	
			P19RA5	Nat	T	H	+	+	+	
			P19RA6	Nat	T	M	0	0	-	
			The regional planning detailed in P19, would enable local planning authorities to help ensure that new development is located appropriately, away from distinct or sensitive landscapes with which it would discord, including Wales's highly sensitive AONBs and National Parks. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier. Regional level planning is also an effective means of avoiding adverse cumulative impacts on sensitive but unprotected landscapes caused by small scale developments in-combination. The high-level development plans would enable a strategic approach to ensuring new development is directed from the identification of green belts and green corridors would help to protect sensitive and distinctive natural landscapes in many places. These would be direct and have positive impacts on this ISA Objective. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would be likely to conform with baseline trends.							
14	To create opportunities for the protection, conservation and enhancement of the historic environment,		P19	Nat	T	M	+	+	+	No recommendations.
			P19RA1	Nat	T	H	+	+	+	
			P19RA2	Nat	T	L	+	+	+	
			P19RA3	Nat	T	H	+	+	+	
			P19RA4	Nat	T	H	+	+	+	
			P19RA5	Nat	T	H	+	+	+	
			P19RA6	Nat	T	M	0	0	+	

Policy Grouping 9									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹⁰						Recommendations
			Scale	T/P	Certainty	Short-term effects	Medium-term effects	Long-term effects	
historic assets and their settings	The regional planning detailed in P19, would enable local planning authorities to help ensure that new development is located appropriately, away from highly sensitive heritage assets or historic areas that it could potentially have an adverse impact on. The placemaking principle will ensure sustainable growth which will create accessible inclusive townscapes, reduce pollution and enhance townscape and landscapes to maximise the health and well-being benefits, the detail of this will depend on implementation at the lower tier. Regional planning may also offer a more strategic, holistic and effective means of preventing adverse cumulative effects on historic areas and historic landscapes caused by multiple small-scale developments in-combination. This would be a direct positive impact on this ISA Objective. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would likely conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture	P19	Nat	T	M	+	+	+	No recommendations.
		P19RA1	Nat	T	H	+	+	+	
		P19RA2	Nat	T	L	+	+	+	
		P19RA3	Nat	T	H	+	+	+	
		P19RA4	Nat	T	H	+	+	+	
		P19RA5	Nat	T	H	+	+	+	
		P19RA6	Nat	T	M	O	O	+	
		The regional planning detailed in P19, would enable local planning authorities to situate new development in appropriate locations, such as based on the type, scale and density of locations. The placemaking principle will ensure sustainable growth and help promote welsh culture. This would be expected to better enable planning authorities to protect and promote Welsh culture on a regional scale. This would be a direct positive impact on this ISA Objective. Planning authorities will be able to determine what is best for their rural areas by creating opportunities for the protection and promotion of Welsh culture by not working in isolation but across local authorities in a collaborative approach, addressing rural issues holistically. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for policy P19 but would provide greater certainty over these effects taking place. P19RA5 and P19RA6 could potentially mean that the groupings of local planning authorities working together may not address the functions of the region, rather than authorities coming together organically. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would be likely to conform with baseline trends.							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	P19	Nat	T	M	+	+	+	P19 could refer to 'protecting & enhancing the connectivity of ecological networks'. P19 could encourage collaboration with NRW to link with area statements to
		P19RA1	Nat	T	H	+	+	+	
		P19RA2	Nat	T	L	+	+	+	
		P19RA3	Nat	T	H	+	+	+	
		P19RA4	Nat	T	H	+	+	+	
		P19RA5	Nat	T	H	+	+	+	

Policy Grouping 9										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹⁰					Recommendations	
				Scale	T/P	Certainty	Short-term effects	Medium-term effects		Long-term effects
			P19RA6	Nat	T	M	O	O	-	incorporate SMNR priorities and protection for geodiversity.
		The regional planning detailed in P19, would enable local planning authorities to direct new development away from areas of high biodiversity value or sensitive designations. The regional plans would also be expected to ‘identify green belts (and) corridors’, which would help to protect biodiversity rich areas as well as connectivity of ecological networks. Regional planning would also be a good way of identifying, evaluating and mitigating potential cumulative impacts of development on ecological networks and wildlife corridors, as well as Natura 2000 sites, such as through habitat fragmentation. The placemaking principle will ensure increase accessibility to natural green spaces, maximising health and well-being benefits. The regional level of planning would also permit a close study of the impacts of development on water resources on the catchment scale, which bears significance for habitats and species across Wales reliant on water or sensitive to changes in the water table. These would be direct positive impacts on this ISA Objective. P19RA1, P19RA3, P19RA4 and P19RA5 would determine certain components of the Plans. This would lead to the same effects as those identified for Policies P19 but would provide greater certainty over these effects taking place. P19RA2 would lead to a longer or shorter list of topics covered in the policy. This option would be likely to result in similar effects as P19 but there is uncertainty over the likely magnitude as this depends on whether the list of topics is expanded or shortened. The do-thing scenario (P19RA6) would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P19	Nat	T	M	+	+	+	P19 could be strengthened to include reference to pollution.
			P19RA1	Nat	T	H	+	+	+	
			P19RA2	Nat	T	L	+	+	+	
			P19RA3	Nat	T	H	+	+	+	
			P19RA4	Nat	T	H	+	+	+	
			P19RA5	Nat	T	H	+	+	+	
			P19RA6	Nat	T	M	O	O	-	
		The regional planning detailed in P19, seeks to ensure there is a co-ordinated framework for circular economies, including waste treatment and disposal. Although this policy addresses waste treatment and disposal it does not address wider pollution issues which would have an impact on human health and the environment. This is addressed within PPW but could be strengthened here. It is expected that planning on a regional scale would also facilitate effective and strategic approaches to making use of brownfield land, remediating contaminated land and avoiding developing on agricultural or ecologically important soils. These would be direct effects of policy P19 that increase in magnitude as regional plans are prepared, adopted and take effect. All reasonable alternative options would determine certain components of the Plans this would provide greater certainty over these effects taking place.								

Policy Grouping 10	
P20 - National Growth Area - Wrexham and Deeside	Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.
P20RA1 – Name alternative growth focus	This option focuses on the whole of north Wales and seeks to address the issues we face through a dispersed approach, which does not seek to prioritise one area over another.
P20RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P21 – Regional Growth Area - North Wales Coastal Settlements	The Welsh Government supports sustainable growth and regeneration in regionally important towns along the northern coast. Holyhead, Caernarfon, Bangor, Llandudno, Colwyn Bay, Rhyl and Prestatyn will be a focus for managed growth and they have an important sub-regional role complementing the National Growth Area of Wrexham and Deeside. Strategic and Local Development Plans should recognise the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.
P21RA1 – Name alternative growth focus	This option focuses on the whole of north Wales and seeks to address issues through a dispersed approach, which does not seek to prioritise one area over another.
P21RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P22: Green Belts in the North	The Welsh Government requires the Strategic Development Plan to identify a green belt around Wrexham and Deeside to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in Cheshire West and Chester. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.
P22RA1 – Directly identify the green belt	This option would directly allocate a green belt within the North Wales region.
P22RA2 – Promote green wedge or other policy interventions	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in North Wales.
P22RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.

Policy Grouping 10	
P23: North Wales Metro	The Welsh Government supports the development of the North Wales Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. The Welsh Government will work with local and regional authorities in North Wales and the North West of England to ensure the Metro and wider transport investments strengthen cross-border transport connections with improved transport links between the North, Chester, Liverpool and Manchester. Strategic and Local Development Plans must support the North Wales Metro. Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional and cross boarder connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.
P23RA1 – Focus only on connections within Wales	This option would focus on transport investments and improved transport links to maximise the potential opportunities arising from better connections within Wales.
P23RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P24: North West Wales and Energy	The Welsh Government supports North West Wales as a location for new energy development and investment. Proposed developments associated with the Isle of Anglesey Energy Island Programme, Wylfa Newydd and Trawsfynydd will be supported in principle as a means to create significant economic benefits for the area as well as generating renewable or low carbon energy. New energy-related development in the region should support local and regional communities; provide jobs and investment in training and skills; and work with universities and businesses across the region and the North West of England to co-ordinate and maximise new investment to support the wider region. In determining any applications for nuclear energy generating stations in this region, consideration should be given to the need for further low carbon energy generation, their contribution towards the UK's energy mix and security, the economic benefits they would bring to the region and their impacts on the natural and historic environment. On-shore developments associated with offshore renewable energy projects will be supported in principle.
P24RA1 – Identify larger or smaller area	This option would specify a larger or small area around Anglesey for new energy development and investment.
P24RA2 – Focus on improving existing infrastructure	Focus on improving existing infrastructure
P24RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 10									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life	P20	Reg	T	H	+	+	++	No recommendations.
		P20RA1	Reg	T	M	+	+	+	
		P20RA2	Reg	T	M	O	O	+	
		P21	Reg	T	H	+	+	++	
		P21RA1	Reg	T	H	O	+	+	
		P21RA2	Reg	T	M	O	O	+	
		P22	Reg	n/a	H	O	O	O	
		P22RA1	Reg	n/a	H	O	O	O	
		P22RA2	Reg	n/a	H	O	O	O	
		P22RA3	Reg	n/a	H	O	O	O	
		P23	Reg	T	H	+	+	++	
		P23RA1	Reg	T	M	+	+	+	
		P23RA2	Reg	T	M	O	O	+	
		P24	Reg	T	M	+	+	+	
		P24RA1	Reg	T	M	+	+	+	
		P24RA2	Reg	T	M	O	+	+	
		P24RA3	Reg	T	M	O	O	+	
2	To contribute to an improvement in physical, mental and social health and well-being	P20	Reg	T	H	+	+	++	Supporting text should clarify the definition of connectivity infrastructure. It is recommended that a flexible approach to
		P20RA1	Reg	T	M	+	+	+	
		P20RA2	Reg	T	M	O	O	+	
		P21	Reg	T	H	+	+	++	
		P21RA1	Reg	T	H	O	+	+	
		P21RA2	Reg	T	M	O	O	+	

Policy P20, P21 and P23: focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities and increased connectivity. Promoting the largest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should result in children and young people within the area being better placed to potentially access education opportunities, including for higher education, and therefore resulting in educational attainment. The supporting text recognises the role of the Universities have an important presence in the region supporting local businesses and communities.

P24 identifies Anglesey as broadly suitable for energy developments. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and skills benefits that such development could offer would increase access to skills and training for adults and young people but may have limited benefits in terms of encouraging educational attainment for children.

Each alternative to policies P20, P21, P23 and P24 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focusing P20 on this region is a means of maximising economic gains.

The do-nothing approaches would be likely to conform with baseline trends. P22 would be unlikely to have a discernible impact on this ISA Objective.

Policy Grouping 10									
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	
for all, including contributing towards a reduction in health inequalities across Wales		P22	Reg	P	M	+	+	++	green space could be adopted, which considers green infrastructure as a whole, ensuring that access to green space is more equitable, including in both rural and urban areas.
		P22RA1	Reg	P	M	+	+	++	
		P22RA2	Reg	T	M	+	+	+	
		P22RA3	Reg	T	M	O	O	+	
		P23	Reg	T	H	+	++	++	
		P23RA1	Reg	T	M	+	+	+	
		P23RA2	Reg	T	M	O	O	+	
		P24	Reg	T	M	+	+	+	
		P24RA1	Reg	T	M	+	+	+	
		P24RA2	Reg	T	M	O	+	+	
		P24RA3	Reg	T	M	O	O	+	
P20, P21, P23 and P24: focusing growth for the region would bring many benefits for all members of society including reducing inequality and poverty through increasing employment and has the potential to support healthy lifestyle choices through well connected places including rural areas, providing services and facilities to a wider area which would achieve multiple health benefits. The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities which will have physical and mental health and well-being benefits. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. Ensuring people are better connected to access services would lead to improvements in health and well-being and reducing inequalities for all including children and young people in the area. P24 Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus contributing to decreasing health inequality in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have limited benefits in terms of improvements in health and well-being and reducing inequalities for children and young people in the area. P22 the provision of a green belt will retain open spaces around identified urban areas which either currently or potentially would have access for recreation would continue to provide physical and mental health benefits for everyone. However, it may also lead to an increase in the density of development in the urban areas, which could lead to a loss of green space in these locations. Each alternative to policies P20, P21, P23 and P24 would be likely to result in similar effects but of a lower magnitude, although for P24RA1 this is somewhat uncertain given the development could be of a larger or smaller area. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focusing P20 on this region is a means of maximising economic gains. Focusing only on connections within Wales will not draw wider benefits of connectivity with England and this would be artificially constraining connections. P22RA1 Directly identifying the green belt would not fit with the proposed approach to regional planning. P22RA2 has potential positive and negative effects depending on type and scale of growth in the area. The do-nothing approaches would be likely to conform with baseline trends.									
3	To create opportunities for an increase in employment	P20	Reg	T	H	+	++	++	P20 and P24 could reference ensuring strong interactions between North West
		P20RA1	Reg	T	L	+	+	+	
		P20RA2	Reg	T	M	O	O	+	
		P21	Reg	T	H	+	++	++	

Policy Grouping 10									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
across the country and promote economic inclusion		P21RA1	Reg	T	H	O	+	+	Wales and the North West of England in terms of job markets.
		P21RA2	Reg	T	M	O	O	+	
		P22	Reg	n/a	H	O	O	O	
		P22RA1	Reg	n/a	H	O	O	O	
		P22RA2	Reg	n/a	H	O	O	O	
		P22RA3	Reg	n/a	H	O	O	O	
		P23	Reg	T	H	+	++	++	
		P23RA1	Reg	T	L	+	+	+	
		P23RA2	Reg	T	M	O	O	+	
		P24	Reg	T	H	+	++	++	
		P24RA1	Reg	T	L	+	+	+	
		P24RA2	Reg	T	L	O	+	+	
		P24RA3	Reg	T	M	O	O	+	
Policies P20, P21, P23 and P24 would each be expected to make a major contribution towards increasing employment opportunities in the northern region of Wales for all working ages and in rural areas. These would be in the strategic area of Wrexham and Deeside. Deeside has relatively high levels of deprivation and focusing new development here would positively affect efforts to reduce inequality. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from NW heartland areas, to remain in Wales. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should result in young people in particular within the area being better placed to access employment opportunities. P21 would help to develop and attract investment and this would be likely to improve economic inclusion and reduce deprivation in these areas. The coastal communities are some of the most deprived in Wales and so regenerative growth here is very important. Policy P23 would help to ensure that inclusive transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced, which would be expected to lead to greater economic inclusion for people in the region. Improved connectivity with the north west of England opens new opportunities for work but could lead to out-migration and pressures from in-migration and would have a potential mix of positive and negative impacts on the Welsh language depending on implementation. Improved transport links should result in communities including children and young people within the area being better placed to potentially access services and potential employment opportunities, including those in rural areas. Policy P24 would help to encourage the provision of new jobs and investment in training and skills in Anglesey, which would be likely to lead to major beneficial impacts in terms of improving employment prospects for all working ages, opportunities to learn new skills and reducing deprivation, particularly as the closure of the old Wylfa power station was the loss of a major local employer. New jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P24 specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities and the development of skills. There are various small towns along the north coast of Wales with relatively high rates of deprivation and each policy would be likely to help combat this by boosting and improving the range of employment opportunities on offer and making them more accessible to local people. Each alternative to policies P20, P21 and P23 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focusing P20 on this region is a means of maximising economic gains.									

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
		P23RA1 by focusing on internal links could help the north Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts for the Welsh language. Should improvements to transport focus on connections within Wales, it would conflict with the clear economic links between areas of North Wales and the north west of England and miss out on opportunities for economic development and would be artificially constraining connections which are already made. Anglesey Energy Island is an established brand. If P24 were to focus on a larger or smaller area (P24RA1) it would be unlikely to maximise on potential gains. The effect of P24RA1 would depend on the degree of change. P24RA2 would be likely to deliver similar positive effects to P24 but of a more limited magnitude. The further the area goes from the language heartlands, the more likely the effect could be negative. Policy P22 is focused on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P22 would also be unlikely to have a discernible impact on this ISA Objective. The do nothing approaches (P20RA2, P21RA2, P23RA2, P24RA3) would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P20	Reg	T	H	+	++	++	See Objective 3.
			P20RA1	Reg	T	L	+	+	+	
			P20RA2	Reg	T	M	O	O	+	
			P21	Reg	T	L	+	++	++	
			P21RA1	Reg	T	L	O	+	+	
			P21RA2	Reg	T	M	O	O	+	
			P22	Reg	n/a	H	O	O	O	
			P22RA1	Reg	n/a	H	O	O	O	
			P22RA2	Reg	n/a	H	O	O	O	
			P22RA3	Reg	n/a	H	O	O	O	
			P23	Reg	T	H	+	++	++	
			P23RA1	Reg	T	L	+	+	+	
			P23RA2	Reg	T	M	O	O	+	
			P24	Reg	T	H	+	++	++	
			P24RA1	Reg	T	L	+	+	++	
			P24RA2	Reg	T	L	O	+	+	
			P24RA3	Reg	T	M	O	O	+	
Policies P20, P21, P23 and P24 would each be expected to make a major contribution towards encouraging economic growth, economic diversification and enhanced business competitiveness in the northern region of Wales. New development, enhanced Green Belt areas and improved public transport options could encourage more visitors to the region and an increase in the tourism sector. These policies could provide opportunities for the third sector to support the growth and benefit from improved connections. Increased economic opportunities within north Wales offers greater opportunities for Welsh speakers, especially those from the north Wales heartland areas, to remain in Wales. These would be in the strategic area of Wrexham and Deeside (P20). Policy P23 would help to ensure that transport links between North Wales, Chester, Liverpool and Manchester continue to be enhanced, including increasing access to and from rural areas, which would be expected to facilitate economic growth and more competitive businesses in the region. Improved connectivity with the north west of England opens new opportunities for work but could lead to out-migration and pressures from in-migration. This could result in a potential mix of positive and negative impacts on the Welsh language which will be dependent on the implementation at the lower tier. Policy P24 would help to encourage the provision of training and skills in Anglesey which would enable economic diversification and more competitive businesses having a positive effect on a rural area, supporting										

Policy Grouping 10									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		local and regional communities with jobs, investments and training and skills and thus promoting sustainable economic growth, diversity and business competitiveness in rural area. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. Policy P22, and its reasonable alternatives, are focused on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Each alternative to policies P20, P21, P23 and P24 would be expected to result in effects of a lower magnitude as they would be unlikely to maximise potential economic gains. Each reasonable alternative is also considered to involve a greater degree of uncertainty of effect. P23RA1, focusing on internal links could help the North Wales economy but could limit the opportunities for growth and new jobs, with knock on negative impacts including the Welsh language. P24RA1, The effect would depend on the degree of change. P20RA2 could generate increased opportunities for the Welsh language but starting from a lower base than Wrexham/Deeside increases the risk to the Welsh language. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.							
5	To contribute towards the future well-being of the Welsh language	P20	Reg	T	H	+	+	++	See Objective 3.
		P20RA1	Reg	T	M	+	+	+	
		P20RA2	Reg	T	M	O	O	+	
		P21	Reg	T	H	+	+	++	
		P21RA1	Reg	T	H	+	+	+	
		P21RA2	Reg	T	M	O	O	+	
		P22	n/a	n/a	H	O	O	O	
		P22RA1	n/a	n/a	H	O	O	O	
		P22RA2	n/a	n/a	H	O	O	O	
		P22RA3	n/a	n/a	H	O	O	O	
		P23	Reg	T	M	+/-	+/-	+/-	
		P23RA1	Reg	T	L	?	?	?	
		P23RA2	Reg	T	M	O	O	+	
		P24	Reg	T	M	+	+	+	
		P24RA1	Reg	T	L	?	?	?	
		P24RA2	Reg	T	L	?	?	?	
		P24RA3	Reg	T	M	O	O	+	
		Policies P20, P21 and P20RA1 looks to deliver an increase in economic opportunities within north Wales, this would offer improved opportunities for Welsh speakers, especially those from North Wales heartland areas, and provide opportunities for them to remain in Wales. Population pyramids in most areas of Wales show a loss of young working age population. When young people leave communities where the language is strong, these places lose the potential teachers, healthcare workers, sport club volunteers, journalists etc that help keep the Welsh language an active part of the community. A choice of good jobs and homes can help to retain more people of young working age in these types of communities. P20RA2, doing nothing could generate increased opportunities but starting from a lower base than Wrexham/Deeside increases the risk to the Welsh language. Policy P23 looks to improve connectivity with the north west of England and opens new opportunities for work but could lead to out-migration and pressures from in-migration. This would lead to a potential mix of positive and negative impacts on the Welsh language. P23RA1, focusing on internal links could help North Wales economy, but could limit the opportunities for growth and new jobs, with knock on negative impacts to the Welsh language. Policy P24 providing new jobs in a language heartland should provide opportunities for local people to benefit and develop their prosperity, having a positive impact on the Welsh language.							

Policy Grouping 10									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		For P24RA1 and P24RA2, the effect of this policy would depend on degree of change. The further the area goes from the language heartlands, the more likely the effect on the Welsh language could be negative. Policy alternatives P21RA2, P23RA2, P24RA3 would be likely to conform with baseline trends. Policy P22 and its alternatives would have no impact on the Welsh language.							
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	P20	Nat	P	M	O	-	-	Opportunities to enhance public transport modes in the Wrexham and Deeside region should be sought out and maximised through these policies, in addition to the Metro proposal. There is a potential to strengthen the policy to focus the connectivity on low carbon options to reduce emissions.
		P20RA1	Nat	P	M	-	-	-	
		P20RA2	Nat	P	M	O	O	+	
		P21	Nat	P	M	O	-	-	
		P21RA1	Nat	P	M	-	-	-	
		P21RA2	Nat	P	M	O	O	+	
		P22	Nat	P	M	+	+	+	
		P22RA1	Nat	P	M	+	+	+	
		P22RA2	Nat	P	M	+	+	+	
		P22RA3	Nat	P	L	O	O	+	
		P23	Nat	P	H	O	+	+	
		P23RA1	Nat	P	L	O	+	+	
		P23RA2	Nat	P	M	O	O	+	
		P24	Nat	P	H	+	++	++	
		P24RA1	Nat	P	L	+	+	++	
		P24RA2	Nat	P	L	+	+	+	
		P24RA3	Nat	P	M	O	O	+	
P20 and P21 and their alternatives would facilitate new development in these areas. It is considered to be likely that new buildings, residents and businesses and their associated energy consumption and transport movements would lead to some degree of increase of greenhouse gas emissions. However, both policies seek to ensure that this development is in relatively sustainable locations that reduce the need for people to travel, such as by being in proximity to key services and offering good digital connectivity, whilst also providing good access to active and public transport modes. New development should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering of sustainable transport modes. Overall it is considered that a minor adverse effect cannot be ruled out but this is somewhat dependent on implementation. P20RA1 and P21RA1 would have similar effects but potentially of a greater magnitude given the risk of new development taking place away from more sustainable locations. The do-nothing alternatives would be likely to conform with baseline trends as greenhouse gas emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P22 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural carbon sinks that help to alleviate greenhouse gas emissions in the area. P23 seeks to support the development of, and improvements to, the North Wales Metro. This would help to enhance the accessibility of sustainable transport modes in the region, particularly as the policy notes car-free development and higher density developments being in proximity to the metro and could therefore make a positive contribution towards lowering the carbon footprint of the region's transport sector.									

Policy Grouping 10									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		The energy sector at Anglesey supported in P24 includes nationally important generation of low-carbon energy. The region would be likely to make a major contribution towards low-carbon energy for Wales and Policy P24 contributes towards this. Over time the energy generated here would be likely to make a major contribution towards low-carbon energy in Wales. P24RA1 and P24RA2 would deliver similar benefits but of a lower magnitude. The reasonable alternatives identified for P20 and P23 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P21 would be expected to result in the same minor benefits as P22 in terms of providing areas of natural carbon sinks. Alternatives to P24 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.							
7	To contribute to the reduction and management of flood risk	P20	Reg	T	L	-	-	-	P20, P23 and P24 could seek to ensure that new development is not situated on the active floodplain. The enhancement of GI through new development is an opportunities to minimise local flood risk further. Careful consideration should be given to the impacts of climate change in determining the distribution and extent of flood risk.
		P20RA1	Reg	T	L	-	-	-	
		P20RA2	Reg	T	M	O	O	-	
		P21	Reg	T	L	O	-	-	
		P21RA1	Reg	T	L	-	-	-	
		P21RA2	Reg	T	M	O	O	-	
		P22	Reg	T	M	O	+	++	
		P22RA1	Reg	T	M	O	+	++	
		P22RA2	Reg	T	M	O	+	++	
		P22RA3	Reg	T	M	O	O	-	
		P23	Reg	T	L	?	?	?	
		P23RA1	Reg	T	L	?	?	?	
		P23RA2	Reg	T	M	O	O	-	
		P24	Reg	T	L	?	?	?	
		P24RA1	Reg	T	L	?	?	?	
		P24RA2	Reg	T	L	?	?	?	
		P24RA3	Reg	T	M	O	O	-	
There are some extensive swathes of Flood Zones 2 and 3, associated with the River Dee, in the Deeside and Wrexham region. It is uncertain if development delivered as a result of P20, P21 or their alternatives would coincide with this land at risk of flooding or if such development would result in the loss of greenfield elements that help to alleviate flood risk. Flood risk is likely to be reduced by policy P8, along with implementation of TAN 15 and PPW. However, a potential negative effect cannot be ruled out. The identification and safeguarding of green belts and green corridors (P22) would help to preserve natural flood defence benefits provided by vegetation. Transport and energy focused development supported by P23 and P24 could potentially be situated on land at risk of flooding given the presence of extensive flood risk areas in North Wales. However, this is largely dependent on the precise location of development in relation to flood risk areas, which is currently unknown for P23, P24 and their alternatives. Do-nothing approaches would be likely to conform with baseline trends in terms of development and flooding.									
8	To create opportunities to encourage the protection and	P20	Reg	P	M	-	-	-	See Objective 6.
		P20RA1	Reg	P	H	-	-	-	
		P20RA2	Reg	P	M	O	O	+	
		P21	Reg	P	M	-	-	-	
		P21RA1	Reg	P	L	-	-	-	

Policy Grouping 10									
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	
improvement of air quality		P21RA2	Reg	P	M	O	O	+	
		P22	Reg	P	H	+	+	+	
		P22RA1	Reg	P	H	+	+	+	
		P22RA2	Reg	P	L	+	+	+	
		P22RA3	Reg	P	M	O	O	+	
		P23	Reg	P	H	+	+	++	
		P23RA1	Reg	P	L	O	+	+	
		P23RA2	Reg	P	M	O	O	+	
		P24	Reg	P	H	+	++	++	
		P24RA1	Reg	P	L	+	++	++	
		P24RA2	Reg	P	L	+	+	++	
		P24RA3	Reg	P	M	O	O	+	
P20 and P21 encourage growth in the Wrexham and Deeside strategic area, or north Wales. It is considered to be likely that such growth would lead to some degree of increase in air pollution emissions in the region that increases over time as more development takes place here. This could conflict with Wales’ current trend of improving air quality. The focused growth has the potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation. P21RA1 would have similar effects to P21 although the dispersed growth could limit residents’ access to sustainable transport modes. P22 would help to ensure green belts and corridors are established. These spaces are likely to provide important areas of natural air filtering. P23 seeks to support improvements in the North Wales Metro, which could help to enhance the regional uptake of low-emission means of transport, particularly given the focus on low-car developments and higher density developments in proximity to the public transport. The energy sector at Anglesey supported in Policy P24 includes nationally important generation of low-emission energy and this could help to reduce pollution associated with energy generation. There is potential to improve air quality through the delivery of infrastructure which reduces the reliance on the car, this would however depend on implementation The reasonable alternatives identified for P20 and P23 would be expected to result in the same effects but at uncertain locations in Wales. Alternatives to P22 would be expected to result in the same minor benefits as P22 in terms of providing areas of natural air filtering, but with less certainty. Alternatives to P24 would be likely to lead to more uncertain and lower magnitude positive effects on this Objective. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.									
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	P20	Reg	T	H	O	-	-	No recommendations.
		P20RA1	Reg	T	H	O	-	-	
		P20RA2	Reg	T	M	O	O	-	
		P21	Reg	T	H	O	-	-	
		P21RA1	Reg	T	H	O	-	-	
		P21RA2	Reg	T	M	O	O	-	
		P22	Reg	T	M	+	+	+	
		P22RA1	Reg	T	M	+	+	+	
		P22RA2	Reg	T	M	+	+	+	
		P22RA3	Reg	T	L	O	O	-	
P23	Reg	T	H	O	-	-			

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
			P23RA1	Reg	T	H	O	-	-	
			P23RA2	Reg	T	M	O	O	-	
			P24	Reg	T	H	O	-	-	
			P24RA1	Reg	T	H	O	-	-	
			P24RA2	Reg	T	H	O	-	-	
			P24RA3	Reg	T	M	O	O	-	
			New development delivered through P20, P21, P23 and P24, as well as their reasonable alternatives, could potentially pose a risk to water quality depending on the precise location and implementation of new development. It would also be likely to lead to a minor increase in water consumption. The economy in Anglesey has been focused on nuclear power generation, which needs to be near the coast. In each case there could be a risk of pollution or contamination of nearby waters. Given that much of the coastal water in the region is designated as a SAC or SPA, it is particularly important that water quality is protected. Development in these locations could also lead to an increase in the consumption of water used for power generation. P22 would help to protect greenfield land, which currently plays an important role in preserving water quality through natural filtration processes. P22RA1 and P22RA2 would have the same effect but with a greater level of uncertainty and potentially to a lower magnitude due to less high-quality or less appropriate land being designated as green belt, corridor or wedge. The do nothing approaches (P20RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.							
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P20	Reg	T	H	+	+	++	P20 and P21 There is an opportunity to increase access to facilities and services for all, including children and young people and the policy could be strengthened to include reference to these.
			P20RA1	Reg	T	M	+	+	+	
			P20RA2	Reg	T	M	O	O	-	
			P21	Reg	T	H	+	+	++	
			P21RA1	Reg	T	H	+	+	+	
			P21RA2	Reg	T	M	O	O	-	
			P22	Reg	n/a	H	O	O	O	
			P22RA1	Reg	n/a	H	O	O	O	
			P22RA2	Reg	n/a	H	O	O	O	
			P22RA3	Reg	n/a	H	O	O	O	
			P23	Reg	T	H	+	++	++	
			P23RA1	Reg	T	M	+	+	++	
			P23RA2	Reg	T	M	O	O	-	
			P24	Reg	T	H	+	+	++	
			P24RA1	Reg	T	L	+	+	+	
			P24RA2	Reg	T	M	O	+	+	
			P24RA3	Reg	T	M	O	O	-	
			P20 and P21 look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region. There is an opportunity to increase access to facilities and services for all, including children and young people and the policy could be strengthened to include reference to these. P22 is focused on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. P23 looks to increase connectivity. This will increase connectivity in the region and increase access to facilities and services for all. Improvements to the North Wales Metro would be likely to help enhance the accessibility of key services and amenities for all people in the region via a sustainable mode of transport.							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		Depending on the implementation of P24, this policy has the potential to increase inclusive access including active travel and green infrastructure which would enable healthier lifestyle choice to be made. Anglesey as a location for new energy development will have a positive effect on rural areas, supporting local and regional communities with jobs, investment, training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas. The policy specifies that it could result in work with universities across the region in terms of energy developments. Educational and wider community benefits that such development could offer may have benefits in terms of some young people within the area accessing potential employment opportunities. Each alternative to policies P20, P21, P23 and P24 would be likely to result in similar effects but of a lower magnitude, expect for P24RA1 which could potentially involve developing a smaller or a larger area and so the potential magnitude of the effect is of low certainty. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focusing P20 on this region is a means of maximising economic gains. P23 improvements to the connections are unlikely to be planned and managed with a view on the long-term. The do-nothing approaches would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved	P20	Reg	T	H	+	+	++	No recommendations.	
		P20RA1	Reg	T	M	+	+	+		
		P20RA2	Reg	T	M	O	O	-		
		P21	Reg	T	H	+	+	++		
		P21RA1	Reg	T	M	+	+	+		
		P21RA2	Reg	T	M	O	O	-		
		P22	n/a	n/a	H	O	O	O		
		P22RA1	n/a	n/a	H	O	O	O		
		P22RA2	n/a	n/a	H	O	O	O		
		P22RA3	n/a	n/a	H	O	O	O		
		P23	Reg	T	H	+	+	++		
		P23RA1	Reg	T	M	+	+	++		
		P23RA2	Reg	T	M	O	O	-		
		P24	Reg	T	H	+	+	++		
		P24RA1	Reg	T	M	+	+	+		
		P24RA2	Reg	T	M	O	+	+		
		P24RA3	Reg	T	M	O	O	-		
P20 and P21: through growth, increasing access and connections in this areas this has the opportunity to increase social cohesion and create a positive built environment. The policy could be strengthened to include reference to connections to facilities and services. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area to sustainable transport and connectivity infrastructure. This should result in creating opportunities within the area for improvements in social cohesion and equality for all, including children and young people. P21RA1 would be likely to have similar positive effects to P21 but of a lower magnitude and with less certainty. P22 is focused on green belts in North Wales and would be unlikely to have a discernible impact on this ISA Objective. Reasonable alternatives to P22 would also be unlikely to have a discernible impact on this ISA Objective. P23 which seeks to invest in connections across the region would improve inclusive access to facilities and services. There are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. Improved										

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		transport links to the north west of England will mean there are opportunities to improve accessibility across the region and in particular rural areas with an increase in public transport provision, access to jobs, services and social infrastructure. This Policy looks to provide improved planning for transport provision within North Wales and in particular to the North West of England. This should result in everyone, including children and young people within the area being better placed to potentially access services, resulting in potential improvements in social cohesion and equality. P24, regarding new energy development, will have a positive effect on rural areas, supporting local and regional communities with jobs, investments and training and skills and thus promoting the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups in rural areas, including children and young people, increasing social cohesion and equality. Each alternative to policies P20, P21, P23 and P24 would be likely to result in similar effects but of a lower magnitude, except for P24RA1 which could lead to development of a larger or a smaller area and so the magnitude of effect is of low certainty. Given the lack of detail in these alternatives there is little certainty involved in the assessment. Wrexham and Deeside are the most populous and economically active areas of North Wales and so focusing P20 on this region is a means of maximising economic gains. The do-nothing approaches would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	P20	Nat	T	H	++	++	++	No recommendations.	
		P20RA1	Nat	T	L	+	++	++		
		P20RA2	Reg	T	M	O	O	-		
		P21	Nat	T	H	++	++	++		
		P21RA1	Nat	T	M	++	++	++		
		P21RA2	Reg	T	M	O	O	-		
		P22	n/a	n/a	H	O	O	O		
		P22RA1	n/a	n/a	H	O	O	O		
		P22RA2	n/a	n/a	H	O	O	O		
		P22RA3	n/a	n/a	H	O	O	O		
		P23	n/a	n/a	H	O	O	O		
		P23RA1	n/a	n/a	H	O	O	O		
		P23RA2	n/a	n/a	H	O	O	O		
		P24	n/a	n/a	H	O	O	O		
		P24RA1	n/a	n/a	H	O	O	O		
		P24RA2	n/a	n/a	H	O	O	O		
		P24RA3	n/a	n/a	H	O	O	O		
P20 and P21 would be likely to help ensure that there is significant residential development in the Wrexham and Deeside or north Wales region to meet the needs of the region. Given that this region is the most populous in northern Wales, P20 and P21 would make a major contribution towards satisfying housing needs for a large number of people, including those in larger and smallest settlements as well as more rural areas. Promoting the biggest and most urban part of North Wales as a focus for growth should result in benefits in terms of co-locating services within that area, including housing, to sustainable transport and connectivity infrastructure. This should result in families, including children and young people, being more readily able to access suitable, affordable housing in sustainable locations across the area. The cross-border nature of housing needs in the region of North-East Wales would be likely to be a key consideration in regional growth proposals here. Alternatives to P20 would also help to satisfy housing needs but, as they would be focused on areas other than Wrexham/Deeside and whilst there are key areas outside of Wrexham and Deeside, it is uncertain the extent to which housing needs could be satisfied by focusing elsewhere or what the impacts would										

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		be. P21RA1 would also still be likely to make a meaningful contribution towards ensuring that north Wales' housing needs will be satisfied but given the uncertain location of development it is unclear if it would deliver benefits to the same degree as P21. P22, P23 and P24, and their reasonable alternatives, would be expected to result in no discernible impacts on this ISA Objective. The do nothing approaches (P20RA2, P21RA2) would be likely to conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	P20	Nat	T	M	O	-	-	No recommendations.	
		P20RA1	Nat	T	L	-	-	-		
		P20RA2	Nat	T	M	O	O	-		
		P21	Nat	T	M	O	-	-		
		P21RA1	Nat	T	L	O	-	-		
		P21RA2	Nat	T	M	O	O	-		
		P22	Nat	T	M	+	+	++		
		P22RA1	Nat	T	M	+	+	++		
		P22RA2	Nat	T	M	+	+	++		
		P22RA3	Nat	T	M	O	O	-		
		P23	Nat	T	M	-	-	-		
		P23RA1	Nat	T	L	-	-	-		
		P23RA2	Nat	T	M	O	O	-		
		P24	Nat	T	M	-	-	-		
		P24RA1	Nat	T	L	-	-	-		
		P24RA2	Nat	T	M	O	-	-		
		P24RA3	Nat	T	M	O	O	-		
		P20 and P21 would facilitate growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the character of natural landscapes to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth could be on smaller settlements – although the approach of focusing in already developed areas would help to ensure significant adverse effects are avoided. This could potentially pose a risk to sensitive landscapes such as Snowdonia National Park, Clwydian Range AONB or the Anglesey AONB that extends along Anglesey's coastline, although the supporting text for the policy clearly recognises the importance of protecting the landscape. This policy has the potential to deliver accessible and inclusive townscapes, the benefits of this would, however, be dependent on implementation. It is likely that P20RA1 and P21RA1 would pose a similar risk to the character of landscapes and townscapes of new development, although the undefined location of this development makes the potential magnitude of the effects largely uncertain. P22 and its alternatives would help to protect large areas of greenfield land from development, which would be expected to make a positive contribution towards protecting rural landscapes in those areas. The policy would retain tranquil areas and has the potential to achieve both physical and mental health and well-being benefits. P23 and P24 would facilitate new development in areas including Snowdonia National Park and relatively rural locations and could be expected to have minor adverse effects on local landscape character. Their reasonable alternatives would also be likely to result in this direct effect, but potentially with less certainty and a slightly lower magnitude given the more limited scale of development. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.								
14	To create opportunities for	P20	Reg	T	M	O	-	-	The opportunity and benefits of heritage led	
		P20RA1	Reg	T	L	-	-	-		

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
the protection, conservation and enhancement of the historic environment, historic assets and their settings		P20RA2	Reg	T	M	O	O	+	regeneration could be recognised in the supporting text.	
		P21	Reg	T	M	O	-	-		
		P21RA1	Reg	T	L	O	-	-		
		P21RA2	Reg	T	M	O	O	+		
		P22	Reg	T	M	+/-	+/-	+/-		
		P22RA1	Reg	T	M	+/-	+/-	+/-		
		P22RA2	Reg	T	M	+/-	+/-	+/-		
		P22RA3	Reg	T	M	O	O	+		
		P23	Reg	T	M	-	-	-		
		P23RA1	Reg	T	L	-	-	-		
		P23RA2	Reg	T	M	O	O	+		
		P24	Reg	T	M	-	-	-		
		P24RA1	Reg	T	L	-	-	-		
		P24RA2	Reg	T	L	O	-	-		
		P24RA3	Reg	T	M	O	O	+		
P20 and P21 would facilitate growth in the Wrexham and Deeside area. Such development would be likely to result in some minor adverse impacts on the historic character of areas throughout the region, as well as on the setting of sensitive heritage assets to some extent. However, adverse effects may be more severe under the alternative scenarios as the focus of growth would be on smaller settlements – although the approach of focusing in already developed areas would help to ensure significant adverse effects are avoided. P22 and its alternatives would lead to open spaces and greenfield being protected and enhanced and in many cases, this would be likely to help protect and enhance the setting of sensitive heritage assets as well as the character of historic areas and landscapes. At the same time, Negative effects on historic assets in urban areas may result, due to a potential loss of green space, through focusing development in urban areas. P20, P21, P22, P23 and P24 have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P23 and its alternatives would help to protect greenfield land from development, which would be expected to make a positive contribution towards protecting the character of historic areas and setting of assets as well as historic landscapes. P23 and P24 would facilitate new development in relatively rural locations and could be expected to have minor adverse effects on the setting of sensitive heritage assets. Their reasonable alternatives would also be likely to result in this direct effect, but potentially with less certainty and a slightly lower magnitude given the more limited scale of development. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.										
15	To create the opportunities for the protection and promotion of Welsh culture	P20	Reg	T	M	O	+	+	The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.	
		P20RA1	Reg	T	L	O	+	+		
		P20RA2	Reg	T	M	O	O	+		
		P21	Reg	T	M	O	+	+		
		P21RA1	Reg	T	L	O	+	+		
		P21RA2	Reg	T	M	O	O	+		
		P22	Reg	T	L	O	+	+		
		P22RA1	Reg	T	L	O	+	+		

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
			P22RA2	Reg	T	L	O	+	+	
			P22RA3	Reg	T	M	O	O	+	
			P23	Reg	T	L	O	O	+	
			P23RA1	Reg	T	L	O	O	+	
			P23RA2	Reg	T	M	O	O	+	
			P24	n/a	n/a	H	O	O	O	
			P24RA1	n/a	n/a	H	O	O	O	
			P24RA2	n/a	n/a	H	O	O	O	
			P24RA3	n/a	n/a	H	O	O	O	
		Development In the north-west of Wales would be likely to attract more people to the region for work. This is unlikely to benefit Welsh culture greatly, although it could enhance access to local Welsh cultural features and activities, but it could potentially pose a risk to Welsh culture as a result of dilution. Overall, effects on Welsh culture for each policy and alternative are likely to be minor positive.								
		P20, P21, P22, P23 and P24 and their alternatives have the potential to increase access to cultural assets and could achieve this through culture led regeneration. This could be recognised in the supporting text.								
		P22 could help to protect and enhance important historic landscapes or regions that facilitate traditional Welsh cultural activities.								
		P24 would be unlikely to have a discernible effect on this ISA Objective.								
		The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P20	Nat	T	M	O	-	-	Could encourage collaboration of the regional planning with NRW to maximise opportunities for protecting and enhancing biodiversity & SMNR principles. P23 - careful consideration of the impacts of transport links on biodiversity is necessary. Transport links that are barriers to the free movement of wildlife in countryside areas should be avoided.
			P20RA1	Nat	T	L	-	-	-	
			P20RA2	Nat	T	M	O	O	-	
			P21	Nat	T	M	O	-	-	
			P21RA1	Nat	T	L	O	-	-	
			P21RA2	Nat	T	M	O	O	-	
			P22	Nat	T	M	+	+	++	
			P22RA1	Nat	T	L	+	+	++	
			P22RA2	Nat	T	L	+	+	++	
			P22RA3	Nat	T	M	O	O	-	
			P23	Nat	T	M	-	-	-	
			P23RA1	Nat	T	L	-	-	-	
			P23RA2	Nat	T	M	O	O	-	
			P24	Nat	T	M	-	-	-	
			P24RA1	Nat	T	L	-	-	-	
			P24RA2	Nat	T	L	O	-	-	
			P24RA3	Nat	T	M	O	O	-	
P20, P21, P23 and P24 facilitate growth that could pose a risk to areas of high biodiversity and/or geodiversity value and sensitive biodiversity designations. This could include both marine, coastal and terrestrial designations such as SACs and SPAs associated with the River Dee and Estuary, Snowdonia, or Anglesey coastline. It is likely that many adverse effects on these sensitive and internationally important designations would be cumulative effects caused by										

Policy Grouping 10										
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations	
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects		
			numerous developments in-combination. At the same time, new development proposals can be an opportunity to deliver biodiversity net gains, depending on how the development would be implemented, although at this stage it is considered the minor adverse effects cannot be entirely ruled out. The HRA has ruled out a significant adverse effect on a Natura 2000 site as a result of these policies. With regards to P20, the HRA identifies the following risks: <i>‘Potential impacts of implementing this policy could include (but are not limited to): loss of ponds and other supporting habitat associated with the Newt SACs, fragmentation of habitats, severance of connectivity between Newt SACs, potential road-related mortality, as well as impacts associated with water quality, and changes to hydrology in the vicinity of breeding ponds or other sensitive SAC habitats (such as the Midland Meres and Mosses Ramsar site), increased disturbance and damage to supporting habitats of the Newt SACs, as well as disturbance/displacement of qualifying bird species associated with The Dee Estuary SAC/SPA/Ramsar site, air pollution and recreational pressure from an increased population within the region.’</i> On the basis that new development would need to conform with the requirement in the policy for <i>‘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’</i>, as well as the need to conform with Planning Policy including Flintshire County Council’s Supplementary Planning Guidance (<i>Supplementary Planning Guidance 8a Great Crested Newt Mitigation Requirements (Adopted by Flintshire County Council, 23rd February 2018)</i>), a major adverse effect as a result of P20 can be ruled out. With regards to P21, the HRA identifies the following risks: <i>‘Increased growth in these coastal areas could lead to impacts upon Natura 2000/ Ramsar sites through potential disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations within lower-tier plans), severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region.’</i> The policy includes reference to the environmental importance of the region and wishes to see biodiversity enhanced and ecosystems become more resilient across North Wales and on the basis that new development would need to conform with Planning Policy and the measures described in the HRA, a major adverse effect as a result of P21 can be ruled out. P22 was screened out of the HRA without the need for detailed consideration. With regards to P23, the HRA identified the following risks: <i>‘Potential impacts could include (but not limited to): loss of ponds and other supporting habitat associated with the Newt SACs; fragmentation of habitats, severance of connectivity between sites (particularly in relation to bat and newt SAC sites); potential road-related mortality; disturbance/displacement of qualifying bird species associated with SPAs/ Ramsar sites; as well as impacts associated with water quality, and changes to hydrology in the vicinity of breeding ponds or other sensitive SAC habitats, increased disturbance and damage to supporting habitats of the Newt SACs, as well as disturbance/displacement of qualifying bird species associated with SAC/SPA/Ramsar sites, air pollution and recreational pressure from an increased population within the region, especially if the new metro opens up areas not currently accessible by existing transport links.’</i> The HRA concludes that <i>‘Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites’</i>. A major adverse effect as a result of P23 can therefore be ruled out. With regards to P24, the HRA identifies the following risks: <i>‘examples of impacts that could arise from new energy-related developments could include (but are not limited to): collision-related impacts on birds as a result of wind energy developments; loss of, or damage to sensitive habitats; disturbance/ displacement of qualifying marine and terrestrial qualifying species; hydrological and hydrogeological changes; and impacts on marine animals as a result of hot water outfalls from nuclear power stations. Solar developments tend to have lower environmental impacts; however, if sited incorrectly these could also have impact Natura</i>							

Policy Grouping 10										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		<i>2000/Ramsar sites through habitat loss/ damage and potential effects on species from solar glare'. The HRA concludes that 'Adhering to the measures set out above by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites'. A major adverse effect can therefore be ruled out.</i>								
		Reasonable alternatives for each of these policies would be likely to have similar effects, but potentially with less certainty and of a slightly lower magnitude given the more limited development considered in each case. P22 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P22RA1 and P22RA2 by not enabling local authorities to determine which land to designate for this purpose. The do nothing approaches (P20RA2, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	P20	Nat	T	M	O	-	-	It is recommended that development supported through these policies is encouraged or required to minimise uses of non-renewable resources and to minimise the generation of waste sent to landfill.	
		P20RA1	Nat	T	L	-	-	-		
		P20RA2	Nat	T	M	O	O	-		
		P21	Nat	T	M	O	-	-		
		P21RA1	Nat	T	L	O	-	-		
		P21RA2	Nat	T	M	O	O	-		
		P22	Nat	T	M	+	+	++		
		P22RA1	Nat	T	M	+	+	++		
		P22RA2	Nat	T	L	+	+	++		
		P22RA3	Nat	T	L	O	O	-		
		P23	Nat	T	M	-	-	-		
		P23RA1	Nat	T	L	-	-	-		
		P23RA2	Nat	T	M	O	O	-		
		P24	Nat	T	M	-	-	-		
		P24RA1	Nat	T	L	-	-	-		
		P24RA2	Nat	T	L	O	-	-		
		P24RA3	Nat	T	M	O	O	-		
		Policies P20, P21, P23 and P24 facilitate growth that could be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have largely similar effects, but potentially with less certainty and of a slightly lower magnitude given the more limited development in each case. Focusing on existing developed areas could help to increase opportunities for developing on brownfield land. P22 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could encourage the protection of natural resources. Negative effects in urban areas may result, due to a potential loss of green space, but this would be unlikely to prevent an overall positive effect on this ISA Objective. There is a greater degree of uncertainty in P22RA1 and P22RA2 by not enabling local authorities to determine which land to designate for this purpose. The do nothing approaches (P20RA1, P21RA2, P22RA3, P23RA2, P24RA3) would be likely to conform with baseline trends.								

Policy Grouping 11	
P25 – Regional Growth Areas – Mid Wales	The Welsh Government supports sustainable growth and development in a series of inter-connected towns across the region. Development in these Regional Growth Areas should meet the regional housing, employment and social needs of Mid Wales. The Regional Growth Areas are: • The Teifi Valley, including Cardigan, Newcastle Emlyn, Llandysul and Lampeter • Brecon and the Border • The Heart of Wales, including Llandrindod Wells and Builth Wells • Bro Hafren, including Welshpool and Newtown • Aberystwyth The Welsh Government supports development in all parts of the region in meeting local needs. Strategic and Local Development Plans will determine the most appropriate locations for growth in Mid Wales and should demonstrate how a regional approach has informed decisions on future growth.
P25RA1 – Name alternative growth focus	This option would set an alternative focus for growth within the region.
P25RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P26 – Growing the Mid Wales Economy	The Welsh Government supports the growth and development of existing and new economic opportunities across Mid Wales. The Welsh Government will work with local authorities, communities, stakeholders and businesses to ensure that its investments and policies support a strong regional economy. Strategic and Local Development Plans must develop policies that support agricultural and land based traditional rural enterprises; and provide a flexible framework to support the development of new, innovative and emerging technologies and sectors.
P26RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P27 – Movement in Mid Wales	The Welsh Government will work with local and regional authorities to ensure transport investments improve accessibility across Mid Wales and strengthen cross-border transport links. Strategic and Local Development Plans should support improved transport links within the region and with other regions and England. Planning authorities should plan growth and regeneration to maximise the potential opportunities arising from better regional connectivity.
P27RA1 – Focus only on connections within Wales	This option would focus on transport investments and improved transport links to maximise the potential opportunities arising from better connections within Wales.
P27RA2 – Focus on improving existing infrastructure	This option would only focus on existing infrastructure to maximise better regional connectivity.
P27RA3 – Focus on specific forms of transport such as rail, public transport etc.	This option would only focus on specific forms of transport within the region such as rail, road, public transport etc.
P27RA4 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.

The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P25	Reg	T	H	+	+	++	P25 could recognise skills and training required to support this economic growth. P27 could include digital infrastructure and connectivity and the benefits this can bring.
			P25RA1	Reg	T	M	+	+	+	
			P25RA2	Reg	T	M	O	O	+	
			P26	Reg	T	H	+	+	++	
			P26RA1	Reg	T	M	O	O	+	
			P27	Reg	P	H	+	++	++	
			P27RA1	Reg	P	M	O	+	+	
			P27RA2	Reg	P	M	O	+	+	
			P27RA3	Reg	T	M	O	+	+	
			P27RA4	Reg	T	M	O	O	+	
Providing appropriate growth in Mid Wales, as per P25, by meeting social and local needs should lead to benefits in terms of accessing education facilities for all members of society including children and young people. P25RA1 would be likely to result in similar effects to P25 but of a lower magnitude.										
The focus of P26 on growing the Mid Wales economy should ensure that maximising the role of universities and other education institutions in the region which contribute to the local economy is fully considered. The universities are recognised within the supporting text. This should help to maximise access to improvements in learning opportunities, skills development and lifelong learning for all members of society including children and young people. This could be strengthened to recognise skills and training required to support this economic growth.										
As a result of strengthening transport links through P27, there could be improvements in accessing education provision for children and young people in Mid Wales. This would also provide opportunities to increase access to training, skills and lifelong learning for all members of society. This includes cross border links which reflects how communities live and move within these areas. This could be strengthened to include digital infrastructure and connectivity and the benefits this can bring.										
P27RA1 would have a similar effect to P27 but does not reflect cross border improvements which does not reflect how communities in these areas live.										
P27RA2 and P27RA3 do not maximise the opportunity to use multi modes of transport or provide new infrastructure which could result in more sustainable methods of access to training and education facilities and services. However there would be some improvements in accessing education provision for all members of society including children and young people in Mid Wales.										

¹¹ To include cumulative effects and consideration of magnitude, spatial extent of effects and value/vulnerability of area likely to be affected. Well-being goals should also be considered.

Policy Grouping 11										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹¹							Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects		
		The do nothing alternatives would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P25	Reg	T	H	+	+	++	The opportunities for the provision of green infrastructure could be recognised in the support text
			P25RA1	Reg	T	M	O	+	+	
			P25RA2	Reg	T	M	O	O	+	
			P26	Reg	T	H	+	+	++	
			P26RA1	Reg	T	M	O	O	+	
			P27	Reg	P	M	+	++	++	
			P27RA1	Reg	P	M	O	+	+	
			P27RA2	Reg	P	M	O	+	+	
			P27RA3	Reg	P	M	O	+	+	
			P27RA4	Reg	T	M	O	O	+	
		Providing appropriate growth in Mid Wales, as per P25, by meeting local and social needs should lead to improvements in health and well-being for all members of society including children and young people. It could help to ensure housing and service needs in Mid Wales are met, reducing child poverty and inequalities for all. It could have a further positive effect in rural areas because it could provide for more health provision. P25RA1 would be likely to result in similar effects to P25 but of a lower magnitude.								
		The focus of P26 on growing the Mid Wales economy should ensure that maximising employment in the region which contributes to the local economy is fully considered, including tourism. This should help to maximise improvements in opportunities which provide recreation and play for children and young people. The policy could lead to physical and mental health benefits across rural areas but it is unlikely to have a direct effect. The policy could help to reduce poverty through the economic growth bringing multiple health benefits.								
		As a result of strengthening transport links through P27, this should aid the promotion of walking and cycling and access to facilities for all members of society in Mid Wales, contributing to health and well-being benefits and leading to a reduction in health inequalities. Associated benefits of reducing air and noise pollution through potential active travel measures are likely to provide further health benefits for all members of society. The opportunities for the provision of green infrastructure could be recognised in the supporting text, this would bring many physical and mental health benefits.								
		P27RA1 would have a similar effect to P27 but does not reflect cross border improvements which does not reflect how communities in these areas live. Strengthening transport links through P27RA2 and P27RA3 should aid the promoting of access to facilities for all members of society in Mid Wales, contributing to health and well-being benefits and leading to a reduction in health inequalities. However, it is unclear if this policy approach would prioritise active travel over the car and the potential for air quality and pollution benefits arising from that.								
		The do nothing alternatives would be likely to conform with baseline trends.								
3			P25	Reg	T	H	+	++	++	No recommendations
			P25RA1	Reg	T	L	+	++	++	

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/ option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
To create opportunities for an increase in employment across the country and promote economic inclusion		P25RA2	Reg	T	M	O	O	+		
		P26	Reg	T	H	+	++	++		
		P26RA1	Reg	T	M	O	O	+		
		P27	Reg	T	H	+	++	++		
		P27RA1	Reg	T	M	+	+	++		
		P27RA2	Reg	T	M	+	+	++		
		P27RA3	Reg	T	M	+	+	++		
		P27RA4	Reg	T	M	O	O	+		
Supporting sustainable development in mid-Wales P25 would be expected to make a major contribution towards increasing employment opportunities in the region, for all members of society with particular benefits for areas of relatively high deprivation and would therefore help to tackle inequality. P25RA1 would have similar benefits but there is less certainty here due to the undefined location. The do nothing scenario would prevent these benefits from being realised and employment growth, economic inclusion and impacts on deprivation would be likely to conform with baseline trends. P26 would be expected to help ensure that the region attracts new investment and that the regional offering of employment opportunities improves over the NDF period. P27 would be expected to improve the accessibility of areas of employment, particularly via active or sustainable modes. This would better enable residents of more deprived areas in the region to access employment opportunities, thereby helping to tackle inequalities and potentially being particularly beneficial to young people. P27RA1, P27RA2 and P27RA3 would deliver similar benefits but likely of a lower magnitude and with less certainty. P27RA1 would not maximise on opportunities for enhancing the accessibility of employment areas in England for people of mid-Wales, whilst P27RA2 and P27RA3 would deliver more limited improvements to transport infrastructure. Increased economic opportunities within the region would provide greater opportunities for Welsh speakers and could therefore help to ensure more Welsh-speakers stay in the region. Do nothing alternatives would be likely to conform with baseline trends.										
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	P25	Reg	T	H	+	++	++	No recommendations	
		P25RA1	Reg	T	L	+	++	++		
		P25RA2	Reg	T	M	O	O	+		
		P26	Reg	T	H	+	++	++		
		P26RA1	Reg	T	M	O	O	+		
		P27	Reg	T	H	+	++	++		
		P27RA1	Reg	T	M	+	+	++		
		P27RA2	Reg	T	M	+	+	++		
		P27RA3	Reg	T	M	+	+	++		
		P27RA4	Reg	T	M	O	O	+		
P25, P26 and P27 would each be expected to make a major contribution towards encouraging economic growth, economic diversification and enhanced business competitiveness in mid-Wales. These policies could provide opportunities for the third sector to support the growth and benefit from improved connections. Increased economic opportunities within mid-Wales offers greater opportunities for Welsh speakers to remain in Wales. Population pyramids in most areas of Wales show a loss of young working age population. When young people leave communities where the language is strong, these places lose the potential teachers, healthcare workers, sport club volunteers, journalists etc that help keep the Welsh language an active part of the community. A choice of good jobs and homes can help to retain more people of young working age in these types of communities.										

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		P26 would help to encourage the provision of training and skills in mid-Wales, which would enable economic diversification and more competitive businesses having a positive effect on a rural area, supporting local and regional communities with jobs, investments and training and skills and thus promoting sustainable economic growth, diversity and business competitiveness in rural area. These direct and positive effects would increase in magnitude as regional plans are adopted and come into effect. P27 would help to ensure that transport links between mid-Wales and England continue to be enhanced including increasing access to and from rural areas, which would be expected to facilitate economic growth and more competitive businesses in the region. Improved connectivity with the North West of England, the English Borders and the Midlands opens new opportunities for work but could lead to out-migration and pressures from in-migration. This could result in a potential mix of positive and negative impacts on the Welsh language which will be dependent on the implementation at the lower tier. Each alternative to P25 and P27 would be expected to result in effects of a lower magnitude as they would be unlikely to maximise potential economic gains. Each reasonable alternative is also considered to involve a greater degree of uncertainty of effect. Do-nothing alternatives would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language		P25	Nat	T	M	+	+	++	No recommendations
			P25RA1	Nat	T	M	+	+	+	
			P25RA2	Nat	T	L	O	O	+	
			P26	Nat	T	M	+	+	++	
			P26RA1	Nat	T	M	O	O	+	
			P27	Nat	T	M	+	+	+	
			P27RA1	Nat	T	M	+	+	+	
			P27RA2	Nat	T	L	+/-	+/-	+/-	
			P27RA3	Nat	T	L	?	?	?	
			P27RA4	Nat	T	M	O	O	+	
		In P25, sustainable growth is encouraged in important areas (for the Welsh language) with Welsh speaking communities, including Aberystwyth and the Teifi Valley. Enabling development to meet local needs across the region will also benefit Welsh speaking communities. P25RA1 would be likely to deliver similar positive effects, but with less certainty. P26 encourages jobs and employment growth and so would be likely to have positive impacts on Welsh speaking communities, especially in rural areas like Mid Wales. P27 & P27RA1 would be likely to deliver benefits due to making communities more accessible and enhancing access to jobs and services. P27RA2 could have a less positive effect than P27 if no scope to invest in new infrastructure and new routes for transport connectivity. The effects of P27RA3 are uncertain because it is not clear if this restriction would have any effect. Do nothing alternatives would be likely to conform with baseline trends.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage		P25	Nat	P	H	O	-	-	P27 could ensure that sustainable transport is the focus of new investment. P27 could seek to reduce the need for people to travel such
			P25RA1	Nat	P	M	-	-	-	
			P25RA2	Nat	P	M	O	O	+	
			P26	Nat	P	H	O	-	-	
			P26RA1	Nat	P	M	O	O	+	
			P27	Nat	P	H	+	++	++	
			P27RA1	Nat	P	M	+	+	++	
			P27RA2	Nat	P	M	+	+	++	

Policy Grouping 11										
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations	
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects		
energy efficient and sustainable design		P27RA3	Nat	P	M	+	+	++	as through improved digital connectivity.	
		P27RA4	Nat	P	M	O	O	+		
	P25 and P26 would facilitate new development. It is considered to be likely that new buildings, residents and businesses and their associated energy consumption and transport movements would lead to some degree of increase greenhouse gas emissions. However, both policies seek to ensure that this development is in relatively sustainable locations that reduce the need for people to travel, such as by being in proximity to key services and offering good digital connectivity, whilst also providing good access to active and public transport modes. New development should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future. These include policies such as increasing the supply of renewable energy, developing more efficient energy networks and improving the offering of sustainable transport modes. Overall it is considered that a minor adverse effect cannot be ruled out but this is somewhat dependent on implementation. P25RA1 would have similar effects but potentially of a greater magnitude given the risk of new development taking place away from more sustainable locations. The do-nothing alternatives would be likely to conform with baseline trends as greenhouse gas emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P27 seeks to support the development and improvements of connectivity within, including into and out of, mid-Wales. This would help to enhance the accessibility of sustainable transport modes in the region as well as the efficiency of movement for local people which could therefore make a positive contribution towards lowering the carbon footprint of the region's transport sector. P27RA1, P27RA2 and P27RA3 would deliver more limited improvements to the sustainable transport offering in the region. Do-nothing alternatives would be likely to conform with baseline trends.									
7	To contribute to the reduction and management of flood risk		P25	Reg	T	L	O	-	-	See Objective 13.
			P25RA1	Reg	T	L	-	-	-	
			P25RA2	Reg	T	M	O	O	-	
			P26	Reg	T	L	?	?	?	
			P26RA1	Reg	T	M	O	O	-	
			P27	Reg	T	L	?	?	?	
			P27RA1	Reg	T	L	?	?	?	
			P27RA2	Reg	T	L	?	?	?	
			P27RA3	Reg	T	L	?	?	?	
			P27RA4	Reg	T	M	O	O	-	
There are extensive areas of tidal, fluvial and surface-water flood risk in mid-Wales. The design, scale and location of new development delivered through P25, P26, P27 or their alternatives, in relation to areas of flood risk, is largely uncertain. There is a risk that new development could be situated on land at risk of flooding. However it is assumed that, in line with Welsh Government policy on flood risk management, that development would not take place in areas of flood risk with which the development type is incompatible. It is also largely uncertain where new development would take place, to what extent it could alter surrounding flood risk areas or whether it would provide opportunities for improving existing flood defence schemes. It is considered that avoiding adverse effects in all cases may not be entirely possible, but it is also recognised that new development would need to conform with planning policy including PPW and TAN 15 which provide robust flood risk policies. Do-nothing alternatives would be likely to conform with baseline trends.										
8	To create opportunities to encourage the		P25	Reg	P	M	-	-	-	P27 could ensure that sustainable transport is the focus of new
			P25RA1	Reg	P	L	-	-	-	
			P25RA2	Reg	P	M	O	O	+	

Policy Grouping 11									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
protection and improvement of air quality		P26	Reg	P	L	-	-	-	investment and also commit to reducing the need for people to travel such as through improved digital connectivity. See Objective 13.
		P26RA1	Reg	P	M	O	O	+	
		P27	Reg	P	L	+	++	++	
		P27RA1	Reg	P	L	+	+	++	
		P27RA2	Reg	P	L	+	+	++	
		P27RA3	Reg	P	L	+	+	++	
		P27RA4	Reg	P	M	O	O	+	
		It is considered to be likely that growth and development delivered through P25, P25RA1 and P26 would lead to some degree of increase in air pollution emissions in the region that could increase over time as more development takes place here. This could conflict with Wales' current trend of improving air quality. The focused growth has the potential to deliver infrastructure that reduces the reliance on the car, which could be particularly beneficial in mid-Wales where there is a relatively high reliance on car, but this would depend on implementation. P27 could help to enhance the regional uptake of low-emission means of transport, including for those travelling in to and out of the region from other regions and England, whilst also enhancing the efficiency of people's movements. These benefits would be likely to increase over time as new improvements are delivered and increasing numbers of people are able to make use of the more sustainable transport options. P27RA1, P27RA2 and P27RA3 would deliver similar benefits but potentially of a lower magnitude and with less certainty due to more limited improvements to the public transport offering. Do nothing alternatives would be likely to conform with baseline trends.							
9	To create opportunities to protect and enhance the quality and quantity of water features and resources	P25	Reg	P	L	O	-	-	See Objective 13.
		P25RA1	Reg	P	L	O	-	-	
		P25RA2	Reg	P	M	O	O	-	
		P26	Reg	P	L	O	-	-	
		P26RA1	Reg	P	M	O	O	-	
		P27	Reg	P	L	-	-	-	
		P27RA1	Reg	P	L	-	-	-	
		P27RA2	Reg	P	L	?	?	?	
		P27RA3	Reg	P	L	O	O	O	
		P27RA4	Reg	P	M	O	O	-	
New development delivered in mid-Wales could potentially have an adverse effect on the quality of surface or ground water sources, but this would depend on the precise location of new development in relation to waterbodies. The design, scale and location of new development delivered through P25, P26, P27 or their alternatives, in relation to surface or ground water sources, is largely uncertain. There is a risk that new development could be situated on in sensitive areas or lead to some level of pollution. However, it is assumed that, in line with Welsh Government policy, that development would not take place in areas of high sensitivity. It is considered that avoiding adverse effects in all cases may not be entirely possible, but it is also recognised that new development would need to conform with planning policy including PPW. It is recognised that P25 would focus new development in existing built up areas and this could reduce the risk of adverse effects. An increase in water consumption as a result of new development is likely, although it is recognised that new development would not be permitted unless there is an adequate water supply and capacity within the sewerage system. Do-nothing alternatives would be likely to conform with baseline trends.									
10	To create opportunities for	P25	Reg	T	H	+	+	++	The supporting text could include digital
		P25RA1	Reg	T	M	+	+	+	

Policy Grouping 11									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P25RA2	Reg	T	M	O	O	-	connectivity and recognise climate change resilience of the infrastructure
		P26	Reg	T	H	+	+	++	
		P26RA1	Reg	T	M	O	O	-	
		P27	Reg	P	M	+	+	++	
		P27RA1	Reg	P	M	+	+	+	
		P27RA2	Reg	P	M	+	+	+	
		P27RA3	Reg	P	M	+	+	+	
		P27RA4	Reg	T	M	O	O	-	
P25 – by providing sustainable growth and development that meets local needs through a service of interconnected towns, this should greatly improve access to services and facilities for all, including meeting local needs in rural areas. It will mean that there is improved connectivity and better provision of services and amenities in the towns listed in the policy and in rural areas. The supporting text could be strengthened to include digital connectivity and recognise climate change resilience of the infrastructure. P25RA1 is likely to result in similar effects to P25 but of a lower magnitude and may be uncertain effects in rural areas. P26 – the focus of this policy on growing the Mid Wales economy should ensure that maximising employment opportunities, infrastructure and services in the region which contribute to the local economy are fully considered. This should lead to opportunities for all members of society including children and young people to connect to and access goods and services. P27 – As a result of strengthening transport links through this policy, there will be obvious benefits in terms of connecting communities and facilitating access to goods and services in Mid Wales, including for children and young people. P27RA1 – this would have a similar effect to P27 but does not reflect cross border improvements which does not reflect how communities in these areas live. This might mean there is increased focus on rural areas where there isn't travel across the border into England. P27RA2 & P27RA3– As a result of strengthening transport links through this policy alternative, there will be benefits in terms of connecting communities and facilitating access to goods and services in Mid Wales, including for children and young people. It is considered the improvements arising from the alterative wouldn't be as comprehensive as the approach taken in the proposed NDF policy however as this focuses on existing infrastructure and is limited to certain modes of travel. However, it is unclear if P27RA3 would prioritise active travel over the car and the potential for delivering sustainable access to facilities and services. The do nothing alternatives would be likely to conform with baseline trends.									
11 To create the opportunities within which an improvement in social cohesion and equality can be achieved		P25	Reg	T	H	+	+	++	The supporting text could recognise the benefits of placemaking through reducing barriers good design and cross reference to overarching policies.
		P25RA1	Reg	T	M	+	+	+	
		P25RA2	Reg	T	M	O	O	-	
		P26	Reg	T	H	+	+	++	
		P26RA1	Reg	T	M	O	O	-	
		P27	Reg	P	M	+	+	++	
		P27RA1	Reg	P	M	+	+	+	
		P27RA2	Reg	P	M	+/-	+/-	+/-	
		P27RA3	Reg	P	M	?	?	?	
		P27RA4	Reg	T	M	O	O	-	
P25 – By providing sustainable growth and development that meets local needs through a service of interconnected towns, this should greatly improve access to services and facilities. Thus, it should provide increased opportunities for all members of society, including children to join in activities and have a									

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		good standard of facilities, leading to improvements in social cohesion and equality. The supporting text could be strengthened to recognise the benefits of placemaking through reducing barriers to good design and cross reference to overarching policies. P25RA1 – likely to result in similar effects to P25 but of a lower magnitude and may be uncertain effects in rural areas. P26 –The focus of this policy on growing the Mid Wales economy should ensure that maximising infrastructure and services opportunities in the region which contribute to the local economy are fully considered. This could include access to education, activities and employment opportunities for all including children and young people, leading to opportunities for improving social cohesion and equality. P27 – strengthening transport links through this policy approach should improve accessibility for communities in Mid Wales, leading to improvements in social cohesion and equality. The policy could also lead to reduction in barriers and loneliness and isolation, which is prevalent particularly in rural areas. P27RA1 – this would have a similar effect to P27 but does not reflect cross border improvements which does not reflect how communities in these areas live. P27RA2 – by focusing on improving existing infrastructure, there could be a range of positive and negative effects in terms of enabling accessibility for communities in Mid Wales, including for children and young people, as it may lead to improvements for some communities, with others having no improvements. This would therefore lead to a range of positive and negative outcomes in terms of delivering improvements in social cohesion and equality. P27RA3 –It is uncertain what focusing on a specific form of transport would mean in terms of ensuring a comprehensive approach in improving accessibility for communities in Mid Wales, including for children and young people. Therefore, the social cohesion and equality outcomes from this alternative approach are uncertain. The do nothing alternatives are likely to conform with baseline trends								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P25	Nat	P	H	++	++	++	No recommendations.
			P25RA1	Nat	P	M	+	++	++	
			P25RA2	Nat	P	M	O	O	-	
			P26	Nat	P	H	++	++	++	
			P26RA1	Nat	P	M	O	O	-	
			P27	n/a	n/a	H	O	O	O	
			P27RA1	n/a	n/a	H	O	O	O	
			P27RA2	n/a	n/a	H	O	O	O	
			P27RA3	n/a	n/a	H	O	O	O	
			P27RA4	n/a	n/a	H	O	O	O	
		P25 would be expected to help ensure that residential development is delivered in mid-Wales over the NDF period and this would make a meaningful contribution towards ensuring that the growing and varied housing needs of the region are satisfied for all. P25RA1 would also be expected to help ensure that housing needs are met but there is uncertainty over where this would be located and to what extent it would be feasible. P25RA2 would be likely to conform with baseline trends. P26, P27 and their alternatives would be unlikely to have a discernible effect on this Objective.								
13	To create opportunities for the protection and enhancement of the local distinctiveness		P25	Reg	P	M	-	-	-	In addition to supporting growth that caters to social and employment needs, catering to the needs of the region's natural environment through
			P25RA1	Reg	P	M	-	-	-	
			P25RA2	Reg	P	M	O	O	-	
			P26	Reg	P	M	-	-	-	
			P26RA1	Reg	P	M	O	O	-	
			P27	Reg	P	M	O	-	-	
			P27RA1	Reg	P	M	O	O	-	

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
of our landscapes, townscapes and seascapes		P27RA2	Reg	P	M	O	O	+	development proposals could also be supported in P25.	
		P27RA3	Reg	P	M	O	O	-		
		P27RA4	Reg	P	M	O	O	-		
		The new development supported in P25, P25RA1 and P26 could potentially have adverse impacts on the local character. Whilst this new development would likely be near, adjacent to or within existing built forms and similar development and would conform with relevant planning policies on high quality design, it would be difficult to avoid adverse effects in all cases as well as alterations to local senses of place where large scale new development is delivered. P27 would encourage new transport infrastructure being developed, which could also lead to alterations to landscape and townscape character depending on its design and location. Alternatives to P27 would have similar effects but of a lower magnitude due to the more limited scale of development, except for P27RA2 which would focus on improving existing infrastructure and, in so doing, could enhance the visual amenity of this infrastructure. Do-nothing alternatives would be likely to conform with baseline trends.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	P25	Reg	T	M	-	-	-	See Objective 13.	
		P25RA1	Reg	T	L	-	-	-		
		P25RA2	Reg	T	M	O	O	-		
		P26	Reg	T	M	-	-	-		
		P26RA1	Reg	T	M	O	O	-		
		P27	Reg	T	M	O	-	-		
		P27RA1	Reg	T	L	O	O	-		
		P27RA2	Reg	T	L	O	O	+		
		P27RA3	Reg	T	L	O	O	-		
		P27RA4	Reg	T	M	O	O	-		
		The new development supported in P25, P25RA1 and P26 could potentially have adverse impacts on the setting of nearby heritage assets or historic areas, depending on its location and design. Whilst this new development would likely be near, adjacent to or within existing built forms and similar development and would conform with relevant planning policies on high quality design, it would be difficult to avoid adverse effects in all cases as well as alterations to the setting of assets and historic areas where large scale new development takes place. P27 would encourage new transport infrastructure being developed, which could also lead to alterations to the historic character of areas or the setting of heritage assets, depending on its design and location. Alternatives to P27 would have similar effects but of a lower magnitude due to the more limited scale of development, except for P27RA2 which would focus on improving existing infrastructure and, in so doing, could enhance the visual amenity of this infrastructure. Do-nothing alternatives would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture	P25	Reg	T	M	O	+	+	No recommendations.	
		P25RA1	Reg	T	L	O	+	+		
		P25RA2	Reg	T	M	O	O	+		
		P26	Reg	T	M	O	+	+		
		P26RA1	Reg	T	M	O	O	+		
		P27	Reg	T	M	O	+	+		
		P27RA1	Reg	T	L	O	+	+		
		P27RA2	Reg	T	L	O	+	+		
		P27RA3	Reg	T	L	O	+	+		

Policy Grouping 11									
ISA Objective	Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
			Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		P27RA4	Reg	T	M	O	O	+	
		P25, P26 and P27 could help to attract increasing numbers of investment, residents and visitors to mid-Wales, providing them with enhanced access to local Welsh cultural activities and places. This could help to preserve these cultural activities into the future, although the influx in new residents and visitors could potentially dilute the local culture. Overall, effects on Welsh culture for each policy and alternative are likely to be minor positive, with less certainty behind this effect for P25RA1, P27RA1, P27RA2 and P27RA3. Do nothing alternatives would be likely to conform with baseline trends.							
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity	P25	Reg	P	M	-	-	-	No recommendations.
		P25RA1	Reg	P	L	-	-	-	
		P25RA2	Reg	P	M	O	O	-	
		P26	Reg	P	M	-	-	-	
		P26RA1	Reg	P	M	O	O	-	
		P27	Reg	P	M	-	-	-	
		P27RA1	Reg	P	L	-	-	-	
		P27RA2	n/a	n/a	H	O	O	O	
		P27RA3	Reg	P	L	-	-	-	
		P27RA4	Reg	P	M	O	O	-	
		P25, P25RA1 and P26 encourage new development. Depending on the location, design and use of this development it could potentially pose a risk to biodiversity, ecosystem connectivity and the conservation status of sensitive designations such as, for example, the Cardigan Bay SAC along the west coast of Wales and proximity to Aberystwyth, whilst the Afon Teifi SAC is in proximity to many settlements in the Teifi Valley. It is recognised that planning policy seeks to ensure biodiversity net benefit through new development but, given the scale of the anticipated development and the fact that much of it would be likely to be situated on greenfield in mid-Wales, avoiding adverse effects in each case would be difficult. A cumulatively adverse effect on the connectivity of the wider ecosystem would also be difficult to avoid. The focus on strategic growth areas in P25 could help to reduce the risk of adverse effects on biodiversity due to the existing built form and potentially more limited biodiversity value of these areas. P27 and its alternatives that would see new transport infrastructure being developed could potentially introduce new barriers to the free movement of wildlife, such as new track lines or paths cutting through greenfield. Alternatives to P27 would have a similar effect, except for P27RA2 as it would focus on just improving existing infrastructure and so would be unlikely to have a discernible effect on wildlife. The HRA of the NDF has ruled out an adverse effect on a Natura 2000 site as a result of P25, P26 and P27. With regards to P25 the HRA identifies the following risks: <i>‘Although the potential for impacts from growth at Newtown, Builth Wells and Llandrindod Wells are considered to be minimal (due to the distance of distance of these towns from Natura 2000/ Ramsar sites); given that there is no spatial element associated with the policy, potential impacts cannot be ruled out. Potential impacts of implementing this policy could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for development within lower-tier plans), loss or damage to sensitive SAC habitats, severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region (in particular, an increase use of upland or coastal habitats).’</i>							

Policy Grouping 11										
ISA Objective		Future Baseline	Policy/option	Summary of Effects ¹¹						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		With regards to P26 the HRA identifies the following risks: <i>'Future economic development in Mid Wales has the potential to impact Natura 2000/ Ramsar sites across the region. In particular, Cardigan Bay SAC, River Wye SAC, Cwm Doethie-Mynydd Mallaen SAC, Elan Valley Woodlands SAC, Elenydd Mallaen SPA, River Teifi SAC and Cors Caron Ramsar site. Given that there is no spatial element associated with the policy, potential impacts of implementing this policy could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for economic development within lower-tier plans), impacts associated with renewable development (such as collision risk), loss or damage to sensitive SAC habitats, severance of commuting routes for bats associated with SACs (i.e. reducing connectivity between the sites through loss of hedgerows/ woodland), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from potential development of coastal paths as well as other tourist facilities inland promoted in the policy.'</i> With regards to P27 the HRA identifies the following risks: <i>'disturbance/ displacement of qualifying species (in particular birds in upland areas or using functionally linked land) if new routes are opened up adjacent to Natura 2000/ Ramsar site; potential direct loss of functionally linked land under the footprint of schemes adjacent to sensitive areas; and potential severance of habitat links from new linear features in the landscape. There is also the potential to open up previously less accessible areas to new visitors, and as such increase the potential for recreational pressure on Natura 2000/ Ramsar sites (in particular, an increase use of upland habitats).'</i> For P25, P26 and P27 the HRA concludes that <i>'Adhering to the measures set out above (in the HRA) by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites'</i>. A major adverse effect can therefore be ruled out in each case.								
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value		P25	Reg	P	M	-	-	-	No recommendations.
			P25RA1	Reg	P	L	-	-	-	
			P25RA2	Reg	P	M	O	O	-	
			P26	Reg	P	M	-	-	-	
			P26RA1	Reg	P	M	O	O	-	
			P27	Reg	P	M	+/-	+/-	+/-	
			P27RA1	Reg	P	M	+/-	+/-	+/-	
			P27RA2	Reg	P	M	+/-	+/-	+/-	
			P27RA3	Reg	P	M	+/-	+/-	+/-	
			P27RA4	Reg	P	M	O	O	-	
The development encouraged in P25, P25RA1 and P26 would be expected to lead to some degree of increase in the consumption of natural resources, and the generation of waste arisings, during both the construction and operation phases. P25 would see development being focused in strategic growth areas, at which the opportunities for using brownfield and re-using existing buildings may be greater than elsewhere in the region, and this could help to limit the consumption of natural materials. P25RA1 would be unlikely to provide this benefit. P27 and its alternatives would lead to the consumption of natural resources when improving transport infrastructure but would also help to enhance the regional public transport offering and could therefore contribute towards a reduction in the regional reliance on personal car use and the consumption of fuels. Alternatives to P27 would have a similar effect but likely of a slightly lesser magnitude given the more limited scales of development. Do-nothing alternatives would be likely to conform with baseline trends.										

Policy Grouping 12	
P28 – National Growth Area - Swansea Bay and Llanelli	Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.
P28RA1 – Name alternative growth focus	This option would set an alternative focus for growth within the region.
P28RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P29 –Regional Growth Areas – Carmarthen and the Haven Towns	The Welsh Government supports sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli. Strategic and Local Development Plans should recognise the roles of these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.
P29RA1 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P30– Green belts in the South West	The Welsh Government supports the use of Strategic Development Plans to identify and establish green belts to manage urban form and growth in the South West, particularly around Swansea Bay and Llanelli.
P30RA1 – Directly identify the green belt	This option would directly allocate a green belt within the South West Wales region.
P30RA2 – Promote green wedge or other policy interventions	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in South West Wales.
P30RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P31 – South West Metro	The Welsh Government supports the development of the South West Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Strategic and Local Development Plans should support the South West Metro. Planning authorities should plan growth and regeneration to maximise the potential opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.
P31RA1 – Focus on working with existing infrastructure	This option would only focus on existing infrastructure to maximise better regional connectivity.
P31RA2 – Focus on regional connections	This option would focus on transport investments and improved transport connection to maximise the potential opportunities arising from better connections within the region.
P31RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.

Policy Grouping 12	
P32 – Haven Waterway and energy	The Welsh Government supports operations at Haven Waterway, and recognises its location for potential new renewable and low carbon energy-related development, innovation and investment. New energy-related development should support local and regional communities and provide jobs and investment in training and skills. In determining any applications for energy proposals, consideration should be given to the contribution it will make to decarbonising energy supplies, the impacts on the landscape, natural and historic environment and the economic benefits they would bring to the region. On-shore developments associated with off-shore renewable energy projects will be supported in principle.
P32RA1 – Identify larger or smaller area	This option would support the growth of ports elsewhere in Wales.
P32RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P28	Reg	T	H	+	+	++	No recommendations.
			P28RA1	Reg	T	M	+	+	+	
			P28RA2	Reg	T	M	O	O	+	
			P29	Reg	T	H	+	+	++	
			P29RA1	Reg	T	M	O	O	+	
			P30	Reg	n/a	M	O	O	O	
			P30RA1	Reg	n/a	M	O	O	O	
			P30RA2	Reg	n/a	M	O	O	O	
			P30RA3	Reg	n/a	M	O	O	O	
			P31	Reg	P	M	+	+	++	
			P31RA1	Reg	P	M	O	+	+	
			P31RA2	Reg	P	M	O	+	+	
			P31RA3	Reg	T	M	O	O	+	
			P32	Reg	T	M	+	+	+	
			P32RA1	Reg	T	L	O	+	+	
			P32RA2	Reg	T	M	O	O	+	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		P28 and P29, focusing regional growth and investment in this area can have a positive effect on skills and training and opportunities for further education facilities which could to support this growth and increased connectivity for all. Such an approach could result in benefits in terms of enabling children and young people to access education services within these areas, leading to improvements in educational attainment. The importance of universities in the region are recognised in the supporting text. P30 and alternatives. The identification and designation of green belts in South West Wales is unlikely to directly affect access to or improvements in educational attainment. P32 The investment in the port has the potential to increase skills and training for all in this area to support the growth of the port and specifically requires that 'New energy-related development should support local and regional communities and provide jobs and investment in training and skills'. Such development could provide opportunities for young people in terms of developing their skills through employment or apprenticeships, leading to resulting improvements in educational attainment, which could be significant in the medium to long term. P31 The policy would improve connections and deliver inclusive access to education facilities for all. Each alternative to policies P28, P31 and P32 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales		P28	Reg	T	H	+	+	++	Supporting text should clarify the definition of connectivity infrastructure. It is recommended that a flexible approach to green space could be adopted, which considers green infrastructure as a whole, ensuring that access to green space is more equitable, including in both rural and urban areas.
			P28RA1	Reg	T	M	+	+	+	
			P28RA2	Reg	T	M	O	O	+	
			P29	Reg	T	H	+	+	++	
			P29RA1	Reg	T	M	O	O	+	
			P30	Reg	T	M	+	+	++	
			P30RA1	Reg	T	M	+	+	++	
			P30RA2	Reg	T	L	+	+	+	
			P30RA3	Reg	T	M	O	O	+	
			P31	Reg	P	M	+	++	++	
			P31RA1	Reg	P	M	O	+	+	
			P31RA2	Reg	P	M	O	+	+	
			P31RA3	Reg	T	H	O	O	+	
			P32	Reg	T	M	+	+	+	
			P32RA1	Reg	T	M	O	+	+	
			P32RA2	Reg	T	M	O	O	+	
		P28 and P29 - The focus of growth for the region would bring many benefits for all members of society including the reduction in inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area for all. Such an approach could result in benefits in terms of increasing access services, leading to improvements in health and well-being and reducing inequalities for all. P30 – the management of urban form through the use of green belts could lead to an improvement in access to good quality green space for local people, particularly those on the edge of settlements, leading to health and well-being benefits. However, it may also lead to an increase in the density of development in the urban areas, which could lead to a loss of green space in these locations. Directly identifying a green belt (alternative P30RA1) would not fit with the proposed approach to regional planning and could lead to similar effects against this objective. Alternative P30RA2 sets out that other policy interventions may be suitable for controlling urban form in these areas, but only includes green wedges as a possible option. It is considered that								

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		this may lead to positive effects on health and well-being, but the certainty is low, as the exact measures proposed are uncertain. The do-nothing approaches would be likely to conform with baseline trends. P32 The investment in Haven Waterway would bring many benefits for all members of society including reducing inequality and poverty through economic growth and employment and has the potential to support healthy lifestyle choices through well connected places, this will depend on implementation. Concentrating development in these areas may reduce pressure to develop rural areas. P31 The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities for healthier lifestyle choices including access to the natural environment, jobs and facilities which will have physical and mental health and well-being benefits for all. This could also lead to better access for children and young people to services, which could facilitate improvements in their health and well-being. Each alternative to policies P28, P31 and P32 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. The do-nothing approaches would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion		P28	Nat	T	H	+	++	++	No recommendations.
			P28RA1	Nat	T	L	+	+	+	
			P28RA2	Nat	T	M	O	O	+	
			P29	Reg	T	H	+	++	++	
			P29RA1	Reg	T	M	O	O	+	
			P30	n/a	n/a	H	O	O	O	
			P30RA1	n/a	n/a	H	O	O	O	
			P30RA2	n/a	n/a	H	O	O	O	
			P30RA3	n/a	n/a	H	O	O	O	
			P31	Reg	T	H	+	++	++	
			P31RA1	Reg	T	M	+	+	++	
			P31RA2	Reg	P	M	+	+	++	
			P31RA3	Reg	T	M	O	O	+	
			P32	Reg	T	H	+	++	++	
			P32RA1	Reg	T	M	+	+	++	
			P32RA2	Reg	T	M	O	O	+	
P28 and P29 would make a major contribution towards increasing employment opportunities for all working ages and economic inclusion in the most populous and economically important areas of west and mid- Wales. Whilst it is somewhat unclear the extent to which this would benefit residents in more rural areas, or if it could potentially be to their detriment due to the majority of new investment being directed towards the larger settlements, it is recognised that these larger settlements are generally highly accessible via sustainable transport modes for people throughout the region. Alternatives to this would bring economic benefits but potentially to a lesser extent and with less certainty. The do-nothing scenario would prevent these benefits from being realised and employment growth, economic inclusion and impacts on deprivation would be likely to conform with baseline trends. Swansea Bay and Llanelli are accessible places for the Welsh language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. This Policy will support the development of the most urban parts of West Wales as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of enabling young people in particular to access employment opportunities. P28RA1 Increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P28RA2, there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P28.										

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		Policy P29 includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen and Aberystwyth. Encouraging development and consolidation of their role is likely to have some positive effect. This Policy will support the development of certain settlements in West Wales as a focus for managed growth; linking services within these areas including housing and employment. Such an approach could result in benefits in terms of enabling young people in particular access to employment opportunities. The do nothing alternative would conform with baseline trends. P30 and alternatives. The identification and designation of green belts in south West Wales is unlikely to have direct effects against this objective. P32 would help to ensure the Haven Waterway continues to develop and attract investment and this would be likely to contribute to improving economic inclusion and reducing deprivation. This growth would in turn provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas, thus creating opportunities for an increase in employment across the region and promoting economic inclusion. Development at the Haven Waterway could facilitate access to employment for some young people in particular at this strategically important location. The area is a nationally important employment region that offers a diverse range of employment opportunities and skills learning whilst supporting existing skills in the area already focused around the port. The investment at the port would bring many benefits for all members of society including reducing inequality and poverty through employment. An alternative of focusing on a different port(s) would be likely to bring similar benefits but of a lower magnitude. There is uncertainty behind this as it is unclear if the different port(s) would be in this region or elsewhere. The do-nothing scenario would conform with baseline trends. Investing in the South West Metro, as per P31, would help to enhance regional connectivity and to promote greater economic inclusivity, particularly for the more employment deprived communities around Swansea. This is highly likely to lead to better access for young people to potential employment opportunities. Focusing on existing infrastructure would have similar effects but to a lesser magnitude. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from improved regional connectivity and an increase in employment across the country. This would also promote economic inclusion. Policy P31 would increase opportunities to access employment through accessible and inclusive connections. Any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language. P31RA1 A failure to invest in public transport will hold back the regional economy, but the effect on Welsh speaking communities and the language generally is unknown. Focusing on the existing infrastructure will not benefit rural areas in the same way the South West Metro could providing limited public transport provision to rural areas. The do-nothing scenario would be likely to conform with the baseline.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness		P28	Nat	T	H	+	++	++	No recommendations.
			P28RA1	Nat	T	L	+	+	+	
			P28RA2	Nat	T	M	O	O	+	
			P29	Reg	T	H	+	++	++	
			P29RA1	Reg	T	M	O	O	+	
			P30	n/a	n/a	H	O	O	O	
			P30RA1	n/a	n/a	H	O	O	O	
			P30RA2	n/a	n/a	H	O	O	O	
			P30RA3	n/a	n/a	H	O	O	O	
			P31	Reg	T	H	+	++	++	
			P31RA1	Reg	T	M	+	+	++	
			P31RA2	Reg	T	M	+	+	+	
			P31RA3	Reg	T	M	O	O	+	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
			P32	Reg	T	H	+	++	++	
			P32RA1	Reg	T	M	+	+	++	
			P32RA2	Reg	T	M	O	O	+	
		P28 and P29 would make a major contribution towards increasing economic development and diversification in the most populous and economically important areas of west Wales. Alternatives to this would bring economic benefits but to a less extent. Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. Population pyramids in most areas of Wales show a loss of young working age population. When young people leave communities where the language is strong, these places lose the potential teachers, healthcare workers, sport club volunteers, journalists etc that help keep the Welsh language an active part of the community. A choice of good jobs and homes can help to retain more people of young working age in these types of communities. P28RA1, increased economic opportunities across mid and south west Wales could result in greater opportunities for Welsh speakers. P28RA2 - there are likely to be fewer opportunities and less potential for employment growth in less established economic centres, than the Swansea Bay-Llanelli area. It is unlikely to be better for economic inclusion than P28. P29 includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen. Encouraging development and consolidation of their role is likely to have some positive effect. P29RA1 a dispersed approach at this scale would mean fewer opportunities to develop or maintain important centres for jobs, culture and social activities. Policies P28, P29, P31 and P32 could provide opportunities for the third sector to support the growth and benefit from improved connections. The do-nothing scenario would prevent these benefits from being realised and employment growth would conform with baseline trends. P30 and alternatives - the identification and designation of green belts in South West Wales is unlikely to have direct effects against this objective. P32 would help to ensure the Haven Waterway continues to develop and attract investment. The area is a nationally important economic region that hosts a diverse range of competitive businesses. P32 would help to ensure businesses here can continue to successfully compete and diversify. An alternative of focusing on a different port(s) would be likely to bring similar benefits but of a lower magnitude. This policy would help to provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas to create opportunities for sustainable economic growth, diversity and competitiveness an increase in employment across the country and promote economic inclusion. There is uncertainty here as it is unclear if the different port(s) would be in the same region or elsewhere. The do-nothing scenario would conform with baseline trends. Investing in the South West Metro, as per P31, would help businesses in the region to be better connected and more able to be competitive. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion. P31 - Following on from P28, any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language P31RA1 a failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on existing infrastructure would have similar effects as improved infrastructure is a key element for attracting new investment, but potentially to a lesser magnitude than P31 - The do-nothing scenarios would be likely to conform with the baseline.								
5	To contribute towards the future well-being of the Welsh language		P28	Reg	T	M	+	+	++	No recommendations
			P28RA1	Reg	T	M	+	+	+	
			P28RA2	Reg	T	M	O	O	+	
			P29	Reg	T	H	+	+	++	
			P29RA1	Reg	T	M	O	O	+	
			P30	n/a	n/a	H	O	O	O	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
			P30RA1	n/a	n/a	H	O	O	O	
		P30RA2	n/a	n/a	H	O	O	O		
		P30RA3	n/a	n/a	H	O	O	O		
		P31	Reg	T	M	O	+	+		
		P31RA1	Reg	T	M	?	?	?		
		P31RA2	Reg	T	L	O	+	+		
		P31RA3	Reg	T	M	O	O	+		
		P32	n/a	n/a	H	O	O	O		
		P32RA1	n/a	n/a	H	O	O	O		
		P32RA2	n/a	n/a	H	O	O	O		
P28 Swansea Bay and Llanelli are accessible places for the language heartland areas in the Neath and Swansea valleys. Increased opportunities in nearby urban areas could help these communities. P28RA1: Increased development opportunities across south west Wales could support communities with high number and proportion of Welsh speakers, though detailed distribution details would be set in regional development plans. P28RA2: There would be less potential to develop a critical mass of Welsh speaking communities if the strategy focused on less populated areas, especially those away from the heartland areas in the Neath and Swansea valleys. The do-nothing alternative approaches would be likely to conform with baseline trends. P29. This policy includes places which are centres of social and economic activity for Welsh speaking communities, e.g. Carmarthen. Encouraging development and consolidation of their role is likely to have some positive effect. 30 and alternatives. The identification and designation of green belt in South West Wales is unlikely to have direct effects against this objective. P32 and its alternatives: Very little link between the economic prospects of the Haven waterway and the well-being of the Welsh language. P31: Following on from P28, any development to improve connectivity in Swansea Bay area could have low level benefit for the well-being of the Welsh language. P31RA1 A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown. Focusing on existing infrastructure would have similar effects as improved infrastructure is a key element for attracting new investment, but potentially to a lesser magnitude than P31. The do-nothing scenarios would be likely to conform with the baseline.										
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P28	Nat	P	M	O	-	-	Should an alternative port be focused on through P32, the Government could seek to ensure that energy generation here is equally focused on renewable sources of energy.
		P28RA1	Nat	P	M	-	-	-		
		P28RA2	Nat	P	M	O	O	+		
		P29	Nat	P	M	O	-	-		
		P29RA1	Nat	P	M	O	O	+		
		P30	Nat	P	M	+	+	+		
		P30RA1	Nat	P	M	+	+	+		
		P30RA2	Nat	P	M	+	+	+		
		P30RA3	Nat	P	M	O	O	+		
		P31	Nat	P	H	+	+	++		
		P31RA1	Nat	P	M	+	+	+		
		P31RA2	Nat	P	M	+	+	+		
		P31RA3	Nat	P	M	O	O	+		
		P32	Nat	P	H	+	++	++		

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
			P32RA1	Nat	P	L	+	+	++	
			P32RA2	Nat	P	M	O	O	+	
		P28 and P29 and their alternatives would facilitate new development. It is considered to be likely that new buildings, residents and businesses and their associated energy consumption and transport movements would lead to some degree of increase of greenhouse gas emissions. However, P28 and P29 seek to ensure that this development is in relatively sustainable locations that reduce the need for people to travel, such as by being in proximity to key services and offering good digital connectivity, whilst also providing good access to active and public transport modes. New development should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering of sustainable transport modes. Overall it is considered that a minor adverse effect cannot be ruled out but this is somewhat dependent on implementation. P28RA1 would have similar effects but potentially of a greater magnitude given the risk of new development taking place away from more sustainable locations. The do-nothing alternative would be likely to conform with baseline trends as greenhouse gas emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P30 and its alternative P30RA1 could lead to benefits against this objective, insofar as the green belt or green wedge designations could form part of a green infrastructure strategy, as part of sustainable design measures to provide pollution sequestration or improve local microclimates. This is more likely based on a more integrated approach to GI, such as through alternative P30RA2, although this is uncertain as a full understanding of what this option may include is not available. Current policy requirements would also encourage sustainable design. P32 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that consumes energy and result in greenhouse gas emissions. However, the area is a nationally important region for energy generation, including tidal and wind. The NDF recognises the potential for new strategic energy development including innovative decarbonisation and marine energy. Further development here would be expected to help boost the local supply of renewable energy. An alternative of focusing on a different port(s) would be likely to also result in extra greenhouse gas emissions whilst it is uncertain if it would lead to additional renewable energy generation. The do-nothing scenario would conform with baseline trends. P31 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards falling greenhouse gas emissions. Identifying opportunities for higher density and mixed-use development around new and improved Metro stations could lead to positive effects against this objective, particularly in the long term. The alternatives of focusing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.								
7	To contribute to the reduction and management of flood risk		P28	Reg	T	L	-	-	-	Development in areas of flood risk should not only conform with WG flood risk management policy but could also incorporate natural flood risk alleviation measures such as GI elements, permeable surfaces & SUDS.
			P28RA1	Reg	T	L	-	-	-	
			P28RA2	Reg	T	M	O	O	-	
			P29	Reg	T	L	-	-	-	
			P29RA1	Reg	T	M	O	O	-	
			P30	Reg	T	M	O	+	++	
			P30RA1	Reg	T	M	O	+	++	
			P30RA2	Reg	T	M	O	+	++	
			P30RA3	Reg	T	M	O	O	-	
			P31	Reg	T	L	-	-	-	
			P31RA1	Reg	T	L	-	-	-	
			P31RA2	Reg	T	L	-	-	-	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
			P31RA3	Reg	T	M	O	O	-	
			P32	Reg	T	L	?	?	?	
			P32RA1	Reg	T	L	?	?	?	
			P32RA2	Reg	T	M	O	O	-	
		There are areas of flood risk, including Flood Zones 2 and 3, in the Swansea Bay and Llanelli region as well as Haven Waterway. It is unclear where the alternative locations for focus would be in the alternatives to P28 and P32. Development here could potentially situate new residents or businesses on land at risk of flooding, although effects are likely to be negative in the long term. Focusing on existing towns and settlements through P29 and its alternative could help to increase the number of people and businesses benefitting from existing flood defence schemes, although as per TAN 15 existing FRM schemes are designed to only protect existing development. Supporting text to P29 sets out that ‘the potential for flooding in the National and Regional Growth Areas has implications for the delivery of growth in the region. Policy 8 sets out the national strategic approach to flood risk management and will ensure growth aspirations in the National and Regional Growth Areas are co-ordinated with strategic decisions on managing flood risk.’ This should help to minimise potential negative effects, although will need to be carefully monitored in relation to the long term flood risk. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could form part of a green infrastructure strategy, as part of sustainable design measures to provide flood risk mitigation. This is more likely based on a more integrated approach to GI, such as through alternative P30RA2, although this is uncertain as a full understanding of what this option may include is not available. Current policy requirements would also encourage sustainable design. The development of the South West Bay Metro as per P31 is unlikely to have a significant effect on this objective, although measures to protect infrastructure from the risks of flooding would be included as part of any planning application. However, this is largely dependent on the precise location of development in relation to flood risk areas. Do-nothing alternatives would be likely to conform with baseline trends.								
8	To create opportunities to encourage the protection and improvement of air quality		P28	Nat	T	H	-	-	-	See recommendation under Objective 6.
			P28RA1	Nat	T	L	-	-	-	
			P28RA2	Nat	T	M	O	O	+	
			P29	Nat	T	H	-	-	-	
			P29RA1	Nat	T	M	O	O	+	
			P30	Reg	T	H	+	+	+	
			P30RA1	Reg	T	M	+	+	+	
			P30RA2	Reg	T	M	+	+	+	
			P30RA3	Reg	T	M	O	O	+	
			P31	Reg	T	H	+	+	++	
			P31RA1	Reg	T	L	+	+	+	
			P31RA2	Reg	T	L	+	+	+	
			P31RA3	Reg	T	M	O	O	+	
			P32	Nat	T	H	+	++	++	
			P32RA1	Nat	T	L	+	++	++	
			P32RA2	Nat	T	M	O	O	+	
P28, P29 and their alternatives would facilitate new development that exacerbates air pollution, they may be opportunities to improve air quality through development but the benefits would be dependent on their implementation. Under P28 this development would be in more sustainable locations that										

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		enable greater rates of efficient and low-emission movements for local people than the do-nothing scenario, which would conform with baseline trends. Dense urban areas are typically the location of some of Wales' poorest air quality and situating new development in these locations could make it increasingly difficult to achieve air quality improvements. There is a potential to strengthen the policy to focus the connectivity on low carbon options to improve air quality. The location of development under P28RA1 is somewhat uncertain and so there is a greater risk of new businesses or residents being situated in locations that are distant from some key services and where access to sustainable modes of transport are more limited. P28RA1 could potentially have more severe impacts on air quality than P28 to some extent, although this is largely uncertain. Neither P28 nor P28RA1 would be likely to lead to a significant effect. P28RA2 and P29RA1, do nothing alternatives, would be likely to conform with baseline trends. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could form part of a green infrastructure strategy, as part of sustainable design measures to provide pollution sequestration or improve local microclimates. This is more likely based on a more integrated approach to GI, such as through alternative P30RA2, although this is uncertain as a full understanding of what this option may include is not available. Current policy requirements would also encourage sustainable design. P32 would help to ensure the Haven Waterway continues to develop and attract investment. This would be likely to facilitate new development that causes air pollution. However, the area is a nationally important region for energy generation, including tidal and wind. Further investment here would be expected to help boost the local supply of low-emission energy. An alternative of focusing on a different port(s) would be likely to also result in extra air pollution whilst it is uncertain if it would lead to additional low-emission energy generation. P32RA1 would have similar effects, potentially of a slightly greater or more limited magnitude depending on the scale of development which is largely uncertain. A significant effect would not be expected. The do-nothing scenario would conform with baseline trends. P31 would help to ensure that a regionally important means of sustainable and low-emission transport is enhanced. This would eventually be likely to make a major contribution towards improving air quality. The alternatives of focusing on existing infrastructure would be likely to be slightly preferable to a do-nothing scenario, which would conform with the baseline.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P28	Nat	T	M	O	-	-	Appropriate sewage capacity of development should be ensured prior to development in coastal areas.
			P28RA1	Nat	T	L	O	-	-	
			P28RA2	Nat	T	M	O	O	-	
			P29	Nat	T	M	O	-	-	
			P29RA1	Nat	T	M	O	O	-	
			P30	Reg	T	M	+	+	+	
			P30RA1	Reg	T	M	+	+	+	
			P30RA2	Reg	T	M	+	+	+	
			P30RA3	Nat	T	M	O	O	-	
			P31	Reg	T	H	O	-	-	
			P31RA1	Reg	T	H	O	-	-	
			P31RA2	Reg	T	H	O	-	-	
			P31RA3	Reg	T	H	O	O	-	
			P32	Nat	T	M	-	-	-	
			P32RA1	Nat	T	L	-	-	-	
			P32RA2	Nat	T	M	O	O	-	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		Development at Swansea Bay and Haven Waterway would pose a risk to the quality of coastal waters. These waters are typically Natura 2000 designations and so are particularly sensitive to quality changes. It is unclear what the sewage capacity is in these regions. New development delivered through P28, P29, and P31, as well as their reasonable alternatives, could potentially pose a risk to water quality depending on the precise location and implementation of new development. It would also be likely to lead to a minor increase in water consumption. Further investment and development at the Haven Waterway through P32 could pose a risk to the quality of water here due to an increase in movements of polluting ships on the water as well as surface water runoff picking up pollutants or contaminants, including during construction and operation of development. The alternative of focusing on a different port(s) would be likely to have a similar effect. The do-nothing scenario would conform with baseline trends. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could form part of a green infrastructure strategy, as part of sustainable design measures to provide pollution sequestration. This is more likely based on a more integrated approach to GI, such as through alternative P30RA2, although this is uncertain as a full understanding of what this option may include is not available. Current policy requirements would also encourage sustainable design.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups	P28	Reg	T	H	+	+	++	Policy P32 could be strengthened to include reference to inclusive infrastructure and connections. See recommendation for objective 2.	
		P28RA1	Reg	T	H	+	+	+		
		P28RA2	Reg	T	M	O	O	-		
		P29	Reg	T	H	+	+	++		
		P29RA1	Reg	T	M	O	O	-		
		P30	Reg	n/a	H	O	O	O		
		P30RA1	Reg	n/a	H	O	O	O		
		P30RA2	Reg	n/a	H	O	O	O		
		P30RA3	Reg	n/a	H	O	O	O		
		P31	Reg	T	H	+	+	++		
		P31RA1	Reg	T	H	+	+	+		
		P31RA2	Reg	T	H	+	+	+		
		P31RA3	Reg	T	M	O	O	-		
		P32	Reg	T	M	+	+	++		
		P32RA1	Reg	T	M	+	+	+		
		P32RA2	Reg	T	M	O	O	-		
Policy P28 and P29 look to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region there is an opportunity to increase access to facilities and services for all. P30 and its alternatives would be unlikely to have a discernible effect. P32 has the potential to improve connections through active travel, green infrastructure etc.at this strategically important location and the human health and inclusive benefits this would bring for all. It could improve access to essential facilities and services, through provision of jobs, and this could result in benefits for all in the region, including for young people and linking to rural areas. It would reduce development pressure on rural areas. These benefits would be dependent on the implementation. P31 looks to improve connectivity in the region and increase access to facilities and services for all. Each alternative to policies P28, P31 and P32 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these.										

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		The do-nothing approaches would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P28	Reg	T	H	+	+	++	See recommendation for objective 2.
			P28RA1	Reg	T	H	+	+	+	
			P28RA2	Reg	T	M	O	O	-	
			P29	Reg	T	H	+	+	++	
			P29RA1	n/a	n/a	H	O	O	-	
			P30	n/a	n/a	H	O	O	O	
			P30RA1	n/a	n/a	H	O	O	O	
			P30RA2	n/a	n/a	H	O	O	O	
			P30RA3	n/a	n/a	H	O	O	O	
			P31	Reg	T	H	+	+	++	
			P31RA1	Reg	T	H	+	+	+	
			P31RA2	Reg	T	H	+	+	+	
			P31RA3	Reg	T	M	O	O	-	
			P32	Reg	T	M	+	+	++	
			P32RA1	Reg	T	M	+	+	+	
			P32RA2	n/a	n/a	M	O	O	-	
Policy P28 and P29: through the growth and increasing access and connections in these areas this has the opportunity to increase social cohesion and create a positive built environment. Such an approach could result in benefits in terms of improving access to services and therefore creating opportunities for improvements to social cohesion and equality for all including children and young people. P32: The investment and growth of Haven Waterway would bring with it health and social benefits for the surrounding area and potentially the region. P30 – and its alternatives would be unlikely to have a discernible effect. P31: The investment in connections across the region would improve inclusive access to facilities and services for all including those in rural communities and for children and young people. This could provide active travel and healthier travel choices. Improving access to services and facilities should create opportunities for improvements in social cohesion and equality for all, including children and young people. Each alternative to policies P28, P31 and P32 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these. Does not reflect the proposed approach to regional planning. The do-nothing approaches would be likely to conform with baseline trends.										
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P28	Reg	T	H	++	++	++	No recommendations.
			P28RA1	Reg	T	L	+	+	+	
			P28RA2	Reg	T	M	O	O	-	
			P29	Reg	T	H	++	++	++	
			P29RA1	Reg	T	M	O	O	-	
			P30	Reg	n/a	H	O	O	O	
			P30RA1	Reg	n/a	H	O	O	O	
			P30RA2	Reg	n/a	H	O	O	O	
			P30RA3	Reg	n/a	H	O	O	O	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effects	Medium-term effects		Long-term effects
			P31	Reg	n/a	H	O	O	O	
			P31RA1	Reg	n/a	H	O	O	O	
			P31RA2	Reg	n/a	H	O	O	O	
			P31RA3	Reg	n/a	H	O	O	O	
			P32	Reg	T	M	+	++	++	
			P32RA1	Reg	T	H	+	+	++	
			P32RA2	Reg	T	M	O	O	-	
P28 and P29 would help to ensure significant new residential development is situated near the most populous regions in west Wales. Such an approach could result in benefits in terms of creating opportunities for families, including children and young people, to access quality and affordable housing. Alternatives to this would also contribute towards satisfying housing needs but in less populated areas in locations more isolated from key services. It is uncertain how much new housing would take place in the region and where it would do so under the do-nothing scenario, but with less impetus than new development. P30 and alternatives. The identification and designation of green belts in South West Wales is unlikely to have direct effects against this objective. P32 The Haven Waterway area is the location of a large number of homes and residential areas. Further investment and development here could facilitate the provision of a significant quantity of new homes and open up new land for potential residential development. It should facilitate the provision of supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas, thus it should provide opportunities for the provision of good quality, safe, affordable housing that meets identified needs for all in the region. The alternative to P32 of focusing on a different port could provide similar benefits, but unlikely of the same magnitude and it is uncertain which alternative port(s) would be the focus of this or where in Wales it would be. It is uncertain how housing provision in the region would progress over time under the do nothing scenario. P31 and its alternatives would be unlikely to have a discernible effect on the provision of housing. Do nothing alternatives would be likely to conform with baseline trends.										
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P28	Reg	T	M	O	-	-	Consideration could be given to seascapes as well as landscapes in P32.
			P28RA1	Reg	T	L	-	-	-	
			P28RA2	Reg	T	M	O	O	-	
			P29	Reg	T	H	-	-	-	
			P29RA1	Reg	T	M	O	O	-	
			P30	Reg	T	M	+	+	++	
			P30RA1	Reg	T	M	+	+	++	
			P30RA2	Reg	T	M	+	+	++	
			P30RA3	Reg	T	M	O	O	-	
			P31	Reg	T	M	-	-	-	
			P31RA1	Reg	T	M	O	-	-	
			P31RA2	Reg	T	M	O	-	-	
			P31RA3	Reg	T	M	O	O	-	
			P32	Reg	T	H	-	-	-	
			P32RA1	Reg	T	M	-	-	-	
			P32RA2	Reg	T	M	O	O	-	

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		P28, P29 and their alternatives would result in new development that could pose a risk to landscape and seascape character. There could potentially be a risk to National Parks, such as the Pembrokeshire Coast or the Brecon Beacons, as well as the Gower AONB. The do-nothing scenario would conform with negative trends. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could protect areas of landscape importance. Negative effects on townscapes could also result, due to a potential loss of green space, from focusing development in urban areas. Overall, effects would be likely to be positive. Directly identifying a green belt (alternative P30RA1) would lead to similar effects against this objective. Alternative P30RA2 sets out that other policy interventions may be suitable for controlling urban form in these areas, whilst protecting landscapes, but the option only includes green wedges as a possible option. It is considered that this may lead to positive effects, but the certainty is low, as the exact measures proposed are uncertain. Policy Alternative P30RA3 could lead to negative effects, as the policy approach in this area may be uncertain. P32 would lead to new investment and development at the Haven Waterway region, which could result in adverse impacts on the local character of landscapes and seascapes. However, it would help to ensure that such development is in proximity to existing similar land-uses. Focusing on an alternative port(s) would have similar effects, but with a higher degree of uncertainty. P32RA1 would be likely to have similar effects, but potentially of a greater or more limited magnitude depending on the scale of development. The do-nothing scenario would ultimately conform with baseline trends. This effect may be minimised through the policy requirement to consider the impacts on the landscape, natural and historic environment in the region. The South West Metro development, invested in through P31, could alter the character of natural landscapes in some locations. The alternative of focusing on existing infrastructure would be likely to avoid this but would instead mostly conform with baseline trends – as would the do-nothing scenario. P28, P29, P31 and P32 have the potential to deliver accessible and inclusive townscapes.								
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings		P28	Reg	T	M	O	-	-	P28 & P29 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.
			P28RA1	Reg	T	L	-	-	-	
			P28RA2	Reg	T	M	O	O	+	
			P29	Reg	T	M	O	-	-	
			P29RA1	Reg	T	M	O	O	+	
			P30	Reg	T	H	+	+	++	
			P30RA1	Reg	T	M	+	+	++	
			P30RA2	Reg	T	M	+	+	++	
			P30RA3	Reg	T	M	O	O	+	
			P31	Reg	T	H	O	O	-	
			P31RA1	Reg	T	M	O	O	+	
			P31RA2	Reg	T	M	O	O	-	
			P31RA3	Reg	T	M	O	O	-	
			P32	Reg	T	M	+/-	+/-	+/-	
			P32RA1	Reg	T	L	?	?	?	
			P32RA2	Reg	T	M	O	O	+	
		P28, P29 and their alternatives would result in new development that could pose a risk to the setting of heritage assets and historic areas in large settlements of the region, such as the extensive range of Scheduled Monuments and Listed Buildings in the region. P28RA1 could have similar effects but the uncertainty location of development makes the scale and magnitude of effect uncertain, although a significant effect is considered to be unlikely given the need for development to conform with planning policy as well as other policies in the NDF. The do-nothing scenario would conform with trends. The								

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		policies in this section have the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could protect areas of landscape importance. Negative effects on historic assets in urban areas may result, due to a potential loss of green space, through focusing development in urban areas. Directly identifying a green belt (alternative P30RA1) would lead to similar effects against this objective. Alternative P30RA2 sets out that other policy interventions may be suitable for controlling urban form in these areas, whilst protecting the historic environment, but the option only includes green wedges as a possible option. It is considered that this may lead to positive effects, but the certainty is low, as the exact measures proposed are uncertain. P32 would lead to new investment and development at the Haven Waterway region, which could potentially alter the setting of local heritage assets or historic areas. Given that such development would be in proximity to existing similar land-uses, these impacts would be minor. Conversely, such development may also be an opportunity to redevelop brownfield sites or enhance their impact on the setting of nearby assets. Focusing on an alternative port could have similar effects, but this is uncertain and depends on the distribution of heritage assets. The do-nothing scenario would ultimately conform with baseline trends. This effect may be minimised through the policy requirement to consider the impacts on the landscape, natural and historic environment in the region. P31 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets. P31RA1 would focus on existing infrastructure and so would be an opportunity to improve the impact of this infrastructure on the local setting. Do-nothing alternatives would be likely to conform with baseline trends.								
15	To create the opportunities for the protection and promotion of Welsh culture		P28	Reg	T	M	O	+	+	P28 & P29 - The opportunity and benefits of heritage led regeneration could be recognised in the supporting text
			P28RA1	Reg	T	L	O	+	+	
			P28RA2	Reg	T	M	O	O	+	
			P29	Reg	T	M	O	+	+	
			P29RA1	Reg	T	M	O	O	+	
			P30	Reg	T	L	O	+	+	
			P30RA1	Reg	T	L	O	+	+	
			P30RA2	Reg	T	L	O	+	+	
			P30RA3	Reg	T	M	O	O	+	
			P31	Reg	T	M	+	+	+	
			P31RA1	Reg	T	L	+	+	+	
			P31RA2	Reg	T	M	+	+	+	
			P31RA3	Reg	T	M	O	O	+	
			P32	n/a	n/a	H	O	O	O	
			P32RA1	n/a	n/a	H	O	O	O	
			P32RA2	n/a	n/a	H	O	O	O	
P28 and P29 could help to attract increased investment, residents and visitors to mid-Wales, providing them with enhanced access to local Welsh cultural activities and places. This could help to preserve these cultural activities into the future, although the influx in new residents and visitors could potentially dilute the local culture. Overall, effects on Welsh culture for each policy and alternative are likely to be minor positive, with less certainty behind this effect for P28RA1. P28RA2 and P29RA1 are unlikely to have a discernible effect P30 and its alternatives have the potential to increase access to cultural assets and could achieve this through culture led regeneration.										

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
		P32 and its alternatives would be unlikely to have a discernible impact on Welsh culture. By enhancing regional connectivity, P31 and P31RA2 could help the region to take advantage of its local culture and attract visitors from further afield, including rural areas. The alternative of focusing on existing infrastructure (P31RA1) would have similar benefits but are less certain. The do-nothing scenario would be likely to conform with the baseline.								
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P28	Reg	T	H	O	-	-	Development near coastal & marine areas should incorporate appropriate avoidance and mitigation measures to prevent adverse impacts on sensitive habitats, species and designations. Development should deliver net gains.
			P28RA1	Reg	T	L	-	-	-	
			P28RA2	Reg	T	M	O	O	-	
			P29	Reg	T	H	-	-	-	
			P29RA1	Reg	T	M	O	O	-	
			P30	Reg	T	M	+	+	++	
			P30RA1	Reg	T	L	+	+	++	
			P30RA2	Reg	T	L	+	+	++	
			P30RA3	Reg	T	M	O	O	-	
			P31	Reg	T	L	-	-	-	
			P31RA1	Reg	T	L	O	-	-	
			P31RA2	Reg	T	L	O	-	-	
			P31RA3	Reg	T	M	O	O	-	
			P32	Reg	T	L	-	-	-	
			P32RA1	Reg	T	L	?	?	?	
			P32RA2	Reg	T	M	O	O	-	
P28, P29 and their alternatives would result in new development that could pose a risk to biodiversity depending on implementation. The focus on existing settlements could reduce the burden of new development in more rural locations where the risk of severe impacts on habitats, species and designations is greater. New development can also be an opportunity to deliver biodiversity net gains through development proposals, particularly in brownfield locations where the loss of ecologically valuable greenfield is avoided. Overall it is considered that a minor adverse effect cannot be ruled out at this stage. The do-nothing scenario would conform with trends. New development and investment at Haven Waterway could potentially pose a risk to Pembrokeshire Marine Special Protection Area due to impacts on water quality. Development at other ports, as per P32RA1, could also impact on a sensitive biodiversity designation but this is uncertain. P30 would be expected to help protect important areas of biodiversity value. There is a greater degree of uncertainty in P30RA1 and P30RA2 by not enabling local authorities to determine which land to designate for this purpose. The do-nothing alternative would be likely to conform with baseline trends. New development associated with the South West Metro, invested in through P31, could potentially have a minor adverse impact on areas of sensitive biodiversity value as well as regional ecological connectivity. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends. Do nothing alternatives would be likely to conform with baseline trends. The HRA has ruled out an adverse effect on a Natura 2000 site as a result of these policies.										

Policy Grouping 12										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	Long-term effects	
17	To create opportunities for the sustainable		With regards to P28 the HRA identifies the following risks: <i>'The Burry Inlet SPA/Ramsar site and Carmarthen Bay and Estuaries SAC lie on the coast to the south of Llanelli and west of Swansea. Crymlyn Bog SAC/Ramsar site lies on the eastern edge of Swansea, and Gower Commons SAC and Gower Ash Woods SAC are to the south west of Swansea. Focusing growth in and around existing urban centres is considered likely to minimise the potential for likely significant effects on designated sites; however, in the absence of any spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in these coastal areas could lead to impacts upon Natura 2000/ Ramsar sites through potential disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for development within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region.'</i> For P29 the HRA identifies the following risks: <i>'The Haven Towns are located along the Cleddau Estuary and Milford Haven (which form part of the Pembrokeshire Marine SAC). Carmarthen lies alongside the River Tywi SAC (with the Carmarthen Bay and Estuaries SAC/Marine site to the south) and Northern Cardigan Bay SPA. Growth in all of these areas has the potential to impact upon Natura 2000/ Ramsar sites. Focusing growth in and around existing urban centres is considered likely to minimise the potential for adverse effects on designated sites; however, in the absence of a spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in these areas could lead to impacts upon Natura 2000/ Ramsar sites through disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of allocations for development within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region.'</i> P30 was screened out of detailed consideration in the HRA as it would clearly have no adverse effects. With regards to P31 the HRA identifies the following risks: <i>'Potential impacts could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of the metro if outside of urban locations, or along the coast), or through other effects such as water/ air pollution or increased disturbance/damage as a result of recreational pressures from an increased population within the region (should the metro provide greater access to coastal areas known to support sensitive habitats and species).'</i> With regards to P32 the HRA identifies the following risks: <i>'Potential impacts identified included: disturbance/displacement effects (noise/ visual/vibration) upon breeding and/or foraging qualifying features of the marine sites; loss/ damage to sensitive marine and coastal habitats (in particular the adjacent SACs); potential impacts to foraging and/ or breeding habitats associated with changes to coastal processes; potential increases in air pollution through construction activities and/or increased boat traffic; potential impacts on water quality (such as pollution within the marine environment from construction activities, dredging, or increased boat traffic); indirect effects such as increased recreational pressures on the coastline through additional tourism to the area; and potential in-combination effects with other large-scale coastal projects regionally/ nationally.'</i> Despite these risks, the HRA concludes that for each policy <i>'Adhering to the measures set out ... by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites as a result of implementing this policy.'</i>							
		P28	Reg	T	M	O	-	-	-	Policies could encourage development to
		P28RA1	Reg	T	L	-	-	-		
		P28RA2	Reg	T	L	O	O	-		

Policy Grouping 12									
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations
				Scale	T/P	Cert	Short-term effects	Medium-term effects	
management and use of natural resources, taking into account their benefits and intrinsic value		P29	Reg	T	M	O	-	-	incorporate low-carbon techniques and materials during construction as well as to use renewable energy.
		P29RA1	Reg	T	L	O	O	-	
		P30	Reg	T	M	+	+	++	
		P30RA1	Reg	T	M	+	+	++	
		P30RA2	Reg	T	L	+	+	++	
		P30RA3	Reg	T	M	O	O	-	
		P31	Reg	T	M	-	-	-	
		P31RA1	Reg	T	M	O	-	-	
		P31RA2	Reg	T	M	O	-	-	
		P31RA3	Reg	T	M	O	O	-	
		P32	Reg	T	M	+/-	+/-	+/-	
		P32RA1	Reg	T	L	+/-	+/-	+/-	
		P32RA2	Reg	T	M	O	O	-	
P28 and P29 would facilitate new development that would be expected to consume natural resources, increase local generation of waste and require large areas of previously undeveloped land. Reasonable alternatives for each of these policies would be likely to have the same effect. The do-nothing scenarios would conform with trends. P30 and its alternatives could lead to benefits against this objective, insofar as the green belt or green wedge designations could encourage the protection of natural resources. Negative effects in urban areas may result, due to a potential loss of green space, but this would be unlikely to prevent an overall positive effect on this ISA Objective. Directly identifying a green belt (alternative P30RA1) would lead to similar effects against this objective. Alternative P30RA2 sets out that other policy interventions may be suitable for controlling urban form in these areas, whilst protecting the historic environment, but the option only includes green wedges as a possible option. It is considered that this may lead to positive effects, but the certainty is low, as the exact measures proposed are uncertain. Policy Alternative P30RA3 could lead to negative effects, as the policy approach in this area may be uncertain. P32 would lead to new development at Haven Waterway, at which there is considered to be good opportunities for development on brownfield land. However, new development would require the consumption of natural resources and would be likely to increase local generation of waste. Focusing on a different port(s) would be likely to have similarly mixed effects, but with less certainty. The do-nothing scenario would be likely to conform with trends. New development associated with the South West Metro, invested in through P31, would require the consumption of resources and would generate waste, particularly during construction. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends.									

Policy Grouping 13	
P33 –National Growth Area - Cardiff, Newport and the Valleys	Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport. The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys. The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region.
P33RA1 – Name alternative growth focuses	This option focuses growth within M4 corridor.
P33RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.
P34 – Green Belts in the South East	The Welsh Government requires the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in the West of England. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.
P34RA1- Directly identify the green belt	This option would directly allocate a green belt within the South East Wales region.
P34RA2 – Promote green wedge or other policy interventions	This option would specify the use of green wedges or other policy interventions to manage urban form and growth in South East Wales.
P34RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
P35 – Valleys Regional Park	The Welsh Government supports the establishment of the Valleys Regional Park. Strategic and Local Development Plans should embed its principles into their planning frameworks. The Welsh Government will work with local authorities, the third sector and key partners to support the Valleys Regional Park and maximise opportunities for new development.
P35RA1- Focus regeneration on other areas of Wales	This option would set an alternative focus for regeneration within the region.
P35RA2 – Do Nothing	Do nothing. The alternative would be to not have a policy at all. The Wales Spatial Plan would remain extant.

Policy Grouping 13	
P36 – South East Metro	The Welsh Government supports the development of the South East Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities. Strategic and Local Development Plans must support the South East Metro. Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.
P36RA1 – Focus on working with existing infrastructure	This option would only focus on existing infrastructure to maximise better regional connectivity.
P36RA2 – Focus on connections within Wales	This option would focus on transport investments and improved transport links to maximise the potential opportunities arising from better connections within Wales.
P36RA3 – Do Nothing	Do nothing. The alternative would be to not have a policy at all, leaving PPW to carry the national policy. The Wales Spatial Plan would remain extant.
The NDF's policies have been developed through an iterative process of evidence gathering, reviewing key strategies and documents, engagement, consultation and assessment. This process has led to the NDF. As potential policies emerged, these alternative policies were identified alongside them and considered to help strengthen the testing process. The policy identified in the NDF is that which the Welsh Government believes best supports the delivery of the NDF's Outcomes and Spatial Strategy. The alternative policies were not considered as effective and therefore rejected.	

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life		P33	Reg	T	H	+	+	++	P36 could be strengthened to include access by a range of sustainable transport modes not just public transport
			P33RA1	Reg	T	M	+	+	+	
			P33RA2	n/a	n/a	H	O	O	O	
			P34	n/a	n/a	H	O	O	O	
			P34RA1	n/a	n/a	H	O	O	O	
			P34RA2	n/a	n/a	H	O	O	O	
			P34RA3	n/a	n/a	H	O	O	O	
			P35	Reg	T	M	+	+	+	
			P35RA1	Reg	T	M	O	+	+	
			P35RA2	Reg	T	H	O	O	O	
			P36	Reg	P	M	+	++	++	
			P36RA1	Reg	P	M	O	+	+	
			P36RA2	Reg	T	M	O	+	+	
			P36RA3	Reg	T	H	O	O	+	

Grouping 13									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		P33 - focusing regional growth and investment in this area can have a positive effect on skills and training to support this growth and opportunities for further education facilities to support this growth and increased connectivity. This could result in benefits in terms of enabling children and young people to access education services within this area, leading to improvements in educational attainment. Achieving these benefits would depend on the detail at the lower tier. P34 and its alternatives. The identification and designation of green belt in this area is unlikely to have direct effect against this objective. P35 The delivery of the Valleys Regional Park prospectus recognises the need to develop skills to deliver the project, this will therefore have a positive impact on access to skills and education. Supporting this could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide education opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in educational attainment. P36 The policy would improve connections and deliver inclusive access for all to education facilities and could facilitate improvements in educational attainment for the local area. Each alternative to policies P33 and P36 would be likely to result in similar effects but of a lower magnitude. Given the lack of detail in these alternatives there is little certainty involved in the assessment of these The do-nothing approaches would be likely to conform with baseline trends.							
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales	P33	Reg	T	H	+	+	++	P28 could include facilities and services. The supporting text to recognise the environmental benefits within this area. P31 could include access by a range of sustainable transport modes not just public transport.
		P33RA1	Reg	T	M	+	+	+	
		P33RA2	Reg	T	H	O	O	+	
		P34	Reg	T	H	+	+	++	
		P34RA1	Reg	T	M	+	+	+	
		P34RA2	Reg	T	H	O	O	+	
		P34RA3	Reg	P	M	+/-	+/-	+/-	
		P35	Reg	T	M	+	+	++	
		P35RA1	Reg	T	M	O	+	+	
		P35RA2	Reg	T	H	O	O	+	
		P36	Reg	P	M	+	++	++	
		P36RA1	Reg	P	M	O	+	+	
		P36RA2	Reg	T	M	O	+	+	
		P36RA3	Reg	T	H	O	O	+	
P33 The focus of growth for the region would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. This policy could be strengthened to include facilities and services and the supporting text to recognise the environmental benefits within this area. The natural environment bring many health benefits both physically and mentally. This Policy will support the development of the region and improving connectivity infrastructure. Such an approach could result in benefits in terms of enabling children and young people to access new services within this area, contributing to an improvement in health and well-being. This policy will contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales by supporting coordinated regeneration and investment in the area to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the Heads of the Valleys Area could result in benefits in terms of improving the social conditions in the Area, leading to improvements in health and well-being for its children and young people P33RA1 – could be less impact to P33 depending on implementation. The outcomes of locating development in a named alternative growth focus for a particular area are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from the									

Grouping 13										
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations	
			Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect		
			provision of new services which contribute to improvements in health and well-being. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned. P34 – The provision of a green belt would retain open spaces around identified urban areas which either currently or potentially have access for recreation and would continue to provide physical and mental health benefits. A policy on green belts in south east Wales will ensure key services and infrastructure support existing built up areas and will be taken on a regional basis ensuring they are located in the most accessible and sustainable locations supporting actions to address inequality and deprivation and thus contributing in a reduction in health inequality in rural areas. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for all, including children and young people in terms of the environmental and social benefits green belts would bring for the area. P34RA1 – The benefits would be the same as P34 and would be stronger in the identified area. Maintenance of settlements in a sustainable form through the inclusion of green belts should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for all, including children and young people in terms of the environmental and social benefits green belts would bring for the area. P34RA2 - Same as P34 depending on implementation. Other green belt related policy interventions such as green wedges should assist in safeguarding the countryside and assist in urban regeneration for South East Wales. This should ensure associated health and well-being benefits for all, including children and young people in terms of the environmental and social benefits such interventions would bring for the area. P34RA3 – potential positive and negative effects depending on type and scale of growth in the area. P35 – The Valleys Regional Park would bring opportunities for recreation, increasing access to natural environment, improving well-being embracing cultural identity which will bring with them many health benefits and providing more opportunities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. Supporting the Government's ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could provide opportunities for children and young people within the local area through learning about the Valleys, leading to improvements in their health and well-being. P35RA1 – could be less impact to P35 depending on implementation, wouldn't support the commitment to the development of the Valleys Regional Park. The outcomes of focusing regeneration on other areas of Wales are uncertain. It is not clear what this would mean in terms of numbers of children and young people that could potentially benefit from improvements to their health and well-being within the Valleys area. Further, it is unclear if this approach would result in benefits from the status quo if opportunities remained as planned. P35RA2 - Doing nothing may not maximise the opportunities and would be likely to conform with baseline trends. A do-nothing policy may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration while contributing to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales. P36 - The increase in public transport could reduce the reliance on the car and improve air quality in the region. It could open up opportunities to access the natural environment, jobs and facilities which will have physical and mental health and well-being benefits. The South East Metro can provide the basis for connectivity across the region and this includes the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity including contributing towards a reduction in health inequalities across Wales. Supporting the development of the South East Metro should ensure better connectivity across the South Wales Region. This could lead to better access for all, including children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities.							

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		P36RA1 - Focusing on the existing infrastructure will not benefit rural areas in the same way the South East Metro could providing limited public transport provision to rural areas. A focus on developing existing infrastructure should ensure better connectivity across the South Wales Region. This could lead to better access for all, including children and young people to services and communities, facilitating in improvements in health and well-being and reducing inequalities. The do nothing alternatives, except for P34, may not maximise the opportunities and would be likely to conform with baseline trends.								
3	To create opportunities for an increase in employment across the country and promote economic inclusion	P33	Reg	T	H	++	++	++	No recommendations.	
		P33RA1	Reg	T	L	+	+	+		
		P33RA2	Reg	T	M	O	O	+		
		P34	n/a	n/a	H	O	O	O		
		P34RA1	n/a	n/a	H	O	O	O		
		P34RA2	n/a	n/a	H	O	O	O		
		P34RA3	n/a	n/a	H	O	O	O		
		P35	Reg	T	H	++	++	++		
		P35RA1	Reg	T	L	+	++	++		
		P35RA2	Reg	T	M	O	O	+		
		P36	Reg	T	H	+	++	++		
		P36RA1	Reg	T	M	+	+	++		
		P36RA2	Reg	T	M	+	+	++		
		P36RA3	Reg	T	M	O	O	+		
The retention of Cardiff's existing role through P33 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the employment market in Cardiff. Jobs here are highly accessible for people across the city, as well as those in its immediate region. P33 would also encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance for employment, this policy would be likely to lead to major positive impacts on this ISA Objective over time and to significantly enhance economic inclusion for local people, including those in the most deprived areas and children and young people. The growth and new connections can be seen as an opportunity to grow the Welsh language, through new employment and education opportunities, or a potential weakening of existing Welsh speaking communities. The proposed investment could bring renewal and jobs in an area in need of these opportunities. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. P33RA1, which would focus on an unconfirmed alternative location, could lead to similar benefits for this ISA Objective but this would be negated somewhat by the failure to focus on Cardiff, Newport or the Heads of the Valleys which could perpetuate the loss of jobs, gradual depopulation and loss of services in the region and could have a negative impact on the Welsh language. P34 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective. P35 and its alternative are focused on a Valleys Regional Park. A Valleys Regional Park could help to maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and would give those living in rural areas an increased access to recreational facilities, which could create new opportunities for employment and promote economic inclusion for all. The Valleys Regional Park could also help to provide local communities with greater stewardship over their natural assets and subsequent employment opportunities. The alternative approach of focusing on a different area of Wales (P35RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location.										

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		P36 would see the Government help to ensure that new development takes place in proximity to sustainable transport modes. This would help to enhance regional connectivity and economic inclusion for all working age ranges. This policy would increase opportunities to access employment through accessible and inclusive connections. Any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education. P36RA1 and P36RA2 would deliver similar benefits but of a slightly more limited magnitude due to the focus on existing infrastructure or on connectivity only within Wales. Do-nothing alternatives would be likely to conform with baseline trends.								
4	To create opportunities for sustainable economic growth, diversity and business competitiveness	P33	Reg	T	H	+	++	++	No recommendations.	
		P33RA1	Reg	T	L	+	+	+		
		P33RA2	Reg	T	M	O	O	+		
		P34	n/a	n/a	H	O	O	O		
		P34RA1	n/a	n/a	H	O	O	O		
		P34RA2	n/a	n/a	H	O	O	O		
		P34RA3	n/a	n/a	H	O	O	O		
		P35	Reg	T	H	++	++	++		
		P35RA1	Reg	T	L	+	++	++		
		P35RA2	Reg	T	M	O	O	+		
		P36	Reg	T	H	+	++	++		
		P36RA1	Reg	T	M	+	+	++		
		P36RA2	Reg	T	M	+	+	++		
		P36RA3	Reg	T	M	O	O	+		
The retention of Cardiff's role through P33 would bring many benefits for all members of society including reducing inequality and poverty through employment and has the potential to support healthy lifestyle choices through well connected places, providing services and facilities to a wider area. The policy would be likely to help enhance the competitiveness and attractiveness of the economy in Cardiff. P33 would also encourage investment and development in Newport in order to facilitate strategic employment and housing growth. Given Newport's strategic importance to the region's economy, this policy would be likely to lead to major positive impacts on this ISA Objective over time. Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. P33 would also encourage greater prosperity in the Heads of the Valleys area and would have significant positive effects for the third sector which it directly references to support the growth and development in this area. The proposed investment would be likely to help facilitate economic growth. Some communities in the area, especially in the western areas, are or were strongly Welsh speaking. This policy could support the well-being of the language and its speakers in this area. It will create opportunities for sustainable economic growth, diversity and business competitiveness by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. P33RA1, which would focus on an unconfirmed alternative location, could lead to similar benefits for this ISA Objective but this would be negated somewhat by the failure to focus on Cardiff, Newport or the Heads of the Valleys which could perpetuate the loss of jobs, gradual depopulation and loss of services in the region and could have a negative impact on the Welsh language. P34 and its alternatives are concerned with green belts in South East Wales and so would be unlikely to have a discernible impact on this ISA Objective. With regards to P35, a Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will help create opportunities for sustainable										

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		economic growth, diversity and business competitiveness. The Valleys Regional Park would be likely to support more empowered communities with greater stewardship over their natural assets and subsequent economic benefits in the region based around a sustainable industry. The policy would however have significant positive effects for the third sector which it directly references to support the delivery of the Park. The alternative approach of focusing on a different area of Wales (P35RA1) would be likely to also deliver similar economic benefits but there is greater uncertainty around this given the unspecified location. P36 would see the Government help to ensure the development of South East Metro. This would help to enhance business competitiveness. Any development to improve connectivity in the south east could have low level benefit for the well-being of the Welsh language, as a result of increased access to jobs and education. The South East Metro can provide the basis for connectivity across the region and this includes rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional connectivity and opportunities for sustainable economic growth, diversity and business competitiveness an increase in employment across the country and promote economic inclusion. P36RA1 and P36RA2 would deliver similar benefits but of a slightly more limited magnitude due to the focus on existing infrastructure or on connectivity only within Wales. The do-nothing alternatives would be likely to conform with baseline trends.								
5	To contribute towards the future well-being of the Welsh language	P33	Reg	T	H	+	+	++	No recommendations.	
		P33RA1	Reg	T	M	+	+	+		
		P33RA2	Reg	T	H	O	O	+		
		P34	n/a	n/a	H	O	O	O		
		P34RA1	n/a	n/a	H	O	O	O		
		P34RA2	n/a	n/a	H	O	O	O		
		P34RA3	n/a	n/a	H	O	O	O		
		P35	Reg	T	L	O	+	+		
		P35RA1	Reg	T	L	O	+	+		
		P35RA2	Reg	T	L	O	+	+		
		P36	Reg	P	L	O	+	+		
		P36RA1	Reg	P	L	O	+/-	+		
		P36RA2	Reg	P	L	O	O	+		
		P36RA3	Reg	P	L	O	O	+		
P33 - Growth focus in a traditionally non-Welsh speaking area can either be seen as an opportunity to grow the language, through new employment and education opportunities, or a weakening of existing Welsh speaking communities. Any impact likely to be very small either way. The attractiveness of this region to people across Wales as a place with job opportunities means the growth focus could draw Welsh speakers into the region. For the region itself, this would have positive impacts. The effects of the P33RA1 as with P33 are unpredictable and likely to be very small, as the region has relatively few traditional 'Welsh speaking communities.' Culture and media play an important role in attracting members of younger age groups to an area, including Welsh speakers to the city and its region. P34 and its alternatives are unlikely to have a discernible impact on this ISA Objective. P35 and P35RA1 It is unclear how the establishment of a park could impact on jobs and on Welsh speaking communities. The do-nothing scenarios would be likely to conform with baseline trends. P36 any development to improve connectivity in the south east could have modest benefit for the well-being of the Welsh language, as a result of increased access to jobs and education within the region										

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		P36RA1: A failure to invest in public transport will hold back the regional economy, but effect on Welsh speaking communities and the language generally is unknown and unlikely to be significant.								
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design		P33	Nat	P	H	O	-	-	No recommendations
			P33RA1	Nat	P	M	-	-	-	
			P33RA2	Nat	P	M	O	O	+	
			P34	Nat	P	H	+	+	+	
			P34RA1	Nat	P	M	+	+	+	
			P34RA2	Nat	P	M	+	+	+	
			P34RA3	Nat	P	M	O	O	+	
			P35	Nat	P	H	O	-	-	
			P35RA1	Nat	P	M	-	-	-	
			P35RA2	Nat	P	M	O	O	+	
			P36	Nat	P	H	+	+	++	
			P36RA1	Nat	P	M	+	+	+	
			P36RA2	Nat	P	M	+	+	+	
			P36RA3	Nat	P	M	O	O	+	
	P33 and P35 would facilitate new development. It is considered to be likely that new buildings, residents and businesses and their associated energy consumption and transport movements would lead to some degree of increase greenhouse gas emissions. However, both policies seek to ensure that this development is in relatively sustainable locations that reduce the need for people to travel, such as by being in proximity to key services and offering good digital connectivity, whilst also providing good access to active and public transport modes. New development should also be seen in the context of other NDF policies which, combined, seek to make a meaningful contribution towards Wales' transition to a low-carbon future, such as policies on increasing the supply of renewable energy, developing more efficient energy networks and improving the offering of sustainable transport modes. Overall it is considered that a minor adverse effect cannot be ruled out but this is somewhat dependent on implementation. P33RA1 and P35RA1 would have similar effects but potentially of a greater magnitude given the risk of new development taking place away from more sustainable locations. The do-nothing alternatives would be likely to conform with baseline trends as greenhouse gas emissions associated with the transport sector are slowly declining, in part due to improving emissions standards of vehicles and the increasing proportion of the vehicle fleet being electric. P34, P34RA1 and P34RA2 would help to protect areas of natural carbon sinks. P36 would help to ensure people in Wales have good access to sustainable transport modes which would support the decarbonisation of transport. The alternative of focusing on existing infrastructure would have a similar effect but to a lesser magnitude (depending on what these other location options would be, which is currently uncertain). P36RA1 and P36RA2 would have similar benefits of a lesser magnitude and certainty. The do-nothing scenarios would be likely to conform with baseline trends.									
7	To contribute to the reduction and management of flood risk		P33	Reg	T	H	-	-	-	Development in areas of flood risk should not only conform with WG flood risk management policy but could also incorporate natural flood risk alleviation measures such
			P33RA1	Reg	T	M	-	-	-	
			P33RA2	Reg	T	M	O	O	-	
			P34	Reg	T	H	O	+	++	
			P34RA1	Reg	T	M	O	+	++	
			P34RA2	Reg	T	M	O	+	++	
			P34RA3	Reg	T	M	O	O	-	

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effect	Medium-term effect		Long-term effect
			P35	Reg	T	H	O	-	-	as GI elements, permeable surfaces & SUDS.
			P35RA1	Reg	T	M	O	-	-	
			P35RA2	Reg	T	M	O	O	-	
			P36	Reg	T	M	O	-	-	
			P36RA1	n/a	n/a	H	O	O	O	
			P36RA2	Reg	T	L	O	-	-	
			P36RA3	Reg	T	M	O	O	-	
P33, P33RA1, P35, P35RA1, P36 and P36RA2 would encourage new development in regions of Wales with a broad extent of Flood Zones 2 and 3. There is a risk that new development could be situated on land at risk of flooding. It is assumed that, in line with Welsh Government policy on flood risk management, that development would not take place in areas of flood risk with which the development type is incompatible. It should also be noted that development in Cardiff and Newport would be likely to benefit from existing flood defence schemes, although as per TAN 15 existing flood defence schemes are only designed to protect existing development. However, there is a risk that the development and growth in these areas would lead to the loss of greenfield (comprised of infiltrating vegetation and permeable soils that help to reduce flood risk) and could potentially expose businesses or neighbourhoods to flood risk or could alter the extent and distribution of flood risk in the region. Climate change will be likely to exacerbate this issue over the coming years. P36RA1 would focus on existing infrastructure and so it would be unlikely to have a discernible effect on flood risk. P34, P34RA1 and P34RA2 could help to enhance the local extent of above ground vegetation and GI, which provides a natural flood risk alleviation service. Do nothing alternatives would be likely to conform with baseline trends.										
8	To create opportunities to encourage the protection and improvement of air quality		P33	Nat	P	M	-	-	-	There is a potential to strengthen P33 to focus the connectivity on low carbon options to improve air quality.
			P33RA1	Nat	P	L	-	-	-	
			P33RA2	Nat	P	L	O	O	+	
			P34	Nat	P	H	+	+	+	
			P34RA1	Nat	P	M	+	+	+	
			P34RA2	Nat	P	M	+	+	+	
			P34RA3	Nat	P	M	O	O	+	
			P35	Nat	P	H	-	-	-	
			P35RA1	Nat	P	M	-	-	-	
			P35RA2	Nat	P	M	O	O	+	
			P36	Nat	P	H	+	+	++	
			P36RA1	Nat	P	M	+	+	+	
			P36RA2	Nat	P	M	+	+	+	
			P36RA3	Nat	P	M	O	O	+	
P33, P33RA1, P35 and P35RA1 would be likely to lead to higher levels of economic growth that may lead to an increase in air pollution due to associated increases in traffic and resources consumption. Development in and around Cardiff and Newport would enable relatively low-emission and sustainable transport for businesses and local people due to the provision of sustainable transport options here and the proximity of services, people and jobs. This would be somewhat dependent on implementation of development and so there is a degree of uncertainty. P34, P34RA1 and P34RA2 would help to protect areas of natural air filtering whilst providing opportunities to enhance the extent and quality of GI cover in the region, which could enhance the air filtering ecosystem service it provides.										

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		P36 would help to enhance access to sustainable transport modes which would support a movement towards low-emission movements and travel for local people. P36RA1 and P36RA2 would have a similar effect but to a lesser magnitude. The do-nothing scenarios would be likely to conform with baseline trends.								
9	To create opportunities to protect and enhance the quality and quantity of water features and resources		P33	Reg	T	H	O	-	-	Development should be water efficient and encouraged to adopt precautionary measures to minimise the risk of contamination or pollution. Development should only be permitted where adequate capacity in the local sewerage system is evident.
			P33RA1	Reg	T	M	O	-	-	
			P33RA2	Reg	T	M	O	O	-	
			P34	Reg	T	H	+	+	+	
			P34RA1	Reg	T	M	+	+	+	
			P34RA2	Reg	T	M	+	+	+	
			P34RA3	Reg	T	M	O	O	-	
			P35	Reg	T	H	O	-	-	
			P35RA1	Reg	T	M	O	-	-	
			P35RA2	Reg	T	M	O	O	-	
			P36	Reg	T	H	O	-	-	
			P36RA1	Reg	T	H	O	-	-	
			P36RA2	Reg	T	H	O	-	-	
			P36RA3	Reg	T	M	O	O	-	
		P33, P33RA1, P35 and P35RA1 would be likely to lead to higher levels of water consumption as a result of new development in the region. Natural waterbodies, such as the River Usk, could be exposed to an increased risk of water contamination or pollution as a result of the construction and operation of new development. However, focusing growth in more urban areas may be an effective means of reducing the quantity of new development in the countryside and in previously undeveloped locations where the potential impacts on natural waterbodies may be greater (the same potential positive impact can be said for P33). It is unclear if new development encouraged in P33 and P35 would risk making local sewerage systems over-capacity. P34 and its alternatives would help to protect green belt land, which could help to protect the quality of natural waterbodies due to the ecosystem services provided by above-ground vegetation and healthy soils. P36 and P36RA2 could potentially pose a risk to water quality depending on the location and implementation of new transport development. P36RA1 would focus on existing infrastructure and so it would be unlikely to have a discernible impact on this ISA Objective. The do-nothing alternatives would conform with baseline trends.								
10	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups		P33	Reg	T	H	+	+	++	P33 could include reference to connections to facilities and services. P36 - the role of the Metro in increasing connections could be recognised within the policy wording itself.
			P33RA1	Reg	T	M	+	+	+	
			P33RA2	Reg	T	M	O	O	-	
			P34	n/a	n/a	H	O	O	O	
			P34RA1	n/a	n/a	H	O	O	O	
			P34RA2	n/a	n/a	H	O	O	O	
			P34RA3	n/a	n/a	H	O	O	O	
			P35	Reg	T	M	+	+	++	
			P35RA1	Reg	T	M	+	+	+	
			P35RA2	Reg	T	M	O	O	-	
		P36	Reg	P	H	+	+	++		

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
			P36RA1	Reg	P	H	+	+	+	
			P36RA2	Reg	T	M	+	+	+	
			P36RA3	Reg	T	M	O	O	-	
		Policy P33, looks to increase connectivity and deliver focused growth. This will increase connectivity through public transport in the region where there is an opportunity to increase access to facilities and services for all. Such an approach could result in benefits in terms of enabling children and young people within the area to access goods and services. The policy could be strengthened to include reference to facilities and services. It will also create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups by supporting coordinated regeneration and investment in the heads of the valleys area to increase prosperity and address social inequalities which will help both urban and rural areas. P33RA1 could be less impact than P33 depending on implementation may not support the commitment to the development of Newport. P35 A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities which will create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. P36 will increase connectivity for all people and enhance their access to facilities and services. The South East Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision to enable them to have better opportunities which arise from better regional transport connections. The Metro provides opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups. P36RA1 and P35RA1 could be less impact than P36 and P35 depending on implementation, wouldn't support the commitment to the development of the northern part of the region. P34 and its alternatives would be unlikely to have a discernible impact. Do nothing approaches would be likely to conform with baseline trends.								
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved		P33	Reg	T	H	+	+	++	P33 could be strengthened to include reference to connections to facilities and services. P36 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.
			P33RA1	Reg	T	M	+	+	+	
			P33RA2	Reg	T	M	O	O	-	
			P34	n/a	n/a	H	O	O	O	
			P34RA1	n/a	n/a	H	O	O	O	
			P34RA2	n/a	n/a	H	O	O	O	
			P34RA3	n/a	n/a	H	O	O	O	
			P35	Reg	T	M	+	+	++	
			P35RA1	Reg	T	M	+	+	+	
			P35RA2	Reg	T	M	O	O	-	
			P36	Reg	P	H	+	+	++	
			P36RA1	Reg	P	H	+	+	+	
			P36RA2	Reg	T	H	+	+	+	
			P36RA3	Reg	T	M	O	O	-	
P33 This Policy will support the development of the South East region as a focus for growth; linking it to transport and connectivity infrastructure. Such an approach could result in benefits in terms of providing services which enable improvements in social cohesion and equality for all, including children and young people within the area. The policy looks to increase prosperity and reduce inequalities this will have a significant positive impact on the health of the communities within this area. There is an opportunity to strengthen the supporting text to recognise the environmental benefits within this area. The natural										

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects						Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		environment bring many health benefits both physically and mentally. This will create the opportunities within which an improvement in social cohesion and equality can be achieved by supporting coordinated regeneration and investment to increase prosperity and address social inequalities which will help both urban and rural areas. Supporting regeneration and investment in the region could result in benefits in terms of improving the social and economic conditions in the Area, fostering the conditions to support improvements to social cohesion and equality for children and young people. The policy could be strengthened to include reference to connections to facilities and services. P33RA1 – could be less impact to P33 depending on implementation. P33RA2 - Doing nothing may not maximise the opportunities P34 would be unlikely to have a discernible impact on this ISA Objective. P35 The Valleys Regional Park would bring opportunities for recreation, increasing access to natural environment, improving well-being and embracing cultural identity. This would bring many health benefits and provide more opportunities for communities to make healthy lifestyle choices. A Valleys Regional Park will help maximise the social, economic and environmental potential of the Valleys' natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities, which will create the opportunities within which an improvement in social cohesion and equality can be achieved. Supporting the Government's ambition for a Valleys Regional Park could provide cultural and environmental benefits in terms of allowing communities to access its existing assets and supporting investment. This could foster the conditions to support improvements to social cohesion and equality for all, including children and young people by providing an environment which allows for the ability to play, relax and join in a wide range of activities. P35RA1 - Could be less impact to P35 depending on implementation, wouldn't support the commitment to the development of the Park P36 - The investment in connections across the region would improve inclusive access to facilities and services, there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text. This could provide active travel and healthier travel choices. The South East Metro can provide the basis for connectivity across the region and this include the rural areas. Rural areas could benefit from increased public transport provision, arising from better regional connectivity, enabling better opportunities, and the Metro provides further opportunities within which an improvement in social cohesion and equality can be achieved. Focusing development in proximity to sustainable transport options should help to ensure people of all backgrounds have equal access to services, places and amenities. Supporting the development of the South East Metro should ensure better connectivity across the South Wales Region. This could lead to notable improvements in access for all, including children and young people to a wider range of services and other communities which were not as easy to access before. For example, it could facilitate better access to education facilities for children and young people. Facilitating access improvements this should create opportunities for improvements in social cohesion and equality. P36RA1 would be likely to have similar benefits to P36, but by simply focusing on existing infrastructure these benefits would be of a lower magnitude with potentially less certainty. Do-nothing approaches would be likely to conform with baseline trends.								
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs		P33	Reg	T	H	++	++	++	No recommendations.
			P33RA1	Reg	T	M	+	++	++	
			P33RA2	Reg	T	M	O	O	-	
			P34	Reg	n/a	H	O	O	O	
			P34RA1	Reg	n/a	H	O	O	O	
			P34RA2	Reg	n/a	H	O	O	O	
			P34RA3	Reg	n/a	H	O	O	O	
			P35	Reg	n/a	H	O	O	O	
			P35RA1	Reg	n/a	H	O	O	O	
			P35RA2	Reg	n/a	H	O	O	O	
		P36	Reg	n/a	H	O	O	O		

Grouping 13										
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations	
				Scale	T/P	Cert	Short-term effect	Medium-term effect		Long-term effect
			P36RA1	Reg	n/a	H	O	O	O	
			P36RA2	Reg	n/a	H	O	O	O	
			P36RA3	Reg	n/a	H	O	O	O	
		P33 and its alternative P33RA1 would be expected to help encourage housing growth in strategic locations of south east Wales. Such an approach could result in benefits in terms of providing good quality, affordable housing which meets local needs, including for children and young people, within the local area. It would support coordinated regeneration and investment in the area to increase prosperity and address social inequalities which will help both urban and rural areas. The alternatives of focusing on alternative locations could encourage housing growth in unconfirmed areas. P34, P35 and P36 and their alternatives would be unlikely to have a discernible impact on this ISA Objective. The do-nothing alternative would conform with baseline trends.								
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes		P33	Reg	T	M	O	-	-	Where P35 refers to maximising opportunities for development, it could instead refer to maximising social, environmental and economic opportunities offered by new development proposals in the region, to ensure that potential positive effects on the natural environment are maximised.
			P33RA1	Reg	T	M	-	-	-	
			P33RA2	Reg	T	M	O	O	-	
			P34	Reg	T	H	+	+	++	
			P34RA1	Reg	T	M	+	+	++	
			P34RA2	Reg	T	M	+	+	++	
			P34RA3	Reg	T	M	O	O	-	
			P35	Reg	T	H	+/-	+/-	+/-	
			P35RA1	Reg	T	M	-	-	-	
			P35RA2	Reg	T	M	O	O	-	
			P36	Reg	T	H	O	O	-	
			P36RA1	Reg	T	M	O	O	+	
			P36RA2	Reg	T	M	O	O	-	
			P36RA3	Reg	T	M	O	O	-	
P33, P33RA1, P35 and P35RA1 would lead to new growth and development that could adversely impact landscape and townscape character depending on the type of development and its location and implementation. It is likely that this development would typically be in and around existing urban areas and the built form, and so could be in-keeping with the surrounding character. Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the surrounding character if these sites are in a derelict or run-down condition. P33, P33RA1 may provide more opportunities for developing in existing built up areas and using previously developed land than P35. There is greater uncertainty over the location of development under P33RA1 and P35RA1. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on landscape character. These policies have the potential to deliver accessible and inclusive townscapes. Whilst new development associated with the Valleys Regional Park, as per P35, could pose a risk to landscape character, the Regional Park could also help to ensure that distinctive and historic landscapes in the area are protected and enhanced and visitors to the area are better able to appreciate them. P34, P34RA1 and P34RA2 would help to protect green land which would help to protect and enhance the landscape character. P36 and P36RA2 would see transport infrastructure enhanced which could also alter the local landscape character depending on the design and scale of the transport infrastructure, however there is potential to deliver accessible and inclusive townscapes. P36RA1 would focus on existing transport infrastructure, which could provide opportunities for improving the impact of transport infrastructure on the local character.										

Grouping 13									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
		Do-nothing scenarios, wherein future development is less managed through the NDF and less focused in certain areas as these policies propose, would be likely to conform with baseline trends.							
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	P33	Reg	T	H	O	-	-	The opportunity and benefits of heritage led regeneration could be recognised in the supporting text of P33. P35 could refer to maximising on social, economic and environmental opportunities offered by new development in the region.
		P33RA1	Reg	T	M	-	-	-	
		P33RA2	Reg	T	M	O	O	-	
		P34	Reg	T	H	+	+	++	
		P34RA1	Reg	T	M	+	+	++	
		P34RA2	Reg	T	M	+	+	++	
		P34RA3	Reg	T	M	O	O	-	
		P35	Reg	T	H	+	+	++	
		P35RA1	Reg	T	L	+	+	+	
		P35RA2	Reg	T	M	O	O	-	
		P36	Reg	T	H	O	O	-	
		P36RA1	Reg	T	M	O	O	+	
		P36RA2	Reg	T	M	O	O	-	
		P36RA3	Reg	T	M	O	O	-	
		P34 and P35, as well as their alternatives, would help to protect green belt land and a Valleys Regional Park which could help to protect and enhance the setting of historic areas and heritage assets. Their alternatives would be likely to have similar benefits, although there is greater uncertainty over their location. The Valleys Regional Park also offers opportunities for new funding to preserve the distinctive heritage environment in the area, as well the delivery of new opportunities for visitors to appreciate this heritage, such as new museums and walking paths. It is likely that P35RA1 would deliver similar benefits but potentially of a lesser magnitude and with less certainty as it is unclear what sort of development, and where, the focus would be on. P33, P33RA1 would lead to new growth and development that could adversely impact the setting of historic areas and heritage assets depending on the type of development and its location. It is likely that this development would typically be in and around existing urban areas and the built form, and so could be in-keeping with the surrounding character and thus have minimal impacts on setting. P33, P33RA1 may provide more opportunities for developing in existing built up areas and using previously developed land due to their focus on Newport and Cardiff. There is greater uncertainty over the location of development under P33RA1 and would be likely to lead to more growth and development than P33 and this could have impacts on the setting of nearby heritage assets or historic environments, such as by increased density of developments or taller buildings altering views. Opportunities to use brownfield land for development may also lead to improvements to the impact of sites on the setting of historic areas or assets if these sites are in a derelict or run-down condition. The majority of new development however would be expected to be on previously undeveloped land and the subsequent losses of open space and greenfield would lead to adverse impacts on the setting of Listed Buildings and SAMs. This policy has the potential to increase access to and understanding of the historic environment and could achieve this through heritage led regeneration. This could be recognised in the supporting text. P36 and P36RA2 would see transport infrastructure enhanced which could also alter the setting of historic areas and heritage assets. P36RA1 would focus on existing infrastructure and so would be an opportunity to improve the impact of this infrastructure on the local setting. Do-nothing alternatives would be likely to conform with baseline trends.							
15	To create the opportunities for	P33	Reg	T	M	O	+	+	The opportunity and benefits of heritage led
		P33RA1	Reg	T	L	O	+	+	

Grouping 13									
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations
			Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect	
the protection and promotion of Welsh culture		P33RA2	Reg	T	M	O	O	+	regeneration could be recognised in the supporting text of P33 or added to the Spatial Strategy as an overarching principle.
		P34	Reg	T	H	+	+	+	
		P34RA1	Reg	T	M	+	+	+	
		P34RA2	Reg	T	M	+	+	+	
		P34RA3	Reg	T	M	O	O	+	
		P35	Reg	T	H	+	+	++	
		P35RA1	Reg	T	M	+	+	++	
		P35RA2	Reg	T	M	O	O	+	
		P36	Reg	T	H	+	+	+	
		P36RA1	Reg	T	M	+	+	+	
		P36RA2	Reg	T	M	+	+	+	
		P36RA3	Reg	T	M	O	O	+	
P33, P33RA1, P35 and P35RA1 have the potential to increase access to and understanding of the cultural assets and could achieve this through culture led regeneration. P34, P34RA1 and P34RA2 would help to protect green and open spaces in south east Wales and this could help to preserve Welsh cultural places and activities, better enabling current and future generations to visit, appreciate and partake in. P35 would see a new Regional Park that will help maximise the social, economic and environmental potential of the Valleys’ natural and cultural heritage assets and will give those living in rural areas increased access to nature and recreational facilities. A Valleys Regional Park will help create the opportunities for the protection and promotion of Welsh culture. P36, P36RA1 and P36RA2 would help to enhance connectivity via sustainable modes of transport, which could enable the area to take more advantage of local Welsh cultural assets in attracting visitors. The do-nothing alternatives would be likely to conform with baseline trends. For P35 this may still mean the Valleys Regional Park will be delivered however, the planning system has a role to play in supporting its delivery and driving change and regeneration to create the opportunities for the protection and promotion of Welsh culture.									
16 To create opportunities for the conservation and enhancement of biodiversity and geodiversity		P33	Reg	P	M	O	-	-	No recommendations
		P33RA1	Reg	P	L	-	-	-	
		P33RA2	Reg	P	M	O	O	-	
		P34	Reg	P	H	+	+	++	
		P34RA1	Reg	P	M	+	+	++	
		P34RA2	Reg	P	M	+	+	++	
		P34RA3	Reg	P	M	O	O	-	
		P35	Reg	P	H	+/-	+/-	+/-	
		P35RA1	Reg	P	L	+/-	+/-	+/-	
		P35RA2	Reg	P	M	O	O	-	
		P36	Reg	P	L	-	-	-	
		P36RA1	Reg	P	L	O	-	-	
		P36RA2	Reg	P	L	O	-	-	
		P36RA3	Reg	P	M	O	O	-	

Grouping 13										
ISA Objective	Future Baseline	Policy/option	Summary of Effects						Recommendations	
			Scale	T/P	Cert	Short-term effect	Medium-term effect	Long-term effect		
			P33 and P33RA1 would lead to new growth and development that could adversely impact nearby biodiversity designations through a variety of impact pathways, such as increased public access associated disturbances, increased atmospheric nitrogen deposition caused by new traffic or losses of functionally linked land. As much of the new development would be situated on previously undeveloped land, the losses of greenfield and open space could reduce habitat connectivity without concerted efforts to ensure that high quality GI is incorporated into new developments and that space is provided for wildlife to move free of disturbances from humans. Focusing development in Cardiff and Newport could help to direct development away from sensitive countryside areas, although brownfield sites can also be of significant biodiversity value and both urban areas are in proximity to European designations at the Severn Estuary. There is greater uncertainty of the location of development under P33RA1. P34, P34RA1 and P34RA2 would help to protect greenfield which could help to protect and enhance important areas of biodiversity value as well as to enhance local ecological connectivity by establishing, protecting and enhancing wildlife corridors. They could also help to protect and enhance important land functionally linked with nearby designations, such as the various SACs coincident with the Brecon Beacons, although it should be noted that the HRA of the NDF ruled out adverse effects on the integrity of Natura 2000 EU sites. P35 and P35RA1 would also lead to new development in the Regional Park that could pose a risk to biodiversity, sensitive designations and the connectivity of the wider ecosystem. Whilst the Regional Park would be designed in a way that seeks to enhance the natural environment, avoiding adverse effects on sensitive species or habitats would be difficult in all cases. The scale of the likely development would be likely to reduce the connectivity of the wider ecosystem. The park could also lead to some degree of increase in the number of visitors to the area, such as due to the creation of new attractions (e.g. museums) and walking paths. New visitors could pose a disturbance risk to sensitive species or habitats in rural locations. At the same time, the Valleys Regional Park could attract new investment for measures that seek to protect and enhance biodiversity in the area. New development associated with the Metro, invested in through P36, could potentially have a minor adverse impact on areas of sensitive biodiversity value as well as regional ecological connectivity. The alternative of focusing on existing infrastructure would have similar effects of a lower magnitude. The do-nothing approach would be likely to conform with baseline trends. Do nothing alternatives would be likely to conform with baseline trends.							
			With regards to P33 the HRA identified the following risks: <i>‘Focusing growth in and around the existing urban areas is considered likely to minimise the potential for adverse effects on designated sites; however, in the absence of a spatial element to the policy, the potential for Natura 2000/ Ramsar sites to be affected cannot be ruled out. Increased growth in Cardiff, Newport and Heads of the Valley area could lead to impacts upon Natura 2000/ Ramsar sites through potential disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of land allocations within lower-tier plans), or through other effects such as water/ air pollution or increased disturbance as a result of recreational pressures from an increased population within the region. Increased growth in the Heads of the Valleys area could also lead to impacts upon Blaen Cynon SAC (designated for marsh fritillary butterfly) through disturbance, loss or fragmentation of habitats suitable for marsh fritillaries.’</i>							
			P34 was screened out of detailed consideration in the HRA.							
			With regards to P35 the HRA identified the following risks: <i>‘The creation of a Valleys Regional Park is considered to be a positive policy, with many environmental, economic and social benefits; however, if the Park is located in an unsuitable location, the policy could potentially lead to detrimental impacts on existing habitats and species. There are a number of Natura 2000/ Ramsar sites within the Valleys area, including Blaen Cynon SAC, Coedydd Need a Mellte SAC and Cwm Cadlan SAC which could be impacted by any potential new Park development. Whilst developing the new Park within a Natura 2000/ Ramsar site would clearly be contrary to their conservation objectives, it is also possible that locating the new Park adjacent to such sites could also have adverse effects, especially if species from those sites depend upon similarly-open habitats beyond the site boundaries (e.g. for foraging or roosting). Introducing new habitats adjacent to existing sensitive habitats could also have negative impacts on the hydrology of the area, may introduce a different seed</i>							

Grouping 13									
ISA Objective		Future Baseline	Policy/option	Summary of Effects					Recommendations
				Scale	T/P	Cert	Short-term effect	Medium-term effect	
		<i>bank of unwanted species, and/or could provide cover for predators of qualifying species. Given that one of the main purposes of the Regional Park is to encourage visitors to the area, recreational pressure, especially in areas not currently disturbed by human activity.'</i>							
		With regards to P36 the HRA identified the following risks: 'Potential impacts could include (but are not limited to): disturbance/ displacement of bird species associated with nearby SPA/ Ramsar sites (for example, loss of functionally-linked land under the footprint of the metro if outside of urban locations, or along the coast), or through other effects such as water/ air pollution or increased disturbance/damage as a result of recreational pressures from an increased population within the region (should the metro provide greater access to coastal areas known to support sensitive habitats and species).'							
		With regards to P33, P35 and P36 the HRA concludes that 'Adhering to the measures set out ... by Local Planning Authorities, Strategic Planning Panels and developers when preparing lower-tier plans and strategies and during project-specific implementation of the policy, as well as compliance with PPW10 and TAN 5 would ensure no adverse effect on the integrity of Natura 2000/ Ramsar sites'.							
		Do-nothing alternatives would be likely to conform with baseline trends.							
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	P33	Reg	P	M	O	-	-	P35 could refer to maximising opportunities for social, environmental and economic gains offered by new development, rather than just maximising on opportunities to deliver new development, to better ensure that the natural environment would be enhanced as a result of the new Regional Park.
		P33RA1	Reg	P	L	-	-	-	
		P33RA2	Reg	P	M	O	O	-	
		P34	Reg	P	H	+	+	++	
		P34RA1	Reg	P	M	+	+	++	
		P34RA2	Reg	P	M	+	+	++	
		P34RA3	Reg	P	M	O	O	-	
		P35	Reg	P	H	-	-	-	
		P35RA1	Reg	P	L	-	-	-	
		P35RA2	Reg	P	M	O	O	-	
		P36	Reg	P	M	O	-	-	
		P36RA1	Reg	P	M	O	-	-	
		P36RA2	Reg	P	M	O	-	-	
		P36RA3	Reg	P	M	O	O	-	
		P33, P33RA1, P35 and P35RA1 would encourage new development that would be likely to require the consumption of natural resources and require using up previously undeveloped land. Focusing development in Cardiff, Newport and The Valleys would be likely to provide good opportunities for utilising previously developed land. Whilst uncertain, P33RA1 could be likely that it would be situated in more rural locations where there are less brownfield opportunities and a greater uptake of previously undeveloped land could be expected.							
		P34 and its alternatives would help to protect greenfield, which would make a meaningful contribution towards preserving natural resources such as soil stocks.							
		P36, P36RA1 and P36RA2 would lead to new and improved transport infrastructure, the development of which would likely require the consumption of minerals and resources. A minor adverse effect therefore cannot be ruled out.							
		do-nothing alternatives would be likely to conform with baseline trends.							

APPENDIX G

Consultation Comments and Responses to the ISA of the Draft NDF

Consultation Responses for the ISA of the Draft NDF

It is noted that all of the consultation responses from the formal consultation on the ISA of the Draft NDF specifically are included in the table below. It is further noted that all of the consultation responses in their totality (including those relating to the Draft NDF, the HRA and the ISA) are set out in the consultation report accompanying the Draft NDF Including Proposed Changes, which responds to all of the issues raised.

Table G-1: Consultation Comments and Responses to the ISA of the Draft NDF

Rep number	Comment	Response	Proposed Action/ Change
2.29	By highlighting central Anglesey as a large scale Wind Farm you have obviously not considered the impact upon rural communities, their health or the economic development - tourism offers great benefits to Anglesey why on earth would you choose North West Wales as an area for mass renewable projects. These projects should be placed in industrial settings - see the turbines off the M56 near to Stanlow - works well industrial setting and not out of character there!	Impacts on rural areas, including health and economic impacts, have been assessed as part of the Integrated Sustainability Appraisal including the renewable energy policies. Tourism in rural areas is recognised in supporting text for Policy 4 which states that "Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy." There has been a study produced on the potential economic impact of wind farms on tourism in Wales ¹ . This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. Tourism as a policy area is covered in more detail in Planning Policy Wales.	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.
2.37	Rural. The key word you blithely skip over in your document is "rural". Areas will no longer be rural if they are developed, nor if they are covered with wind turbines. Think carefully before you act (or allow action). Once our exquisite rural areas are spoiled they will be lost, for ever.	Impacts on rural areas, including health and economic impacts, have been assessed as part of the Integrated Sustainability Appraisal, including the renewable energy policies. In rural areas the NDF looks to deliver places where people will live in vibrant rural places with access to homes, jobs and services. Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns.	None
2.53	The report is very partial. Other monitoring indicators not included in the ISA - no test of "soundness" as necessary for Planning Inspectors in LDPs i.e. well-evidenced, area appropriate and coherent methodologies - no detailed relationship with regional and local policies analysed - no direct reference to Sustainability Assessment, Strategic Environmental Assessment and other Environmental Directives	- The tests of 'soundness' do not apply to this report. However, the report demonstrates that a robust assessment process has been followed, starting at Stage A (Scoping), which included the development of an evidence base appropriate to the national scale, as	None

¹ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

		well as setting out the scope and the methodology. - The relationship between the NDF and other relevant plans, policies and programmes, was assessed at the Scoping Stage (PPP review). The relationship between the NDF and lower tier plans is explained within the plan and this will be strengthened. - The ISA does directly set out the processes and SA and SEA, with clear tables explaining how the requirements of the SEA Directive have been met (Tables 1.3 and 1.6).	
2.57	Point 2 of the ISA appraisal states the objective 'To contribute to an improvement in physical, mental and social health and well-being for all...' I'm entirely in agreement with this statement, but the threat posed to the natural environment by large scale wind and solar energy farms (together with the expansion of cities and towns) goes against this objective. Human beings need access to environments free of man-made interference. Note that a survey undertaken by the University of Leicester in recent years found that between 2006-2012, 22,000 hectares of green space was converted to 'artificial surfaces'. With reference to wind-farms in particular, in view of my own experience of living for the last 14 years under 1 kilometer from a wind-farm, the effect the noise from this development has had on my mental well-being has been extremely detrimental. The World Health Organisation has just released a survey of the detrimental effects of noise pollution in the modern world (wind-farm noise was included in the survey). This kind of mechanical noise in an environment (such as ours once was) entirely free of man-made noise is extremely distressing and debilitating. The spread of thousands more of these noisy machine simply fills me with horror. Point 15 of the ISA also states 'To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes'. This simply will not happen if large swathes of rural Wales are viewed as locations on a map for wind turbines and solar panels.	Impacts on health and well-being, including physical and mental health, have been assessed as part of the Integrated Sustainability Appraisal. This includes the renewable energy policies. A study from Public Health Wales (PHW) looking at health impacts of wind turbine noise concluded that “there is no evidence to suggest that noise from wind turbines has a direct physiological impact on health”. It recognised that “annoyance from wind turbine operation may cause stress and anxiety which can, in turn, affect quality of life”. The impact of turbines, including on health, would be addressed on a case by case basis through the planning process.  Wind Turbines - Noise.pdf PHW article -	Health section of the ISA for Group 8 amended to clarify that health impacts have been considered.
2.66	Please include Tourism as being potentially impacted by the proposal re wind turbines and Anglesey	A recent study (Regeneris Consulting and The Tourism Company, 2014) into the impact of wind turbines on Welsh Tourism found, <i>inter alia</i>, that: - National studies of the impacts of wind farms have shown that, where negative effects do occur, these are often in the form of displaced tourism. This is likely to be the case in Wales, where substantial areas of the country will remain unaffected by wind farm development. - There are a number of areas in Wales where wind farms have been an established presence on the local landscape for a relatively long time. These include Powys, Anglesey and the South Wales Valleys which were all the subject of case studies. The case	ISA updated in relation to the potential impacts on tourism from wind turbines on Anglesey and Powys, taking into account the land use planning considerations from the study.

		studies have not revealed any evidence of significant impacts on tourism to date. - The study has shown that the areas most affected by wind farms (currently and in the next decade) account for a very small proportion of Wales's total visitor economy. This is likely to be an indirect consequence of planning policy focusing development away from Wales's key natural assets and visitor attractions, including areas of outstanding natural beauty and national parks. - The evidence base shows a clear majority of people do not react negatively to wind farm developments or change their visiting behaviour as a result. Study into the Potential Economic Impact of Wind Farms and Associated Grid Infrastructure on the Welsh Tourism Sector: https://gov.wales/sites/default/files/publications/2019-06/potential-economic-impact-of-wind-farms-on-welsh-tourism_0.pdf	
2.69	There is no mention of 'Wellbeing'	Well-being, including the Well-being of Future Generations Act, has been an integral consideration through the ISA process. Well-being is a key element of ISA Objective 2.	None
2.72	The crisis in healthcare, or utter lack of it, in Wales is what the Assembly urgently needs to focus on	The importance of health is recognised in the NDF which takes a health in all policy approach. Noting the role of the planning system and impacts on the wider determinants of health. It is recognised that the built and natural environment is a key determinant of health and well-being and that the planning system has an important role in shaping the social, economic, environmental and cultural factors which determine health, and which promote or impact on well-being. The way places work and operate can have an impact on the choices people make in their everyday lives, including their travel and recreational choices and how easy it may be to socialise with others. The ISA integrates a health impact assessment to ensure the NDF avoid detrimental impacts and delivers positive impacts on health and well-being.	None

2.74	I feel that including the Welsh Language as a target is wrong. Simply the cost of supporting a bilingual economy is something that is not acceptable to taxpayers any longer. It also severely limits the opportunities for organisations, particularly Public sector to recruit sufficient staff to operate efficiently. There is no mention of reducing consumption as part of the greener future, only that of generating more energy. A KEY step towards sustainability is reduction of demand. The only mention of population is the growth of the older sector and growing major population sectors. Wales should have a population growth policy. The world's problems today are largely those of overpopulation.	A thriving and healthy Welsh language is an important and established ambition of the Welsh Government. Our strategy for growing the language – <i>Cymraeg 2050: A Million Welsh speakers</i> was issued in 2017. Public attitudes towards the Welsh language were captured in the 2017-18 National Survey for Wales. It found that 86% believe the Welsh language is something to be proud of and that 67% thought more effort needed to be put into supporting the language. The planning system can contribute towards creating favourable conditions in which the language can thrive, therefore it is legitimate and important for the NDF to address the matter. The ISA Framework contains objectives with which to assess the NDF in relation to reducing energy consumption, including objective 6: To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design It is not the role of the ISA to seek to control population numbers.	None None
2.79	We feel there needs to be more emphasis on education especially as it relates to citizenship, awareness of Welsh History and our place in the World, together with the naturalisation of people moving into Wales. The divisions exposed by the Brexit vote needs addressing and the most vulnerable in our society need protection. Education is one of the primary vehicles for social cohesion and tolerance of others	The ISA assess the impact of the NDF on education and social cohesion. The NDF looks to increase access for all to education facilities and to develop skills to support prosperity and well-being for all communities in Wales.	None
2.80	The Integrated Sustainability Appraisal Report provides a huge amount of data that will be useful in understanding the context and rationale for the NDF. It will also provide a means to monitor the effectiveness of the Plan as it goes forward. Llanfair DC will monitor its Neighbourhood Plan and refer where appropriate to the ISA. Llanfair D C Community Council would draw the NDF consultation's attention to the special interest areas. Llanfair DC's area includes areas such as	Noted with thanks. Sites designated for their nature conservation importance are considered in the baseline for the ISA.	No action.

	* the Clwydian Range and Dee Valley AONB * the nature reserves of Coed Cilygroeslwyd SSSI, one of North Wales Wildlife Trust's first nature reserves, purchased in 1964 and home to some genuine rarities and brimming with wildlife * Graig Wyllt, a lovely site sheltered by ancient woodland, awash with spring colour and with dazzling views across the Vale of Clwyd * the Eyarth Rocks butterfly reserve which has rare and endangered species [SSSI] Further special sites are being considered and the Community Council is liaising with the North Wales Wildlife Trust as well as the AONB. The Community Council will look at all proposed developments and seek to ensure there is no impact on these special areas. There is also a proposal to develop a strategic wildlife corridor across the Vale of Clwyd to allow connectivity between these special areas to enable continuity between habitats, build ecosystem resilience and, by this means, to encourage sustainability of the rare and nationally important species and as well as locally vulnerable habitats.		
2.86	As I have previously stated, wind turbines will not do what you think. they will blight the landscape. many tourists come for the landscape not to see wind turbines on every hill, every mountains, in every valley. the turbines will cost millions and tourism will fall off. wildlife especially birds struggle with turbines. many people I know have found dead buzzards at the base of these monstrosities. concrete gets poured into the ground contaminating our precious Earth, and concrete slurry runs off into all the local water courses, contaminating them! All the insects and amphibians are in the firing line and you want to help biodiversity. Do any of you live in the country? I know several people who are 'already surrounded by wind farms and communities are not protected! these are causing stress by flickering shadows from the turning turbines, constant noise and visual blight to their landscapes. It is causing major mental health impacts to a lot of people. House prices are effected and I know someone personally who has been offered a substantial sum of money by the wind turbine company to sell the house to them. The neighbor took the money and now there is an empty house not being used, and now owned by the energy company. I don't think that your policy covers that!! you say about reviewing the landscape and visual impact. I don't think you understand the concept of what that means. The map shows priority sites for wind and solar, but you neglect to put on the wind farms that already exist in Wales. I think you would find the map a little bit fuller and one might wonder why you are pursuing this un sustainable avenue. oh yes, its on the agenda. I don't see how wind turbines help to ecological networks, restoring peat lands and grasslands. new roads are carved into the hillside, cement and concrete thrown into the ground, all for the infrastructure to be built. In the process this destroys habitats, wildlife, peoples sanity and tourism. Some European protected sites and many Sites of Special Scientific Interest are within proposed sites. With rural towns having resources taken away all the time. local communities have to fight for their libraries. four local libraries near where I live were luckily given a years reprieve and not shut. The libraries are a community hub, not just for books but helping local people get bus passes, send documents through to local council, etc... most of these people do not drive, are vulnerable and old. no thought is given to these peoples lives. to my mind that is not creating a healthy happy community. local recycling centres are taken away, and now we have the green bin scheme. Surely if you are worried about carbon why are lorries getting sent to every house in the area to pick up bins, most people were happy to take their garden waste to the local recycling, where one lorry came and emptied the bins, less carbon.	There has been a study produced on the potential economic impact of wind farms on tourism in Wales². This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. Tourism as a policy area is covered in more detail in Planning Policy Wales. A study from Public Health Wales looking at health impacts of wind turbine noise concluded that "there is no evidence to suggest that noise from wind turbines has a direct physiological impact on health". It recognised that "annoyance from wind turbine operation may cause stress and anxiety which can, in turn, affect quality of life". The impact of turbines, including on health, would be addressed on a case by case basis through the planning process.	Economic section of the ISA for Group 8 amended to clarify that tourism and health impacts have been considered.
2.96	Rhaid rhoi mwy o bwyslais ar y Gymraeg, ar ddatblygu ar draws Cymru gan gymryd i ystyriaeth diffygion amlwg mewn buddsoddiad yn y Canolbarth, y ffyrdd, y gymuned, byd amaeth, iechyd ayyb.	The matters referenced are each addressed in the NDF and/or in Planning Policy Wales.	None
	Translation:		

² <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

	There must be a greater emphasis on the Welsh language, on its development across Wales taking account of obvious shortcomings in investment in mid Wales, on roads, on community, agriculture, health etc.		
2.98	Your consultation has been inadequate. The rural proposals, aside from the wind and solar, are so general that they are almost not worth the mention. What is clear from your proposals that local people will have no say. Local democracy is being taken away by the plan as it removes local decision making. The Welsh Government is giving itself the sole right to blight communities and landscapes, without taking any account of how its plans will impact local people, businesses and wildlife. Where are your comparison considerations? You don't even mention off shore wind as a possible option. How can a consultation be valid if it fails to consider viable options but rather simply pushes a predetermined proposal? This consultation should have involved a full analysis of all options with costs and impacts clearly quantified.	Noted. The NDF and the Welsh National Marine Plan (WNMP) both recognise that there are a number of opportunities to generate renewable energy across a variety of technologies, both on-shore and offshore, which should be maximised to help meet the targets. The plans do not rule out any particular technologies nor set specific targets for a particular technology. The NDF and WNMP will provide a framework to deliver renewable energy and ensure decision making is joined-up to maximise the opportunities across the marine and terrestrial areas. Due to the nature and scale of the NDF, the approach we have taken is considered to be the most appropriate method to assess the impacts of the plan, including the economic impacts. To deliver the type of cost-benefit analysis as set out in HM Treasury's Green Book would require detailed proposals for specific projects and that information is not available at this stage. We do not believe it would be possible to develop a meaningful cost-benefit analysis for the over-arching framework. However, wider social, economic, cultural and environmental impacts which would be addressed by a Green Book assessment are captured by the integrated assessment approach,	None
2.105	I know that by allowing comment to the NDF for the public, you are including the human voice BUT when I speak to people in my locality NO-ONE was aware of the NDF. There was no advertisement, nothing posted on any boards, no leaflet drop, no request for participation within the draft stage and no simplified statement (within the actual localities). If I am right in thinking you want the ordinary people of Wales to know about this process - which is indeed a political and social one affecting all of our lives - why did I only find out about it by a chance reading in a local rag? If you want a transparent all-inclusive process, why haven't you ensured this happened? At the very least, a simplified ISA should be made available - not just online but in people's letterboxes.	Noted. The statutory process of consultation has been followed with regards to the ISA process. In addition, further consultation events have taken place across Wales to ensure that as many people as possible have been aware of the process. It is not considered sustainable to include a letter drop / print a copy for every resident across the country. There are further details of the consultation and engagement that has informed the NDF on the website: https://gov.wales/national-development-framework	None.
2.106	I just hope mental health is high up on the agenda as I was totally let down by my local AM minister for Newport when I turned to her for help against cahms and I'm totally disgusted at the fact I was totally ignored when I tried to get back in touch to complain further.. voted labour all my life but I won't be voting for her again nor my friends and family!	The importance of health is recognised in the NDF which takes a 'health in all' policy approach, noting the role of the planning system and impacts on the wider determinants of health. It is recognised that the built and natural	Health section of the ISA for Group 8 amended to clarify that

		environment is a key determinant of health and well-being and that the planning system has an important role in shaping the social, economic, environmental and cultural factors which determine health, and which promote or impact on well-being. The way places work and operate can have an impact on the choices people make in their everyday lives, including their travel and recreational choices and how easy it may be to socialise with others. The ISA integrates a health impact assessment to ensure the NDF avoids detrimental impacts and delivers positive impacts on health and well-being.	health impacts have been considered.
2.111	As with my earlier responses, the balance between desired outcomes needs to be weighed up so there are not unintended consequences say from the drive for renewables blighting the landscape and destroying the tourism and visitor economy in a small ecosystem like Anglesey. The protection of species and safeguarding the natural environment need to be part of the indicators - as well as increasing biodiversity. Sustainability assessments should take account of the unique place based characteristics of regions like Anglesey, including the AONB and not water down any safeguards for these areas which are present in national planning policy.	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, and economic impacts, including tourism. There has been a study produced on the potential economic impact of wind farms on tourism in Wales ³ . This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. Tourism as a policy area is covered in more detail in Planning Policy Wales.	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.
2.117	The impact on rural communities has been grossly underestimated.	Noted. The impact on rural communities has been assessed as part of the Integrated Sustainability Appraisal. In rural areas job opportunities and community services will be supported to help attract and retain people. Development in towns and villages in rural areas will complement cities and towns	None
2.119	Tourism in central Wales is very important to the local economy. More wind farms will have a damaging effect on tourism and will lead to further closures of shops, restaurants, pubs etc.	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, and economic impacts, including tourism. Tourism as a policy area is covered in more detail in Planning Policy Wales. There has been a study produced on the potential economic	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.

³ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

		impact of wind farms on tourism in Wales ⁴ . This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process.	
2.120	There will be a unfavourable impact on rural communities in Mid-Wales by increasing the number of on-shore wind farms. This will likely to reduce tourism which keeps so many of our shops, pubs, restaurants and post offices open and provides so much employment where there are few other alternatives.	Noted. Policy 4 supports sustainable rural communities. The impact on rural communities has been assessed as part of the Integrated Sustainability Appraisal. In rural areas job opportunities and community services will be supported to help attract and retain people. Development in towns and villages in rural areas will complement cities and towns Tourism in rural areas is recognised in supporting text for Policy 4 which states that “Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy.” There has been a study produced on the potential economic impact of wind farms on tourism in Wales⁵. This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. Tourism as a policy area is covered in more detail in Planning Policy Wales.	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.
2.130	It appears that little or no notice is taken of comments from local residents . . . it is hoped that this situation may improve!	The statutory process of consultation has been followed with regards to the ISA process. In addition, further consultation events have taken place across Wales to ensure that as many people as possible have been aware of the process. All comments received have been responded to, and actioned where appropriate. There are further details of the consultation and engagement that has informed the NDF on the website: https://gov.wales/national-development-framework	None.
2.151	I don't believe that housing numbers were taken account of , under these proposals Housing numbers will continue to decline as there will not be sufficient availability in areas in which people want to live	An explanatory paper has been prepared to assist readers of the Draft NDF in understanding	None

⁴ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

⁵ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

		how it seeks to address housing issues across Wales, highlighting the key evidence that has informed the housing elements of the plan. This can be found here: https://gov.wales/sites/default/files/publications/2020-01/ndf-explanatory-note-housing-need.pdf	
2.155	I am against this theoretical exercise, it does not take on board the view of industry professionals, it is not ambitious enough or provide clarity in terms of how we provide sufficient new homes in Wales.	Noted.	None.
2.163	Outcomes monitoring is all about measuring the changes in people's real lives over time -but it doesn't have to be done through indicators - you can just ask people directly - give them a voice - so ask people how content/happy/satisfied they are with their lives now and ask them again in five years time.	Noted.	Different monitoring methods to be considered by the NDF team.
2.165	The slowing or reversal of rural depopulation would be a consummation devoutly to be wished. So many places have practically nobody living there, and derelict houses litter the landscape. With global warming, some of those places might be useful or productive again.	Noted. The NDF contains a supportive policy for rural communities and Outcome 2 of the NDF states that "In rural areas, job opportunities and community services will be supported to help attract and retain people." Through the NDF, people will live in vibrant rural places with access to homes, jobs and services. Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns	None
2.168	Broadly agree, with the proviso that Objective 4, for sustainable economic growth, should be recast as the development of sustainable local economies.	As a national scale plan, the role of the NDF is to consider the economy at a high level, whilst creating a framework to allow local sustainable economic growth.	None.
2.172	Care strategy for older people - no one wants to be forced to move away in later years	A care strategy is not the role of land use planning, but more the role of the local health board. The NDF identifies future changes in population, including an increasing older population.	None.
2.176	What sort of general public promotion did the ISA and the NDF actually have? - Because this is the first we have heard of it, we didn't even know this survey was being carried out until they told us it was closing. It finally made it onto national television, but only due to the disquiet everyone felt about the Welsh landscape being sold-off to build wind farms and the ugly spectre of industrial pylons being raised yet again in mid-Wales	The statutory process of consultation has been followed with regards to the ISA process. In addition, further consultation events have taken place across Wales to ensure that as many people as possible have been aware of the process. All comments received have been responded to, and actioned where appropriate. There are further details of the consultation and engagement that has informed the NDF on the website: https://gov.wales/national-development-framework	None.
2.197 - WBFGCo mmissioner	NDF Consultation – Response from the Future Generations Commissioner for Wales, Sophie Howe My response to this consultation constitutes advice issued under my section 19(1)(a) power. I would like to thank the Welsh Government's planning team for having sought the advice of my office from the start of the preparation of the first draft National Development Framework for Wales. I am pleased that the team have, in particular, followed our advice on involvement and have engaged more widely	Noted with thanks.	

	and differently from what they would have done prior to the coming into force of the Well-being of Future Generations Act. You will be aware that I have already advised that you need to consider future trends and scenarios in the development of this plan. As well as the issues around carbon emissions and biodiversity I have raised below, this is also clearly crucial in terms of how the NDF will support the delivery of the infrastructure required particularly in terms of connectivity and the changes in how we will live and work as a result of the fourth industrial revolution. I would like to understand how this has been considered in the framework. Turning to the substance of the framework: Consideration of the well-being of communities Subject to my main concern explained in the next paragraphs, I generally welcome the contents of the document and its references to communities well-being which follows my advice and I can recognise a real intent to embed the Well-being of Future Generations Act throughout the framework. Clearly the Government will need to demonstrate how these intentions are being implemented on the ground when the NDF is finalised as I am increasingly concerned that the aspirations set by Government are not being fully realised due to a lack of focus on supporting the change in culture needed and monitoring implementation Climate emergency, biodiversity and carbon targets The work on the NDF started prior to the declaration of Climate Emergency and I would like to understand precisely how the NDF contents are to be amended to reflect this very important development. In the same line, I would also like the Government to explain how the proposed NDF and maps have been assessed in line with the delivery of the national carbon reduction targets. I would like to see a robust analysis of how the NDF can help deliver the national carbon targets and how the framework seeks to carefully avoid increasing carbon emissions. While I was pleased that, following on my advice, there are commitments to 'low emission' transportation, 'low carbon' heat and energy generation throughout the document I fear this won't compensate for the proposed increase of high carbon emission projects (ports, airport, etc.) encouraged by the framework. This is particularly based on the fact that while some parts of the document encourage the right behaviours (renewables, cycling path, green belts, mixed use developments, mixed tenures, low carbon energy, low emission transport etc.), these can be totally undone by other parts of the framework such as the push towards airport and port development. The same point applies also in relation to the enhancement of biodiversity required in Wales by the Environment (Wales) Act. I would also like to see more clearly how the need for nature and biodiversity recovery has been taken into account and is delivered through the NDF, as well as how the Sustainable Management of Natural Resources principles have been applied (in addition to the sustainable development principle and ways of working in the well-being legislation) to the design of the NDF and in particular for design of the maps. I would therefore like to see another clear assessment of how the proposed NDF will help reverse the current biodiversity decline and I am not sure that the current propositions will be sufficient. The proposed draft of the NDF does not yet reflect the Climate and Ecological Emergency Declaration which must be taken seriously and be implemented in this framework (as well as in all other government policies) and I would expect to see visible amendments to this framework following a review in the light of the declaration. Latest evidence suggests that the UK's share of the global carbon budget between 2010 and 2050 would need to be around 7,600 MtCO₂e in order to have an 80% change of avoiding an above 2 degrees global average temperature rise. The State of Nature Report 2019 reveals that of the 3902 species assessed in Wales 73 have been lost from Wales already with a further 666 species being threatened with extinction. The NDF must demonstrate clearly how the it will support the reverse of this decline. Disconnect between the ambitions and objectives of the framework and the priority area maps I would like to understand how the current maps would enable the delivery of the objectives of the NDF. For example, it is not clear that renewable onshore wind development on the size and scale consistent with the stated ambitions of Ministers will be possible because it is suggested that a significant part of the priority areas might not practically be suitable for sustainable wind farms. It has been brought to my attention, as another example, that the area around Newport has restrictions such as infrastructure and flooding zones which would render impossible the	Responses to any previous comments have been documented within earlier stages of the ISA. Noted with thanks. The monitoring framework of the ISA will seek to monitor the predicted significant effects of the NDF. <u>Climate Change Emergency</u> The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies, including transport, economy, environment, decarbonisation, regeneration, etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also address climate change and will ensure this is considered and reflected in the NDF. This includes ensuring	

	delivery of the development suggested in the proposed NDF. It is clearly crucial that the NDF supports the shift to a low carbon society in terms of the ‘words’ of the document but critically in terms of what flows in terms of ‘action’. We must see a clear and detailed assessment of whether this framework will deliver decarbonisation targets in terms of the shift to renewable energy – the Zero Carbon Britain Report is due to publish models the actions that will need to be taken to achieve zero carbon and considers that a zero carbon Britain will need to onshore and offshore wind will need to meet around 50% of energy needs (accounting for action taken to reduce demand). What assessment has been made as to how the framework will support practically both the long term environmental and economic benefits of off shore wind and solar energy required to meet decarbonisation targets in the Environment Act and beyond given more recent Ministerial commitments? I would therefore like to see further and detailed analysis of the practical and more granular potential for each of the areas highlighted in the NDF to ensure that the overall ambitions of the Government as well as the proposed NDF objectives can be delivered by this NDF (integration) and to identify the areas which might need adjusting to ensure implementation in the short and longer term. Updating of the TANs and Investment plan The setting out of the first NDF is part of the general recast of the land use planning in Wales and I would like to know what the government's plan is for updating the Technical Advice Notes and the Investment Plan referred to at the beginning of the document in light of the new planning and climate change policies. These will also impact the good implementation of the NDF. Transitional Period and Reliance on SDPs A final point concerns the references in the proposed NDF to the Strategic Development Plans which will provide a lot of the details of the implementation of the NDF objectives and policies. I understand that only one SDP is currently in preparation and it might only be ready in 2025. This is of significant concern given the timescales for decarbonisation. This development framework is just the initial phase of the policy change process that would be required to meet targets and without comprehensive adoption and implementation at speed. I would therefore like to know what the transitional arrangements are for the 5 to 10 years ahead until we have SDPs in place but also what would be the provisions if no such plans were adopted in some places. Conclusion I am grateful for the opportunity the Welsh Government has given to my office to work with this them on this draft. They have taken in account most of my advice to date, but having seen the full proposed document, I am concerned that the proposed NDF won’t sufficiently moving us towards a resilient and low carbon society at the pace and scale required to meet our duties around decarbonisation and the enhancement of our ecosystems which are needed to fight climate change and to meet the needs of future generations. I would like to see, to reassure me and to improve the framework, detailed analysis demonstrating that the NDF and in particular the design of the different areas will enable Wales to meet practically its sustainability ambitions and well-being goals.	communities are sustainable and resilient. The NDF reflects these aims and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy. <u>Reversing Biodiversity decline</u> The Natural Resources Policy identifies the key priorities, risks and opportunities to achieve the sustainable management of natural resources (SMNR), including addressing the climate change emergency and reversing biodiversity decline. Its objectives are to maintain and enhance the resilience of ecosystems and the benefits they provide. Planning Policy Wales outlines how the planning system should contribute towards these goals and the NDF builds on this policy by setting out specific policies that: - safeguard areas for the purposes of improving the resilience of ecological networks and ecosystems services, to identify areas for the provision of green infrastructure and to secure biodiversity enhancement (net benefit); - ensure resilient location and design choices by promoting a sustainable growth strategy as well as ensuring the consideration of natural resources and health and well-being forms part of site and design choices; and	

		- facilitate the decarbonisation of the economy, including energy and transport choices, and promote the principles of a circular economy. The comment about flooding and Newport is noted. A policy has been added to the NDF to address flooding issues and National growth areas. Following publication of the NDF we will review and amend Planning Policy Wales and Technical Advice Notes (TANs) as considered necessary. The NDF will be strengthened when it is complemented by other Welsh Government strategies and plans. To a degree, this should emerge organically as documents such as the Transport Strategy and the Wales Infrastructure Investment Plan are revised in the coming years. Recognising that Strategic Development Plans (SDPs) are not yet in place, the NDF has a strong focus on regional planning. NDF regional policies set out the key regional issues identified through the plan preparation process, to provide a starting point for the preparation of SDPs. This provides a context for regional planning in advance of the adoption of SDPs. As SDPs are required by law to be in conformity with the NDF, the regional content of the NDF provides a clear outline of the matters SDPs must address, while enabling regionally-distinctive approaches to be developed. Proposed Policy 19 in Chapter 5 of the NDF sets out the framework for the preparation of SDPs. The NDF has been prepared to directly support the delivery of SDPs. The Local Government and Elections (Wales) Bill 2019 has specifically considered regional planning and places a duty on Local Authorities to work together to prepare SDPs. This will ensure greater certainty on the delivery of SDPs. The Welsh Government will consider using its intervention powers, if required, to commence and drive the preparation of SDPs.	
2.222	Ychydig iawn o sylw o roddir i'r Gymraeg yn yr arfarniad, sy'n annigonol yn enwedig o gofio bod y Gymraeg yn un o nodau craidd Deddf Llesiant Cenedlaethau'r Dyfodol.	The approach taken in the ISA accords with national planning guidance set out in TAN 20.	None

	Translation: There is little attention given to the Welsh language in the appraisal, which is inadequate especially given that the Welsh language is a core aim of the well-being of future Generations act.	The Welsh language should not be considered in isolation as it both affects and is affected by other planning considerations, and an integrated approach enables these combined impacts to be assessed. The ISA has assessed the likely effects of the NDF on the Welsh language, ensuring opportunities to promote the Welsh language, facilitate its use, safeguard its future, and see the language thrive, are considered and identified where possible.	
2.230	The Welsh language should be vigorously supported. Impact on rural communities should take into consideration loss of tourism and loss of amenity from large scale wind farms. Impact on rural communities should involve rigorous monitoring of air quality, especially ammonia. Currently, planning applications for Intensive Poultry Units only take into account projected ammonia - but total ammonia (existing level + addition to total ammonia for proposed new unit) needs to be considered, and a cap should be introduced, so that no new IPUs can be built in areas where ammonia levels are already high.	Tourism in rural areas is recognised in supporting text for Policy 4 which states that “Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy.” Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns. Tourism in rural areas is recognised in supporting text for Policy 4 which states that “Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy.” There has been a study produced on the potential economic impact of wind farms on tourism in Wales⁶. This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. Tourism as a policy area is covered in more detail in Planning Policy Wales. The planning system can contribute towards creating favourable conditions in which the language can thrive, therefore it is legitimate and important for the NDF to address the matter. The Minister for Housing and Local Government has established the Town and Country Planning Intensive Agriculture Working Group comprising members from the environment and agriculture	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.

⁶ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

		sectors. The objective of the Group is to identify the various roles and responsibilities of the bodies involved in the planning process relevant to intensive agriculture and examine technical advice and scientific evidence in relation to this type of development. The work will include looking at the impacts of intensive agriculture on biodiversity and climate change. Advice contributing to the preparation of a new Technical Advice Note (TAN) will be the key output of the Group, helping improve the quality of planning decisions, benefiting both the industry and local communities. The draft TAN is expected to be released for consultation in the first half of 2020.	
2.235	" Some policies, such as P10, include a requirement for measures to minimise adverse impacts on the local character. This implies that for some of the proposed land-uses in the NDF will be visually prominent and impacts on local character would to some extent be accepted." I believe that the above demonstrates the down playing of the potentially monumental adverse impacts of aspects of Policy 10 will have upon the landscape. You cannot minimise the adverse impacts of large scale wind farms and solar parks. There should have been a full appraisal of the possible adverse impacts upon not only the landscape but wildlife especially birds, tourism and the mental and physical health and well being of residents both living in small communities and individual homes within these areas	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, Welsh language, rural and economic impacts, including tourism.	Economic section of the ISA for Group 8 amended to clarify that tourism impacts have been considered.
3.39	Extract - The ISA submitted with the NDF is amorphous and lacking criteria for proper scrutiny for a proposal with such far reaching consequences. An LDP has a fairly rigorous evolutionary and examination process; here we have a major land use and administrative change proposal that must surely and publicly answer the same questions as an LDP.	Similar to that of an LDP, the ISA of the NDF has followed a prescribed process, as dictated fundamentally by the SEA Directive, but also integrating the requirements of a number of other legislative and non-legislative assessment processes. However, as a national-scale plan, the level of assessment is at a more strategic scale. Locally specific issues will be assessed at the LDP level. The NDF will be subject to scrutiny by the Senedd.	None
3.50 – Children’s commissioner	The National Development Framework (NDF) sets out Welsh Government’s twenty year vision for Wales’ structural, environmental and technological development to support Wales’ growth as a sustainable, prosperous and healthy nation. With its 11 NDF Outcomes, underpinned by the principle of The Well-being of Future Generations (Wales) Act 2015 “to improv[e] the economic, social, environmental and cultural well-being of Wales”, the proposals contained within the NDF will have a direct impact on the children and young people of Wales, now and in the future. To ensure that NDF delivers for all, the NDF must recognise the unique needs of children and young people, as current citizens and members of our communities and as those likely to be affected by the Plan for many years to come. Therefore, children and young people must be fully involved and considered in the NDF’s developments and decisions. As stated by the Committee on the Rights of the Child (UNCRC), there is “inextricable linkage between inclusive, equitable and sustainable development and the realisation of children’s rights. Development can constitute an enabler for children’s enjoyment of their rights by providing them with a safe and healthy environment”. (Committee on the Rights of the Child (CRC), Contribution to the 2030 Agenda for Sustainable Development in response to a	The Welsh Government notes and welcomes the detailed comments from the Children’s Commissioner for Wales on the consideration of children and young people in informing the NDF. Impacts of the NDF’s policies and proposals on children and young people have been considered. How consideration of the NDF’s impacts on children and young people have been taken into account as part of the ISA approach will be made explicit in the final ISA. The Welsh Government recognises the Commissioner’s comments regarding engaging children and young people on the NDF and	The final ISA will make explicit how its impacts on children and young people have been taken into account as part of the ISA approach. The final NDF will provide

	call for inputs by the High-Level Political Forum on Sustainable Development (HLPF), 15 March 2019. Available; https://www.ohchr.org/Documents/HRBodies/CRC/HLPoliticalForumSustainableDevelopment.pdf) Whilst I recognise that the NDF seeks to “make sustainable places that work for everyone” and to develop places that “meet and suit the needs of a diverse population, with accessible community facilities and services”, the NDF at present does not make the explicit connection between sustainable national planning and the potential advancement of children’s rights. Children and young people in Wales have specific rights which must be upheld by Welsh Ministers, as set out in the Rights of Children and Young Persons (Wales) Measure 2011. It is important that children and young people are recognised as unique stakeholders in this regard, which warrants an adapted approach that supports their meaningful participation and engagement. By taking a children’s rights based-approach to the delivery of the NDF, the Welsh Government can further advance the realisation of children’s rights by recognising children and young people as active agents in national planning decisions and achieve inclusive, sustainable national development. This response will seek to demonstrate how this can be achieved when delivering against the National Development Framework, through the delivery of children’s rights approach that aligns with Wales’ Well-Being Goals and embeds children’s rights into decision making. The response will cover; - How the National Development Framework relates to children’s rights; including their rights to protection from harm, to provision that meets their needs to develop and fulfil their potential and their rights to participate as citizens in planning and decision-making. - How a children’s rights approach can align with the Wales’ Well-Being Goals; - The importance of evidencing consideration of Children’s Rights through consistent and thorough Children’s Rights Impact Assessments; How the National Development Framework relates to children’s rights; It is promising that the Framework has already sought to provide information for children and young people in an accessible format, with the publication of a Young People’s Summary, recognising Article 13 – the right to seek, receive and impart information in an accessible format. It is important that similar resources are provided at each five year review point to support continued engagement and participation of children and young people. It is disappointing however that, despite having a young person’s summary, there is no specific means for young people to respond to this consultation in an accessible or age appropriate way. Children have a right for their voices to be heard (UNCRC Article 12) and to participate in decision making processes which are likely to impact their lives. Article 12 states that “a child who is capable of forming his or her own views [has] the right to express those views freely in all matters affecting the child”. The United Nations’ Committee on the Rights of the Child has expressed concern that “children are often denied the right to be heard, even though it is obvious that the matter under consideration is affecting them and they are capable of expressing their own views with regard to this matter”. The Committee’s General Comment on this Article specifically mentions that there should be explicit inclusion of children’s views “in community development plans that call for public consultation”.(United Nations Committee on the Rights of the Child (2009) <i>General Comment no.12: the Right of the Child to be Heard</i>. Available at: http://tbinternet.ohchr.org/layouts/treatybodyexternal/TBSearch.aspx?Lang=en&TreatyID=5&DocTypeID=11) The NDF is to have continued impact on the lives of children and young people in Wales and it is important that children’s engagement is facilitated throughout its delivery. It is vital that the Welsh Government recognises children as active agents in the progression of the plan and supports and facilitates their continued engagement. Numerous public bodies that I have supported to take a children’s rights approach have found that the quality of their decision-making has improved when including those most directly affected by those decisions. I believe this requires further consideration from Welsh Government as the NDF progresses.	providing means of allowing them to respond to the draft NDF consultation. In this regard, the Welsh Government’s NDF Team has facilitated engagement on the NDF with a group of young people in North Wales as part of the Children in Wales initiative. This engagement resulted in a number of interactive sessions with the group during the NDF preparation process and they further assisted the NDF Team on ways of effectively engaging with wider groups of children and young people across Wales. This work culminated with members of the group launching Education Resource Packs⁷ on the NDF with the Minister for Housing and Local Government on the 19 September 2019. The Young People’s Summary to the draft NDF was publicised through the NDF Newsletter and further disseminated to schools through NDF Education Resource Packs. Information on responding to the consultation and contacts for obtaining further details on the NDF were provided in the Young People’s Summary. Various other formats of accessing information on the NDF were also made available which could be accessible to specific groups of children and young people. These included a draft NDF Easy Read Version and NDF Animation. The Welsh Government acknowledges the Commissioner’s consideration of Articles under the United Nations Convention on the Rights of the Child (UNCRC) in informing the NDF. The Articles have been considered and where considered to be of most relevance in terms of development outcomes from the draft NDF, they have been listed in the ISA Report. With regards to Article 30 and the Welsh language, the impact of the NDF on the Welsh language for all members of society has been considered and this would include children and young people. Topic issues such as air quality, the economy, housing, sports and recreation and the Welsh language are referenced in the draft NDF where they are considered to represent the spatial national planning priorities of the Welsh	information regarding the importance of supporting opportunities for children and young people. The NDF will contain a section outlining the assessment processes and clarify how children’s rights have been considered and shaped the plan. Consideration to be given to clarifying how the Welsh language has been dealt with regarding Article 30. This would not result in a change to the ISA framework.

⁷ Weblink to NDF and Planning in Wales Education Resource Pack Key Stage 2: <https://hwb.gov.wales/repository/resource/dc719db0-de38-4516-8122-d9d9d69441c6/en>. Weblink to NDF and Planning in Wales Education Resource Pack Key Stage 3: <https://hwb.gov.wales/repository/resource/7fd63088-bf14-444b-8cfa-e8453dd661b6/en>.

Below, I have sought to demonstrate how the eleven NDF outcomes are linked to the rights of children, as citizens, consumers, users and future employees and leaders of the cohesive, sustainable and prosperous Wales the National Development Framework sets out to achieve. The NDF has the potential to further recognise children’s rights in its pursuit of a more prosperous, inclusive, greener and sustainable Wales. This is why it is vital that children and young people are fully engaged and involved in the delivery of the NDF.		Government. It is important to note that the NDF will be read alongside Planning Policy Wales (PPW) which provides further topic-based national planning policy on matters of relevance to the planning system. Detailed decision making on proposals will take place at a regional and local level. Specific consideration of proposals with regards to children and young people should therefore be made at those levels, having due regard to national planning policy and other considerations, including children’s rights legislation and guidance. Further, regional and lower tier Strategic and Local Development Plans should assess the impacts of their specific proposals on children and young people, including for housing and employment, as part of the impact assessments carried out for those tiers of development plan. The ISA Objective 2 ensures the issue of child poverty is assessed. Notwithstanding the above, it is recognised the NDF could make reference to children and young people in terms of setting some national spatial direction for their consideration in development planning at the regional and local levels.
NDF Outcomes; A Wales where people...	Links to Rights of The Child (UNCRC) & Potential Impact on Children	
Live and work in connected, inclusive and healthy places;	As active members of their communities, these collective objectives will have a significant impact on how children access services, live, play and potentially work in the future. In the pursuit of these objectives, Welsh Government must consider what impact subsequent developments of the NDF will have on children’s rights. Whilst a significant focus of these objectives are to develop prosperous communities through sustainable, social-economic development, the pursuit of prosperity and improved wellbeing must be considered in the context of how this can be achieved for all, including children and young people. Every child has the right to a standard of living that is good enough to meet their physical and social needs and support their development (Article 27), a right to the best possible health and a clean environment (Article 24) and for their best interests to be given priority in any decision that affects them (Article 3). The NDF’s vision is to support Wales’ progress towards becoming a cleaner, greener, and more prosperous and healthier nation. However, despite much of its vision chiming with the ambitions of the UNCRC, there is no specific mention of how the NDF is linked with and can support children and their rights. Therefore, to ensure that communities are developed sustainably for all and effectively promote inclusivity and equality, decisions taken in regards to socio-economic development, as set out in the NDF, must take account of children’s specific rights. If the Welsh Government were to make this linkage at a strategic level within the NDF, it would go some way to further embedding children’s rights within planning decisions relating to the framework. For example, while it is very welcome that tackling health and socio-economic inequalities is an aim, it would be worth giving specific attention to the fact that children are the most likely population group to be living in poverty. Article 12 states that “Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example [in regards to]...housing decisions”. This relates to wider issues about communities and services too. Whilst I recognise the messages of inclusivity within the NDF’s objectives, Welsh Government must ensure that children are supported to meaningfully engage with any development proposals for their communities in an appropriate way. One area where the needs of children and young people seemed to have been overlooked is in the NDF’s vision for housing. The NDF sets out its vision for building more affordable homes, but this is framed in regards to the needs of Wales’ “ageing society”. Whilst I recognise this is a vital area for development, it is also important to recognise that younger and older people can have similar requirements for housing, such as safe, semi-independent and affordable accommodation, supporting full inclusion in communities with good access to local services. For example, young people who are living with disabilities, leaving care (https://www.childcomwales.org.uk/publications/hidden-ambitions/), residential homes(https://www.childcomwales.org.uk/wp-content/uploads/2016/06/The-right-care.pdf), secure settings(	

		outcomes-of-children-and-young-people-from-wales-receiving-secure-accommodation-orders) or youth justice institutions (https://www.justiceinspectorates.gov.uk/cji/inspections/youthresettlementcommunity/) face significant barriers in this area, compounded by a lack of suitable housing options, such as a lack of smaller housing units and lack of availability of semi-independent living provision specific for young people. When framing the need for this type of housing solely as a requirement for ageing populations, we fail to recognise the vulnerabilities of individual, younger groups. Considering the housing needs of Wales as a population as a whole, with specific understanding of varying needs, the NDF can work towards achieving the well-being objective of developing a Wales of cohesive communities. The UN General comment No. 16 (2013) on State obligations regarding the impact of the business sector on children’s rights recognises the impact that business can have on the realisation and advancement of children’s rights, through the creation of decent jobs, investment, provision or services, technological advancements, production, and child supportive practices for employees – such as payment of sufficient wages, parental leave and family friendly workplace practices. However, it further states that “the realisation of children’s rights is not an automatic consequence of economic growth”, which is why Government must implement mechanisms to ensure that businesses can contribute towards rights respecting, inclusive communities.(Committee on the Rights of the Child (CRC), General Comment No. 16 (2013) On State Obligations Regarding the Impact of the Business Sector on Children’s Rights. Available: http://tbinternet.ohchr.org/layouts/treatybodyexternal/TBSearch.aspx?Lang=en&TreatyID=5&DocTypeID=11) The Welsh Government has many levers at its disposal to ensure that any businesses they seek to attract or support in pursuit of the NDF can contribute towards a rights respecting environment and “encourage a business culture that understands and fully respects children’s rights”. This ability is further cemented with the Children’s Rights Measure. Welsh Government can similarly put in place measures to ensure businesses pay due diligence to children’s rights in their practices, and do not adversely impact children’s enjoyment of their rights through their business activities. Therefore, the NDF could play an important role in further embedding children’s rights by encouraging such a business culture as part of its vision for a prosperous, healthy and inclusive Wales by 2040. Furthermore, the NDF places a specific focus on “retaining and attracting” young people to live and work in Wales. Young people in Wales are already taking significant positive steps in regards to this issue, with the Welsh Youth Parliament recently publishing their report on Life Skills(https://static1.squarespace.com/static/58e7b1b717bffc1056c5949b/t/5daebdee5642ea5d1cf32684/1571732976510/WYP-life-skills-E.pdf). The Youth Parliament and other participative platforms for children and young people should be involved significantly in in any decision or process that asks “what Wales would we like to create by 2040?” and be supported to contribute towards achieving how best young people within Wales can be “retained” – or better termed – supported to remain within their communities through diverse opportunities. Therefore, the NDF should be shifted in its focus to pose the question “how can we use this National Development Framework to create diverse opportunities that will promote the increased involvement, inclusion and engagement of young people and make Wales a more attractive place to live and work for young people?”		
	Live in places with world-class digital infrastructure;	A significant focus of the NDF is to enhance Wales’ digital connectivity and digital infrastructure, to support economic growth and global competitiveness. It is vitally important that the impact of such developments on the rights of children are considered.		

		The Welsh Government must be committed to ensuring that any potential adverse impacts on the rights and protections of young people as a result of a more digitised and connected nation are addressed and mitigated. Digital technology plays a significant role in the lives of the majority of children and young. A review of evidence from UNICEF in 2017 suggests that moderate use of digital technology tends to be beneficial to children and young people's mental well-being, while excessive use can have a small negative impact.(https://www.unicef-irc.org/publications/pdf/Children-digital-technology-wellbeing.pdf) It is important that developments are cognisant of the impact that increased digital usage can have on children and young people's wellbeing. The Welsh Government must ensure that this objective is supported by aligning with existing strategies in this area, such as the Welsh Government's Online Safety Action Plan and Wales' new Curriculum. This will help to ensure children are well equipped with skills to support their contribution in an increasingly digitised world and are equally aware of their rights in a digital context to help keep themselves safe. It is equally important that regular reviews take place to ensure digital safeguards keep pace with advancements. The UN Committee on the Rights of the Child is currently drafting a General Comment on children's rights in relation to the digital environment.(https://www.ohchr.org/EN/HRBodies/CRC/Pages/GCChildrensRightsRelationDigitalEnvironment.aspx) At the 2019 ENOC Conference the Commissioners and Ombudsmen for Children from across Europe agreed a joint statement on children's digital rights.(http://enoc.eu/wp-content/uploads/2019/10/ENOC-2019-Statement-on-Childrens-Rights-in-the-Digital-Environment.pdf) This was heavily influenced by the contributions of young people from across Europe; my office supported a group of Welsh young people to have input into this work and one member of that group represented them at the conference. The statement makes it clear that States should be making every effort to facilitate children's digital rights and that their views are highly influential in this area, as children and young people will continue to grow up with technology and the internet at the heart of their everyday lives.		
	Live in places with a thriving Welsh Language; Live in places where prosperity, innovation and culture are promoted;	Article 30 of the UNCRC states that every child has the right to learn and use the language, customs and religion of their family, whether or not these are shared by the majority of the people in the country where they live. This right requires states to pay specific attention to indigenous and minority languages. It therefore important to ensure that any developments delivered as a result of the NDF support children and young people to access these bilingually in line with the Welsh Language (Wales) Measure 2011. Article 31 of the UNCRC is the right of the child to 'rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.' It is vital that the NDF and subsequent developments recognise the importance of developing and protecting recreational spaces for the health, social and wider community benefits of play, sport and physical exercise, which is so important for children's development at all ages. It is also important that children and young people are able to scrutinise these developments, and that developments fulfil their purpose of creating a space which maximises children and young people's engagement. My office published a Spotlight Report last year on Article 31, which shares the views of over 450 children and young people, and 277 parents and carers(Children's Commissioner for Wales (2018) Spotlight Report – Article 31. Available at: https://www.childcomwales.org.uk/wp-content/uploads/2018/04/Play-FINAL.pdf). One of the key messages in our report is that the children and young people that we engaged with told us that the most common barriers they face to accessing play and leisure		

		activities are financial, a lack of variety, and transport. Children have less economic power than adults, and households with children are those most likely to be living in poverty in Wales(Welsh Government (2018) Analysis of HBAI, Family Resources Survey, DWP. Available at: https://www.slideshare.net/StatisticsWales/relative-income-poverty-family-characteristics). Children therefore need play and leisure facilities which they can access for free or, where this is not possible, affordably; which cover a range of interests, play activities and hobbies; and which are within the communities where they live. Planning can play an important part in improving facilities, if children and young people are able to participate effectively in the planning process. A further key message from our report is that children have the right to be involved in planning and decision-making about public provision of facilities and activities. Organisations are likely to find that their decisions on facilities used by children and young people will be better informed by hearing the voices of the users of those facilities.		
	Live in places where travel is sustainable; Live in places that sustainably manage their natural resources and reduce pollution; Live in places with biodiverse, resilient and connected ecosystems; Live in places which are decarbonised.	Article 24 of the UNCRC stated that every child has a right to the best possible health and a clean environment. It is welcomed that the NDF places such a focus on Wales' journey towards decarbonised areas, improved active travel opportunities and increased environmental protections which will contribute to a cleaner, healthier, greener Wales, which all generations can enjoy. The Committee on the Rights of the Child contribution to the 2030 Agenda for Sustainable Development states that "All children should have access to a healthy and safe environment without discrimination. However, a number of emerging environmental issues such as the increasing negative impacts of global climate change and certain environmental chemicals expose children to environmental health risks". It further states how climate change and environmental damage disproportionately affects children(Committee on the Rights of the Child (CRC), Contribution to the 2030 Agenda for Sustainable Development in response to a call for inputs by the High-Level Political Forum on Sustainable Development (HLPF), 15 March 2019. Available; https://www.ohchr.org/Documents/HRBodies/CRC/HLPoliticalForumSustainableDevelopment.pdf). It is welcomed that the Welsh Government are taking significant steps to address environmental concerns and ensure that the NDF is delivered in a way that develops, protects and nurtures Wales' environment. Its recognition of and alignment with the well-being objectives of the Wellbeing and Future Generations Act future cements the importance of protecting Wales' environment for our future generations. Welsh Government's Local Air Quality Management Policy Guidance recognises how babies and children are particularly vulnerable to suffering ill health as a result of exposure to air pollution, requiring local authorities to give special consideration to the long term risks posed to babies and children as a result.(https://gov.wales/sites/default/files/publications/2019-04/local-air-quality-management-in-wales.pdf) These risks must continue to be recognised in regards to any associated NDF developments in areas where children live, play and are educated. It is vital that children participate in decisions regarding environmental matters.(Committee on the Rights of the Child (CRC), (2016) Children's Rights and the Environment. Available: https://www.ohchr.org/Documents/HRBodies/CRC/Discussions/2016/DGDoutcomereport-May2017.pdf) Wales' Youth Parliament is already work to propose changes to the way we consume plastics and better protect Wales' environment. Children and young people have led the way in campaigning for action on climate change, in Wales and globally. Young people must be recognised as valuable change makers in regards to our behaviours and consumerism in pursuit of these NDF objectives.		

	How a children's rights approach can align with the Wales' Well-Being Goals; In 2017, the Future Generations Commissioner and I jointly developed The Right Way – a Wales Future Fit for Children. The guide has been specifically designed to help organisations take account of the economic, social, cultural, and civil circumstances specific to children and young people. The guide takes account of the requirements laid down by the Well-being of Future Generations (WFG) (Wales) Act 2015 and aims to support bodies – those in the public, third or private sector - to maximise their contribution to securing the long-term well-being of children and young people in Wales. The guide has been developed to demonstrate this and to provide practical guidance on how a children's rights approach can support public bodies to improve the economic, social, environmental and cultural well-being of Wales. Children's rights and the Well-Being of Future Generations (Wales) Act 2015 have common interests and can mutually support one another, through recognising children's rights to be safe, healthy and to flourish, and to ensure we plan for the long-term. This aligned approach brings fresh impetus to building prosperous, resilient and inclusive communities. As this is the overwhelming objective of the National Development Framework, it is important that the Welsh Government consider this approach and ensure that any developments delivered by the NDF are done so with this aligned rights-based approach. By adopting this approach, Welsh Government can have greater assurances that the NDF is able to achieve its vision of a sustainable, prosperous and inclusive Wales by 2040. By recognising children's rights within the context of well-being objectives, organisations can adopt an integrated approach to sustainable development. For example, decisions taken to improve air quality, promote public transport and decarbonisation can make a direct contribution to the goal "A Resilient Wales" by improving children's health and environment (Articles 6 and 24 of the UNCRC). Such a decision could also contribute to children's rights to live in safer communities (A More Cohesive Wales), promote active travel (A Healthier Wales) and might promote economic well-being by improving access to jobs and cheaper fares (A Prosperous Wales). By taking this approach, the NDF can be seen to further embed children's rights into sustainable, socio-economic developments. This can be achieved by ensuring any developments of the NDF apply the principles of the five ways of working to developments. The five ways of working are designed to achieve sustainable development in a way that is closely aligned to children's rights and a rights based approach. These are: - Working to the long term: The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs - Prevention; How acting to prevent problems occurring or getting worse may help public bodies meet their objectives - Integration; Considering how the public bodies' well-being objectives may impact upon each of the well-being goals, on their objectives, or on the objectives of other public bodies - Collaboration; Acting in collaboration with any other person (or different parts of the body itself) that could help that body to meet its well-being objectives - Involvement; The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body services. By working in this manner, developments and responsible authorities can have greater assurances that they have considered children's rights in their work. For example, paying due regard to children's rights could create the economic and social case to prioritise long-term investment in early intervention services for children and young people, identify opportunities for integration and collaboration across sectors and create opportunities for children and young people to be involved in creating the solutions for change. This approach ensures that children's rights are embedded in the planning stages, without discrimination. This will enable children and young people to be empowered through greater recognition of their rights and can lead to greater participation of young people in decision making or community design. Through this approach,		

	developments and organisations can become more accountable to children for the actions they take that impact children and their lives. To do so, organisations should consider: □ Well-being assessments consider what is important to children and that well-being planning ensures children's rights and well-being needs have a high-level of prominence in priority setting, including the needs of vulnerable groups. Financial planning and budgets are appropriately analysed and assessed for their long-term impact on children's rights. Children and young people are involved in budget setting, procurement and commissioning processes. □ Listen to children and take account of their views and be open, honest and transparent with children. Appropriate arrangements are in place to support children's active involvement in decision-making that might affect them and appropriate arrangements are in place to provide feedback to children and tell them what has happened as a result of their involvement. □ Integrate and Take Action together: Children's rights and well-being needs have been considered across each of the Well-being Goals. Working arrangements maximise contributions to improving children's well-being within and between organisations. There is coherence between organisational objectives and plans. Partnership arrangements give a clear focus to children and clearly set out responsibility for how organisations will work together to improve children's rights and well-being. □ Review and improve together: Appropriate monitoring arrangements are in place to clearly identify progress made/outcomes achieved on children's rights and well-being. This monitoring information is regularly used to provide an up-to-date picture on the state of children's well-being and informs the reviewing of well-being objectives and plans. This is clearly communicated to children in a way that is appropriate to their needs. The importance of evidencing consideration of Children's Rights through consistent and thorough Children's Rights Impact Assessments; The realisation and consideration of children's rights can be effectively monitored and evidenced through consistent and thorough undertaking of Children's Rights Impact Assessments. The NDF states how it will align with Habitat Regulation Assessments and fit with Strategic and Local Development Plans. However, it fails to demonstrate how developments made as a result of the plan will fit with wider impact assessments, for example, Children's Rights Impact Assessments (CRIAs). I raised similar concerns in my response to the Draft Planning Policy Wales Consultation. These specific impact assessments can support Welsh Ministers to evidence their statutory duties under the Children's Rights Measure and ensure that due regard to children's rights is given in policy decisions. As stated by UNICEF, "most policies do have some level of impact on the lives of children, and child rights.		

	<i>impact assessments (CRIA) provide a systematic, flexible way to ensure children are placed at the forefront of national decision-making".¹⁷</i> The Welsh Government is making progress in its use of CRIA to evidence how consideration has been given to children's rights, however, they often vary in timeliness and quality. Often, CRIAs are produced in regards to policies which have a clear and direct impact on children, and decisions such as those relating to planning and development proposals, do not publish CRIAs as part of their Impact Assessments. I am not confident that the use of CRIAs are fully embedded within the practice of Welsh Government decision making, despite their benefit for understanding, protecting and promoting children's rights. I believe the NDF would benefit from a commitment from Welsh Government to play consistent and evidenced consideration to children's rights through the use of CRIAs as part of any NDF project impact assessments. The use of CRIAs has also been suggested by the UN Committee on the Rights of the Child as being used to understand the impact of business activities and business related policies on the rights of children and young people. Considering the objective of the NDF to create a more prosperous Wales through sustainable socio-economic development, the Welsh Government should give consideration to routine completion and publication of CRIAs to ensure the NDF is progressing in a fully inclusive way and that sustainable development is aligned with a rights-respecting approach. This would further contribute to embedding children's rights within Wales and ensuring that the NDF achieves its positive vision for all. I am due to publish guidance notes for those undertaking CRIA to support thorough consideration in line with a children's rights approach.		
3.53 -	Annex: Critique of The Integrated Sustainability Appraisal The ISA, undertaken by Arcadis, was designed to inform the drafting of the National Development Framework. It claims to provide a robust and thorough mechanism for identifying issues and opportunities, assessing impacts, including cumulative and indirect effects, of options being considered for the NDF and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined. In providing the Welsh Government with accurate, robust and transparent information with regards to the sustainability of options it has played a major role in the Government's decision-making about what to include in the NDF. The various iterations of the sustainability appraisal include a scoping report (2017), a final scoping report (2018), and a final report (2019). We applaud the fact that the drafting of NDF vision and objectives has been subjected to extensive appraisal in these various iterations and that the process has been documented extensively. The scope of the data and recommendations in the ISA therefore need to be taken very seriously. The Appraisal Framework uses 17 monitoring indicators or objectives and decision-aiding questions designed to embed the principles of sustainable development. However these do not fully cross reference with either the Well-being Act goals (2015), the objectives of Sustainability Appraisal for a Low Carbon Wales (2019) or the draft NDF outcomes, among other WG and European directives which underpin the ISA. This therefore raises questions about the appraisal's claim to be thorough and holistic.	Noted, with thanks. Table 1-2 of the Draft ISA Report demonstrates how the ISA accords with the Well-being of Future Generations Act 'ways of working' and, thus, the Act itself. Table 1-3 sets out how the ISA meets the requirements of the European SEA Directive, a key driver behind the process. The Draft NDF Outcomes and the objectives of	None. None.

	other SAs would not be directly relevant to the ISA because the framework is intended to be assessing the potential of the NDF, so a) is not integrating the outcomes it seeks to assess, and b) not using a framework intended to assess a different document. The compatibility matrix is intended to be a high level review of the objectives. Where information is unclear with regards to implementation, an unknown score is assigned. Sustainable management of natural resources could include the quarrying of local materials, which could be at odds with environmental objectives, but create local opportunities for creating a sense of place through the use of local materials, enhancing Welsh Culture (such as through the use of slate). Noted. The baseline data does include trend data and comparative data which has helped to establish key issues and opportunities for the NDF, and has influenced the development of the ISA Objectives. The assessment has also considered the baseline information, including the trend data and consideration of the spatial implications of the NDF. The assessors of the NDF, employed by Arcadis, are both environmental and planning specialists. Noted.	None. None. None. Economic section of the ISA for Group
A compatibility matrix assessing the internal compatibility of the 17 objectives (p53, 2018) also appears rather incoherent; for example, where as one might expect a positive compatibility of objectives 10, 15 and 16, each of which focus on environmental issues, with objective 17, 'to create opportunities for sustainable management and use of natural resources taking into account the benefits and intrinsic value', the matrix indicates compatibility is unknown. Where as objective 9, 'to create opportunities for the protection and promotion of Welsh culture' is presumed to be compatible with objective 17. The ISA takes its definition of sustainability from the Well-being of Future Generations Act. "Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." This circular definition based on aspirational goals is a poor starting point for monitoring NDF opportunities and outcomes. Nevertheless, Arcadis attempts to refine their understanding of sustainability (section 1) and seeks to take a more rounded view of the sustainability implications and opportunities arising from the NDF by integrating their approach to the SA and SEA with other statutory and non-statutory assessments. The following comments focus on how well we think they have achieved this with reference to renewable energy (Policy Grouping 7, ISA 2019) and rural communities in Powys. (Policy Grouping 10, ISA 2019). The evidence base for the ISA is published as an appendix to the Scoping Report 2018⁸ (it is not actually included in the report itself.) The baseline provides limited environmental social and cultural data that relates specifically to Wales' well-being goals. It does not include baseline trends to which the ISA frequently refers. Apart from this the ISA does not refer any to data projections or evidence to support their impact assessments of the draft NDF spatial framework despite an undertaking (p37, 2018) that the appraisal will be "evidence-based (using qualitative and quantitative data sets) and will consider the likely effects of the NDF on the sustainability ... baseline of Wales (SEA practical guide paragraphs 5.A.5 and 5.A.6). It therefore provides no robust appraisal of sustainability and consequently, fails to function as a test of 'soundness', unlike LDPs, which are required to be tested by a Planning Inspector to show that they are well-evidenced, appropriate for the area, coherent, and in line with other legislation. This rather begs the question why the Welsh government commissioned a design consultancy rather than planning experts to appraise the National Development Framework. Appendix B of ISA report 2019 provides an appraisal of NDF policy impacts against ISA objectives. Our comments below question the extent to which the ISA process has provided a "robust and thorough mechanism for identifying issues and opportunities, assessing impacts, including cumulative and indirect effects" with respect to Policy Group 7 renewable energy policies and Policy Group 10 Mid and Southwest Wales. The ISA report notes there is a "presumption in favour of large-scale onshore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising	other SAs would not be directly relevant to the ISA because the framework is intended to be assessing the potential of the NDF, so a) is not integrating the outcomes it seeks to assess, and b) not using a framework intended to assess a different document. The compatibility matrix is intended to be a high level review of the objectives. Where information is unclear with regards to implementation, an unknown score is assigned. Sustainable management of natural resources could include the quarrying of local materials, which could be at odds with environmental objectives, but create local opportunities for creating a sense of place through the use of local materials, enhancing Welsh Culture (such as through the use of slate). Noted. The baseline data does include trend data and comparative data which has helped to establish key issues and opportunities for the NDF, and has influenced the development of the ISA Objectives. The assessment has also considered the baseline information, including the trend data and consideration of the spatial implications of the NDF. The assessors of the NDF, employed by Arcadis, are both environmental and planning specialists. Noted.	None. None. None. Economic section of the ISA for Group

⁸ <https://gov.wales/sites/default/files/publications/2019-08/appendix-b-baseline-data-and-key-issues-and-opportunities.pdf>

	benefits and minimising impacts.” Whilst appraisal comments suggest the significance of potential employment opportunities in priority areas for wind and solar development is unclear, they conclude it would bring some indirect benefit to Welsh speaking communities from enhanced employment opportunities, especially if schemes incorporate local ownership. They suggest RE policy should help to address overall improvements in health and well-being for communities across Wales, including for children and young people. In particular P12 would ‘retain tranquillity in National Parks and AONBs, which provide mental health benefits.’ With respect to ISA objective 13, “To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes”, they claim ‘A strategic Landscape and Visual Impact Assessment has been undertaken and the Priority Areas for Renewable Energy are considered to be the most appropriate locations to accommodate landscape change. There is, therefore, an acceptance of landscape change in these areas. However, the design and micro siting of proposals must minimise the landscape and visual impact.’ Apart from this vague reference to an impact assessment there is no robust evidence provided elsewhere in the 350-page document to support this comment. With reference to the conservation and enhancement of the historic environment, historic assets and their settings (Objective 8), Arcadis notes blandly ‘The design and micro siting of proposals could help to minimise impacts on local heritage assets such as nearby Listed Buildings but cumulative impacts on historic environments at the landscape-scale may be difficult to avoid’ and ‘It should be noted that there are a lot of registered historical landscapes outside National Parks and AONBs, but these are assumed to be included under the phrase ‘historical assets’ in the policy.’ In their appraisal of RE policy impacts on biodiversity and geodiversity (Objective 16), Arcadis comments ‘supporting text states that there is a presumption in favour of large-scale on-shore wind and solar energy development in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. There is a potential for negative effects on biodiversity assets, as P10 seeks that impacts on nature conservation sites and species are ‘minimised’. However, outside of these areas P11 and P13 is predicted to have neutral effects in relation to this objective, as the policy states that planning applications must demonstrate that there are ‘no adverse impacts’ by way of (<i>inter alia</i>) nature conservation sites and species.’ This assumption contradicts the obvious indications in the ARUP studies that the Priority Areas will have a significant negative impact on local heritage and conservation sites. As far as opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value (objective 17) are concerned, Arcadis predict renewable energy policy would have very positive medium and long-term benefits; ‘P10, P11 and P13 would create the opportunities within which renewable and low carbon energy generation can help to make a tangible contribution to energy generation overall, with the target of 70 per cent of electricity generation to be generated from renewable energy by 2030. This could lead to significant effects in the medium and longer terms, as schemes are developed, leading to a cumulative effect.’ Aside from the recognition that this section is a summary of the appraisal process any adherence to SEA Requirements for an evidence-based appraisal would be unlikely to produce such bland generalities, which defy reasonable comment. Policy Group 10 includes NDF policies relating to Swansea Bay area and Mid Wales. Arcadis makes 4 minor references to rural communities included in this Policy Group, in 20 pages of appraisal. They suggest, ‘investment in connections across the region would improve inclusive access to facilities and services for all, including those in rural communities’ (p213); a focus on city growth and interconnectivity would ‘reduce development pressure on rural areas’, (p212). The policy would have a positive impact on sustainable economic growth by helping ‘to provide supply chains and infrastructure to rural areas concentrating development in the correct location without increasing pressure to develop in rural areas to create opportunities for sustainable economic growth diversity and competitiveness an [sic] increase employment across the country and promote economic inclusion.’ (p206). Apart from the fact this last sentence makes no sense whatsoever, the tone of the entire section implies a total lack of regard for the needs of rural areas, the significant contribution of the tourism and agricultural industries of these areas to the economic and cultural well-being of Wales, and the connectivity infrastructure needs to develop their industries.	Noted.	8 amended to clarify that tourism impacts have been considered. Assessment revised to reflect new policies considering the restructuring of the regions.

	Because the ISA has not attempted to appraise the internal contradictions of NDF policies, the cumulative impact of renewable energy policies on rural areas and the commitment to supporting rural communities in Policies 3 and 4 has been overlooked. In conclusion, we have chosen not to examine the extent to which the ISA has embedded sustainable principles, outlined in the Well-being Act, in its process. However, given the significant weakness of the ISA to test the material sustainability of NDF Policy development or provide any tangible evidence for long-term development trends and outcomes of the policies we question the credibility of the ISA to support adequately the decision-making process.	Noted.	Cumulative assessment to be reviewed and amended as necessary.
3.60	2.47 Although the NDF has been subjected to an Integrated Sustainability Appraisal, it is particularly challenging to trace and hence understand how the specific aspects of landscape character, quality and sensitivity and therefore the continued protection and resilience of these characteristics (specifically those in designated landscapes), have been accounted for in deriving the various conclusions set out in the ISA Objectives 13 and 14 of this Appraisal, namely <i>13. To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes</i> <i>14. To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings</i> 2.48 Thereafter, it is equally problematic understanding how these factors have then been weighted and assessed in relation to other aspects of the sustainability and public wellbeing agendas, given these two particular Objectives receive a ++ rating in the Appraisal, i.e. <i>“Strong positive – likely to result in progress towards the objective (significant)”</i> 2.49 A more complete explanation of how the merits of landscape quality are accounted for in this ISA weighting process should be available.	The basic principles of the approach to the appraisal are outlined in the Scoping Report (section 5.1) and are reflective of the requirements in the SEA Practical Guide (see footnote 5 in section 1.3). In summary, the appraisal has been primarily qualitative, and undertaken by professional SA practitioners. The decision aiding questions associated with each objective, alongside the baseline information, have been used to assess the NDF policies. This has resulted in a score being assigned. The explanation behind these scores is provided in Appendix B to the Draft ISA Report.	None
3.72	Para 1.3.32 suggests the NDF will impact on rural communities. It singularly fails to recognise the detrimental impact the NDF will have on all rural businesses because of the complete absence of a strategic economic policy in the NDF.	Policy 4 supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. It states that “Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy.”	None
3.84	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 -	Noted. <u>Climate Change Emergency</u> The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies, including transport, economy, environment, decarbonisation, regeneration, etc. This includes	No action for the ISA.

	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 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 resilience¹? 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	the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also addresses climate change, which will ensure this is considered and reflected in the NDF. This includes ensuring communities are sustainable and resilient. The NDF reflects these aims and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra-low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy. <u>Reversing Biodiversity decline</u> The Natural Resources Policy identifies the key priorities, risks and opportunities to achieve the sustainable management of natural resources (SMNR), including addressing the climate change emergency and reversing biodiversity decline. Its objectives are to maintain and	

	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 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. 1 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 adopt an eco-town model where green infrastructure is proactively used to reshape the existing build 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	enhance the resilience of ecosystems and the benefits they provide. Planning Policy Wales outlines how the planning system should contribute towards these goals and the NDF builds on this policy by setting out specific policies that: - safeguard areas for the purposes of improving the resilience of ecological networks and ecosystems services, to identify areas for the provision of green infrastructure and to secure biodiversity enhancement (net benefit); - ensure resilient location and design choices by promoting a sustainable growth strategy as well as ensuring the consideration of natural resources and health and well-being form part of site and design choices; and - facilitate the decarbonisation of the economy, including energy and transport choices, and promote the principles of a circular economy. Chapter 1 of the NDF included a section outlining the structure of the Welsh planning system which sets out how the NDF sits with Planning Policy Wales, SDPs and LDPs.	

	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 along side 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.	Comments noted and will feed into the consideration of renewable energy policy amendments.	
3.85 - NRW	Integrated Sustainability Appraisal Report for the Draft National Development Framework Thank you for consulting Natural Resources Wales on the Integrated Sustainability Appraisal Report for the Draft National Development Framework 2020-2040. Our comments are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, and in our statutory role as advisers to Welsh Government on the natural heritage and resources of Wales. We provide a summary of our key comments below, followed by more detail on these, together with more specific comments. In summary, our main comments are: 1. We welcome your commitment to Strategic Environmental Assessment (SEA) and Integrated Sustainability Appraisal (ISA). We also welcome the iterative and transparent way you have worked with ourselves and other consultees during the development of the Draft National Development Framework (NDF) and its ISA. 2. Whilst there are some innovative aspects to the assessment, for example the explicit consideration of short, medium and long term affects, however, in general the assessment methodology is complex, which makes identifying effects on specific receptors difficult. This complexity also means that aspects of the assessment required under the SEA Regulations are difficult to assess and verify (see pts. 9.1, 9.2 and 9.4 of this letter). The assessment summary appears to include some discrepancies, which may limit its ability to effectively and robustly inform the plan-maker and wider audience of the likely environmental effects of the NDF in these areas (see pts. 9.3 and 9.5). The consideration of climate change should be strengthened, especially around flood risk and the unsuitability of some sites in targeted growth areas for development due to present and future flood risk (see pts. 12 and 13). We consider that the negative landscape impacts of renewable energy policies deserved greater consideration, especially the implications of the move from land that currently sits within Strategic Search Areas to land within Priority Areas for Renewable Energy (see pt. 15.2.3), and the potential for cumulative impacts (see pt. 15.2.4).	Noted, with thanks. Noted. See response below. Noted. See response below. Noted. See response below. Noted. See response below.	

	Recommendations for mitigation should be strengthened and made more comprehensive (see pt. 10). Monitoring proposals require further development and should be more effectively targeted at areas where likely significant effects have been identified (see pt. 11). We also present comments on specific topic areas, namely flood risk, water resources, landscape and geodiversity. Our detailed comments are as follows. 8. Inconsistency between significant negative effects in Appendix B and the main report A number of Significant Negative Effects appear to be incorrectly summarised. Two significant negative effects (on ISA Obj. 8 - Air Quality and ISA Obj. 9 – Water Resources) have been identified in the detailed assessment matrices but are missing from both the Summary tables and from the Non Technical Summary. The significant negative long term impact of Policy 20 on Air Quality (p. 183) and Water Resources (p. 185), as identified in Appendix B, is understated as minor negative (i.e. pink in summary table when it is red in Appendix B) and the significant negative impacts of Policy 32 (Cardiff Airport) on air quality (ISA Obj. 8) are also understated – medium and long term are red in Appendix B but only pink in the summary. This error is repeated in paragraph 2.6.10 and in the Non Technical Summary 1.1.43 which only refer to significant negative long term effects on greenhouse gas emissions (Obj. 6). We seek clarity as to whether this is simply an editing error between drafts, with the main report representing the most recent draft, or whether the significance of the effects illustrated in Appendix B is correct and the main report has overlooked significant negative effects identified in its own analysis, which could raise more significant concerns in the robustness of the assessment overall. Note that we have not been able to check each individual assessment cell in the matrices against the accompanying text. Complexity and clarity The assessment is complex and challenging to get to grips with. The very extensive, cross-referenced assessment matrices are daunting and often hard to follow and understand. They could have been made more user-friendly and their presentation improved, for example by using column headings rather than repeating the label in each cell, or by providing a table of policy groupings. The page numbering is also confusing, with the main report and Appendix A in one sequence (pp. 1-78), but Appendix B starting again at page 1 (pp. 1-267), so that pp 1-78 could be in either Appendix B or the main report. Because of the complexity, readers are more dependent on the summaries in the text of the main report. There is a lack of clarity as to why certain aspects are highlighted in the summary of recommendations table (Table 2-10) and others are not. For example, recommendations on green infrastructure networks and flood risk are included, but recommendations on sustainable construction (p. 261) or geodiversity (p. 63 of Appendix B) are not. Certain summary tables contain significant errors. For example, Table 2-8 (Scores for all policies for all ISA objectives) omits a line for Policy 18 (North Wales Coastal Settlements), as well as mis-recording significant negative effects as minor negative effects as described in Point 1 above. We seek clarity as to whether these tables have been quality checked to ensure that they accurately reflect the conclusions of the assessments as set out in Appendix B. The complexity of the assessment makes it hard to track impacts on SEA receptors in the ISA as each is reflected in multiple ISA objectives and guide questions. For example, Table 1-6 'SEA Directive topics and main ISA objectives of relevance' shows Biodiversity as being relevant to Objectives 7, 9, 16 and 17, with each objective having between 5 and 13 decision aiding questions, only a few of which address biodiversity (Table 1-5). Only for	Noted. See response below. Noted. This will be developed for the Final ISA Report. Noted with apologies - these are editing errors. It is noted that the main report was edited to represent the most recent draft, but the Appendix was not updated accordingly. Noted with thanks. Noted. As a summary, only the significant effects of each of the policies will have been included in the main report, as there is not space to summarise every possible effect. Noted, with apologies. It is noted that the scores present for Policy 18 have now been reflected in the main report. Noted. Where specific effects in relation to certain SEA topic areas have been identified, these have been drawn out, whether they have	This has now been corrected. This has now been corrected. Page numbering to be reviewed. Inclusion of all predicted significant effects in the main report to be checked. These errors have now been corrected. Effects on the SEA topics within the assessments

	Objective 16, which is primarily focussed on biodiversity, would negative impacts on biodiversity definitely translate into a negative score against that objective in the assessment. This limits the effectiveness of the ISA in transparently informing the plan-maker of the likely environmental effects of the draft plan, a key function of SEA. Whilst we support in principle the integrated sustainability appraisal approach, we have consistently maintained that it is essential that specific SEA requirements, as set out in the SEA Regulations, remain distinct. In places, the assessment does not appear to reflect the current version of the draft NDF or the ISA. For example, section 2.6.2 states that the NDF does not include a chapter on the spatial strategy, although in fact this is one chapter of current draft NDF together with a suite of associated policies. Similarly, there appears to be some confusion in the ISA over whether the proposed National Forest is on one site or several, whereas the draft NDF clearly states that it will be on more than one site. A key purpose of SEA and ISA is to provide an objective assessment of the environmental <i>etc.</i> effects of a plan - the priority given to addressing the various effects it highlights is more subjective, depending on, among other things, political will and available funding. Under Policy Grouping 7 (Renewable energy) the ISA text includes reference to '<i>an accepted degree of landscape change</i>' (p. 142-3). The assessment goes on to record no landscape impacts for Policies 11 and 13 (Wind and Solar outside of priority areas, and Other renewable energy developments). Both policies include wording that '<i>benefits are maximised and there are no unacceptable adverse effects on landscape</i>'. Whilst we recognise that these policies aim to avoid unacceptable adverse effects, they do not aim to avoid all adverse effects and the ISA should reflect this when assessing their effects. We therefore consider that the ISA should be recording a potential negative effect on landscape from these policies. Table 2.9 (p. 58) summarises cumulative, synergistic and secondary effects together. However, presenting such diverse impacts across a range of policy types as one score risks oversimplifying and limiting its usefulness. For example, for Obj. 13 Landscape, the overall impact is assessed as being neutral, through including positive effects relating to green infrastructure and negative ones relating to wind and solar farms. Mitigation and Recommendations Because of the length and complexity of the assessment matrices in Appendix B, readers are likely to rely more on the summaries presented in the main report text. The summary of recommendations to enhance the sustainability performance of the draft NDF, presented in Table 2-10, is therefore particularly important. However, this table does not present a comprehensive summary of the assessment, more a headline review, and the rationale over which points have been drawn out from the dozens of recommendations in the full assessment matrices in Appendix B is not clearly explained. We provide two examples below: Important recommendations on geodiversity (p. 63 of Appendix B), biodiversity (p. 265) and sustainable construction (p. 95) are not included in this table. There are also no recommendations included to mitigate green greenhouse gas (GHG) emissions. A key recommendation made on p. 54 of the main reports is not included in the table, namely to subject Policies 20 (Port of Holyhead) and 32	been within a specific topic-related objective or within another related objective. The Spatial Strategy was not re-assessed in the latest version of the assessment as it was assessed during the options development stage of the ISA. Noted. Noted. Noted. Noted.	have been made clearer, including within the assessment summary. The report text will make clearer what was assessed in the latest draft of the NDF. To be clarified in the assessment. Assessment to be reviewed and revised as appropriate. Assessment and approach to be reviewed and revised as appropriate, using the precautionary approach. To be reviewed and revised as appropriate.

	(Cardiff airport), which both have significant negative impacts on GHG emissions, to more detailed analysis of their contribution to GHG emissions to inform a targeted mitigation strategy. Monitoring It is our view that the monitoring proposals set out in the ISA require further development. The current outline, set out on p.63, Table 2-9 (which should be correctly labelled Table 2-11) appears to be more aspirational than robust and workable. For example, '<i>Indicators related to condition of biodiversity designations... specifically in relation to the role of the NDF to be developed and agreed.</i>' For complex matters with many influences, we question whether it is realistic to be able to identify specific effects from the NDF separately from all the other influences. We understand that the intention is to have an integrated monitoring framework for the NDF and ISA. Within this, we remind you of the SEA requirement to monitor likely significant environmental effects as predicted in the SEA, and so would like to see monitoring focussed in particular on the significant negative effects predicted in some areas, in particular against Objs. 6 (GHG) and 7 (Flood Risk). For Obj. 7 (Flood Risk), we suggest that monitoring 'loss of functional floodplain as a result of development' should be included. The <i>UK Climate Change Risk Assessment 17 (UK CCRA 17)</i> sets out climate risks for Wales, and these should be considered in their entirety when deciding on appropriate monitoring indicators. For example, ISA Objective 7 (Flood Risk) includes a decision aiding question (p.24) on encouraging 'all new development to be climate change resilient'. Climate change resilience is wider than just flood risk and should be adequately monitored. We recommend including a monitoring indicator around the reduction of wider climate risk and the attainment of climate resilient infrastructure. We refer you to State of Natural Resources Report (SoNaRR) for additional potential monitoring indicators. Comments on specific topics 12. Climate Change 12.1. The NDF should guide Wales in planning for and implementing climate change adaptation measures, to support long term sustainable development and a more resilient Wales, and the ISA has a key role in evaluating and strengthening how it does this. Currently, decarbonisation aspects appear to get more attention than adaptation/mitigation. The ISA should more clearly highlight the current and future flood risks which may limit development within the focussed growth areas identified in the draft NDF, particularly in Policies 18 (North Wales Coastal Settlements) and 28 (Newport).	Noted. The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies, including transport, economy, environment, decarbonisation, regeneration, etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also addresses climate change, which will ensure this is considered and	To be developed with the NDF team.

	reflected in the NDF. This includes ensuring communities are sustainable and resilient. The NDF reflects these aims and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra-low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy.	
We advise that the consideration of climate change should be further strengthened, and actions for adaptation and mitigation more integrated throughout the ISA and NDF. The NDF should guide Wales in planning for and implementing climate change adaptation measures, to support long term sustainable development and a more resilient Wales, and the ISA has a key role in evaluating and strengthening how it does this. Currently, decarbonisation aspects appear to get more attention than adaptation/mitigation. The ISA should more clearly highlight the current and future flood risks which may limit development within the focussed growth areas identified in the draft NDF, particularly in Policies 18 (North Wales Coastal Settlements) and 28 (Newport). We consider that the <i>UK CCRA 17</i> should be included in section 2.1.3 in the list of particularly important national documents, together with the Climate Change Adaptation Plan for Wales (currently at final draft stage). Whilst flood risk is the main risk for Wales identified in the <i>UK CCRA 17</i>, there are many other risks and challenges to the delivery of climate resilient infrastructure which are set out in this document.	Noted.	Flood Risk and climate change adaptation and mitigation to be given more prominence throughout the assessments. CCRA 17 reviewed and given greater consideration.
The assessment of Policy 5 – Delivering affordable homes - refers to sustainable construction methods but makes no recommendation that they be adopted. We suggest that this should be included as a recommendation along with the recommendation that <i>‘the sustainability of sites for development should be a primary consideration over where to situate new homes...’</i>, and both recommendations should be included in the Summary of Recommendations Table 2-10. Whilst there is a cost to the construction of sustainable new homes, building energy efficient homes which reduce energy use and emissions should actually make housing more affordable in terms of life-time costs even if it results in some additional up-front costs, as ongoing running costs will be significantly	Noted.	No action.

	reduced. In addition, we consider it is likely that energy efficient and climate resilient communities will be more socially cohesive. The assessment of Policy 25 – Haven Waterway – is significant positive for GHG emissions (p. 209 of Appendix B). The accompanying text however describes a range of positive and negative impacts. We suggest that this should more accurately be recorded as a mixed effect, not significant positive. Flood Risk We have some concerns about the priority given to flood risk in the assessment and the NDF. This is a particular concern given that flood risk is likely to increase in the future due to climate change. The ISA highlights the potential for the regional development policies 23, 25, 27, 28 and 29 to have a negative impact on flood risk, but it is not clearly stated that flood risk should be a deciding factor when siting new development. Several of the priority areas for development (e.g. North Wales coastal arc, Newport) are already at heightened risk of flooding. Prioritising more development in these areas will increase the pressure to develop on or near flood plains with associated future problems. Support for the redevelopment of brownfield sites is included in several NDF policies, but the future flooding constraints and compliance with Planning Policy Wales (PPW) may mean some of these sites are more suited to green infrastructure than housing or industrial development. These potential impacts are not currently reflected in the ISA. There are also potential impacts from exposure to flood risk on health and wellbeing, especially for housing developments. We welcome the recognition in paragraph 2.6.8 of the extensive flood risk present in areas targeted in the Spatial Strategy, and the risk that the significant level of development proposed would place some new development in active floodplains. The assessment could be improved by looking longer term at how climate change is likely to exacerbate these current day risks. Climate change may mean that difficult decisions will need to be made, especially around the coast, where current and proposed development may not be sustainable in the longer term. Table 2-10 – Summary of Recommendations and Welsh Government's responses - whilst we accept and agree with the comments referencing PPW and TAN15, we do not agree that the draft NDF <i>clearly</i> identifies flooding as a significant issue which may constrain development in many areas. For example, the draft NDF states Welsh Government is “<i>determined to see development and growth in Newport</i>” (Policy 28), yet does not as part of the policy or supporting text acknowledge the already significant challenges flood risk presents to this area. Water resources We have concerns about whether the ISA correctly identifies all the potential impacts on water resources. Some of the places targeted for development, such as Wrexham and Deeside (Policy 17), and Newport (Policy 28), are in areas which may already be under water stress. The assessment for Newport identifies a potential impact on water quality, and there are several recommendations, including that development should only be permitted where there is adequate capacity in the local sewage system, and that new-builds should incorporate water efficiency measures to minimise consumption. By contrast, there is predicted to be no discernible impact on water resources in the Wrexham and Deeside area and hence no recommendations. We consider that similar impacts are possible in Wrexham and Deeside to those predicted in Newport, and that similar recommendations should therefore be included. We also note that the summary of recommendations in Table 2-10 does not include any recommendations around mitigating impacts on water resources and quality. We recommend that broad recommendations are included that	Noted. This consideration will be provided by other policies and is not the main intention of the policy. Noted. Noted. Noted. Noted. Noted.	Assessment reviewed and revised. Assessment reviewed and revised. Assessment reviewed and revised. Assessment reviewed and revised. Assessment reviewed and revised. Assessment reviewed and revised. Recommendations reviewed

	any development in growth areas should be sited so that local sewage systems are not over-capacity, and that all new-builds should include water efficiency measures. Landscape Landscape impacts are predicted from several NDF policies, many of which may be mitigated by sensitive siting and strategic green infrastructure. The impacts from renewable energy developments, particularly wind and solar power, will be significant and often cannot be mitigated. The urgent need to decarbonise energy supply leads to the acceptance in the policy of landscape change, but this does not reduce the impact on the landscape. Green infrastructure – need for further guidance. Better landscape design is often a key to creating appropriate, robust and resilient landscapes that can accommodate new development. There is potential for significant positive impacts on landscape and visual resources from policies that promote green infrastructure, but in order to realise this, we consider that the NDF will need supporting with further guidance to inform subsequent programmes and projects. Renewable Energy policies The following comments relate to the assessment of the landscape impacts of Policies 10, 11, 12 and 13 (pp. 142-143). Acceptability of adverse impacts We note that the assessment states that Policies 11 and 13 would have a neutral impact, ‘as the policy states that planning applications must demonstrate there are <i>‘no adverse impacts’ by way of... landscape and visual...</i>’. The current policy wording in the draft NDF (p. 40 of NDF) however states that there must be <i>‘no unacceptable adverse effects...</i>’. This wording implies that some adverse impacts may occur but may be considered acceptable: if this is the case, the assessment should record a potential negative landscape impact. Balancing landscape and visual effects with the urgent need to decarbonise energy generation We consider that the policies relating to Priority Areas for renewable energy, and renewable energy outside of Priority Areas (Policies 10 and 11) would have a significant adverse effects on Wales’s landscapes (not minor negative as set out in p. 142 of Appendix B), because of the scale of developments envisioned combined with the policy of accepting landscape change from wind and solar farm developments, often in rural, upland or undeveloped landscapes. This is particularly so for wind farms, that are known to have very significant visual effects. However, as the NDF sets out, the wider planning need is for a rapid decarbonisation of energy generation in the context of a climate emergency (see pt. 8.6 above). Opportunities to mitigate the landscape and visual effects on this scale are limited. However, we understand that Welsh Government are commissioning further technical guidance on this subject, which we welcome. The spatial pattern of Priority Areas in relation to Strategic Search Areas and the difference in landscape and visual effects We recommend that the assessment consider in more depth the implications of the policy change from the former Strategic Search Areas (SSAs) to the proposed Priority Areas for Renewable Energy (PAREs). In particular, the spatial pattern of Priority Areas differs from the spatial pattern of SSAs that the Priority Areas would replace. Priority Areas are much larger than SSAs, reflecting the need to increase the amount and scale of developments. Whereas SSAs tended to be located on open rolling upland plateaux with forestry, Priority Areas tend to be also located on enclosed farmland in some areas, notably in parts of Ceredigion and Carmarthenshire. We note a	Noted. Noted. Welsh Government is looking to produce guidance on green infrastructure. Noted. Noted.	and revised as appropriate. Assessment reviewed and revised. Assessment reviewed and revised as appropriate. Assessment reviewed and revised as appropriate. NDF policy updated and assessment revised.

	strong correlation with Priority Areas avoiding large areas of LANDMAP's Visual and Sensory Aspect areas that were evaluated as 'high' or 'outstanding', which tend to be undeveloped, remote, tranquil upland areas and not lowland enclosed farmland. As Priority Areas to some extent avoid the uplands, which society tends to value most highly for their natural beauty, this leads to some Priority Areas in lowland areas closer to where more people live, which would be likely to lead to more residential amenity effects. The assessment does not explore the issue of whether this is the correct option for the NDF in landscape terms for fitting in the Priority Areas. Cumulative landscape and visual effects We consider that potential negative cumulative landscape impacts deserve greater discussion and consideration in the ISA. As the Priority Areas identified in Policy 10 cover a significant land area, and as Policy 11 also allows for some large wind and solar farm developments outside of these Priority Areas, the effect, despite the spatial policy of the NDF, may be to allow much more flexibility to developers in their site search. In consequence, a developer is likely to choose the easiest and most productive locations to develop. This could lead to clusters of developments that would provide cumulative landscape and visual effects in some parts of Wales. The Cumulative, synergistic and indirect effects section of the ISA (p. 57) does not discuss this adequately and simply records mixed impacts (+/-) in Table 2-9. Mobile Action Zones: risk of cumulative landscape and visual effects NDF Policy 6 supports an increase in the scale and numbers of mobile telecommunications developments, and that there is a presumption in favour provided there are no significant adverse landscape impacts. Although the assessment records a minor negative impact, we consider there could be a risk of significant adverse landscape and visual impacts occurring from the collective clutter that this form of development could produce. We agree with the mitigation suggested (p. 105) that such infrastructure should be '<i>carefully managed and located</i>' to avoid adverse landscape impacts, and further recommend that guidance on this is developed. Compact towns and tension with space for urban green infrastructure We consider that there is a potential for adverse impacts on landscape and townscape from the sustainable urban growth supported in Policy 1, although the ISA records only positive impacts (p. 77), not mixed effects. NDF Policy 1 sets up a tension between a desire for higher density development in compact towns, and the need more widely to significantly increase our planning and implementation of urban green infrastructure, including gardens, parks, open spaces and street trees. There would be a conflict if in practice the policy led to infilling gardens or not providing the necessary scale of green areas within a development. For example, in 2013, in Wales, just 1% of all urban tree cover (a principal component of urban green infrastructure) was found in areas of high-density housing, often being those areas experiencing the highest levels of deprivation. Private residential gardens made up 35% of Wales' urban areas, providing 20% of all our towns' tree canopy, being 29% of all urban trees (figures from Natural Resources Wales' <i>Tree Cover in Wales' Towns and Cities</i>, 2016, p. 64). This study also showed that 159 of Wales' 220 towns lost canopy cover between 2006 and 2013, including 7000 large trees and 20 hectares of urban woodland. We suggest expanding the seventh recommendation in Table 2-10 Summary of Recommendations (which currently refers to consideration of the potential impact of dense urban development on air quality) so that it covers the potential implications for green infrastructure as well. Area policies that favour development The ISA identifies the potential for Policy 20 (Port of Holyhead) to have adverse landscape impacts on the nearby Anglesey Area of Outstanding Natural Beauty (AONB). We support the recommendation made on p. 192 around ensuring the AONB is protected or enhanced by development in the region. Likewise, Policy 23 has potential impacts on the Gower AONB, and we support the recommendation on p. 215 relating to the need for careful	Noted. Noted. Noted with thanks. Noted.	Assessment reviewed and revised as appropriate. Assessment updated as supporting text to NDF has been updated. The potential risk is recorded, although minor positive benefits are recorded as the overall predicted effect. Include recommendations in the ISA

	consideration of sensitive landscapes and seascapes or biodiversity assets to avoid adverse impacts. We suggest that these recommendations are included in Table 2-10 Summary of Recommendations in the ISA report. Geodiversity We continue to have some concerns over the way geodiversity is considered in the assessment, as set out in our previous responses. In previous consultation responses Natural Resources Wales has asked for recognition that geodiversity has value in its own right, and that it should be explicitly included in the assessment, as opposed to simply being considered as part of biodiversity. The inclusion of geodiversity alongside biodiversity in Obj. 16 is welcomed. However, in the policy groupings, preferred options and NDF Outcomes in the ISA and NDF, the distinct consideration of geodiversity is lost (see also pt. 8.4 above).		Report summary. Assessment reviewed and revised as appropriate.												
4.4	The ISA has defined a comprehensive range of outcomes that address health and well-being, economic development and environmental protection and enhancement. It is also comprehensive and inclusive in its spatial consideration. Important to the on-going use of the ISA tool should be to ensure that it remains consistent with the key components of the Well-Being and Future Generations Act.	Noted with thanks.	None.												
4.13	Please see also response to question 7). The appraisals appear well written with clear rationale. The appraisal acknowledges that there is a lot of uncertainty, and that some impacts e.g. especially in terms of GHGs, are unavoidable. Where the latter is the case mitigation is suggested. Comments/ suggestions about indicators: <table><tr><th>ISA Objective</th><th>Suggested additional/alternative indicator</th><th>Data source</th></tr><tr><td>3. To create opportunities for an increase in employment across the country and promote economic inclusion</td><td>As well as indicators for employment and deprivation, indicators for the health of businesses and/or business birth/death/survival rates could be used here with the context of national infrastructure?</td><td>Stats Wales/ONS Business Demography</td></tr><tr><td>4. To create opportunities for sustainable economic growth, diversity and business competitiveness</td><td>See above, general health of business. Also, demographics in terms of the sectors that are growing may help to indicate if the types of business that are growing are those that have a future i.e. sectors that do not rely on dwindling natural resources such as fossil fuels</td><td>Stats Wales/ONS Business Demography</td></tr><tr><td>6. To create opportunities within which greenhouse gas emissions can be reduced and</td><td>GHG emissions heat maps - changes in the NAEI model emissions maps and how they reflect the pattern of development promoted by the NDF</td><td>NAEI</td></tr></table>	ISA Objective	Suggested additional/alternative indicator	Data source	3. To create opportunities for an increase in employment across the country and promote economic inclusion	As well as indicators for employment and deprivation, indicators for the health of businesses and/or business birth/death/survival rates could be used here with the context of national infrastructure?	Stats Wales/ONS Business Demography	4. To create opportunities for sustainable economic growth, diversity and business competitiveness	See above, general health of business. Also, demographics in terms of the sectors that are growing may help to indicate if the types of business that are growing are those that have a future i.e. sectors that do not rely on dwindling natural resources such as fossil fuels	Stats Wales/ONS Business Demography	6. To create opportunities within which greenhouse gas emissions can be reduced and	GHG emissions heat maps - changes in the NAEI model emissions maps and how they reflect the pattern of development promoted by the NDF	NAEI	Noted with thanks.	Indicators to be considered in the drafting of the monitoring framework.
ISA Objective	Suggested additional/alternative indicator	Data source													
3. To create opportunities for an increase in employment across the country and promote economic inclusion	As well as indicators for employment and deprivation, indicators for the health of businesses and/or business birth/death/survival rates could be used here with the context of national infrastructure?	Stats Wales/ONS Business Demography													
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6. To create opportunities within which greenhouse gas emissions can be reduced and	GHG emissions heat maps - changes in the NAEI model emissions maps and how they reflect the pattern of development promoted by the NDF	NAEI													

limited and encourage energy efficient and sustainable design				
8. To create opportunities to encourage the protection and improvement of air quality	See above for a link to NAEI emissions mapping/modelling.	NAEI		
Monitoring information should be drawn from the Welsh Government's Environment & Rural Affairs Monitoring and Modelling Programme (ERAMMP) which provides a programme of monitoring and modelling which collects data across key environmental parameters and undertakes analysis informing upon the health and resilience of Wales' land-based natural resources (including areas of interface with the freshwater and marine environments) and associated flows of ecosystems services. Note: Snowdonia NPA host the ERAMMP Designated Landscapes Monitoring and Liaison Officer. Response to Question 7: We question whether microgeneration at domestic and farm level could be promoted further by the NDF, given it would likely reduce requirements for significant grid infrastructure investment, be less intrusive (i.e. incidental to the landscape) and provide rural energy charging points for the transition to non-fossil fuels. Comments on specific areas: Table B-40 of the ISA (page 126) notes that planning applications for renewable energy development in Wind and Solar Energy Priority Areas must demonstrate how adverse impacts have been minimised including on the Setting of National Parks. As landscape change in these areas is accepted, and this policy provision is not directive (i.e. it is related to an administrative provision "demonstrating") it is unclear what scope there is to dispute an applicant's assertion that they have minimised the adverse impact on the setting of a National Park and this brings into question the ISA's assessment of the policy. For example, Priority Area 7: The Begwyns. Development will impact key view points from inside the National Park (i.e. from the black mountains (Twmpa)). The Priority Areas adjacent to Snowdonia National Park appear to overlap. Regarding Policy P11. It is not for applicants to determine that there are no unacceptable adverse effects on the settings of National Parks. This is a role of the relevant Local Planning Authority having regard to their s62 duty. Perhaps the policy could be worded: "Outside of the Priority Areas for Solar and Wind, such development must be sustainable (i.e. bring local social, cultural, economic and environmental benefits) and have no unacceptable effect on any planning considerations. Development will only be permitted where appropriate arrangements are in place for the removal of all infrastructure and for site aftercare and re-use." The NDF is unclear on the associated development and whether these developments will be safeguarded (by restricting grid connections to smaller scale renewable energy schemes until development in the priority areas is on-line). Could a buffer be included between National Parks and these Priority Areas? Perhaps this is something that could be pursued in the further guidance that Welsh Government intend to provide. Could this guidance be prepared alongside, and 'adopted' with, the final NDF so there is clarity for applicants and the planning authority? The ISA is unclear on implications, for the agricultural sector, of identifying Priority Areas for solar arrays.			Noted. Policy 17, as amended, addresses renewable and low carbon energy generation at all scales alongside Planning Policy Wales. Noted. The priority areas have been reviewed and updated. Policies 17 and 18 in the amended NDF and Planning Policy Wales cover the issues around grid connections and associated development.	None – this is a comment for the NDF team. Assessment reviewed and revised as appropriate. Assessment reviewed and amended as appropriate.

	District heat networks How are these to be progressed in National Parks? Are they a function of Unitary Authorities to pursue? ¹ https://www.ruralpayments.org/publicsite/futures/topics/all-schemes/forestry-grant-scheme/	Policy 16 in the amended NDF on district heat networks would also apply to National Park areas.	
4.16	We have noted the following recommendation in the ISA, and the Welsh Government's response to it below: ISA Recommendation: <i>"The NDF could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside. The NDF could explicitly refer to the need for any development supported in the NDF to accord with Welsh Government policy on flood risk, to avoid building on active flood plains where feasible, to incorporate Sustainable Drainage Systems and other measures to help alleviate flood risk for the development and nearby properties."</i> Welsh Government Response: <i>"•PPW and TAN 15: Flooding: sets out national policy in relation to flooding. PPW includes policy in relation to SUDs. The NDF does not repeat this national guidance, which applies to all development in Wales alongside the NDF.</i> <i>•The Draft NDF identifies the importance of flooding as an issue and identifies flooding in the context of each region and the importance of flooding issues informing regional strategic decisions on locations for growth and new infrastructure.</i> <i>•Given the well-established existing policy guidance on flooding, it is not necessary to repeat this in the NDF."</i> We recognise the important role that PPW and TAN 15 play in setting out policy and guidance on planning and flood risk management. However, we nonetheless feel that there is an important role for the NDF in integrating issues arising from flood and coastal erosion risk management into the NDF spatial strategy, and in setting the context for SDPs and LDPs. This is reflected in the remainder of our comments on this consultation.	Noted. The issue of flooding is recognised and the need to strengthen this within the NDF is accepted.	Flooding policy has been inserted into the next version of the NDF.
4.35	The Welsh Language is actually a Bar to Development. eg. Aberystwyth University has the discrimination towards Welsh speakers, such that numbers of overseas students & English speaking students has dropped reducing income to University as well as reducing the diversity of the teaching & social environment.	A thriving and healthy Welsh language is an important and established ambition of the Welsh Government. Our strategy for growing the language – <i>Cymraeg 2050: A Million Welsh speakers</i> was issued in 2017. Public attitudes towards the Welsh language were captured in the 2017-18 National Survey for Wales. It found that 86% of people believe the Welsh language is something to be proud of and that 67% thought more effort needed to be put into supporting the language. The planning system can contribute towards creating favourable conditions in which the language can thrive, therefore it is legitimate and important for the NDF to address the matter.	None

4.39	Welsh Government state that “we have developed an Integrated Sustainability Appraisal (ISA) which is a process for assessing the social, economic and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process”. i. There is no clarity on how the ‘monitoring indicators’ & ‘objectives’ in the ISA were arrived at, and these do not cross reference with other legislative and other designated frameworks that are supposed to have informed the ISA, nor do they cross reference with the NDF ‘outcomes’. ii. ISA is supposedly a holistic process, but there is no direct reference made to the Sustainability Assessment (SA), Strategic Environmental Assessment (SEA) other environmental directives and PPW10. The HRA is specifically excluded. iii. So-called monitoring of NDF drafting excludes regional policies. iv. The ISA follows the NDF in ignoring the impact of Policy 10 (RE ‘priority areas’) on rural communities. v. Lack of any rigorous scrutiny: no reference to any evidence base (the ‘baseline’ for informing Preferred Option 4 from 4 option choices is ‘do nothing’, which is irrelevant since the NDF is a legal requirement of planning policy). vi. No test of ‘soundness’—unlike LDPs which are required to be tested by a Planning Inspector to show that they are well-evidenced, appropriate for the area, coherent, in line with other legislation. vii. The assessment of the internal consistency of the 17 ISA objectives is incoherent.	The Monitoring Framework is still in a draft form and will be developed further based on the predicted significant effects of the NDF in relation to the ISA Framework. This will be closely linked and integral to the NDF monitoring framework. The ISA report clearly sets out how the processes of SA and SEA, alongside other integrated assessments, have been followed. The SEA Directive and the Well-Being of Future Generations Act in particular, have been specifically set out in terms of their requirements and how the report has addressed them. The HRA is the subject of a separate but parallel process, as required by legislation. A monitoring framework is being developed for the NDF. Noted. The baseline data, which has helped to establish key issues and opportunities for the NDF, has influenced the development of the ISA Objectives. The assessment has also considered the baseline information, including the trend data and the spatial implications of the NDF. The consideration of a ‘do nothing’ scenario is judged to be appropriate in order to establish a baseline against which other options might be compared. The tests of ‘soundness’ do not apply to this report. However, the report demonstrates that a robust assessment process has been followed, starting at Stage A (Scoping), which included the development of an evidence base appropriate to the national scale, as well as setting out the scope and the methodology. The compatibility matrix is intended to be a high level review of the objectives. Where information is unclear with regards to implementation, an unknown score is assigned.	To be noted when developing the Monitoring Framework. None. Assessment reviewed and revised as appropriate. None. None. None.

	viii. Total lack of any meaningful definition of ‘sustainability’	The ISA takes its definition of sustainability from the Well-being of Future Generations Act.	None.
4.40 - EA	We welcome the opportunity to respond to Welsh Government’s consultation on its draft National Development Framework (NDF). The NDF covers a range of issues including housing, energy, economy, transport and the environment. It identifies where nationally significant developments should take place, where key growth areas are and what infrastructure and services are needed. The range of issues and spatial nature of the NDF means there is significant potential for it to directly impact Environment Agency interests in England. Our response to this consultation explains how proposals in the NDF could affect aspects of the environment that lie within the Environment Agency’s interest, how potential impacts can be managed and how mutual opportunities could be realised. 1.0 INTRODUCTION 1.1 Our comments focus on how proposals and policies in the NDF: • have potential to affect key environmental issues within the Environment Agency’s remit, including flood risk, water quality, water resources, climate change, biodiversity and environmental net gain and waste management, and • interact with receptors in England via pathways from Wales across the border. 1.2 The Environment Agency is a statutory consultee for about 20,000 planning applications a year and for all local plans, strategic development strategies and neighbourhood plans in England. In this capacity we seek to create great places that bring communities together and improve physical and mental wellbeing. We do this by advising local planning authorities on key aspects of the environment so proposed developments and plans contribute to creating sustainable development. It is important that environmental issues are considered and addressed at a catchment scale, and our advice helps local planning authorities identify and address environmental issues across their district boundaries. 1.3 The Environment Agency’s key issues regarding the draft NDF are summarised below. Our answers to the specific consultation questions are in the appendix to this document, and we ask that the points we raise in section 2 below are taking into account in addition to our answers to the consultation questions. 2.0 KEY ISSUES FOR THE ENVIRONMENT AGENCY 2.1 Potential for cross border impacts in England from proposed major growth areas and strategic infrastructure proposals – identifying likely risks and mitigation and promoting cross border co-ordination, where needed 2.1.1 Growth areas and strategic infrastructure proposals in the NDF are mainly located close to the border with England. Consequent development activity is likely to be significant and could have impacts via various pathways to receptors in England. These include: • changes to flood risk, existing and proposed flood risk management infrastructure and water quality downstream in England • significant increase in waste generation and the potential for waste to be transported long distances to be processed, including to England • additional pressure on water resources, including water resources shared with England 2.1.2 We understand that much of the detail regarding the nature and scale of development in growth areas will be developed through Strategic Development Plans for each of the 3 regions. The risks identified above can be managed by the NDF promoting a strategic approach when considering implications for flood risk, water quality, water resources, air quality and waste management when developing proposals for growth areas through Strategic Development Plans. In doing this we believe the following issues should be considered.		

	2.1.3 Flood risk - we believe the NDF should promote a catchment based approach to managing flood risk. We are unsure if a strategic level flood risk assessment has been produced to understand the broad flood risks for the identified growth areas. Such an assessment is important to inform planning for growth areas and would help to identify strategic risks and potential mitigation needs that could inform the development of board flood risk management strategies for the NDF. One such mitigation strategy is use of natural flood risk management. We believe there is a strong opportunity for natural flood risk management to be included in NDF policies (e.g. as part of policy 8 and 9). We also recommend the NDF should promote consideration of the potential for accommodating respective housing needs either side of the Wales-England border, in order to ensure development is in lowest flood risk areas (e.g. as part of policies 1 to 4). 2.1.4 Waste management – we recommend waste management is included in the ‘NDF model of influence’, to ensure it is considered a strategic issue. This will help ensure growth and development promoted by the NDF has a supporting waste management infrastructure that adheres to best practice. It is also important the NDF promotes a structured approach to waste management that: • promotes the ‘proximity principle’ where waste processing is close to where its generated, minimising carbon emissions due to transport of waste and promoting local employment opportunities • manages the reduction of risks from waste crime • ensures waste is not disproportionately handled by a few sites where costs are lowest, at the expense of promoting handling and treatment further up the waste hierarchy. 2.1.5 The NDF can facilitate the achievement of this by specifically referencing these objectives as part of policies 1 to 4. We feel this is especially important as supporting policies in current Technical Advice Notes for waste don’t reflect current best practice in waste management, such as circular economy. 2.1.5 To ensure consistent ‘end of waste’ management procedures across the border, a degree of consistency with waste management policy in England will be important. Liaison with waste policy makers in England when refining waste policies for the NDF, and subsequent Strategic Development Plans will facilitate this. 2.1.6 Water resources – The NDF recognises that climate change could increase pressure on water resources, and the location of growth areas provides the opportunity to consider where water will be needed and how to safeguard resources. It also reflects that Wales currently transports water to areas of demand. This will include areas of England including Cheshire, Wirral and West Midlands. 2.1.7 However, we are not aware of an evidence base underpinning the NDF that considers how water availability might change in the future due to climate change, growth proposed by the NDF and wider growth across the border in England. It is important the NDF demonstrates such evidence has been considered so it can reflect the likely water availability risks and set high level mitigation principles. This will help ensure provision is made (e.g. as part of policies 1 to 4) for sufficient water resources to serve proposed growth areas for the lifetime of development it proposed by the plan, in the context of water needs for wider growth across the border in England and water needs for the natural environment. 2.1.8 Water quality – The NDF recognises clean water as a valuable resource to the environment and for growth. This is reflected in the key NDF outcomes. Major growth can affect water quality and climate change is likely to affect water quality too. However, there is no reference to an evidence base that considers how current water quality could be affected by climate change and proposed growth areas. It is important the NDF demonstrates such evidence has been considered so it can reflect the likely risks to water quality and identify high level strategies to manage risks (e.g. as part of policies 1 to 4). It’s important the NDF is underpinned by evidence collected at a catchment scale, considering how water will flow along rivers and through the ground across the border to England (and vice versa). 2.1.9 There is an opportunity as part of policy 8 to reflect the importance of blue infrastructure, as well as green infrastructure impact, in enhancing biodiversity and seeking ecosystem resilience, and to reflect that climate change has the potential to have an adverse impact on existing ecosystems and biodiversity if left unmanaged. The NDF also has the opportunity to promote high level mitigation to manage risks as part of the Spatial Development Plans (policy 16), particularly where there are problems already, for example in the River Wye and River Severn catchments.	Noted. The issue of flooding is recognised and the need to strengthen this within the NDF is accepted. Noted. Waste management is recognised in Policy 19 of the NDF and more detail is set out in Planning Policy Wales. The issues of water resources, water quality and air quality are all recognised and considered through the ISA, including climate change impacts and resilience. Planning Policy Wales also sets out national policy. Cross-boundary impacts are also recognised. Noted. Planning Policy Wales defines ‘Green infrastructure’ as “... the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places.”	Flooding policy has been inserted into the next version of the NDF

	2.1.10 Air quality - The NDF focuses on health impacts of air quality in urban areas. As air quality is transboundary, affecting biodiversity, commercial forests and crop plants, it is important the NDF includes provisions for working with adjacent regulatory bodies (including the Environment Agency and others such as neighbouring planning authorities, including those in England, and Natural England) to ensure a coordinated approach to managing sources of air pollution and air quality. This could be covered as part of policy 8. The NDF also has the opportunity to promote high level mitigation to manage risks as part of the Spatial Development Plans (policy 16), particularly in locations where there are likely to be air quality issues, for example where intensive agriculture is prominent and sensitive habitats are present. 2.2 Strategic management of environmental risks and maximise improvement opportunities 2.2.1 Climate change resilience and adaptation – climate change will have implications for water quality, water availability and flood risk that will manifest at a catchment scale and beyond. Growth and development can exacerbate these impacts – but with good risk management growth and development can also present opportunities to reduce the overall impact of climate change on these environmental factors. 2.2.2 Given the strategic nature of climate impacts and the location of many growth areas close to the border with England, it is important the NDF promotes a coordinated approach to understanding the risks and developing strategic mitigation measures. This will ensure the NDF promotes a robust framework for local plans that provide the detailed framework to deliver growth and development. 2.2.3 The Environment Agency is keen to understand the effects of a 4°C temperature increase by 2100 and how we can prepare for the likely implications. While we are committed to supporting the UK's efforts to limit greenhouse gas emissions by striving to be a net zero organisation ourselves by 2050, we recognise achieving this globally relies on actions taken by many other nations, who may not share our approach. On this basis, we believe planning for a 4°C temperature increase by 2100 scenario will provide a robust framework to ensure development is resilient for its lifetime. The Environment Agency are currently liaising with colleagues in Natural Resources Wales regarding our respective approaches to updating our climate change allowances for flood risk assessments to ensure our respective approaches work well together and are not in conflict. This includes consideration of how a scenario of a 4°C temperature increase by 2100 is likely to affect flood risk. We recommend the NDF's policies provide a framework for sustainable growth (for example as part of policies 1 to 4) that reflects robust climate change resilience standards to ensure its proposals are deliverable in the context of the wider spatial planning framework. 2.2.4 Furthermore, there is an opportunity for the NDF to build on its adaptation policies related to biodiversity and ecosystem resilience in Policy 8 to set a framework for resilience and adaptation planning. It could be expanded it to incorporate flood risk, water quality and water resources, overheating in buildings and urban heat island. Stronger links to shoreline management plans, flood risk management plans, climate change allowances for flood risk and river basin management plans would help facilitate this. 2.2.5 Carbon reduction and climate change mitigation – The Draft NDF makes clear commitments to reducing greenhouse gas emissions and creating a sustainable decarbonised society in its strategic outcomes and in many of its policies. This includes through promotion of low carbon transport and buildings, low carbon and renewable energy sources and through green infrastructure and a national forest. Environment Agency objectives to improve land management not only seek to achieve improvements for flood risk management and water quality, but also help to achieve carbon sequestration through soil management, upland afforestation and restoration of peatland and other habitats. We recommend the NDF promotes cross border engagement to optimise opportunities to secure these land management measures. Furthermore, we have already noted in our response that we recommend early and strategic engagement with the Environment Agency to manage potential environmental risks from renewable energy infrastructure. This will also help ensure deliverability of important infrastructure that will help achieve the carbon reduction goals. 2.2.6 Flood and Coastal Erosion Risk Management Strategy - It is important the NDF and any supporting infrastructure plans, ensures strategic flood risk is considered and there is coordination with the Environment Agency, accounting for the Environment Agency's FCERM Strategy, to manage these risks. We expect the FCERM Strategy to be finalised and laid before parliament for approval this calendar year. This Strategy has a time horizon to 2100 and seeks to take a much broader view of flood and coastal risk management, moving from a	Noted. Noted. The NDF sets a framework for sustainable growth alongside Planning Policy Wales, which sets out further guidance on sustainable development, climate change, ecosystem resilience, etc. Noted. Noted. The issue of flood risk has been addressed in the updated NDF.	

	narrow view of protection, to one of resilience. This acknowledges that building higher and higher flood defences will not always be possible or appropriate. It introduces a commitment to develop and explore the concept of resilience standards – a way of improving flood and coastal resilience across the country. Ways of managing flood and coastal resilience will vary from place to place, with the responsibility on the best combination of ‘tools’ resting with the most appropriate decision maker. 2.2.7 Our Draft FCERM Strategy also introduces the concept of adaptive pathways. This is a positive way to pre-plan adaptation actions for a range of different climate scenarios before they are needed. This approach is useful because flooding and coastal change is not static, but constantly changing. A dynamic approach that can be reviewed over time in response to changing risks can avoid potential over or under adaptation, and help to keep options for adaptation open. Adaptation pathways need to be planned holistically and in conjunction with other infrastructure providers, so that plans for growth and development can be aligned with other infrastructure plans. 2.2.8 Our Draft FCERM Strategy also acknowledges that in some places, adaptation in the long term to flood risk or coastal change may not be possible, and that the relocation of some existing development and infrastructure may need to be planned – i.e. ‘build back better and in better places’. A proactive approach to this can help to minimise the impacts of relocation on local places. 2.2.9 We encourage closer alignment between the NDF and our FCERM Strategy on these important principles. This could be achieved through policies 1 to 4, and through policy 16 to inform the Spatial Development Plans that will emerge from the NDF. 2.2.10 Net gain – Environmental net gain was identified in the Government’s 25 Year Environment Plan, which sets a comprehensive and long term approach to protecting and enhancing the natural landscapes and habitats of England. Growth and development provide significant opportunities to enhance the natural environment and the assets and services it provides for society. It can also be away of improving resilience to natural hazards and the predicted impacts of climate change. On this basis there is an opportunity for the NDF to provide a policy framework to identify strategic opportunities for biodiversity net gain, wider net gain and enhancement of natural capital to better align with emerging approaches in England to meet aspirations of the 25 Year Environment Plan. This could be included as part of policies 8 and 9. 2.2.11 Given the NDF proposes many growth areas close to England, the NDF should promote a strategic approach to identifying net gain opportunities at a regional and local level, including cross border opportunities in England, for the delivery of net gain that maximises benefits for the wider environment. 2.3 Management of impacts from key growth industries 2.3.1 Renewable energy – The NDF promotes significant growth for renewable energy that will see significant infrastructure being built to harness tidal, wind and solar energy. 2.3.2 Tidal lagoons on welsh shores proposed in Severn Estuary/Bristol Channel, and potentially in North Wales have the potential to impact English rivers and shores, in particular migratory fish that require English river habitat as part of their lifecycle. Increase in renewable energy generally is likely to result in additional powerlines to access the national grid in England, particularly in mid-Wales where there is a strong drive for onshore wind energy generation. Transmission infrastructure tend to be in river valleys and can result in an increase in impermeable surface area, speed of surface water runoff can be affected, potentially increasing river flows and flood risk. 2.3.3 It is important the spatial context set by the NDF recognises these risks as part of policies 10, 11 and 13 and facilitates join up with relevant Environment Agency functions to ensure adequate protections can be put in place. 2.3.4 Mineral extraction – The NDF promotes minerals extraction as important growth industry for some regions of Wales, with many areas promoted for these industries being located close to the border with England. Minerals activities in Wales close to the border with England can pose significant flood risk and ground and surface water issues in England, accepting there are existing arrangements to manage crossborder issues through our respective permitting regimes that minerals activities can pose.	Amended Policy 9 reflects net gain and this is also addressed in Planning Policy Wales. Noted. Cross-border impacts and relationships are recognised in the NDF.	

	2.3.5 It is important the spatial context set by the NDF recognises these risks as part of policies for those regions where minerals extraction is a prominent industry and facilitates join up with relevant Environment Agency functions to ensure adequate protections can be put in place. This could be achieved through policy 16 (informing the development of the Spatial Development Plans) and through the policies for those regions where minerals activity is most prominent (for example policies 22, 26 and 33). Recommendations for the ISA objectives are listed below. Objective 7 - add the following to the decision adding questions: - encourage a strategic approach to assessing and managing flood risks at a catchment scale and delivering growth across local authority boundaries to ensure vulnerable development is in lowest flood risk areas possible - ensure flood risk assessment accounts for the impact of a range of climate change, including a scenario of a 4°C increase by 2100. Objective 8 - add the following to the decision adding questions: - encourage opportunities to reduce air emissions from intensive agriculture. Objective 9 - add the following to the decision adding questions: - encourage a strategic approach to assessing and managing risks to water quality and water resources. - encourage assessment of the impact of a range of climate change on water quality and resources, including a scenario of a 4°C increase by 2100. Objective 11 - add the following to the decision adding questions: - encourage consideration of the potential of climate change to exacerbate social inequality and address this risk. Objective 16 – add the following to the decision adding questions: - encourage valuation (physical and/or monetary) of natural capital. - encourage development to deliver net environmental improvements (i.e. not just ensuing development doesn't cause net damage). Objective 17 – add the following to the decision adding questions: - reduce amount of waste generated; - promote waste processing close to source.	Noted. Minerals are also addressed further in Planning Policy Wales. It is noted that the ISA Objectives were consulted upon as part of the Draft ISA Framework at the Scoping Stage of the project. Following this stage, the finalised Framework has been used to provide a consistent appraisal framework throughout the assessment of the NDF. Therefore, although useful, these recommendations will be considered in relation to monitoring indicators, as opposed to the refinement of the ISA Framework.	To be considered when developing the Monitoring Framework.
4.43	It fails to predict the effects of solar and windfarms on the economy, biodiversity, culture and health of populations in Priority Areas.	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, Welsh language, culture, rural impacts and economic impacts, including tourism.	The impacts of tourism have been strengthened in the assessment.
4.47 - PHW	Yes. We welcome the inclusion of Objective 2 in the ISA framework which focusses on health, wellbeing and health inequalities and that these have been considered as part of the integrated assessment of the draft NDF. The monitoring dashboard that is developed needs to be drafted with, and linked into, public health and health service policy makers, agencies such as Public Health Wales and providers to ensure that health and inequalities are sufficiently monitored and progress against health and wellbeing outcomes captured. We welcome the inclusion and consideration of health and well-being within the draft NDF, the explicit references to health and also its place as a key objective in the Integrated Sustainability Assessment. The references to mobilising and increasing active travel, policies for increasing and improving green infrastructure and the focus on low carbon growth and sustainable energy could potentially be positive for the health and well-being of the people of Wales. However, there is little reference to the potential impact of the NDF on mental well-being nor of the potential increase in health and other inequalities that could emerge as unintended negative consequences from the focus on future Local and Strategic Development Plans (SDPs) or Growth Plans / City Deals. These could be between urban and rural or deprived communities and regions. We suggest that further assessment of these development and growth plans and Deals is carried out in respect to health and well-being and a consideration of inequalities both now and in the future. This would support the Welsh	The Monitoring Framework is still in a draft form and will be developed further based on the predicted significant effects of the NDF in relation to the ISA Framework. This will be closely linked and integral to the NDF monitoring framework. This assessment is undertaken at the national scale and lower tier plans are required to undertake impact assessments. More details are set out in the Development Plans Manual. The legal status of the Draft NDF is set out in the 'Dear CPO' letter here: https://gov.wales/sites/default/files/publications/2	Front section of NDF and engagement/ involvement, etc. enhance the ways of working. Same section of ISA to be checked to see if it can be enhanced. Action – ensure the next stage of the

	Government (WG) Public Health (Wales) Act 2017 requirements for Health Impact Assessment (HIA) by public bodies in specific circumstances. There are strong hooks in the draft NDF to enhance population health and wellbeing in the long term such as improved air quality, employment opportunities, housing affordability and accessibility and any assessments would also capture these and provide opportunities for maximisation and involvement of key stakeholders in the Plan/Deal development. For the identified Regions, reference is made to Strategic Development Plans. According to WG's Designating a Strategic Plan Boundary and Establishing a Strategic Planning Panel (SPP) (March 2019) "it is envisaged the earliest an SDP would be adopted is 2025" it is important that Local Planning Authorities are able to embrace (with consultees) the intentions of the NDF in the near future rather than delaying action until any SDP is approved. We would like to see firm steps taken to in the intervening period in improving the health and wellbeing of communities in line with the Well-being of Future Generations (Wales) Act 2015. To put good planning into practice, we recognise the important role that an independent, informed, local government planning department plays. It is estimated that the real term changes in spending on planning in local government in Wales fell by 52% between 2009/10 and 2016/17 (Institute for Fiscal Studies, 2016), this is an issue the Welsh Government may want to consider in future. The Framework is light on describing collaboration with consultees on strategic decisions. As the primary public health agency for Wales, it is important that Public Health Wales are engaged early on in national and strategic discussions and decisions on the health and wellbeing of national and local populations. This is also true of the monitoring of the NDF and its outcomes in the short and long term.	019-12/legal-status-of-the-draft-national-development-framework.pdf Lower tier plans must be in accordance with the NDF once published. The NDF will have development plan status against which decisions are made. The NDF and ISA have been shaped and developed using the 'five ways of working'. It is proposed to clarify the assessment process, including the 'five ways of working' and the role of stakeholders within the plan and ISA document.	assessment strengthens inequality issues, including urban/rural, regional, etc.
4.60	The ISA seems to be very comprehensive and covers the diverse issues well. The problem with the monitoring indicators is that there are so many and the criteria against which monitoring is to take place have not been developed or agreed. It is pointless introducing many more monitoring items if the initial dataset has not been determined. Much more Control and monitoring of agricultural land (especially BMV) is needed to ensure that there actually is a good future and natural resources for generations yet to come. Compliance with PPW10 Para 3.62 needs to be reinforced as the ineptitude of at least 1 LPA in preparing an LDP in taking 15years, since the 2004 Planning & Compulsory Purchase Act, was introduced will frustrate this requirement for many years to come. The NDF therefore can/should be prescriptive in this context if the LPAs involved actually get an LDP approved as the forerunner to an SDP.	Noted, with thanks. The Monitoring Framework is still in a draft form and will be developed further based on the predicted significant effects of the NDF in relation to the ISA Framework. This will be closely linked and integral to the NDF monitoring framework.	To be considered when developing the Monitoring Framework
4.76	I don't quite see how a "presumption in favour of large scale on-shore wind and solar energy development...and an acceptance of landscape change" and a scheme that envisages solar and wind priority areas "that will cover over one fifth of Wales (in addition to the wind farms etc that we already have) quite chimes with 'wellbeing' for the sort of factors listed above. Looking at the map, I see two very large proposed wind and solar areas around Welshpool and Newtown. As I live in Abermule halfway between these two towns I feel myself very much in the eye of this particular storm—and all this while our village is still licking its wounds from being on the receiving end of the defeat of our campaign not to have a bulk waste recycling centre built here (which, by the way we warned was liable to serious flooding and, lo and behold has already been flooded whilst in the process of construction). Do I feel consulted? No. Do I feel adversely affected in regard to any number of the factors you list above? Yes.	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, Welsh language, rural impacts and economic impacts, including tourism. The draft NDF consultation process was wide-ranging and followed the Welsh Government's public consultation guidelines. In addition to the online consultation form, a down-loadable form for manual or email return was available. Approximately 1,552 groups and individuals (including 83 protected characteristics groups) were contacted directly via our Consultation Database which is open to all and includes statutory and any other interested parties. Easy-read versions of the consultation questions were also published.	None

4.96	In pursuit of decarbonisation and renewable energy development it attaches insufficient weight to negative impacts on biodiversity, on the Welsh language, rural employment and culture. We need to consider alternative forms of renewable energy like tidal power, off shore wind and hydro-electricity	The Integrated Sustainability Appraisal has assessed the impacts of the renewable energy policies, including health and well-being, landscape, biodiversity, Welsh language, culture, rural impacts and economic impacts, including tourism. The NDF and Welsh National Marine Plan (WNMP) both recognise that there are a number of opportunities to generate renewable energy across a variety of technologies, both on-shore and offshore, which should be maximised to help meet the targets. The plans do not rule out any particular technologies nor set specific targets for a particular technology. The NDF and WNMP will provide a framework to deliver renewable energy and ensure decision making is joined up to maximise the opportunities across the marine and terrestrial areas.	
4.98	No comment. One of the recommendations was that ‘the NDF could more closely consider the potential impact of dense development in urban locations on air quality and the extent to which this can be managed through the design and layout of development.’ There is not much in the NDF related to air quality and increased housing development.	The issue of air quality and the NDF will be considered as part of the ISA.	None.
4.99	The evidence base put forward as part of this consultation falls a long way short of what would be expected of a document that will form part of the statutory development plan. As national policy produced by the Welsh Government, it will not be subject to examination in public and therefore its ‘soundness’ will not be tested by an independent Inspector. We do not consider that the Welsh Government should take advantage of the process that NDF goes through and the evidence base should be bolstered to support any policies proposed. This would ensure the document has more ‘teeth’ in plan-making and decision-taking and does not face the same problems the Wales Spatial Plan suffered. The ISA attempts to score proposed policies and reasonable alternatives against the ISA’s objectives. The ISA’s objectives relate to goals within the WBFGA – something which the Draft NDF itself does not holistically achieve. In relation to green belts and the alternative policy approaches considered in the ISA, we feel that the scoring needs to be reviewed in respect of assessment against ISA objectives 3, 4, 7 and 12. Each is discussed below.	A set of evidence papers have been published and can be found here: https://gov.wales/national-development-framework The NDF will also be subject to scrutiny by the Senedd. In developing the NDF we have recognised our obligations under the Well-being of Future Generations Act. Embedding the principles of the Act, including the 5 ways of working (long-term thinking, prevention, collaboration, integration and involvement), within our strategic thinking and policy development has informed, influenced and shaped the NDF. We have carefully considered how the NDF reflects, aligns with and maximises its contribution to the well-being goals, objectives and ways of working.	

	<i>3. To create opportunities for an increase in employment across the country and promote economic inclusion.</i> Policy 30 and the reasonable alternatives score neutrally. However, green belts will limit land available for development, including mixed-use and employment-generating developments, and therefore must be considered to negatively impact on this objective, at least in the long term. <i>4. To create opportunities for sustainable economic growth, diversity and business competitiveness.</i> Policy 30 and the reasonable alternatives score neutrally. However, green belts will limit land available for development, including mixed-use and employment-generating developments, and therefore must be considered to negatively impact on this objective, at least in the long term. <i>7. To contribute to the reduction and management of flood risk.</i> Policy 30 and 30 RA1 (which both involve the use of green belts) are scored positively in the medium and long term due to potential to “<i>enhance the local extent of above ground vegetation and GI, which provides a natural flood risk alleviation Service.</i>” It is unclear how this conclusion could possibly be reached. The essential characteristics of a green belt include openness, but this would have no discernible impact on the level of vegetation and GI beyond what is currently existing. For example, if land is currently open farmland, the introduction of a green belt in planning policy is not going to encourage more planting and vegetation on the land. We would argue that, given the extensive areas of land at risk of flooding south of the M4 between Cardiff, Newport and the Severn crossings, to introduce a green belt north of the M4 could result in more growth being directed south of the M4 into flood risk areas. <i>12. To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs.</i> The ISA scores Policy 30 and the reasonable alternatives neutrally in response to this objective. It is unclear how this conclusion could possibly be reached when the introduction of green belts would limit the land available for new housing development for the foreseeable future. Green belts endure beyond plan periods in line with PPW; the SDP’s plan period is likely to run from 2020 to 2040 in line with the NDF, and green belts would therefore indicatively be in place until at least circa 2060. There is simply no reasonable scenario in which restricting new development in South East Wales for such a long period would not impact upon the number of new homes delivered (depending of course on the extent of the green belts), which would lead to a worsening of the affordability crisis. As experienced across plan preparation in English authorities with green belts, green belt locations are regularly seen as some of the most sustainably located. English authorities are now having to regularly review green belt boundaries for these reasons, despite their role being to span plan periods.	Noted. Noted . Noted. Noted.	Assessment reviewed and revised. Assessment reviewed and revised. Assessment reviewed and revised as appropriate. Assessment reviewed and revised as appropriate.
4.100	What thought has been given to how the Framework sits with NHS planning, for example, will Health Boards be mandated to ensure all plans are sustainable? There is a spectrum – renewable energy, reducing our carbon footprint, ‘green’ buildings, digital solutions etc. As this framework covers the next 20 years it would be helpful to understand the milestones along the way. We understand from discussion at an engagement session on the NDF that the Team agreed to discuss with WG Health & Social Services leads to look at how to reflect in NHS planning guidance (not just capital and estates).	WG officials in planning and health departments have met over the period of plan production to discuss the opportunities and links for health and planning. Approaches to sustainable development are also reflected within the guidance documents produced by health colleagues and liaison will continue.	
4.105	The Integrated Sustainability Appraisal Report appears to be a complex multi-factorial analysis which was beyond the comprehension levels of the majority of our members. It does appear to have been conducted in a systematic manner, but as the ISA concedes itself, the complexity and margin for error can only provide an indication of the certainty of the impacts. The report also concedes that unforeseen circumstances and the cumulative effect of policies could lead to unanticipated outcomes. In view of the above, the FUW’s members felt that a measure of common sense should prevail as some outcomes are more important than others. They felt that a nation’s economy was of the utmost importance. As regards the monitoring indicators listed for each ISA objective, they seem to lack definition of which variable would be used for each outcome and no specific units are offered.	Noted. The Monitoring Framework is still in a draft form and will be developed further based on the predicted significant effects of the NDF in relation to the ISA Framework. This will be closely linked and integral to the NDF monitoring framework.	To be considered when developing the Monitoring Framework.

	However, one assumes that the data analyses have produced outcome predictions for the short, medium and long term. The predictions should be compared with the monitored indicators and if the model proves to be inaccurate, then modifications would be required.		
4.107	It is assumed that the Environmental impacts will include transport, water, renewables etc.	Agreed. This is reflected in the ISA Report.	None.
4.109	Note that the assessment of the NDF's impact on the Welsh language has been included within the Integrated Sustainability Appraisal. Due to the importance of the Welsh language and the target of increasing the number of speakers to a million by 2050, the NDF should be supported by the Impact Assessment on the Welsh Language outside the Integrated Sustainability Appraisal.	The approach taken in the ISA accords with national planning guidance set out in TAN 20. The Welsh language should not be considered in isolation as it both affects and is affected by other planning considerations, and an integrated approach enables these combined impacts to be assessed. The ISA has assessed the likely effects of the NDF on the Welsh language, ensuring opportunities to promote the Welsh language, facilitate its use, safeguard its future, and see the language thrive, are considered and identified where possible.	None
4.124	The Table at the end of the NDF – “The relationship between the NDF’s policies and the ‘Outcomes’ it sets out to achieve” should indicate whether the relationships are positive or negative. The ISA Objective 4 “To create opportunities for sustainable economic growth, diversity and business” should include opportunities for greater economic equality.	The table is to illustrate how the policies contribute to the delivery of the outcomes. Economic inclusion/economic equality is included within ISA Objective 3.	None.
4.125	This report was “seen to be done but not done to be seen”. It’s failure to properly quantify both a baseline for present-day development trends, and to measure quantifiably the effects of policies in future, creates the situation which allows the NDF to fail – see accompanying report.  20191114-wag_ndf_analysis.pdf	The baseline for the assessment was collated at the Scoping stage of the assessment.	To be appended to the Final ISA Report.
4.127	Cultural heritage, including the archaeological heritage, is noted as meeting the main ISA Objectives 5, 13, 14 and 15. Positively, this is identified as relating to tourism and regeneration, economy, accessibility, town centre development, and so on, as well as in its own right, and referring to the Welsh Government Legislation and Policy. The preferred option 2018 details positively for encouraging the conservation and enhancement of heritage assets (although Welsh Government Legislation and Policy refers to <i>historic</i> assets). Monitoring indicators from the Welsh Archaeological Trusts are provided via Cadw to Welsh Government on a regular basis from all the historic environment sectors support (Planning, Heritage Management, HER).	Noted.	None
4.136	As set out earlier in these representations, no testing of alternative scenarios (such as there being no green belt designation) has been undertaken with regard to economic / employment implications. This has a bearing as to whether the Draft NDF meets the SEA Requirements that it is subject to.	Noted. There have been a number of reasonable alternatives to the Green Belt Policy, including no green belt, which are set out in the ISA report. This approach is compliant with the SEA Directive.	None.
4.179	Sustainability is reliant on support for locally cohesive, rural Welsh language communities, essential to support Welsh Government’s ambition for growing the language.	Response noted.	None
4.186	Paragraph 1.1.43 notes that ‘Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in greenhouse gas emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals	The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies, including transport, economy, environment, decarbonisation, regeneration, etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce	

	be subject to more detailed analysis of their contribution to emissions, which could then inform measures to mitigate these impacts. Confirmation as to what has happened with the recommendation is sought. It is also noted that the need to consider emission contributions is not referenced in the supporting text of Policy 32, which is surely a factor to mitigate this identified environmental impact. • There were a number of recommendations from the ISA to the NDF. One of which was that the NDF 'could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside'. There is not much in the NDF related to flood risk and increased housing development. • Another recommendation was that 'the NDF could more closely consider the potential impact of dense development in urban locations on air quality and the extent to which this can be managed through the design and layout of development.' There is not much in the NDF related to air quality and increased housing development.	greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also addresses climate change, which will ensure this is considered and reflected in the NDF. This includes ensuring communities are sustainable and resilient. The NDF reflects these aims and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra-low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy. The issues around flooding are noted and will feed into the NDF through inclusion of a new flooding policy. Air quality comments are noted and will feed into the review of the NDF and its assessment.	
4.189	It is not clear that this appraisal process clearly and effectively identifies environmental issues, or when it does, this has any impact on the policies drafted. For example the absence of any follow up on the recommendation that the	The NDF has been prepared under the direction of the Programme for Government and in the context of key national strategies, including	

	proposals for Cardiff Airport and the Port of Holyhead be subject to more detailed analysis because of significant increases in carbon emissions.	transport, economy, environment, decarbonisation, regeneration, etc. This includes the Environment (Wales) Act 2016 to introduce targets and carbon budgets to reduce greenhouse gas emissions in Wales. Prosperity for All: A Low Carbon Wales sets out the actions we will take to cut emissions in the first carbon budget period (2016-20) and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society. It contains policies and proposals for the key areas of agriculture, land use, transport, energy, the public sector, industry and business, waste and buildings. It specifically states that the NDF will ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation. Prosperity for All: A climate conscious Wales is a climate change adaptation plan for Wales which is about anticipating the risks and impacts arising from climate change and making sure we carry out the work required to ensure we are well prepared. The Integrated Sustainability Appraisal also addresses climate change, which will ensure this is considered and reflected in the NDF. This includes ensuring communities are sustainable and resilient. The NDF reflects these and sets out specific policies that look to promote decarbonisation through: - Delivering sustainable development; - Reducing reliance on the car through increasing active travel and public transport; - Supporting investment in infrastructure to enable ultra low emission vehicles; - Facilitating the delivery of renewable energy; - Promotion of the National Forest; and - Promoting the principles of a circular economy.	
4.196	Clean Air Air quality monitoring, regulation and enforcement is of pervasive importance as set out in the responses above to Question 2 (Spatial Strategy) and indicators about this should be included.	The Monitoring Framework is still in a draft form and will be developed further based on the predicted significant effects of the NDF in relation to the ISA Framework. This will be closely linked and integral to the NDF monitoring framework.	To be considered whilst developing the Monitoring Framework.

4.207 - PAW	At 350 pages, Planning Aid Wales would question the accessibility of this document for members of the public, albeit, the provision of the provision of a non-technical summary is welcomed.	A Non Technical Summary is the regulatory required way in which a complex process can be easily communicated with the public.	None
4.223	- Paragraph 1.1.43 notes that 'Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in greenhouse gas emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals be subject to more detailed analysis of their contribution to emissions, which could then inform measures to mitigate these impacts. Confirmation as to what has happened with the recommendation is sought. It is also noted that the need to consider emission contributions is not referenced in the supporting text of Policy 32, which is surely a factor to mitigate this identified environmental impact. - There were a number of recommendations from the ISA to the NDF. One of which was that the NDF 'could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside'. There is not much in the NDF related to flood risk and increased housing development. Another recommendation was that 'the NDF could more closely consider the potential impact of dense development in urban locations on air quality and the extent to which this can be managed through the design and layout of development.' There is not much in the NDF related to air quality and increased housing development.	See response 4.186	
4.229	Support	Noted, with thanks.	None.
4.236 - HBF	<u>INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK Final Scoping Report APRIL 2018</u> <i>Well-Being goals - A more equal Wales</i> <i>Opportunities for the NDF to address</i> <i>The NDF should support the provision for a range of housing and other types of accommodation that meet the needs of the population and promotes safe and sustainable communities. This could be through methods such as identifying strategic housing locations and/or developing national housing targets.</i> <u>INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK Appraisal of Draft National Development Framework: ISA Report (incorporating Environmental Report) JUNE 2019</u> <i>2.6.3 The support for significant economic growth and new housing that satisfies needs should help to reduce poverty and homelessness and better enable people of all backgrounds in many regions of Wales to pursue healthy and high-quality lifestyles.</i>	An explanatory paper has been prepared to assist readers of the Draft NDF in understanding how it seeks to address housing issues across Wales, highlighting the key evidence that has informed the housing elements of the plan. This can be found here: https://gov.wales/sites/default/files/publications/2020-01/ndf-explanatory-note-housing-need.pdf	

	<u>NDF - Preferred Option Objectives (p.74)</u> 5. Housing 5.1 To provide strategic direction for affordable and market housing linked to connectivity infrastructure, key facilities and areas of growth. The HBF refer to all three of these documents which clearly state the need and the importance of considering a range of housing types including market housing and the wider importance of housing in creating a more equal Wales. As stated in our comments above as the current plan only contains a policy relating to affordable housing the document is clearly not in line with the comments and opportunities identified in the documents referenced above.		
4.244	The <i>Integrated Sustainability Appraisal</i> (ISA) provided as part of the Draft NDF Consultation identifies positive effects in relation to Policy 22; largely attributed to the emphasis on renewable energy resources and generation of low-carbon energy within the text. The NDA are supportive of this conclusion.	Noted, with thanks.	None.
4.248	Table 1-5 in the ISA. ISA objectives 11 – asks will the NDF create opportunities to reduce levels of crime and fear of crime? IPSOS MORI Survey on the most important issue facing Britain today consistently flags up crime/law and order/ASB as a key issue. The NDF appears to give no thought to crime though and its connection with other policy areas such as housing and transport.	The NDF looks to create sustainable places and cohesive, well-connected communities throughout Wales, although it does not directly reference crime. The issue of crime and the role of the planning system in contributing to the reduction of crime are addressed in Planning Policy Wales and TAN 12. Officials are also developing guidance with the Police on this topic.	None
4.249	A key omission is any reference to nitrate vulnerable zones (NVZ). The effects of nitrates in waterways are readily observable and projects such as SWEPT in the Cleddau, together with monitoring undertaken by NRW make this a readily measurable indicator. This is particularly relevant to ISA objective 9 and 13 (page 44 and 46) We note that ‘Brexit’ is identified as an opportunity to take a different approach. We would advocate that approach should be collaborative to ensure maximum opportunity to achieve prosperity goals. Wales’ marine border is vast. It is pleasing to see reference to the National Marine Plan; we would argue that the significance and extent of the sea facing border deserves greater significance in terms of its ability to achieve the ISA objectives and in particular Nos. 3, 4 and 6 (page 42 and 43)	Noted.	NVZs, Brexit and the significance of the relationship with the National Marine Plan to be reviewed and revised as appropriate.
4.253	We would support the conclusions of the report.	Noted, with thanks.	None.
4.258	As set out earlier in these representations, no testing of alternative scenarios (such as there being no green belt designation) has been undertaken with regard to economic / employment implications. This has a bearing as to whether the Draft NDF meets the SEA Requirements that it is subject to.	As 4.136	
4.263	We are concerned the findings of the Integrated Sustainability Appraisal report have not been expressed in the policies formulated as part of the draft framework. Specifically, the framework fails to express support for significant economic growth and new housing, nor does it ensure that identified housing needs are satisfied at national, regional and local levels. Instead the policies contained in the draft framework are confined to general statements on the provision of affordable housing with no policies concerning housing more generally.	The consultation response report and ISA report will illustrate how the findings of the ISA have shaped the NDF.	
4.267	As set out earlier in these representations, no testing of alternative scenarios (such as there being no green belt designation) has been undertaken with regard to economic / employment implications. This has a bearing as to whether the Draft NDF meets the SEA Requirements that it is subject to.	As 4.136	
4.273	1. ISA 17 Objectives 1.1. The Arcadis ISA selected 17 objectives (Table 2-1), informed the NDF drafting and checked the sustainability (derived from the Well-being of Future Generations Act) of the consultation draft. CPRW applauds the undertaking of this exhaustive iterative approach however the 350 pages of the stages and suite of tables illustrating the	Noted.	Summaries to be reviewed to ensure that all

	procedure are too extensive and complex for our detailed assessment in this context. We are not surprised that many other responses fail to address them. Sadly, this omission will mean that an important overall view of the fitness of the NDF is lost. 1.2. The central question must be whether the 17 objectives (as measures) do capture and ensure the sustainability of the dNDF. Four topics are central to our remit: landscape, biodiversity, heritage and living conditions in rural communities. All of these are of key importance to “rural proofing” and demonstrating sustainability in these areas is essential to prove that the ISA “helps to ensure that the ISA and NDF takes into consideration the interests of a diverse range of people reflective of Wales.” (p9). 1.3. ISA 1.6.4 quotes the SEA Directive requirement to consider “the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural heritage, landscape and the interrelationship between the above factors...” This requirement covers our remit apart from some aspects of rural living conditions such as economic opportunities and protection of amenity. 2. Landscape 2.1. In the NDF, Wales is described as a living landscape and NDF Objective 9 says that Landscape qualifies as an “asset of great value in its own right”. There are various tributes to the quality of particular landscapes but overall NDF policy is weak on the subject. Within the NDF reasoned justification there is a scattering of the broad statement “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.” The reasoned justification for Policy 10 claims “A strategic review of landscape and visual impact identified the Priority Areas for Solar and Wind Energy as the most appropriate locations to accommodate landscape change” which we dispute. 2.2. ISA objective 13 mentions Landscape. Table 1.6 relates the SEA Directive topic of Landscape to ISA Objectives 7, 13, 14 & 17 and ISA 2.4.2 considers Landscape has been strengthened. But when we look at Policy-wording, which is the critically important part of the NDF, Landscape is mentioned hardly at all: Policy 6 and Policy 11 insist “significant adverse landscape impacts” must be avoided. Policy 10 includes “acceptance of landscape change” in Wind and Solar RE Priority Areas. 2.3. Landscape is discussed in more detail in our responses to RE policies see Q15. 3. Biodiversity 3.1. The ISA analysis relies on the incorporation of the HRA which relates only to Natura 2000 sites and Ramsars. These are important but only represent a minute portion of the declining species and habitats at critical risk throughout Wales. 3.2. Even if we accept the scoring in the key Table 2.8, Air quality, Water, Biodiversity and geodiversity, & Natural Resources all score plenty of “minor negative” (pink), some of which should undoubtedly be “strong negative ” (red) had there not been an underlying bias towards positive scores and motive to suppress red scores. The only NDF Policy red score red is the long-term impact of the Development of Holyhead port on Green House Gases and Energy. Many strong positives rely on the “mitigation” of avoiding negative impacts and some of these connections are tenuous. 3.3. The Policy 10 Priority Areas covering 20% of rural Wales scores dark blue: “range of positive and negative outcomes”. The NDF must have regard to Section 6 of the Environment (Wales) Act, which in turn is governed by the UN 1992 Convention on Biological Diversity (EA s6 (a)) which notes that “the fundamental requirement for the conservation of biological diversity is the in-situ conservation of ecosystems and natural habitats and the maintenance and recovery of viable populations of species in their natural surroundings” 3.4. We note that the amended ISA published on 28/8/19 replaced “the NDF seeks to maximise onshore wind and solar energy potential, whilst minimising the potential impact on the most sensitive environmental and cultural assets” with a more bland statement: “there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, and acceptance of landscape change and a focus on maximising benefits an minimising impacts.” “Sensitive environmental and cultural assets” has been removed.	The integrated approach to the assessment of the NDF has ensured that a wide range of impacts have been assessed in a holistic manner. This has helped to shape the NDF to ensure it is as sustainable as possible and outlines how it contributes towards the Well-Being Goals. Noted. Landscape impact has been assessed as part of the ISA. The HRA assesses the impacts of the NDF - it only addresses Natura 2000 sites, which are protected by EU Law or treated as such through government policy. These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs), as well as candidate and potential SACs and SPAs, and Ramsar sites. The HRA seeks to ensure that the NDF will not result in a likely significant effect on any Natura 2000 site. The wider biodiversity impacts are assessed within the ISA.	of the key detail is included. None

4. Heritage/Historic Environment 4.1. We note that the amended ISA published on 28/8/19 removed the reference to cultural assets on p143 of ISA replacing “the NDF seeks to maximise onshore wind and solar energy potential, whilst minimising the potential impact on the most sensitive environmental and cultural assets” with “there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, and acceptance of landscape change and a focus on maximising benefits an minimising impacts.” 4.2. This is represented in ISA Objective 14 which has an overwhelming negative (pink – but see 3.2 above) score against dNDF policies. This should be addressed in NDF Policy so that a transparent positive assessment is achieved. 5. Rural Living Conditions 5.1. The NDF is largely a framework for towns and the “rural-proofing” exercise is not convincing. The realities of the rural economic structure is not recognised. We regret that, although “tourism” appears scattered throughout the ISA, it does not appear once in ISA Objectives or in dNDF Policy wording. NDF Policies 10 and 11 (renewable energy) score positively against a swathe of economic factors however associated employment opportunities for rural residents are very limited and confined to construction phases (therefore short-term only) while the impacts of the Priority areas in Policy 10 on rural income from tourism threatens to be economically devastating for rural market towns and smaller communities. 6. Conclusion 6.1. Table 2.8 (p55) matches NDF policies against the 17 objectives however the scoring depends on aspirational “guesstimates” of the impacts of the dNDF policies and the ability of the NDF policies to achieve the NDF outcomes which makes the entire exercise open to accusations that is both circular and value-laden rather than objective. 6.2. ISA Conclusion (p66) says “the Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability impacts, with significant positive impacts on most ISA Objectives likely.” However it goes on to say that impacts on : Objective 5 -Welsh Language, Objective 6 – GHG & Energy Objective 7- Flood-risk, Objective 8 - Air Quality Objective 9 – Water Objective 13 – landscapes and townscapes Objective 14 –Historic Environment & Assets Objective 15 - Welsh Culture Objective 16 - Biodiversity and Geodiversity Objective 17 – Natural resources - which is ten out of seventeen Objectives, were “more mixed”. 6.3. The WG is facing a Climate Change and Biodiversity emergency. When those Objectives which not clearly met are presented in a transparent list as in 6.2 above, this does not support the ISA conclusion about the sustainability of the NDF. APPENDIX 3. ERRORS, PROBLEMS & METHODOLOGY in the EVIDENCE for ENERGY POLICY - in draft NDF 2019 INTEGRATED SUSTAINABILITY APPRAISAL REPORT 1. ISA Table A-1 ‘Comparison between NDF Preferred Option Objectives and the National Sustainable Place Making Outcomes (PPW)’ (pp70-71) is unexplained This table has two columns and appears to have the function of relating ‘<i>NDF Preferred Option Objectives</i>’ to	Noted. An element of landscape change is predicted using the precautionary principle. However, the NDF requires that unacceptable adverse landscape and visual impacts are prevented. Tourism in rural areas is recognised in supporting text for Policy 4 which states that “Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy.” Tourism as a policy area is covered in more detail in Planning Policy Wales. There has been a study produced on the potential economic impact of wind farms on tourism in Wales⁹. This concluded that there are no significant impacts on tourism to date. It recognised that low level impacts could occur in remoter parts of Powys, but that impact is uncertain and would be looked at on a case by case basis through the planning process. The title of Table A-1 has been amended as this was not a comparison but a list.	

⁹ <https://gov.wales/potential-economic-impact-wind-farms-welsh-tourism>

	their corresponding ‘<i>Key Planning Principles and National Sustainable Placemaking Outcomes</i>’ but the following categories of ‘<i>NDF Preferred Option Objectives</i>’ have no counterparts: Natural Resources, Circular Economy and Flooding, ☐ Welsh Language, ☐ Health & Well-being, ☐ Digital Infrastructure and ☐ Cohesive Communities. What does this mean? Are there no place making outcomes for these objectives? The table requires either completion, or explanation. PROCEDURAL ERRORS IN RUNNING OF CONSULTATION 1. Changes to documents made during consultation period: Revised HRA and appendices, and revised ISA, were placed on the consultation website on 28th and 21st August respectively, we understand. Members of the public were notified, where this was possible, on 17th October. The consultation period was extended by two weeks to reflect the date of correction, not the date on which (some of) the public were made aware of substantial changes having been made to key documents mid-consultation. It is doubtful whether any public announcement of the changes and explanation of what form the amendments took would have been made had CPRW not written to Russell Dobbins on 4th October to express extreme concern over unannounced changes to documents mid-consultation. Many changes appear to be the correction of errors. Others are more fundamental, for example the replacement in the ISA of: ‘<i>the NDF seeks to maximise onshore wind and solar energy generation potential, whilst minimising the potential impact on the most sensitive environmental and cultural assets. However, it is accepted that large scale renewable energy development can be visually prominent</i>’ by ‘<i>there is a presumption in favour of large scale on-shore wind and solar energy generation potential in the Priority Areas for Renewable Energy, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. However, ‘large scale wind and solar renewable energy development can be visually prominent.</i>’ In sum, changes set out in ‘Extension of Consultation on Draft National Development Framework: Changes to Habitats Regulations Assessment and Integrated Sustainability Appraisal Report’ dated 17th October are significant in both number and impact, and were introduced mid-consultation. This is unacceptable without restarting the consultation.		These changes were made to aid the reader and did not materially affect the assessment and conclusions within the ISA, HRA, the Draft NDF or its policies.