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Welsh Government

INTEGRATED SUSTAINABILITY APPRAISAL OF FUTURE WALES – THE NATIONAL PLAN 2040

Post Publication Statement

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CONTENTS

VERSION CONTROL	1
1 INTRODUCTION	1
1.1 What is Future Wales - the national plan 2040?	1
1.2 What is the Integrated Sustainability Appraisal?	1
1.3 Purpose of this Post Publication Statement.....	2
2 HOW ENVIRONMENTAL AND SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO FUTURE WALES.....	3
2.2 Timing, and the implications of Covid-19	3
2.3 Evidence Gathering, ISA Scoping and Stakeholder Engagement.....	6
2.4 Objectives and Options Development, Further Engagement, ISA and HRA Screening	7
2.5 Development of the Draft NDF.....	7
2.6 Draft National Development Framework Including Proposed Changes (March 2020)	8
2.7 Post Senedd Scrutiny.....	8
2.8 Consultation on the ISA Reports and consideration of responses	8
2.9 ISA Framework and Scope	9
Geographical and Temporal Scope.....	9
ISA Framework	9
3 HOW THE FINDINGS OF THE ISA HAVE BEEN TAKEN INTO ACCOUNT, AND THE REASONS FOR CHOOSING THE PUBLISHED FUTURE WALES, INCLUDING THE ASSESSMENT OF REASONABLE ALTERNATIVES.....	17
3.1 What the ISA has appraised	17
3.2 Future Wales Outcomes (including reasonable alternatives) (Task B.1)	17
3.3 The reasons for choosing the Published Future Wales, in light of reasonable alternatives considered.....	18
Spatial approach including Alternative Options	18
The Preferred Option	19
Assessment of the Preferred Option (February 2018)	20
3.4 Summary of assessment of the Draft NDF (now Future Wales) (May 2019).....	22
3.5 Assessment of the Draft NDF Including Proposed Changes Policies (March 2020) (Now Future Wales)22	
3.6 Updates Post Senedd Scrutiny	23

4	MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS.....	24
5	CONCLUSION	31
	APPENDIX A WELSH GOVERNMENT RESPONSES TO RECOMMENDATIONS	33
	APPENDIX B SCREENING TABLE TO DETERMINE WHETHER FURTHER CHANGES WERE REQUIRED TO THE ISA, FOLLOWING CHANGES TO FUTURE WALES, FOLLOWING SENEDD SCRUTINY	52
	APPENDIX C CONSULTATION RESPONSES TO THE INTERIM ISA REPORT (PREFERRED OPTIONS)	75

1 INTRODUCTION

1.1 What is Future Wales - the national plan 2040?

- 1.1.1 The Welsh Government has recently prepared Future Wales - the national plan 2040. This was previously known as the 'National Development Framework' (the NDF). Some of the iterations of assessment, as described in this Statement, are referred to as assessments of various stages of the NDF, as it was known at that time.
- 1.1.2 Future Wales will provide a spatial context for facilitating the delivery of development in Wales over the next 20 years. Future Wales 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. Therefore, Future Wales 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 could have as the plan developed. Future Wales should be read alongside Planning Policy Wales (PPW) and does not repeat PPW, which provides planning policy on an all-Wales basis. Future Wales replaces the Wales Spatial Plan (WSP).

1.2 What is the Integrated Sustainability Appraisal?

- 1.2.1 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.”***
- 1.2.2 The WBFG Act sets out seven well-being goals over the 20-year period, which Future Wales will play an important role in contributing towards sustainable development (see Table 1-1 of the ISA Main Report¹, February 2021). These well-being goals are indivisible from each other and explain what is meant by the well-being of Wales.
- 1.2.3 The Integrated Sustainability Appraisal (ISA) accompanies Future Wales – the national plan 2040, which has recently been published.² The process leading up to the development of the published ISA Report has run parallel with the preparation of Future Wales. The ISA process has included assessments of the likely sustainability effects of options being considered for Future Wales (including positive and negative effects), carried out at a high-level as a reflection of the strategic nature of the plan. During this process, the ISA has recommended measures for mitigating or avoiding likely negative sustainability effects and for enhancing likely positive sustainability effects.
- 1.2.4 This assessment is reflective of the requirements of several pieces of legislation, including the SEA Regulations³. Section 3 of the Planning (Wales) 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 a national development framework for Wales. Section 60B (1) (b) specifically requires the Welsh Ministers to carry out an appraisal of the sustainability (known as a Sustainability Appraisal (SA)) of the policies in the national development framework and this must incorporate the requirements of the SEA Regulations and consideration of effects on the Welsh Language.

¹ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

² <https://business.senedd.wales/mglIssueHistoryHome.aspx?lId=21513>

³ 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)

- 1.2.5 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.
- 1.2.6 Given the nature and scope of Future Wales, Welsh Government has sought to integrate the approach to the SA and SEA with other statutory and non-statutory assessments. A full description of the legislative and non-legislative requirements covered by the ISA can be found in section 1.5 of the ISA Main Report. This allows a more rounded view of the sustainability implications and opportunities arising from Future Wales. The ISA integrates the following assessments, and fully meets the legislative requirements, of: Sustainability Appraisal; SEA Regulations; Well-being of Future Generations Act (2015); Welsh Language (Wales) Measure 2011; Equalities Impact Assessment; Children's Rights Impact Assessment; Sustainable Management of Natural Resources and the Natural Resources Policy (Environment (Wales) Act 2016). The ISA also accounts for the non-legislative requirements of assessments relating to Rural Proofing; Health Impacts; Climate Change; and Economic Development.
- 1.2.7 The integration of these assessments ensures that a collaborative approach is undertaken on different issues, sharing knowledge and recognising links between topics in a consistent and transparent manner.

1.3 Purpose of this Post Publication Statement

- 1.3.1 This Post Publication Statement represents the conclusion of the ISA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:
- How environmental and sustainability considerations have been integrated into Future Wales (Section 2 of this document);
 - How opinions expressed in response to the consultation on the ISA Reports have been taken into account (Section 2 of this document);
 - How the results of the ISA Reports have been taken into account (Section 3 of this document);
 - The reasons for choosing Future Wales, as published, in the light of the other reasonable alternatives dealt with (Section 3 of this document); and
 - The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of Future Wales (Section 4 of this document).

2 How Environmental and Sustainability Considerations have been integrated into Future Wales

- 2.1.1 The scope of the assessment of Future Wales was based on the assessment framework of objectives, developed and refined in April 2018 at the ISA Scoping stage⁴. The well-being goals have been integral to the preparation of the Scoping Report and the ISA Framework (see Table 1-5 of the ISA Main Report⁵, February 2021). 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 of the ISA Main Report, February 2021.
- 2.1.2 The assessment was high-level, reflecting the national remit of Future Wales and its purpose. The assessment has taken into account what Future Wales 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 Future Wales 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 Future Wales.
- 2.1.3 The assessment of Future Wales demonstrates a transparent and robust decision-making process for developing the plan. The development of the ISA and Future Wales has been iterative, with regular discussions between the ISA and Future Wales 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 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 Future Wales.

2.2 Timing, and the implications of Covid-19

- 2.2.1 The drafting of the ISA has been undertaken over the past five years. In 2020, the Covid-19 Global pandemic hit the UK and resulted in an unprecedented impact on Wales’ economy, travel patterns and the population’s health and well-being. It has been suggested that the pandemic may result in longer term changes to the way that we live our lives, particularly in terms of our appreciation of outdoor spaces, our changes in travel patterns and our working patterns. Following the end of the pandemic, the shift in people’s attitudes to outdoor activity and remote working have the potential to become more permanent.
- 2.2.2 Whilst Covid-19 is not specifically referred to in the ISA, the ISA provides an appraisal of the policy measures in Future Wales using an appraisal framework that was based on a clear understanding of how to achieve more sustainable places. The framework includes ISA Objectives related to, for example, access to open spaces, the promotion of active travel, improvements in digital communications and lower car-dependency. This has ensured that Future Wales includes a range of

⁴ ISA Scoping report is available online at:

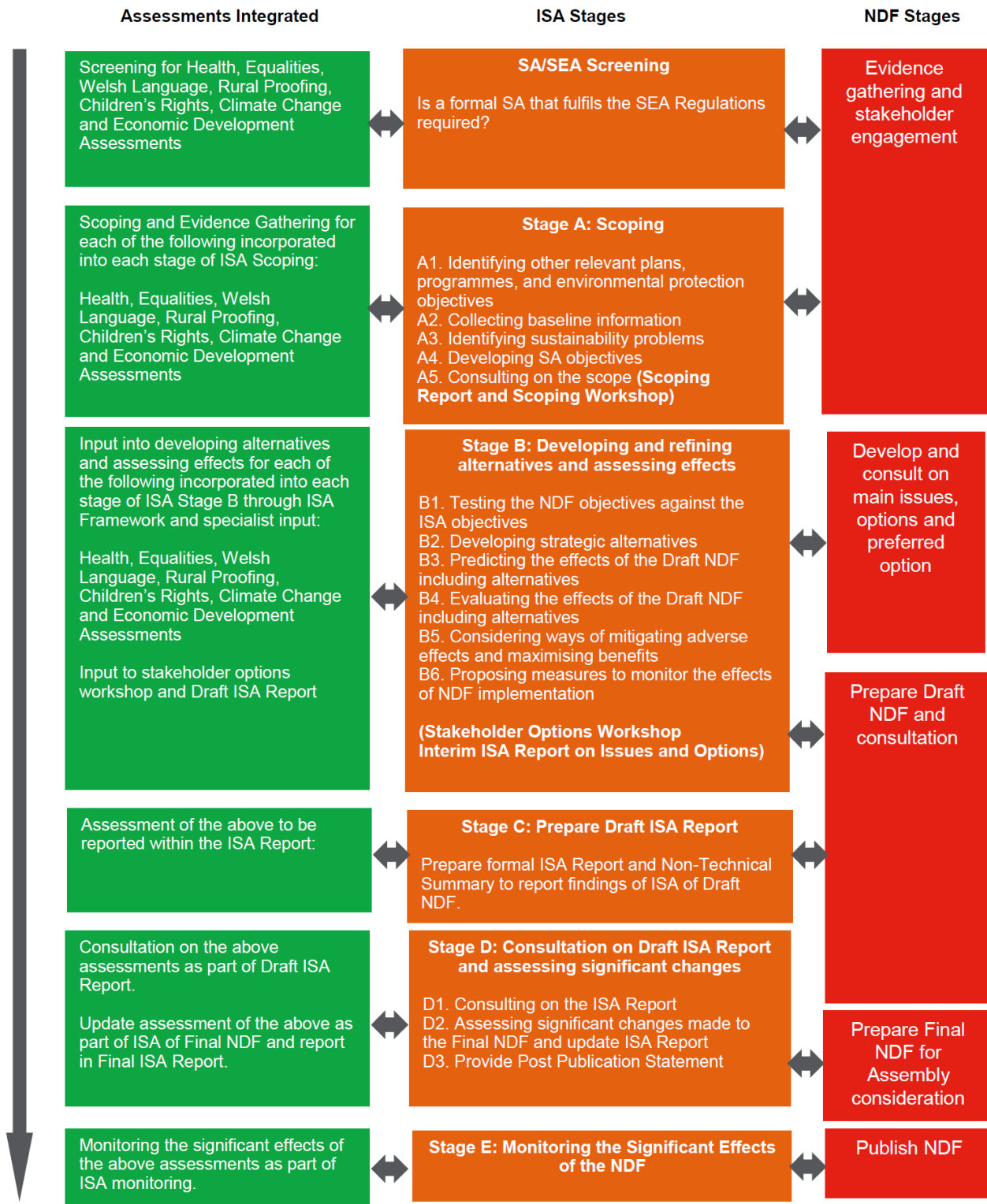
<https://gov.wales/national-development-framework-integrated-sustainability-appraisal-report> [accessed 19.02.21]

⁵ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

policy measures designed to support and promote these themes, which will form a key part of a sustainable development, and recovery where necessary, into the future.

- 2.2.3 The ISA is underpinned by baseline evidence and trends. Whilst 2020 is atypical in terms of many socio-economic and environmental trends it is considered that this year is an anomaly rather than a 'new normal', so the long-term trends identified in the ISA remain an appropriate basis for appraisal. Changes observed during the pandemic to travel patterns, active travel, impacts from homeworking, town centres, health and well-being inequalities, socio-economic disadvantages, and the value of outdoor recreational space, may have a lasting effect beyond the pandemic. If so, Future Wales provides a robust framework to maximising the benefits of these trends and to address any potential negative effects. The impacts and future trends from the pandemic will be reflected in the evidence and monitoring work. The ISA process is not static and future iterations of it and Future Wales will reflect any changes to long-term trends going forward. It is also the case that Strategic and Local Development Plans will have the opportunity to adapt to any new evidence that arises.

Figure 2-1: Stages in the ISA Process (adapted from ODPM 20056) and NDF Development Stages (now Future Wales)



⁶ 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"

2.3 Evidence Gathering, ISA Scoping and Stakeholder Engagement

- 2.3.1 Figure 2-1 presents the process leading up to the development of this Post Publication Statement, which has run parallel with the preparation of Future Wales (shown in the figure as 'NDF'). The 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 (now Future Wales) 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 plan. In parallel to this, the national development framework (Future Wales) 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.
- 2.3.2 In Spring 2017, further work was undertaken to identify issues for the plan following the engagement events. At this stage initial ideas were developed for potential objectives and strategic options.
- 2.3.3 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 evidence base. The draft Scoping Report for the ISA of NDF (now Future Wales) was one of the first stages in engagement and collaboration. 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).
- 2.3.4 This work constituted Stage A, 'Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope', of Figure 2-1 above. 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.
- 2.3.5 The Final Scoping Report (April 2018)⁷ 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 guidance⁸ 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;
 - 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 (now Future Wales) can be appraised.
- 2.3.6 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](#)⁹.

⁷ ISA Scoping report is available online at <https://gov.wales/national-development-framework-integrated-sustainability-appraisal-report> [accessed 19.02.21]

⁸ 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"

⁹ <https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework> [Accessed 6.08.20]

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

- 2.4.1 Drawing upon the consultation feedback, work began in Summer/Autumn 2017 on further developing outline Objectives and Strategic Options. This used all work that had been undertaken to-date for the NDF (now Future Wales) including, for example, the evidence base, the engagement event and consultation records and the emerging ISA and Habitats Regulations Assessment (HRA). An initial, high-level, HRA Screening was also undertaken at this time¹⁰. 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 recorded¹¹.
- 2.4.2 In November 2017 the initial objectives and options were subject to ISA and the results of this were fed back to the Welsh Government 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 Report¹² that accompanied consultation on the Issues and Options and Preferred Option version¹³ of NDF (now Future Wales), between 30 April 2018 and 23 July 2018. The ISA was further refined and amended in light of the consultation responses received.
- 2.4.3 This work constituted Stage B, 'Developing and Defining Options'. This included the following six tasks:
- 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.
- 2.4.4 In addition to the above, the Interim ISA Report also completed certain tasks of Stage B for the purpose of refining and defining policy options (see Appendices C and D). Further, the structure of the report itself was consulted upon by Welsh Government with the wider consultees, as part of the iterative process of drafting. This included discussions with the RSPB, which are documented in the Engagement Plan¹⁴ for the then NDF (now Future Wales).
- 2.4.5 The responses to the consultation on the Interim ISA Report weren't published at that time, and are set out in Appendix C of this report.

2.5 Development of the Draft NDF

- 2.5.1 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. This stage of the process was consulted upon from 7 August – 15 November 2019.

¹⁰ 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]

¹¹ <https://gov.wales/future-wales-national-plan-2040#Engagement>

¹² Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

¹³ NDF Issues and Options consultation, available online at: <https://gov.wales/national-development-framework-issues-options-and-preferred-option> [Accessed 06.08.20]

¹⁴ https://gov.wales/sites/default/files/publications/2020-02/national-development-framework-engagement-plan_1.pdf [accessed 26.01.21]

2.6 Draft National Development Framework Including Proposed Changes (March 2020)

Based on the above, the Draft NDF Including Proposed Changes was produced in accordance with the five ways of working required by the Well-being of Future Generations Act. It was developed using 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 was strongly influenced by public and stakeholder involvement and a cross-Government collaborative approach.

2.7 Post Senedd Scrutiny

- 2.7.1 Following Scrutiny by the Senedd, between 21 September and 26 November 2020, a number of changes to Future Wales were proposed. These have since been reflected in this ISA, a process which is documented in Appendix A of this Statement. It is noted that only two scoring changes were recorded, in relation to the assessment of P6, increasing the medium and long term score from neutral to minor positive, against the housing objective.

2.8 Consultation on the ISA Reports and consideration of responses

- 2.8.1 The ISA Reports that have been prepared, and where they can be accessed online, are set out in Table 2-1. This also includes reference to where responses to the consultation are recorded.

Table 2-1: 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 2018, Arcadis	Available online at: https://gov.wales/national-development-framework-integrated-sustainability-appraisal-report [Accessed 19.02.21]
Responses to the comments received, and how they have influenced the revisions to the ISA are set out in the consultation report	Available online at: https://gov.wales/integrated-sustainability-appraisal-scoping-report-national-development-framework [Accessed 6.08.20]
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]
Responses to the comments received, and how they have influenced the revisions to the ISA, are set out in the summary of responses.	Available online at: https://gov.wales/sites/default/files/consultations/2019-06/national-development-framework-summary-of-responses.pdf [Accessed 18.01.21]
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]

Existing ISA Reports	Where to find them
Responses to the comments received, and how they have influenced the revisions to the ISA, are set out in Appendix G of the ISA Report	Available online at: https://gov.wales/future-wales-integrated-sustainability-appraisal https://gov.wales/future-wales-integrated-sustainability-appraisal-non-technical-summary [Accessed 28.01.21]
Integrated Sustainability Appraisal of the National Development Framework Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report) August 2020, Arcadis	Available online at: https://gov.wales/future-wales-integrated-sustainability-appraisal [Accessed 21.12.20]
Appraisal of Future Wales – the national plan 2040: ISA Report (incorporating Environmental Report)	Available online at: https://gov.wales/future-wales-integrated-sustainability-appraisal-0 https://gov.wales/future-wales-integrated-sustainability-appraisal-non-technical-summary-0

2.9 ISA Framework and Scope

Geographical and Temporal Scope

- 2.9.1 The geographical scope of the ISA has been driven by the geographical scope of Future Wales i.e., the whole of Wales and up to the mean low-water spring tide. Whilst Future Wales 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 that would last longer than this, these have also been considered.

ISA Framework

- 2.9.2 A key output of the ISA Scoping Stage was the ISA Framework. The ISA Framework (Table 2-2) was 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 NDF (now Future Wales). Each Objective links to the baseline information; key sustainability issues and opportunities in Wales; and other plans, programmes and strategies relevant to NDF (now Future Wales). These were established during the Scoping stage and subsequently form the basis of the assessment. An update to the PPP Review has been undertaken where appropriate, throughout the ISA. However, no updates to the ISA Framework were required. As the baseline was largely based on State of Natural Resources Report (SoNaRR) prepared by Natural Resources Wales¹⁵, the baseline has not been updated at this stage. The ISA Framework also incorporates the requirements of the other integrated assessments. Although the ISA Framework remains unchanged, the Monitoring Framework has been designed to reflect the significant predicted effects of Future Wales.

¹⁵ <https://naturalresources.wales/sonarr2020?lang=en>

- 2.9.3 The intention of the ISA is to enable the principles of sustainable development to be embedded into NDF (now Future Wales) 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 (now Future Wales) could potentially achieve. Each stage of the ISA has been undertaken using an iterative process, with feedback and communication between the NDF (now Future Wales) and ISA teams. This process enables NDF (now Future Wales) to take a more sustainable direction in its development.
- 2.9.4 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.

Table 2-2: 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	<ul style="list-style-type: none"> • 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? 	<p>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</p>
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	<ul style="list-style-type: none"> • 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? 	<p>A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities</p>
3. To create opportunities for an increase in employment across the country and promote economic inclusion	<ul style="list-style-type: none"> • 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? 	<p>A prosperous Wales A resilient Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales</p>

ISA Objectives	Decision aiding questions – Will the NDF ...?	Well-being goal
4. To create opportunities for sustainable economic growth, diversity and business competitiveness	<ul style="list-style-type: none"> • 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-active¹⁶? • 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? 	<p>A prosperous Wales A resilient Wales A more equal Wales A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales</p>
5. To contribute towards the future well-being of the Welsh Language	<ul style="list-style-type: none"> • 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? 	<p>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</p>
6. To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design	<ul style="list-style-type: none"> • 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? 	<p>A prosperous Wales A resilient Wales A healthier Wales A more equal Wales A Wales of cohesive communities A globally responsible Wales</p>

¹⁶ 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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? 	<p>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</p>
11. To create the opportunities within which an improvement in social cohesion and equality can be achieved	<ul style="list-style-type: none"> • 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? 	<p>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</p>

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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 tranquillity¹⁷? • 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	<ul style="list-style-type: none"> • 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

¹⁷ Figure 7-1 in Appendix B of the Scoping Report April 2018

ISA Objectives	Decision aiding questions – Will the NDF ...?	Well-being goal
15. To create the opportunities for the protection and promotion of Welsh culture	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 laNDF (now Future Wales)lll? • 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

3 How the findings of the ISA have been taken into account, and the reasons for choosing the Published Future Wales, including the assessment of reasonable alternatives

3.1 What the ISA has appraised

- 3.1.1 The ISA is an iterative process which involves appraisal and feedback to the plan-makers at numerous stages of Future Wales's development. The ISA has appraised the following:

Presented in the Interim ISA Report and summarised in the 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 NDF (now Future Wales). It gives a useful benchmark summary against which the appraisal of NDF (now Future Wales) can be compared;
- The NDF (now Future Wales) Vision and Outcomes (previously called Objectives) (including Reasonable Alternatives to these);
- Strategic Options (Reasonable Alternatives) for the Spatial Approach (four options and a benchmark/Do-Nothing option); and
- The Preferred Option (the preferred Spatial Approach).

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

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

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

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

Presented in this Post Publication Statement:

- An overview of how the ISA process has influenced the development of Future Wales

3.2 Future Wales Outcomes (including reasonable alternatives) (Task B.1)

- 3.2.1 Extensive consideration was given to the development of the NDF (now Future Wales) Outcomes. These were developed originally during the preparation of the Preferred Strategy as the 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 Outcomes was the most appropriate way of establishing both a vision and objectives for NDF (now Future Wales).
- 3.2.2 The compatibility assessment of the original objectives was undertaken in three iterations and is presented in the Interim ISA Report¹⁸. 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 NDF (now Future Wales). This has included the following improvements, which will improve the potential for NDF (now Future Wales)'s objectives to contribute to more sustainable development, compared to previous iterations:
- Strengthened consideration of landscape (objective 6);

¹⁸ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

- 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 (objective 6);
- Text added to include consideration of pollution (objective 6);
- Improvement to the Welsh Language objective to include consideration of socioeconomic infrastructure of communities; and
- Additional objective relating to cohesive communities added.

3.2.3 In response to the consultation, Welsh Government determined that it was preferable for the proposed Vision and Objectives to be replaced by a single set of Outcomes. The 5 Key Principles in PPW are the guiding vision and Outcomes take forward the national outcomes set out in PPW to create an overarching set of Outcomes for NDF (now Future Wales).

3.2.4 Three alternatives were considered to this change. The first was to retain the vision and objectives as they were proposed in April 2018. 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. The third option was to have no overarching principles or outcomes or similar content in Future Wales. It was considered important that NDF (now Future Wales) should respond to the clear requirements set out in PPW. In the absence of the NDF (now Future Wales) Outcomes, it would be difficult to establish what NDF (now Future Wales) was trying to achieve, to take a 'whole plan' approach to policy issues, and to monitor the success of NDF (now Future Wales) going forward.

3.2.5 Tables C-1 and C-2 of Appendix C of the Final ISA Report¹⁹ present an explanation of the relationship between the assessed NDF (now Future Wales) Objectives and the NDF (now Future Wales) Outcomes and the reasoning behind their evolution.

3.3 The reasons for choosing the Published Future Wales, in light of reasonable alternatives considered.

3.3.1 For the purpose of satisfying the requirements of the SEA Regulations, it is necessary for the ISA report to identify and evaluate the environmental effects of proposals in Future Wales, 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.

3.3.2 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 Regulations 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 including Alternative Options

3.3.3 The Interim ISA Report documents the appraisal of the Alternative Options and Preferred Option. Four Alternative Options were developed together with a Benchmark Option which comprises not producing NDF (now Future Wales). Each option was subject to ISA in November 2017. A full

¹⁹ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

description of the Alternative Options can be found in Appendix C of the Interim ISA Report²⁰. 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?

3.3.4 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 NDF (now Future Wales)

3.3.5 Appendix D of the Interim ISA Report²¹ also provides reasoning for why these options were carried forward or otherwise.

The 'Benchmark Option'

3.3.6 Future Wales will replace the Wales Spatial Plan (WSP). It was important for the ISA to assess reasonable alternatives for the emerging NDF (now Future Wales), 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 NDF (now Future Wales), as the SEA Regulations require that the relevant aspects of the current state of the environment and the likely evolution without the plan are considered, together 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 was the key consideration in the assessment.

The Preferred Option

3.3.7 Following the assessment of the Alternative Options, the Welsh Government team refined the NDF (now Future Wales) Options and developed a Preferred Option. The full assessment tables for the assessment of the Alternative Options (November 2017) with commentary is presented in Appendix C of the Interim ISA Report²².

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

- Placemaking;
- Distinctive & Natural Places;

²⁰ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-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 Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

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

3.3.9 The Preferred Option was a hybrid option which seeks to incorporate many of the benefits of the alternative options. Table 2-3 of the ISA Report²³ 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 in the ISA to varying degrees and would not deliver the balanced sustainable development required. Therefore, 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 on 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 NDF (now Future Wales) 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 of the ISA Report, February 2021²⁴ 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.

Assessment of the Preferred Option (February 2018)

- 3.3.10 At this stage, the Preferred Option was assessed at a high level. The full assessment of the Preferred Option assessment can be found in Appendix D of the Interim ISA Report²⁵.
- 3.3.11 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).

Recommendations

- 3.3.12 Although strong positive effects were predicted for social and economic indicators, it was considered through the ISA that the potential for NDF (now Future Wales) 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. 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).
- 3.3.13 The following direct amendments were made for the final draft Preferred Option for:

²³ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

²⁴ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

²⁵ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 06.08.20]

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

3.3.14 Table A-1 of Appendix, of this Statement, sets out how the recommendations of the ISA of the Preferred Option have been taken into consideration.

3.3.15 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. Reasons why some of the recommendations within the ISA may not have been appropriate include:

- NDF (now Future Wales) should be read as a whole and the provisions to address the specific ISA recommendations were already covered elsewhere in the Preferred Option.
- The assessment of the Preferred Option provided a high-level overview of NDF (now Future Wales), setting out the key strategic objectives and a spatial direction for the preparation of NDF (now Future Wales). Some of the suggested changes were detailed in nature and lend themselves to consideration at the next stage of the process, where detailed policy will be developed to deliver the 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) (now Future Wales)

3.3.16 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 Welsh Government has determined that these three areas are 'whole plan'. All policies in the Draft NDF were therefore developed to help deliver them and the Outcomes, and the monitoring of the whole plan will demonstrate the success in delivering them. 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 NDF and their relationship with the Outcomes. The Outcomes specifically considered these three policy areas as they were developed. The Draft NDF policies were prepared to deliver the Outcomes and the Spatial Strategy.

3.3.17 Table 2-5 of the ISA Report, February 2021²⁶ identifies the Preferred Option (assessed February 2018) and how the Draft 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 policies. This reflects the integrated nature of the preparation and the 'whole plan' approach to addressing the overarching policy aims. Consideration was given to preparing a 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 of the Final ISA Report, February 2021.²⁷

²⁶ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

²⁷ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

3.4 Summary of assessment of the Draft NDF (now Future Wales) (May 2019)

- 3.4.1 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. Throughout the appraisals, which are presented in full in Appendix B of the Draft ISA Report²⁸, recommendations have been made that could help to reduce the risk or magnitude of potential adverse effects. In response, the Welsh Government considered that the spatial policies and proposals contained in the Draft NDF (now Future Wales), 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 (now Future Wales). The Welsh Government's response to the recommendations is provided in Appendix A (Table A-1) of this Statement. During the iterative process of the ISA, NDF (now Future Wales) has incorporated a range of recommendations that have helped to enhance the overall sustainability performance of its proposals.

3.5 Assessment of the Draft NDF Including Proposed Changes Policies (March 2020) (Now Future Wales)

- 3.5.1 The Spatial Strategy in Future Wales would be expected to result in predominantly positive sustainability effects, with significant positive effects on most ISA Objectives likely.
- 3.5.2 All policies in Future Wales 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.
- 3.5.3 Appendix F of the ISA Report²⁹ presents the assessments of policies from the Draft NDF Including Proposed Changes. 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 of the ISA Report records these recommendations. Table A-2 in Appendix A of this Statement provides an overview of how these recommendations have been considered by Welsh Government. Overall, Welsh Government agreed with and made the changes suggested, which will contribute to the overall improvement in the potential for Future Wales to achieve more sustainable development.
- 3.5.4 The appraisal in the ISA has focussed on chapters 4 and 5 of the NDF (now Future Wales), 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 3-3 of the ISA Report, sets out the scores recorded for each policy for each ISA Objective, including in the short, medium and long-terms. Table 3-4 provides a summary of the assessment results for policies, the full results of which are presented in Appendix F of the ISA Main Report.
- 3.5.5 In addition to appraising each of the proposals in the NDF (now Future Wales) separately, they have also 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 of the ISA Main

²⁸ Appraisal of Draft National Development Framework: ISA Report (incorporating Environmental Report) Available at: <https://gov.wales/draft-national-development-framework> [Accessed 20.03.20]

²⁹ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

Report, alongside the assessment summaries. The final row in the overall cumulative effects 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 of the ISA Report³⁰. These are included in Table A-2 of Appendix A, of this Statement.

3.6 Updates Post Senedd Scrutiny

- 3.6.1 Following Scrutiny by the Senedd, a number of changes to Future Wales were proposed. These have since been reflected in the ISA, dated February 2021³¹. Appendix B of this Statement presents a screening table, whereby all of the changes were considered, and responded to in the ISA as appropriate. It is noted that only two scoring changes were recorded, in relation to the assessment of P6, increasing the medium and long term score from neutral to minor positive, against the ISA housing objective (12).

³⁰ Appraisal of Draft National Development Framework Including Proposed Changes: ISA Report (incorporating Environmental Report), Available online: <https://gov.wales/future-wales-integrated-sustainability-appraisal> [accessed 28.01.21]

³¹ <https://gov.wales/future-wales-integrated-sustainability-appraisal-0>

4 Measures to Monitor Significant Environmental Effects

- 4.1.1 The ISA has identified the likely effects of Future Wales 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 Future Wales, including the effects of specific policies or the cumulative effects of policies in-combination, are different to those anticipated due to unforeseen circumstances. The Covid-19 pandemic also provides some uncertainty as to how future trends may materialise. The SEA Regulations require that the significant environmental effects of the implementation of Future Wales are monitored. It is, therefore, an essential component of delivering sustainable development to monitor the effects of Future Wales 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. This is in line with Well-being of Future Generations Act sustainable development 'prevention' principle, as well as the SMNR principle for adaptive management. The act of monitoring Future Wales will comprise Stage E of the SEA process. Figure 2-1 of this Statement presents the stages of the ISA process.
- 4.1.2 It is anticipated that Welsh Government will be monitoring the implementation and effects of Future Wales post-adoption to feed into future plan review and revision. Table 3-6 includes a Monitoring Framework to keep track of the sustainability effects of Future Wales, which will be integrated with Future Wales monitoring. The Monitoring Framework has been refined following discussion with Welsh Government. In addition to monitoring the extent to which Future Wales results in the effects identified in the ISA, the Monitoring Framework will provide an indication of the effects of the Future Wales on the environmental baseline in Wales and this can be compared with the future trends of this baseline, as set out in Table 4-1 of this statement.
- 4.1.3 Over the lifetime of Future Wales, new information, which will help inform the review of Future Wales, will be added to the Future Wales Monitoring Framework. Some indicators currently used by 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 Future Wales over its 20 year plan period.

Table 5-1: Final Monitoring Framework

ISA Objective		Effects to be monitored	Indicators for monitoring (aligned with the Future Wales 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	Future Wales 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	Future Wales would be likely to lead to a significant positive impact on improving the physical, mental and social health and well-being for all.	<p>Life expectancy at birth in Wales.</p> <p>Life expectancy at birth in regional areas across Wales.</p> <p>Healthy life expectancy at birth in regional areas across Wales.</p> <p>Frequency of active travel by walking and cycling in Wales.</p> <p>NI2. Healthy life expectancy at birth including the gap between the least and most deprived.</p> <p>NI3. Percentage of adults who have fewer than two healthy lifestyle behaviours.</p> <p>NI4. Levels of nitrogen dioxide (NO₂) pollution in the air.</p> <p>NI5. Percentage of children who have fewer than two healthy lifestyle behaviours.</p> <p>NI18 Percentage of people living in households in income poverty relative to the UK median: measured for children, working age and those of pension age.</p> <p>NI19 Percentage of people living in households in material deprivation.</p> <p>NI24. Percentage of people satisfied with their ability to get to / access the facilities and services they need.</p> <p>NI26. Percentage of people satisfied with local area as a place to live.</p> <p>NI29. Mean mental well-being score for people.</p> <p>NI30. Percentage of people who are lonely.</p> <p>NI38. Percentage of people participating in sporting activities three or more times a week.</p>

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

ISA Objective		Effects to be monitored	Indicators for monitoring (aligned with the Future Wales Monitoring Review. NI= national well-being indicators)
	efficient and sustainable design	Development supported by Future Wales could lead to an increase in energy consumption, and much of this is likely to be non-renewably sourced.	NI41. Emissions of greenhouse gases within Wales. 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	Future Wales 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 Future Wales could help to ensure people in Wales are able to make relatively efficient and low-emission movements. Development supported by Future Wales 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	Future Wales would support new development that would increase water consumption in Wales. New development supported by Future Wales 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	Future Wales would be expected to make a significant positive contribution towards the	NI24. Percentage of people satisfied with their ability to get to / access the facilities and services they need.

ISA Objective		Effects to be monitored	Indicators for monitoring (aligned with the Future Wales Monitoring Review. NI= national well-being indicators)
	communities and sustainable access to basic goods, services and amenities for all groups	creation of opportunities for improving connectivity between people and places, key services, goods and services.	<p>NI26. Percentage of people satisfied with local area as a place to live.</p> <p>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.</p> <p>Percentage of people satisfied with access to good services and facilities (within 15-20 minute walk from home) in Wales.</p> <p>Total number of railway station entries and exits in Wales by year.</p> <p>Transport usually used to get to work (by transport mode).</p>
11	To create the opportunities within which an improvement in social cohesion and equality can be achieved	Future Wales would be expected to make a significant positive contribution towards the creation of opportunities for enhancing the cohesiveness of communities across Wales and moving towards a more equal society.	<p>NI23. Percentage who feel able to influence decisions affecting their local area.</p> <p>NI25. Percentage of people feeling safe at home, walking in the local area, and when travelling.</p> <p>NI26. Percentage of people satisfied with local area as a place to live.</p> <p>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.</p> <p>NI35. Percentage of people attending or participating in arts, culture or heritage activities at least three times a year.</p> <p>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.</p>

ISA Objective		Effects to be monitored	Indicators for monitoring (aligned with the Future Wales Monitoring Review. NI= national well-being indicators)
12	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs	Future Wales 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.	<p>Number of new homes built in Wales per annum.</p> <p>Number of new homes built in regional areas across Wales per annum.</p> <p>Number of affordable housing units built in Wales per annum.</p> <p>Number of affordable housing units built in regional areas across Wales per annum.</p> <p>NI31. Percentage of dwellings which are free from hazards.</p> <p>NI33. Percentage of dwellings with adequate energy performance.</p> <p>NI34. Number of households successfully prevented from becoming homeless per 10,000 households.</p>
13	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes	<p>Future Wales 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.</p> <p>Development in urban areas could pose a risk to surrounding townscapes and settlement character.</p>	<p>Number of Green Infrastructure Assessments completed by local authorities in Wales.</p> <p>Area of woodland in Wales per annum (by thousand hectares).</p> <p>Area of new woodland planting in Wales per annum (by hectares).</p> <p>LANDMAP change reporting</p> <p>Review of designated landscapes</p> <p>*It may be appropriate to link monitoring for this ISA Objective with AONB monitoring plans</p>
14	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings	Future Wales supports new development in regions throughout Wales where it could potentially alter the setting of sensitive heritage assets and historic areas.	<p>NI40. Percentage of designated historic environment assets that are in stable or improved conditions.</p> <p>LANDMAP Historic Landscape Character Areas conserved.</p>

ISA Objective		Effects to be monitored	Indicators for monitoring (aligned with the Future Wales Monitoring Review. NI= national well-being indicators)
15	To create the opportunities for the protection and promotion of Welsh culture	Future Wales 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	<p>Future Wales supports new development across Wales that could potentially reduce the connectivity and coherence of ecological networks.</p> <p>New development supported by Future Wales could potentially increase public access associated disturbances at sensitive habitats.</p> <p>New development supported by Future Wales could potentially result in the direct loss of sensitive habitats or functionally linked land.</p>	<p>Number of Green Infrastructure Assessments completed by local authorities in Wales.</p> <p>Area of woodland in Wales per annum (by thousand hectares).</p> <p>Area of new woodland planting in Wales per annum (by hectares).</p> <p>NI4. Levels of nitrogen dioxide (NO₂) pollution in the air.</p> <p>NI13. Concentration of carbon and organic matter in soil.</p> <p>NI14. The Ecological Footprint of Wales.</p> <p>NI43. Areas of healthy ecosystems in Wales.</p> <p>NI44. Status of Biological diversity in Wales.</p> <p>NI45. Percentage of surface water bodies, and groundwater bodies, achieving good or high overall status.</p> <p>*It is noted that SoNaRR informs the Natural Resources Policy priorities set by WG, which in turn will inform future revisions of Future Wales. The SoNaRR indicators, therefore, will also provide an important monitoring tool for the ISA and Future Wales.</p>
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value	Future Wales supports new development in regions across Wales that would be likely to lead to an increase in the consumption of natural resources.	<p>NI15. Amount of waste generated that's is not recycled, per person.</p> <p>*It is noted that SoNaRR informs the Natural Resources Policy priorities set by WG, which in turn will inform future revisions of Future Wales. The SoNaRR indicators, therefore, will also provide an important monitoring tool for the ISA and Future Wales</p>

5 CONCLUSION

- 5.1.1 This Report satisfies the requirements of a Post Publication Statement as per the SEA Regulations. 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 well-being goals have been integral to the ISA including the preparation of the Scoping Report and the ISA Framework. The well-being goals have also been used to inform the review of the evidence, identify issues and structure the assessment Framework. Future Wales, at each iteration, has been appraised for its likely significant effects against each of the ISA Objectives within the assessment Framework. The ISA is a process that has been highly integrated with the development of Future Wales, 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 Future Wales 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.
- 5.1.2 The ISA provides a consultation tool, providing the general public and statutory bodies with an analysis of how Future Wales has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation, involvement and engagement process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of Future Wales.
- 5.1.3 Throughout the process, the ISA has provided recommendations which 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. Key recommendations made, and the responses to these, are presented in Appendix A of this Statement. Welsh Government has proved highly receptive to measures for enhancing the sustainability performance of Future Wales and subsequently made enhancements and amendments throughout. Recommendations made to Welsh Government, and how these were taken into consideration, were particularly discernible for the following elements of Future Wales:
- **Outcomes (formerly called NDF Objectives):** The compatibility assessment of the NDF objectives (now refined as Outcomes for Future Wales)) 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.
 - **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 analysed, and the appraisals revised where appropriate. These appraisals and accompanying recommendations are presented in their entirety in Appendix E of the Final ISA Report³². 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 (now Future Wales):** Alongside the detailed appraisals, as presented in Section 3 and Appendix F of the ISA Report, 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

³² <https://gov.wales/future-wales-integrated-sustainability-appraisal-0>

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.

Appendix A Welsh Government Responses to Recommendations

Table A-1 Summary of recommendations made in the ISA to help enhance the sustainability performance of the Draft NDF (now Future Wales) (May 2019)

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) 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 should be specifically	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 (now Future Wales) following consultation
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.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
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.
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 and enhancing the local 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.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
Grouping 7	
<p>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.</p>	<p>Policy 17 now includes all types and scales of renewable energy.</p> <p>Policy 16 sets the national context for heat networks. Further guidance will be produced to support the implementation of the renewable energy policies.</p>
<p>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.</p>	<p>Policy P2 has been strengthened to recognised green infrastructure and nature based solutions.</p> <p>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.</p>
<p>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.</p>	<p>Policy 17 includes references to cultural improvements and policy 18 addresses settings for AONBs and National Parks.</p>
<p>P10, P11 and P13 could be strengthened by including reference to cultural benefits to encompass all elements of sustainable development</p>	<p>Policy 17 includes reference to cultural improvements</p>
Grouping 8	
<p>Provide clarity on skills and training, in particular related to economic growth could widen term employment provision</p> <p>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”.</p>	<p>This is addressed in PPW.</p>
<p>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.</p>	<p>Reference has been included to green infrastructure in Policy 19.</p> <p>PPW and Policy 9 address both green belt and green infrastructure.</p>
<p>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.</p>	<p>The supporting text has been updated to define ‘connectivity infrastructure’.</p>

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
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.
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	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.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
impacts of climate change in determining the distribution and extent of 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.
<p>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.</p> <p>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.</p>	<p>Development Plan manual and PPW provide a fuller context for preparation of SDPs.</p> <p>The supporting text for policy 24 addresses this.</p>
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	
<p>Supporting text should clarify the definition of connectivity infrastructure.</p> <p>Policy P23 could be strengthened to include facilities and services.</p>	The definition of connectivity infrastructure has been included throughout the regional sections.
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.	<p>The metro policy and policy 12 deal with sustainable transport modes.</p> <p>PPW addresses construction materials and renewable energy.</p> <p>Policy 32 haven waterway has been redrafted to focus on energy.</p> <p>Policy 10 addresses port policies.</p>

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
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.	
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 report. 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	

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
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 include access by a range of sustainable transport modes not just public transport.	Policy 28 addresses access to facilities and services. 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.

ISA of Draft NDF - Recommendations	WG Response – These reflect the amended NDF (now Future Wales) following consultation
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.
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

Table A-2 Summary of recommendations made in the ISA to help enhance the sustainability performance of the Draft NDF Including Proposed Changes (March 2020) and Post Senedd Scrutiny (February 2021)

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

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	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. Text has also been added to drive proactive engagement with universities.
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 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	

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
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 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.

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	<p>The NDF reflects these and sets out specific policies that look to promote decarbonisation through:</p> <ul style="list-style-type: none"> - 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.
<p>P10 could be strengthened to include delivery of green infrastructure, active travel and sustainable transport.</p>	<p>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.</p>
<p>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’.</p>	<p>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.</p>
<p>Could potentially include wording to ensure that development at Strategic Gateways protects and enhances the character of the surrounding area.</p>	<p>Addressed. The principles of place making, landscape, heritage and character are dealt with in PPW</p>
<p>The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.</p>	<p>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.</p>
<p>The opportunity and benefits of heritage led regeneration could be recognised in the supporting text.</p>	<p>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.</p>
<p>Cardiff Airport should adopt best-practice to incorporate Green Infrastructure into the development that is visually attractive and of a high biodiversity value.</p>	<p>Addressed. This is covered in PPW and NDF policy 9.</p>
<p>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.</p>	<p>Noted. Policy 10 allows appropriate development in the context with our wider sustainability and decarbonisation objectives.</p>

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
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.
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	Reference has been included to green infrastructure in Policy 19.

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
its widest definition - relationship with GI could be clarified.	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	<p>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.</p> <p>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 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.</p> <p>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.</p>
Supporting text should clarify the definition of connectivity infrastructure.	Agree. The supporting text includes a definitions of connectivity infrastructure to include transport and

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
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.	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. Transport links that are barriers to the free movement of wildlife in countryside areas should be avoided.	Addressed. 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	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

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	<p>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.</p> <p>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.</p>
<p>P25 could recognise skills and training required to support this economic growth.</p> <p>P27 could include digital infrastructure and connectivity and the benefits this can bring.</p>	<p>Addressed. This is addressed in PPW.</p> <p>Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW.</p>
<p>The opportunities for the provision of green infrastructure could be recognised in the support text</p>	<p>Addressed. The benefits of green infrastructure are addressed in the supporting text.</p>
<p>P27 could ensure that sustainable transport is the focus of new investment.</p> <p>P27 could seek to reduce the need for people to travel such as through improved digital connectivity.</p>	<p>Addressed. The supporting text for policy 27 addresses investment in sustainable transport.</p> <p>Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW.</p> <p>Supporting text for the region also addresses this.</p>
<p>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.</p> <p>The supporting text could include digital connectivity and recognise climate change resilience of the infrastructure</p>	<p>Addressed. The supporting text for policy 27 addresses investment in sustainable transport.</p> <p>Policy 27 is focused on transport movement and the benefits of digital infrastructure and connectivity are addressed in policies 13 and 14 and PPW.</p> <p>PPW also address climate change resilience.</p>
<p>The supporting text could recognise the benefits of placemaking through reducing barriers good design and cross reference to overarching policies.</p>	<p>Addressed. PPW sets out the principles of placemaking.</p>
<p>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.</p>	<p>Addressed. The supporting text to the region, policy 9 and PPW addressed this.</p>
Grouping 12	
<p>Reasonable Alternative</p>	<p>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.</p> <p>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.</p>

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
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.
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

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
	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. P36 there are opportunities to achieve green infrastructure along the corridors and this would be recognised in the supporting text.	Addressed. Policy 33 refers to facilities and services. The supporting text for policy 36 addresses green infrastructure as well as policy 9 and PPW.
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.

ISA of Draft NDF Including Proposed Changes	Welsh Government Response
<p>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.</p>	<p>Addressed. Supporting text seeks to maximise economic, social, cultural and environmental potential. As well as policy 9 which will address this.</p>
Cumulative Impacts	
<p>The NDF could place greater emphasis could be placed on those that also offer skills learning and education services.</p> <p>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.</p>	<p>The importance of skills and education are recognised within the NDF and PPW.</p> <p>The supporting text for the transport related policies address the need for active travel, green infrastructure networks. PPW also sets out relevant national policy.</p>
<p>The NDF could seek to specifically encourage and facilitate development that is carbon neutral.</p>	<p>This is addressed throughout the NDF and PPW.</p>
<p>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.</p>	<p>This is covered through policy 9, policy 15 and PPW.</p>

Appendix B Screening Table to determine whether further changes were required to the ISA, following changes to Future Wales, following Senedd Scrutiny

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
Culture, Welsh Language and Communications Committee – Letter 18 November				
3	<p>The Committee would like to see more information on the Welsh Government's thinking on 'local hubs'. The Committee recommends that the Framework is updated to take account of:</p> <ul style="list-style-type: none"> • a more balanced approach to developing urban and rural centres to prosper rather than one which focusses on urban centres surrounded by a rural 'hinterland'. new working patterns, arising from the COVID-19 pandemic most recently, which have seen a greater need for fast, reliable and accessible 	<p>Accept</p> <p>We agree that employment patterns have become, and will continue to be, more flexible in spatial terms. The supporting text to policies 4 and 5 make this point:-</p> <p><i>"The increasing ability to work from home and remotely from main offices may result in higher demand to live in rural areas and opportunities to retain the working age population. This could bring positive impacts for rural enterprises and the foundational economy."</i></p> <p>The supporting text to policies 13 and 14 states:-</p> <p><i>"Modern, reliable mobile telecommunications and fast broadband services are essential to our everyday lives, as highlighted by the number of people working and learning from home during the Covid-19 pandemic. Digital communications infrastructure is crucial to the future success and economic competitiveness of Wales' businesses and supports community and individual needs, including access to key services and facilities"</i></p>	<p>Chapter 2 under the heading 'Covid-19'</p> <p>New text in red:-</p> <p>The quality and accessibility of our local areas was hugely important for people's health and their well-being during the toughest stages of the pandemic. There was a collective appreciation of the value of parks and green spaces, walking and cycling routes, local shops and amenities, and the cleaner air that emerged during the lockdown. The essential nature of good broadband and telecommunications connections to enable people to work from home, access services, and to stay in touch with one another has also been highlighted during this period. Good digital communications can have a positive effect on well-being. Among the many important challenges in the recovery period will be ensuring all communities enjoy access to these fundamentally important things.</p> <p>Many of the urgent actions and changes in behaviour that were introduced in response to the pandemic are emerging as permanent features of life. The Welsh Government has published COVID-19 Reconstruction: Challenges and Priorities which outlines the issues our response to the pandemic must address. These have implications for the planning system as people are using places differently, travelling less and spending more time working from home. The planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. Planning Policy Wales is the primary source of detail on how the planning system will support reconstruction efforts.</p> <p>Introductory text to Chapter 4</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	broadband in all parts of Wales;	<p>In recognition of the Committee's recommendation we will amend references to an 'urban growth focus' in the introductory text to Chapter 4; strengthen references to broadband in Chapter 2 under the heading 'Covid-19'; and add a further reference to the potential growing role for co-working hubs to the supporting text of policy 6.</p> <p>The role of Planning Policy Wales in providing the all-Wales approach to developments of this type will also be highlighted within Future Wales.</p>	<p>New text in red:-</p> <p>The focus on Growing urban areas across Wales 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. An Urban growth focus enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being</p> <p>Text under Policy 6</p> <p>New text in red:-</p> <p>Town centres remain important focal points of communities and are increasingly becoming places to live, centres of community and cultural activity, and the a focus for public services such as health and education, and the location of new co-working spaces.</p>	
Climate Change, Environment and Rural Affairs Committee Report				
1	Future Wales should explicitly state the need for a reciprocal and iterative relationship between Strategic Development Plans and growth deals over time.	<p>Accept</p> <p>The supporting text to policy 19 'Growth Deals & Regional Economic Frameworks' covers the important relationship between growth deals, Regional Economic Frameworks and SDPs. The relationship between the three elements is important, particularly over time as plans are prepared and updated, and Future Wales will be amended to include this point.</p>	<p>Text under policy 19 under 'Growth Deals & Regional Economic Frameworks'</p> <p>New final paragraph to be added to the section. New text in red:-</p> <p>'Over time as growth deals are developed and delivered, Regional Economic Frameworks are prepared and updated and Strategic Development Plans adopted and reviewed, the relationship between all three will be reciprocal and iterative. It is important in the future that the three elements continue to be informed by and support each other to deliver a co-ordinated and effective approach.'</p>	No change required.
2	Policy 6 should include residential	<p>Accept</p>	<p>Text under Policy 6</p>	P6 assessment score and

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	properties in the list of facilities which must be located within town and city centres.	<p>The principle that town centres are an appropriate location for residential development is accepted. However, it is not possible for all housing to be located within town centres, particularly in rural areas.</p> <p>A key theme of Future Wales is that growth and regeneration should be directed to urban areas and, in particular, in and around town and city centres. This is the basis for the spatial strategy and a key theme underpinning many of the supporting policies.</p> <p>Policy 6 'Town Centre First' is focused on directing non-residential development to town and city centres. In particular, it is focused on commercial, retail, education, health, leisure and public service facilities that will serve a town, city or region-wide catchment. These are the facilities that should be located in the most accessible areas, where everyone can access them easily on foot, bike or public transport.</p> <p>The location of residential development is instead promoted in Policy 2 'Shaping Urban Growth and Regeneration – Strategic Placemaking'. This promotes focusing development around town centres, including locating homes within walking distance of local</p>	<p>New text in red:-</p> <p>The principle of 'Town Centre First' is well established in planning policy in relation to retail developments. However, good planning can help us re-think the future of town and city centres, which are moving away from their traditional retail roles. The impact of Covid-19 on the retail sector is a further driver towards making our town centres multi-functional places. Town centres remain important focal points of communities and are increasingly becoming places to live, centres of community and cultural activity, and the focus for public services such as health and education. They are more than the extent of designated retail areas.</p> <p>Town centres are the most accessible parts of our towns and should be the focus of growth and regeneration. As well as non-residential development, town centres are an appropriate location for new homes. Policy 2 provides the basis for local planning authorities to support intensification in and around town centres. This will support the future of our town centres and provide opportunities for small-scale development, including new housing and mixed-use development.</p> <p>Commercial, retail, education, health, leisure and public service facilities should be located within town and city centres. This policy applies to developments of a significant scale, which can broadly be defined as where the facility will serve a town, city or region-wide catchment. It is for planning authorities to determine whether a development is considered to be of a significant scale. Planning Policy Wales sets out further requirements under 'Town Centre First' for retail developments.</p> <p>Planning authorities are encouraged to take a similar approach for smaller developments. It is important for local facilities and homes to be integrated within walkable, mixed use neighbourhoods, particularly in or adjacent to local centres in accordance with policy 2.</p>	text updated to show positive long-term effect on housing ISA Objective

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
		facilities and public transport. Future Wales will be amended to highlight the support for locating residential development in and around town centres.		
3	Future Wales should indicate how the strategy it sets out will further the objectives set out in Prosperity for All and the proposals in A Manufacturing Future for Wales.	<p>Accept</p> <p>Future Wales references Prosperity for All: economic action plan, and reflects and supports its aims throughout the document. In order to best understand how Future Wales addresses the economy it should be read as a whole.</p> <p>However, it is agreed that the linkages between Future Wales and the economic action plan can be made more explicit and a new paragraph will be added to Future Wales to this effect.</p> <p>A Manufacturing Future for Wales is at present a closed consultation. Whilst Future Wales is considered to already reflect many of 'A Manufacturing Future for Wales' main aims, it has not been included in Future Wales on this occasion because work on the final version is still ongoing.</p> <p>Future Wales supports a low carbon economy and the decarbonisation of industry. It supports the growth of</p>	<p>Chapter 1 under heading 'How does the NDF fit with wider Welsh Government policy?'</p> <p>New text in red:-</p> <p>A number of Welsh Government strategies and policies have informed and helped shape Future Wales, including the Welsh National Marine Plan, the Transport Strategy, Prosperity for All: Economic Action Plan, the National Natural Resources Policy and the Low Carbon Wales plan.</p> <p>Chapter 1 under heading 'Future Wales and....'</p> <p>New text in red:-</p> <p>The Economic Action Plan supports the delivery of Prosperity for All – the national strategy for Wales. It sets out a vision for inclusive growth based on strong foundations, future industries and productive regions. It aims to build resilience and future proof the economy. The Plan focuses funding support on businesses which align with decarbonisation objectives, are innovative and entrepreneurial, seek to export and import, support skills development and high quality employment, and support automation, research and development and digitalisation. The Plan identifies national thematic sectors and foundational sectors. Thematic sectors include high value manufacturing, tradable services (e.g. sale of online services), and enablers (key competitiveness drivers e.g. digital or renewable sectors). Whilst foundation sectors include tourism, food, retail and care. The Plan also introduces a new regionally focused model of economic development.</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
		<p>sustainable and renewable energy to help achieve this goal. It recognises the importance of innovation, research and development supported by public/private and academic partnership to help develop new ideas.</p> <p>Future Wales supports the development of advanced manufacturing in all four regions citing examples of sectors where this is currently exemplified. It recognises that highly skilled and highly paid jobs lead to greater prosperity.</p> <p>Future Wales identifies and supports the new high tech sectors that will provide prosperity and wealth in the future such as artificial intelligence, digital tech, new modes of transport and fuels, automation and robotics, and renewable technologies.</p> <p>The foundational economy is also strongly supported and referred to throughout Future Wales.</p> <p>Future Wales recognises the importance of infrastructure development to meet the future needs of the economy and manufacturing industry and includes policies on digital communications, energy and transport.</p>	<p>Future Wales supports and helps deliver the aims of the Economic Action Plan. Future Wales,</p> <ul style="list-style-type: none"> • supports a low carbon economy and the decarbonisation of industry, and the growth of sustainable and renewable energy. • supports the sustainable location of economic land uses • supports the growth of innovation, research and development, and better linkages between higher education and private industry • supports the development of advanced manufacturing in each region • recognises the importance of key future sectors such as advanced engineering, renewable technologies, Artificial Intelligence, transport, automation and digital innovation. • supports the foundational economy and identifies a regional and sub- regional approach to economic development delivered through Strategic Development Plans and Local Development Plans. • supports infrastructure development, including transport, energy, and digital communications. 	

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
4	Policies for National Growth Areas should identify the clusters and sectors important to each region.	<p>Accept</p> <p>It is considered that the development of strategies on sectors and clusters is best taken forward collaboratively at the regional and local level through SDPs and LDPs, Regional Economic Forums and public/private partnership programmes.</p> <p>However, it is agreed that Future Wales text should be amended to clarify this position.</p> <p>Future Wales does identify sectors which are important to each region and where there is opportunity for further growth. There is also strong elements of clustering taking place in different parts of Wales where certain sectors are strongly represented, for example in advanced manufacturing, energy research and development, and compound semiconductor development.</p> <p>PPW recognises the importance of clustering and states that Development plan policies should identify potential networks and clusters. Development plans should also recognise and plan for the associated transport, environmental and telecommunications infrastructure links needed to support these networks and clusters.</p>	<p>Text under policy 21</p> <p>New text in red:-</p> <p>The Strategic Development Plan should be informed by and facilitate the delivery of the North Wales Growth Deal and ensure support for a smart, resilient and connected region. It will provide a framework to take the strategic locational decisions that will support the long-term ambitions of the Growth Deal in relation to housing, economic growth, key services and essential infrastructure. The Strategic Development Plan should also consider the importance of key economic sectors across the region. It should also recognise opportunities for the development of economic clusters, where businesses choose to locate in close proximity for mutual benefit, and whether there is a need for further infrastructure investment to support this.</p> <p>Text under policy 26</p> <p>New text in red:-</p> <p>A strengthened regional approach to planning should be informed by and seek to facilitate the delivery of the Mid Wales Growth Deal. A Strategic Development Plan should provide a framework to take the strategic locational decisions that will support the long-term ambitions of the Growth Deal in relation to housing, economic growth, key services and essential infrastructure. It should also consider how traditional and new economic sectors can be supported across Mid Wales and be open to exploring the role of both existing and new types of employment areas. It should also recognise opportunities for the development of economic clusters, where businesses choose to locate in close proximity for mutual benefit, and whether there is a need for further infrastructure investment to support this. A Strategic Development Plan should consider the potential for the expansion and growth of key regional sectors, including defence and security, animal health and veterinary science, bio-technology and agri-tech.</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			<p>An understanding of the types of sites and infrastructure these sectors will require in the future is important and should harness the potential of key regional assets such as the Aberystwyth Innovation and Enterprise Campus.</p> <p><i>Text under policy 29</i></p> <p>New text in red:-</p> <p>The Regional Economic Framework, prepared in partnership with local authorities, communities, businesses and key stakeholders, will set out the priorities for future regional economic development. The planning system, through its Strategic and Local Development Plans and the decisions it takes, has a major role to play in shaping the places that support and strengthen the regional economy. The Strategic Development Plan should be informed by the Swansea Bay City Region City Deal and Economic Regeneration Strategy and should ensure that key locational decisions on housing and employment sites, key services and essential infrastructure are planned to support and benefit from the investment and projects across the region. The Strategic Development Plan should also consider how traditional and new economic sectors can be supported and be open to exploring the role of both existing and new types of employment areas. It should also recognise opportunities for the development of economic clusters, where businesses choose to locate in close proximity for mutual benefit, and whether there is a need for further infrastructure investment to support this.</p> <p><i>Text under policy 33</i></p> <p>New text in red:-</p> <p>The South East region accounts for 51% of the total economic output of the Welsh economy. The Regional Economic Framework to be</p>	

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			prepared by the Welsh Government in partnership with local authorities, communities, business and key stakeholders, will set out the priorities for future regional economic development. The planning system, through Strategic and Local Development Plans and the decisions it takes, will have a major role to play in shaping the places that support and strengthen the regional economy. The Cardiff Capital Region City Deal has made progress in developing and strengthening a regional approach. The Strategic Development Plan should be informed by the Cardiff Capital Region City Region Deal and should ensure that key locational decisions on housing and employment sites, key services and essential infrastructure are planned to support and benefit from the investment and projects across the region. The Strategic Development Plan should also consider how traditional and new economic sectors can be supported and be open to exploring the role of both existing and new types of employment areas. It should also recognise opportunities for the development of economic clusters, where businesses choose to locate in close proximity for mutual benefit, and whether there is a need for further infrastructure investment to support this.	
8	Future Wales should include a commitment to more proactive engagement with universities, identifying them as active partners in national and regional development	Accept Future Wales highlights the important role of universities and asks Strategic and Local Development Plans to consider how they can play a bigger role in supporting regional economies, innovation and their communities. Text will be added to drive proactive engagement with universities.	Chapter 2 under heading 'Prosperity' New text in red:- Our universities can play an important role both nationally and regionally, leading innovation and research and providing opportunities for students of all ages to grow and develop. They play a key role in their local communities, attracting students from all around the world to different parts of Wales and supporting local economies and businesses. Planning Authorities should proactively engage with universities to maximise the role they can play in supporting national and regional development.	No change required.
9	Future Wales should recognise the public rights	Accept	Text under Policy 9	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	of way network and access to common land as national assets.	The Welsh Government recognises the importance of the public rights of way network and access to common land. They play an important environmental and recreational role, which is recognised in Planning Policy Wales, and we expect planning authorities to reflect this at the local level. Text will be added to Future Wales to acknowledge this point.	<p>New text in red:-</p> <p>As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being. Local green infrastructure assets such as public rights of way, common land, parks, village greens and allotments can all make a cumulative contribution towards wider national scale ecological connectivity. The real-life importance of urban green spaces was demonstrated when people were restricted to taking exercise in immediately local green spaces during the Covid-19 lockdown.</p>	
10	Future Wales should include a clear statement to reflect the lessons learned from COVID-19 and explains how the framework will help to further post-COVID-19 recovery. It should recognise the potential contributions of investments in infrastructure, housing, connectivity, heat networks and	<p>Accept</p> <p>The recognition of the impact of Covid-19 in Chapter 2 under the heading 'Covid-19' will be updated to reflect the latest understanding of the immediate and longer-term impact of Covid-19 on our society.</p>	<p>Text under Chapter 2 heading 'Covid-19'</p> <p>New text in red:-</p> <p>The quality and accessibility of our local areas was hugely important for people's health and their well-being during the toughest stages of the pandemic. There was a collective appreciation of the value of parks and green spaces, walking and cycling routes, local shops and amenities, and the cleaner air that emerged during the lockdown. The essential nature of good broadband and telecommunications connections to enable people to work from home, access services, and to stay in touch with one another has also been highlighted during this period. Good digital communications can have a positive effect on well-being. Among the many important challenges in the recovery period will be ensuring all communities enjoy access to these fundamentally important things.</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
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	natural capital, and increasing capacity in the foundation economy.		Many of the urgent actions and changes in behaviour that were introduced in response to the pandemic are emerging as permanent features of life. The Welsh Government has published COVID-19 Reconstruction: Challenges and Priorities which outlines the issues our response to the pandemic must address. These have implications for the planning system as people are using places differently, travelling less and spending more time working from home. The planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. Planning Policy Wales is the primary source of detail on how the planning system will support reconstruction efforts.	
11	The Welsh Government should work with the National Grid, the electricity distribution companies and the renewable energy industry to develop a shared understanding of the strategic improvements which need to be made to electricity transmission and distribution infrastructure, including any new infrastructure required in mid	<p>Accept</p> <p>Future Wales already commits the Welsh Government to using its policy levers to assist in the delivery of renewable energy projects by coordinating strategic action to build the case for new or reinforced grid infrastructure where necessary (text under policies 17 and 18).</p> <p>Regular liaison between the Welsh Government, DNOs, National Grid and renewable energy developers is helping to understand the issues and improvements needed.</p> <p>Future Wales does not set out the Welsh Government's energy policy but the Minister for Energy, Environment and Rural Affairs is aware of this issue and will be taking action in this area.</p>	<p>Text under Policies 17 and 18</p> <p>New text in red:-</p> <p>The UK's energy system is now undergoing significant change, with energy generation and delivery becoming more distributed in the communities and regions where the energy is used. The boundaries between systems are also becoming blurred, with energy being converted into (and stored in) different forms to address a range of needs. There is also a need to consider large-scale energy storage as part of the energy system to provide grid balancing. During the lifetime of Future Wales the energy system is likely to move to a 'multi-vector system' approach, which will require flexibility to fully exploit the inter-relationships and synergies between the power, heat and transport sectors. The Welsh Government acknowledges the significant challenge that grid infrastructure and capacity will have on the potential for new on-shore and off-shore renewable energy developments across Wales. We are committed to working with energy networks and developers to identify opportunities and barriers as well as working collaboratively to find solutions.</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	Wales. The first iteration of Future Wales should include a commitment to developing such a strategy. If the Welsh Government believes it would not be appropriate to include such a commitment in Future Wales, it should commit to do so in another way it believes to be appropriate.	Future Wales will be amended to acknowledge the challenges which the Grid poses in Wales and that ongoing work and liaison will address these issues.		
13	The Welsh Government should amend the text of the final paragraph on page 99 of Future Wales to make clearer its intention that planning at the regional level should identify opportunities for all types of renewable energy developments.	<p>Accept</p> <p>Text under policies 17 and 18 of Future Wales already states that regional energy planning will be used to identify opportunities for all types of renewable projects.</p> <p>However, it is believed that there has been confusion and the belief that regional energy planning in this context refers to Strategic Development Plan (SDPs) and that there is concern that these plans would further constrain renewable energy developments. This is not the case.</p>	<p>Text under Policies 17 and 18</p> <p>New text in red:-</p> <p>The Welsh Government will use support regional and local energy planning to identify opportunities for all types of renewable projects. Energy planning in this context means the process undertaken by local authorities working with stakeholders to inform, shape and enable key aspects of the transition to a low carbon energy system. This will help local areas develop plans to meet climate change targets by exploring a range of different local energy scenarios. Local area energy plans will identify the preferred combination of technological and system changes needed to the local energy system, to decarbonise heat and local transport and realise opportunities for local renewable energy production.</p>	Additional text added to P18 assessment text to outline local and regional approach.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
		<p>Energy planning in this context means the process which aims to inform, shape and enable key aspects of the transition to a low carbon energy system. It helps local areas develop plans to meet their climate change targets by exploring a range of different local energy scenarios. Local area energy plans identify the preferred combination of technological and system changes needed to the local energy system, to decarbonise heat and local transport and realise opportunities for local renewable energy production.</p> <p>This will be clarified in the text of Future Wales.</p>		
15	<p>The Welsh Government should consider whether criterion 2 of Policy 18 should require the application of the test of 'no unacceptable adverse visual or noise impacts on nearby communities or individual dwellings'. It should also consider whether</p>	<p>Accept</p> <p>We accept that these suggested changes to Policy 18 will help to make the clearer and in line with established practice.</p>	<p>Policy 18</p> <p>New text in red:-</p> <p>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:</p> <ol style="list-style-type: none"> 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 There are no unacceptable adverse visual impacts on nearby communities and individual dwellings, and the cumulative impact of the proposal, with other existing or proposed development, is acceptable; 	<p>No change required. Landscape policy assessment already accounts for this change and references in text. Cumulative effects assessment remains unchanged.</p>

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
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	cumulative impact should be a consideration in the assessment of other potential environmental impacts.		<p><i>Additional paragraph to the end of Policy 18 following the criteria</i></p> <p>The cumulative impacts of existing and consented renewable energy schemes should also be considered.</p>	
16	The Welsh Government should ensure that Future Wales and the National Marine Plan are well aligned and complementary in relation to renewable energy developments. Future Wales should provide guidance on the protection of potential cable landfalls for offshore renewable energy developments.	<p>Accept</p> <p>Future Wales highlights the relationship with the National Marine Plan and the importance for these plans to provide a coordinated framework for the management of change around our coast. This includes renewable energy opportunities. Policies 24 North West Wales and Energy and 32 Haven Waterway also support in principle on-shore developments associated with off-shore renewable energy projects including cable landfall infrastructure.</p> <p>The appropriate renewable energy sections within Future Wales will be amended to ensure cable landfall sites for off-shore renewable energy developments are considered in all development plans.</p>	<p><i>Text under Policies 17 and 18</i></p> <p>New text in red:-</p> <p>Policy 18 provides a decision-making framework for renewable and low carbon energy technologies. The planning system sets policy and takes decisions on on-shore schemes. The Welsh Government is supportive of off-shore proposals and sees them as an important part of our future energy mix but they do not fall within the remit of Future Wales. The on-shore development aspects of off-shore schemes are supported, for example cable landfall infrastructure. Strategic and Local Development Plans should identify and enable appropriate on-shore development to support such schemes. Future Wales and the Welsh National Marine Plan address energy and reflect the energy hierarchy as set out in Planning Policy Wales. Both plans recognise that there are a number of opportunities to generate renewable energy across a variety of technologies both on-shore and off-shore which should be maximised to help meet the targets.</p> <p><i>Text under Policy 24</i></p> <p>New text in red:-</p> <p>The planning system has an important role in supporting renewable and low carbon energy and ensuring the North plays its part in decarbonising society. The region has strong potential for generating wind, solar and marine energy and has the potential to play a continuing role for energy generation from nuclear power. There is</p>	Assessment text strengthened for ISA Objective 6 for Policy 24. No changes to Policy 18 and 32.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
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			<p>also the opportunity across the region for the generation of hydrogen to deliver energy storage capacity and a transport fuel source for the A55 corridor, Holyhead Port and rural communities. There are a number of opportunities for off-shore renewable energy developments in this area and the role of development plans is to enable appropriate on-shore development, including cable landfall sites.</p> <p><i>Text under Policy 32</i></p> <p>New text in red:-</p> <p>Some developments will be located in the marine environment, and the role of of Future Wales and other development plans is to enable appropriate on-shore development to support such schemes, including cable landfall sites.</p>	
17	Future Wales should include a clear statement that it is the highest tier of the development plan, against which proposed Developments of National Significance require to be assessed.	<p>Accept</p> <p>Chapter 1 under the heading ‘What is this document?’ already states that “Future Wales is the highest tier of development plan”. To reinforce this point, it will be restated again in Chapter 1 under the heading ‘A plan-led system’.</p> <p>With regard DNS, text will be added under Policies 17 and 18 under the heading ‘Developments of National Significance’ to confirm that DNS will be determined in accordance with Future Wales.</p>	<p><i>Chapter 1 under the heading ‘A plan-led system’</i></p> <p>New text in red:-</p> <p>The Welsh Government by producing Future Wales contributes the national tier of the development plan. This is the highest tier of development plan. Strategic Development Plans cover regional and sub-regional scales and Local Development Plans consider issues at the local scale.</p> <p><i>Text under Policies 17 and 18 under the heading ‘Developments of National Significance’</i></p> <p>New text in red:-</p> <p>Developments of National Significance Proposals for large-scale energy development are classed as ‘Developments of National Significance’ and are determined by the Welsh Ministers. Proposals</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			below the threshold for Developments of National Significance are determined by local planning authorities. As set out in legislation, applications for Developments of National Significance must be determined in accordance with Future Wales, which is the national development plan for Wales.	
19	The Welsh Government should clarify its role in improving connectivity between north and south Wales and other inter-regional transport links of national importance. This should also address east west connectivity in both north and south Wales.	<p>Accept</p> <p>The Welsh Government has published for consultation a first draft of the new Wales Transport Strategy, Llwybr Newydd, which sets out the Welsh Government's vision, priorities and desired outcomes for improving connectivity across Wales.</p> <p>Future Wales sets out how the Welsh Government will support and invest in improving national and regional connectivity. Text will be added to make clearer how this will improve north south and east west connectivity. This includes the re-opening of railway lines and stations, improvements to the strategic road network, and the development of the National Cycle Network. Further details can be found in the draft Wales Transport Strategy.</p>	<p>Text under Policies 11 and 12</p> <p>New text in red:-</p> <p>Travelling in Wales</p> <p>The national and regional connectivity policies set out the measures the Welsh Government will support and invest in to improve connectivity. These measures will improve connectivity between the north and south, as well as east-west connectivity in the north, the south and mid Wales.</p> <p>The Welsh Government's aim is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. The sustainable transport hierarchy in Planning Policy Wales, which prioritises active travel and public transport, is a fundamental Welsh Government principle that underpins Future Wales.</p> <p>Map Strategic Corridors and Metro Developments under Policies 11 and 12</p> <p>Replace map with Figure 3 and 4 from A Railway for Wales - Meeting the Needs of Future Generations: https://gov.wales/sites/default/files/publications/2019-10/a-railway-for-wales-the-case-for-devolution.pdf</p> <p>Include the text on these maps to show the detailed measures being taken to improve connectivity on the rail network and through the</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			metro projects. Also clearly reference that these are from A Railway for Wales - Meeting the Needs of Future Generations.	
20	The text supporting Policy 9 - Resilient Ecological Networks and Green Infrastructure should identify Section 7 species and habitats as potential drivers of habitat creation and restoration.	<p>Accept</p> <p>The function and role of Section 7 species and habitats will be referenced in the supporting text to Policy 9.</p>	<p>Text under Policy 9</p> <p>New text in red:-</p> <p>There is a need to expand and make connections between designated sites to increase the ability of species and ecosystems to adapt to the pressures of climate change and pollution. While protected sites are critically important to the long term resilience of our ecosystems, they should not be seen as islands within the landscape, but should instead form the nodes of large-scale resilient and functional ecological networks and green infrastructure. In this context, the species and habitats of principal importance identified under Section 7 of the Environment (Wales) Act 2016 are a key driver of habitat restoration and creation.</p>	No change required.
24	Future Wales should include a statement on the role of National Park Authorities in Strategic Development Plan preparation and the Welsh Government should address the resource implications.	<p>Accept</p> <p>Clarity can be given in Future Wales to the role of National Parks in the preparation of Strategic Development Plans (SDP).</p> <p>The Local Government Elections (Wales) Act and associated Corporate Joint Committee (CJC) Establishment Regulations set out that National Park Authorities will be a member and have a vote on the respective CJC when preparing a SDP.</p>	<p>Text under Policy 19 to be added after the section headed 'Cross Border Relationships'</p> <p>New text in red:-</p> <p>National Parks</p> <p>National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas. National Parks are at the heart of resilient ecological networks and have a key role to play in Strategic Development Plans as part of the sustainable management of natural resources, protecting Wales's cultural heritage and promoting health and well-being. Future Wales policies respect the functions of National Parks in terms of their statutory purposes. At the regional scale, where National Park Authorities will be considered in the context of a wider spatial region, their statutory duty must inform Strategic Development Plans. Planning Policy Wales sets out the wider planning policy context for National Parks.</p>	No change required.

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
		<p>It will be for the CJC to determine the financial contribution from each principal council (including a National Park Authority) as part of the budget for each respective SDP/CJC.</p> <p>The Regulatory Impact Assessment accompanying the CJC Establishment Regulations set out the cost implications for preparing a SDP. This is based on the Planning Wales Act 2015 Regulatory Impact Assessment, (updated to take account of respective cost increases).</p>		
Further Changes				
No	Section of Plan		Change Proposed	
1	Across Document		Text amended to reflect change from 'Climate Change' to 'Climate Emergency'.	No change required
2	Across Document		Updates to graphics and maps including new headings, improved explanation, visual changes, and removal of superfluous graphics.	No change required
3	Across Document		Correction of drafting and setting errors; grammatical, phrasing and presentational improvements; updating of terminology and the status of documents; updated referencing; improvement to visual presentation; numbering of criteria in policies; and other such final drafting changes.	No change required
4	Introduction under heading – 'Habitats Regulations		<p>Habitats Regulations Assessment of Future Wales</p> <p>Under Article 6 of the Habitats Directive (and Regulation 105 of the Habitats Regulations), a A Habitats Regulations Assessment is required where a plan or project has the potential to impact upon</p>	No change required

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	Assessment of Future Wales'		<p>National Site Network sites (formerly known as Natura 2000 sites prior to the amendments made to the Habitats Regulations by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019). In line with planning policy, we have included Ramsar sites in the Habitats Regulations Assessment. Planning Policy Wales and Technical Advice Note 5 also provide guidance in relation to National Site Network Natura 2000 sites and Ramsar sites, including refusing development where there are adverse effects on the features for which a site has been designated. Specific mitigation measures have been developed within the Habitats Regulations Assessment which will provide a strong guide to lower-tier plans and projects (refer to table 6 and Appendix A of the Habitats Regulations Assessment report). Future Wales does not support lower-tier plans or projects where adverse effects on site integrity cannot be ruled out. Development at the lower-tier plan or project stage will need to demonstrate there are no adverse effects on the features for which a National Site Network site Natura 2000 or Ramsar site has been designated, and Future Wales does not support lower-tier plans or projects where this is not concluded lower-tier plans or projects cannot be approved (unless there are no less damaging alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured).</p> <p>The Welsh Government therefore expects the findings of the Habitats Regulations Assessment to be taken into consideration during the preparation and implementation of all Strategic and Local Development Plans. The Habitats Regulations Assessment concludes that, on the assumption that the findings of the Habitats Regulations Assessment are adopted at the lower-tier planning or project scales, adverse effects on the integrity of National Site Network sites Natura 2000 and Ramsar sites can be avoided as a result of implementing the policies within Future Wales.</p>	
5	Text Under Policy 3		Developments should be resource efficient and reflect the principles of a circular economy.	No change required

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			Compulsory purchase powers are available to the public sector to assemble land and, where necessary, will be used to support the delivery of urban growth and regeneration.	
6	Policy 12 – Regional Connectivity		<p>Policy 12 – Regional Connectivity</p> <ul style="list-style-type: none"> • Active Travel – Prioritising walking and cycling for all local travel. We will be 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 purposes. • Bus – Improve the legislative framework for how local bus services are planned and delivered. We will 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. We will to create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail. 	No change required
7	Text under Policies 11 & 12		The changes in the way people moved around towns and cities during the Covid-19 pandemic are a sign of the widespread potential will to reduce our use of cars and to allocate more space for walking and cycling. We will also be making 20mph intend to introduce a national the new default speed limit for most streets. of 20mph on restricted roads by April 2023	No change required
8	Policy 13 – Supporting Digital Communications		Development Plans should include policies supporting this requirement.	No change required
9	Text under Policy 13		'Gigabit capability' will give developers some flexibility over the type of technology that is deployed; for the most part this is likely to be	No change required

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			fibre, but could also include fixed wireless access. For the former this will mean that the developer will need to install underground ducting to allowing the communications provider to install fibre to connect easily with residents and businesses, and for fixed wireless infrastructure the communications provider may need to erect a mast and/ or install small antennae. This helps negate the need to retro-fit developments in the near future to accommodate fibre or any newer technologies that arise.	
10	Text under Policies 17 & 18		From a well-being perspective, the Welsh Government would wishes to see as much renewable electricity generated and consumed as locally as possible.....	No change required
11	<p>Policy 18 – Renewable and Low Carbon Energy Developments of National Significance - additional criteria and amendment to criteria 3.</p> <p><i>(This change addresses the issue discussed in the CCERA Report on page 18 regarding criteria 3 of policy 18, which is not raised within one of the 26</i></p>		<p><i>3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);</i></p> <p>4. There are no unacceptable 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;</p>	No change required

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
	<i>recommendations).</i>			
12	Text under Policies 17 & 18		<p>Re-siting of text to read:-</p> <p>Policy 17 recognises the wealth of current and emerging renewable energy technologies that can contribute towards our energy and decarbonisation targets. It also demonstrates the Welsh Government's support in principle for all renewable energy projects and technologies. Proposals should ensure there is no significant unacceptable detrimental impact on the surrounding natural environment and local communities and that the development delivers positive social, environmental, cultural and economic benefits.</p>	No change required
13	Text under Policy 19 under heading – 'Strategic Development Plans and the Future Wales Outcomes'		<p>Add to last para in first column:-</p> <p>In sustainably managing natural resources, Strategic and Local Development Plans must ensure that environmental capacity issues have been fully assessed and addressed, for example not exceeding environmental capacity for nutrients and other water quality issues. Planning Policy Wales sets out the policy context for biodiversity and ecological networks.</p>	Minor update to P19 assessment text for ISA Objective 17 but no change to score.
14	Text under Policy 22 and 34		<p>Text under Policy 22</p> <p>Strategic decisions on the location of development, key services and infrastructure should support existing built-up areas and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations, support actions to address inequality and deprivation and improve links to neighbouring areas of England. Planning Policy Wales sets out the policy context for establishing green belts. In advance of a Strategic Development Plan, the areas shown for consideration for green belts should be treated as if they have been designated as green belts by a Strategic Development</p>	No change required

Recommendation / Conclusion		Welsh Government Response		Further Assessment required?
		Accept / Reject	Change Made	ISA
			<p>Plan. Planning Policy Wales sets out the circumstances and limited forms of development that may be appropriate in green belts and this should be applied to the areas identified for consideration for green belts.</p> <p>Text under Policy 34</p> <p>Strategic decisions on the location of development, key services and infrastructure should support existing built-up areas and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations, support actions to address inequality and deprivation and improve links to neighbouring areas of England. Planning Policy Wales sets out the policy context for establishing green belts. In advance of a Strategic Development Plan, the areas shown for consideration for green belts should be treated as if they have been designated as green belts by a Strategic Development Plan. Planning Policy Wales sets out the circumstances and limited forms of development that may be appropriate in green belts and this should be applied to the areas identified for consideration for green belts.</p>	
15	Text under Policy 24		<p>The site lies within the Snowdonia National Park and major development here should be subject to the principles in Planning Policy Wales. At the detailed planning stage, it will would be necessary to consider design and impact upon the environment and landscape of the National Park including potential mitigation.</p>	

Appendix C Consultation Responses to the Interim ISA Report (Preferred Options)

Question 1a

Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?

Rep Number	Name	Yes/No	Representation	Response
1	WHIASU Public Health Wales	Yes	<p>We note that the purpose of the interim ISA report includes the recognition of the role and influence of other stakeholders including health boards and public health agencies. PHW support the inclusion of health in determining the development of the preferred option.</p> <p>We would underline the importance of health and wellbeing as being a fundamental theme in the planning system and cannot be divorced in setting future plans in place. We are encouraged with the findings that strongly endorse this factor. PHW therefore must be included as an important consultee in any finalised framework.</p>	Comments are noted and we will continue to engage with Public Health Wales as work on the NDF progresses.
2	Clwydian Range and Dee Valley AONB	Did Not Complete Form	No Comment	
3	RTPI	Yes	<p>The structure and findings of the Integrated Sustainability Appraisal (ISA) are generally supported. The appendix B is helpful in summarising the stages of refining questions and findings.</p> <p>Listing documents is useful and demonstrates the breadth of existing material this plan needs to consider initially. However, making that critical link between key issues and outcomes/recommendations is vital. Whilst this is one of several stages in a longer, detailed process, the narrative and justification behind the conclusions could be enhanced within the ISA. The high-level nature of the assessment can be difficult to scrutinise in detail, in particular how</p>	<p>These comments are noted and will inform the draft NDF which will include a greater level of spatial detail including on policies and projects.</p> <p>The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF.</p> <p>It is noted that cross-border linkages, City and Growth Deals, etc. are already covered made within the Integrated Sustainability Appraisal Framework. The NDF will look at England, Ireland and Northern Ireland to address and identify any cross border opportunities. The potential effects of each option were addressed as far as possible at this stage, taking a precautionary approach. When further detailed policies, and the spatial</p>

			<p>conclusions have been reached between the assessment of different options.</p> <p>Whilst this is meant to be an objective assessment with a clear process to be followed, the spatial dimension, which is critical to this plan's success, is lacking. For example, mapping out different topics/issues which add a dimension to understanding the variations between options. There appears to be little reference to a number of factors including cross border linkages, City and Growth Deals; North Wales Economic Ambitions Board and impacts on National Parks and relationship to other policies for example Welsh Language, Children, Equalities and Active Travel.</p> <p>The only negative impacts are identified in Option 1, the economic/market-driven approach. This approach could be interpreted somewhat unfairly that an economic-driven approach would be harmful to the environment, whereas an environmental-driven approach (e.g. Options 3 or 4) would not be harmful to the economy? This appears to overlook the fact that there is more to an economic/market-led option than environmental harm. It should also take into account that there are regulations and other strategies that could provide the checks and balances to mitigate some of the perceived harms.</p>	<p>expression of these, have been developed, more certainty in the assessment process will be possible. Each score is justified in Appendix C of the Integrated Sustainability Appraisal Interim Report.</p>
4	Hereford Council	Did Not Complete Form	No Comment	
5	Bay of Colwyn Town Council	Did Not Complete Form	No Comment	
6	Trees and Design Action Group	Did Not Answer	No Comment	
7	Wildfowl and Wetlands Trust	Did Not Complete Form	No Comment	

8	Pembrokeshire County Council	No	No Comment	
9	Cardiff Civic Society	Yes	This report is, in Terry Pratchett's perceptive phrase, 'A write-only' document, that will be read only by people who are paid to read it.	The document is published online, making it available to the wider public. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary that will help make the appraisal process and findings more easily understood and accessible.
10	British Holiday & Home Parks Association	No	No Comment	
11	Isle of Anglesey County Council	Did Not Complete Form	No Comment	
12	SP Energy Networks	Did Not Complete Form	No Comment	
13	Dwr Cymru Welsh Water	No	No Comment	
14	Snowdonia Enterprise Zone Advisory Board	Did Not Complete Form	No Comment	
15	Individual	Yes	In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management Independent management accreditation is required to achieve this Thank you	This comment is not relevant to the Integrated Sustainability Appraisal directly.
16	North West Cardiff Group	Yes	The Vision and Objectives are too general, and lacking in spatial detail, to enable a meaningful impact assessment at this stage.	The comment is noted. Further consideration will be given to the NDF Vision and Objectives in the context of Planning Policy Wales and whether they should be replaced by a single statement of Planning Principles and Outcomes. This would provide clarity and consistency, reduce complexity and enable the NDF to have a much clearer spatial focus.

17	Neath Town Council	Yes	Not enough information contained in the document to give a comprehensive response. Overall the document was difficult to follow and interpret for Town and Community Councils. The numerous attachments and appendices made the document very un-user friendly.	The document is intended to be as user-friendly as possible, whilst also providing a high-level appraisal of the NDF Options. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary which will help make the Integrated Sustainability Appraisal process and findings more easily understood and accessible. The draft NDF will include a greater level of spatial detail, including on policies and projects.
18	Business	No	No Comment	
19	Individual	No	No Comment	
20	South East Wales Strategic Planning Group	Yes	Undertaking the statutory assessments such as the sustainability appraisal when producing a development plan can be complicated and very technical. The integrated method used for the NDF appears clear and is relatively easy to understand. The fact it is an integrated appraisal also means the evolution of each stage of the process can be seen and therefore the different iterations can be understood.	Noted.
21	Cardiff Council	No	No Comment	
22	Association of British Ports	No	No Comment	
23	Wales Tourism Alliance	Yes	Firstly, the consultation itself is complex, you need to be able to cross reference a number of key documents all of which have been written by professionals, in itself this consultation does not invite any real degree of scrutiny by the layman. The ISA states 'where the NDF identifies that new nationally important infrastructure is required, the planning system will play an important role in helping to support the delivery of this infrastructure' with which we agree. It also goes onto state the principle aim is to 'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption	The document is published online, making it available to the wider public. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary that will help make the appraisal process and findings more easily understood and accessible. The iterative process will help to ensure that appropriate infrastructure is delivered in locations that avoid significantly adverse effects on environmental assets in line with an avoid > mitigate > compensate hierarchy. A holistic approach is adopted in all cases and, where new infrastructure is delivered, it can provide opportunities for improving the protection and enhancement of local assets. This will be explored more within the next

			of plans and programmes with a view to promoting sustainable development' these seem to be mutually conflicting. How can this be reconciled?	iteration of the Integrated Sustainability Appraisal and NDF.
24	Denbighshire County Council	No	Support the methodology and the conclusions.	Noted.
25	Wrexham County Council	No	Support the methodology and the conclusions.	Noted.
26	Renewable UK Cymru	Did Not Complete Form	<p>It is not clear whether the ISA interim report was informed by the Issues paper (at appendix A of the consultation document), or whether the ISA Framework and Objectives were informed by a review of plans, policies and programmes and national scale evidence base such as the National Indicators for Wales, Wellbeing of Wales statistics, Future Trends report and the State of Natural Resources Report (SoNaRR).</p> <p>The Integrated Sustainability Appraisal (ISA) interim report appears to be limited as far as it relates to the analysis on renewable energy, despite renewable energy being a core component across the alternative options appraised, and a 'central theme' of the Preferred Strategy. Although the legal target under the Environment Act to reduce emissions by a minimum of 80% by 2050 is referred to as a 'key driver' which all development plans should support, relevance at the national scale is not recognised. The Future Trends report (https://gov.wales/statistics-and-research/future-trends/?lang=en) recognises that "Wales will require a major decarbonisation of energy generation" to meet the "challenging" targets, and that "Wales has great untapped growth potential to generate energy". These are strategic challenges that need a strategic response in the NDF and should under-pin the 'needs case' that the NDF should articulate to provide a positive planning platform for development.</p> <p>It is noted that there has been analysis of the</p>	<p>The Issues & Options paper was not finalised until the Integrated Sustainability Appraisal Scoping Report had been finalised and an iterative process was adopted throughout. The Issues & Options were therefore informed by a review of plans, policies and programmes and the environmental baseline, as well as the emerging evidence base, for which there has also been an iterative process. Further background studies are also being undertaken, which will inform the draft NDF and Integrated Sustainability Appraisal.</p> <p>The Welsh Government recognises the importance of renewable energy to delivering its decarbonisation and energy objectives (as well as other objectives). The NDF has an important role in ensuring the planning system positively supports the delivery of renewable energy development.</p> <p>The NDF, along with the Integrated Sustainability Appraisal, has been shaped by the Well-Being of Future Generations Act, will be consulted on, alongside various levels of engagement, at all stages and is considered to be both collaborative and involving. The details of engagement undertaken and future work can be found here: https://gweddi.gov.wales/topics/planning/national-development-framework-for-wales/getting-involved/?lang=en</p>

			<p>Ways of Working under the Wellbeing of Future Generations Act as it relates to the process of undertaking the ISA. This is insightful, though perhaps a more impactful way of applying the Ways of Working would be to consider relevance to the development of the Preferred Strategy and Objectives. For example, do the Objectives sufficiently address the longer term considerations, such as decarbonisation targets, and infrastructure planning?; do the Objectives sufficiently consider the national scale problems that need to be avoided?; do the Objectives sufficiently integrate the relevant national infrastructure planning considerations?; is the process of developing the NDF collaborative and involving?</p>	
27	Woodland Trust	Yes	<p>In proposing and delivering infrastructure projects public bodies must comply with the Biodiversity Duty under Section 6 of the Environment (Wales) Act and Ministers with the Duty under Section 7. NDF objectives need to reflect this. (Q1a; Q3a)</p> <p>It is not clear to us that environmental issues and data have been fully and appropriately assessed and that the requirements of the SEA Regulations have been met. A clear summary is needed identifying the NDF's interaction with environmental protection law and policy objectives and other plans and programmes.</p> <p>On the ISA Final Scoping Report To meet the purpose of the ISA as set out in 1.3.1. of the final scoping report, we think there needs to be specific reference to the Environment Act (Wales) and in particular the Section 7 Duty on Ministers and the Section 6 Duty that “.. public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.” And that “public authorities should embed the</p>	<p>A summary of the NDF's interaction with the plans, policies and programmes is provided in Appendix C of the Integrated Sustainability Appraisal Scoping Report in a manner that satisfies the requirements of the Strategic Environmental Assessment Directive. Compliance with the Strategic Environmental Assessment Directive will be made more explicit in the Integrated Sustainability Appraisal Environment Report for the draft NDF.</p> <p>The Integrated Sustainability Appraisal will need to comply with the Environment (Wales) Act included in the review of plans, policies and programmes. Appendix C of the Integrated Sustainability Appraisal Scoping Report states: <i>“The emphasis of the duty is that the consideration of biodiversity and ecosystem 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.”</i> Objective 16 of the NDF reflects this Duty.</p> <p>Area Statements are not yet finalised. When available, they will inform the NDF and be considered within the Integrated Sustainability Appraisal as part of the iterative process.</p>

			<p>consideration of biodiversity and ecosystems into their early thinking and business planning”</p> <p>SoNaRR has been recognised as a key source but that Area Statements are barely mentioned. This seems extraordinary given that Area Statements are the spatial dimension of SMNR.</p> <p>There is no mention of the Welsh Government's Nature Recovery Action Plan https://www.biodiversitywales.org.uk/Nature-Recovery-Action-Plan</p> <p>On the ISA Interim Report – see comments under questions 4b and 5b</p>	<p>The Nature Recovery Action Plan is included within the review of plans, policies and programmes. It is further reflected in multiple objectives, including those that cover biodiversity, air quality, water, natural resources, landscapes, health and flood risk.</p>
28	St Fagans Community Council	Did Not Complete Form	No Comment	
29	National Grid	Did Not Answer	N/A	
30	Calon Cymru Network	Yes	<p>1a1 The Integrated Sustainability Appraisal document explains the over-arching requirements of the Well-being of Future Generation Act (WBFGA) and then selects (a) decarbonisation and climate change and (b) sustainable management of natural resources as the themes of two separate options, when in our opinion they are strands of foundation policy to protect living systems on planet Earth. Sustainable management of natural resources, i.e. limiting their use, itself is a form of brake on climate change.</p> <p>1a2 The two other stated options are location-based, (a) a focus on existing areas of economic strength and (b) equal treatment for the whole of Wales. The focus on ‘strong’ areas is a homage to economic history and to times when exploitation of natural resources was normal, and those locational patterns are unrelated to the aims of the WBFGA, which itself forms an Integrated</p>	<p>The comments on the NDF Options are noted. The Well-Being of Future Generations Act has fundamentally shaped the Integrated Sustainability Appraisal and therefore will shape the NDF. The goals and five ways of working have informed the development of the NDF to date and will continue to do so, alongside the other relevant legislative requirements such as the Environment (Wales) Act.</p> <p>The draft NDF will include a greater level of detail on policies and projects and will allow a clearer understanding of delivery mechanisms.</p> <p>In developing the draft NDF, informed by the responses submitted during this consultation, it is important to consider how the NDF vision and objectives shape the emerging NDF and deliver the necessary outcomes. The final NDF will include monitoring of the plan to assess its impact and enable effective review of its policies and proposals.</p>

		<p>Sustainability Assessment. On the other hand the all-Wales option expands the process of site selection so much that it would not provide significant location guidance to planners</p> <p>1a3 A fifth option was 'do nothing'. Evaluation of all five of these possibilities led to a conclusion that none was ideal and so aspects of all which appeared wholly positive were synthesized into a new 'preferred option'.</p> <p>1a4 The WBFGA is law and therefore should be the foundation of all planning for future developments. This will require changes to the education of planners, to concentrate more on skills of evaluation and systems design, and to foster collaborative working with local communities.</p> <p>1a5 The Integrated Sustainability Assessment for the NDF says little about PROCESS or SCALE. What mechanisms will there be to activate the NDF? How are the appropriate scales for development to be decided? Calon Cymru Network understands that after adoption the NDF will have the force of law and will guide 'national scale' development. Strategic Development Plans and Local Plans sitting below the NDF would provide specific development frameworks tailored to local or sub-regional circumstances. Your attention is drawn to CNN's comments in response to the consultation on a revised PPW. If the policies sitting alongside the NDF are not wholly fit for purpose then the delivery of the NDF will be compromised</p> <p>1a6 Calon Cymru suggests that all planning issues, including energy projects exceeding 50MW, and strategic road, rail, maritime and aviation developments, should be decided in Wales, although allowing for cross-border agreements for relevant energy and transport planning.</p> <p>1a7 The Welsh Government should have final responsibility for infrastructure planning (energy</p>	<p>The comments regarding infrastructure consenting are noted. The NDF is prepared in the context of devolution arrangements at the time of its preparation. Should those arrangements change, the scope of the NDF will change accordingly.</p> <p>Other comments made are considered to be wider matters in relation to the planning system as the NDF will be a statutory development plan setting out national scale issues. Issues such as training for planners, collaborative working and local level input into development proposals are matters not precluded by the NDF or within its direct scope for consideration as part of its preparation.</p>
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			<p>projects, reservoirs, pipelines, transport networks, higher education establishments and acute care hospitals). Other development (employment, housing, community services) should be determined at unitary authority level, or in Strategic Development Plans combining all or part of appropriate local authorities, in CCN's view.</p> <p>1a8 Community councils should have the right to propose and organise a local vote on developments to counteract local economic and social decline.</p> <p>1a9 In essence, we suggest that we should use the WBFGA as the framework for national development.</p> <p>1a10 Planners' education should be expanded to concentrate more on skills of system design and system protection, and on the evaluation of complex factors. Collaborative working - part of the five ways of working - between tiers of local government, and with stakeholder organisations, should be the norm.</p>	
31	Barratt David Wilson Homes (South Wales) Ltd	No	N/A	
32	Welsh Language Commissioner	Did Not Complete Form	No Comment	
33	Gwynedd County Council	Did Not Complete Form	No Comment	
34	Country Landowners Association Cymru	Did Not Complete Form	We have no comments to make at this time.	Noted.
35	Alliance for Welsh Designated Landscapes	No	No Comment	
36	Abergavenny and District Civic Society	Did Not Complete Form	No Comment	

37	National Park Wales	Yes	National Park Wales are in broad agreement with the findings of the ISA and have no substantive comments to make.	Noted.
38	Prospect	Yes	Deploying SMR's would be beneficial to the communities surrounding the existing Magnox sites. The early Magnox reactors were constructed in sparsely populated remote areas of the UK. As a result of this the local communities expanded and became dependent on the nuclear power stations as major employers. As they are closing and being decommissioned it is evident that the communities are suffering in terms of good quality skilled and well paid jobs. By deploying SMR's at these locations it would prove to be a huge boost for the communities and secure long term jobs for decades to come. An SMR would benefit local schools, technical colleges and universities with generations to come having an opportunity to take up apprenticeship's or engineering degrees to work at the sites. For the staff and contractors at Trawsfynydd there may be an opportunities to utilise the training facilities set up for the Wylfa Newydd Nuclear power station. These facilities are geographically close to each site.	Noted. A policy will be included in the Draft NDF in relation to Energy generation in North Wales. The Draft NDF will reference the potential for a SMR at the Trawsfynydd site and will identify the economic benefits this could bring to the region.
39	Caerphilly County Borough Council	Yes	<p>As a general comment, the structure of, and rationale for, the NDF is unclear, on the basis of this document. It is stated that it will be a spatial plan for the next 20 years, whereas what is set out appears to be a rehashing of the "well-being goals" reformulated within PPW Ed.10, which itself is not a user-friendly document. There is nothing which will be helpful from the point of view of SDP preparation, which will be vitally important in terms of delivering a spatial agenda in practical terms.</p> <p>Although sustainability appraisal is an accepted part of the process, it is questionable as to whether the resulting assessment of the</p>	<p>Comments on the structure and rationale of the NDF are noted. Further consideration will be given to the draft NDF in the context of Planning Policy Wales, including whether to incorporate a single statement of Planning Principles and Outcomes. This would provide clarity and consistency, reduce complexity and enable the NDF to have a much clearer spatial focus in setting out its approach.</p> <p>The NDF will set the direction for Strategic Development Plans and Local Development Plans which are required to be in conformity with the NDF. This will ensure that development plans at all levels are consistent and work together.</p>

			relationship between the ISA and NDF options and objectives is so amorphous as to have a material effect in terms of development on the ground through the formulation of effective national policy, being as far removed as they are from the practicalities of local conditions.	The Interim Integrated Sustainability Appraisal has been undertaken at a high level, appraising national options, for which not all the details are yet available. The next stage of the Integrated Sustainability Appraisal will provide assessments of the more detailed policies and spatial options, whilst still operating on a national scale.
40	Natural Resources Wales	Yes	<p>Please see our response to the ISA Interim Report in our accompanying letter [the contents of this letter are included below]</p> <p>We welcome and support the development of the NDF, together with your commitment to SEA and ISA, including the iterative and collaborative way in which you have developed the NDF and accompanying assessments to date.</p> <p>2. We disagree with the assertion that the Sustainable Management of Natural Resources (SMNR) will have a negative impact on economic growth and housing supply (Non-Technical Summary ii). We are concerned that this view does not reflect an accurate interpretation of this term, as defined in the Environment (Wales) Act 2016 (see section 3 of Annex 1).</p> <p>3. In relation to the assessment of the preferred option, we note that many of the recommendations from the ISA, as listed in Appendix D, Table D-1 have not been incorporated at this stage. We emphasise the importance of referring to these recommendations during the next stages in the development of the NDF to ensure these concerns are addressed as more detailed policy is developed where appropriate (see 1.1 in Annex 1).</p> <p>4. We continue to have some concerns over how climate change issues are reflected and addressed in the NDF, and how the ISA has assessed them. In particular, it is our view that the issue of sea level rise, its potential impacts and the need to build resilience going forward, is not adequately addressed or assessed. We also seek clarity on whether the expansion of the road network is identified as a priority in the latest</p>	<p>Comments are noted and we will continue to engage with Natural Resources Wales as work on the NDF progresses.</p> <p>2. Given the current lack of detail, the existing assessment is appropriate, which states “<i>The potential effect of this could be that insufficient housing is delivered of appropriate types and in appropriate areas to meet identified needs.</i>” In some locations, Sustainable Management of Natural Resources could <u>potentially</u> reduce the quantity of land considered to be suitable for residential development, or limit the quantity of homes appropriate for the area, in a way which conflicts with identified needs. It is noted that a precautionary approach has been taken at this stage. The strategic role of SMNR and nature-based solutions in ensuring sustainable development at a national scale will be further explored through the development of the NDF.</p> <p>3 & 1.1. This will be considered in the next stage of the Integrated Sustainability Appraisal and as the NDF is developed further.</p> <p>4 & 1.2 . The appraisal of Option 4 identifies the potential benefits in relation to resilience to sea level rise, whilst a consideration of the ‘Do not prepare NDF’ option is that ensuring resilience to sea level rise is an important factor in major developments. In the next stage of the Integrated Sustainability Appraisal, when more detail is available, the assessments will be better able to reflect the impacts of development proposals on sea level rise resilience. The assessments against Integrated Sustainability Appraisal Objective 7 on flood risk include</p>

		<p>version of the Preferred Option (see 1.2 and 4.2 in Annex 1).</p> <p>5. We note the uncertainty at this stage over the impacts of the Preferred Option on climate change, landscapes and bio/geodiversity, depending on the details of how policies are developed and implemented. We recommend that careful attention is paid to these areas in particular as the more detailed policies are developed, to ensure that positive impacts can be maximised and negative impacts minimised. We also include a number of suggestions for ways to strengthen the consideration of climate change, landscape and biodiversity and geodiversity in the Preferred Option (see 4 in Annex 1).</p> <p>6. We note that very positive impacts of the Preferred Option on Natural Resources (ISA Objective 17) are recorded in the ISA, although there is a degree of uncertainty over this in the commentary. We recommend that close attention is paid to this as the NDF is developed further to ensure potential benefits are realised (see 4.5 in Annex 1).</p> <p>Comments on the Findings of the ISA (Consultation Question 1a 'Do you have any comments on the findings of the Integrated Sustainability Appraisal Interim Report?')</p> <p>1.1 Implementation of recommendations</p> <p>We note that the findings of the ISA (4.2, Recommendations) indicate that the potential for the NDF to contribute to environmental sustainability could be strengthened. We have some concerns that a number of the recommendations in the commentary in Table D-1 have not been incorporated at this stage, for reasons that include 'The current stage provides a high-level overview...suggested changes... lend themselves to consideration at the next stage of the process, where detailed policy will be developed...'. During the next stage of the NDF's</p>	<p>'Encourage all development to be climate change resilient?' as a decision aiding question.</p> <p>UK Climate Change Risk Assessments are included in the Plans, Policies and Programmes Review in Appendix A of the Integrated Sustainability Appraisal Scoping Report and informed Objective 7 on the management of flood risk.</p> <p>5. Noted.</p> <p>6. Noted.</p> <p>2.1.1 The more detailed assessments of proposals within the Preferred Option during the next stage of Integrated Sustainability Appraisal will identify likely negative and positive impacts on natural resources, where possible. Any measures considered appropriate to enhance the positive impacts will be addressed.</p> <p>2.1.2 The NDF will support the delivery of Welsh Government policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes, this will include Sustainable Management of Natural Resources. Comments on the rewording of Objective 6.5. are noted; Further consideration will be given to the NDF Vision and Objectives in the context of Planning Policy Wales and whether they should be replaced by a single statement of Planning Principles and Outcomes. This would provide clarity and consistency, reduce complexity and enable the NDF to have a much clearer spatial focus.</p> <p>2.1.3 The comments are noted and will inform the draft NDF and Integrated Sustainability Appraisal. To be considered in the next stage of assessment. Geodiversity consideration to be made more explicit.</p> <p>2.2 Comments noted on City Regions and Growth Deals. The Integrated Sustainability Appraisal will provide further consideration of initiatives and their impacts.</p> <p>2.3. The role of strategic landscape issues at a national scale will be further explored through the development of</p>
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		<p>development, for the recommendations with this entry, we emphasise the importance of referring back to this Table, to ensure these recommendations are being adequately addressed as more detailed policy is developed.</p> <p>1.2 Climate Change</p> <p>We continue to have some concerns over the way climate change is addressed in the ISA. For example, our response to the NDF itself has highlighted that the NDF should provide a strategic policy direction for managing coastal erosion risk, an issue you would expect to be a high priority for a Spatial Plan. It is clearly important that developments undertaken within the lifetime of the plan are resilient to climate change, including sea-level rise. The absence of reference to the issue of sea-level rise and associated coastal change in the NDF has not been highlighted in the ISA. We would have expected the ISA to have identified this gap. As a key strategic document, the NDF should identify both the key strategic issues, and the key sources of evidence that should inform how we deal with them. In our response to the earlier Scoping Report, we recommended detailed consideration of the UK Climate Change Risk Assessment (UK CCRA), undertaken every five years (published most recently in 2017 – UKCCRA17) under the Climate Change Act. This, and its Evidence Report for Wales, represents the most comprehensive, authoritative and recent source of evidence available to Welsh Government in this area. Note that the Welsh Government adaptation programme in response to UKCCRA17 is currently being updated and will be consulted on in December 2018 – we would expect the ISA to refer to this.</p> <p>We consider that it is critical that there is specific reference to this five-year adaptation planning cycle in strategic documents such as the NDF if Wales is to make real progress on embedding</p>	<p>the NDF. Both nationally and locally significant places and landscapes are supported and valued through national planning policies contained in Planning Policy Wales.</p> <p>3.1 The benefits of Sustainable Management of Natural Resources to the local community are recognised in the positive impacts identified for themes such as social cohesion, sustainable access and Welsh culture. However, the commitment to sustainable management of resources such as land, soils and water could in some locations result in less homes being built, for example due to less land being considered appropriate for development. At this stage, a minor adverse impact cannot be ruled out and in line with the precautionary principle it has been recorded. Notwithstanding this, the comment are noted and in subsequent versions of the Integrated Sustainability Appraisal careful consideration will continue to be given to the potential benefits of Sustainable Management of Natural Resources in relation to the sustainable delivery of new homes and economic growth. The NDF will support the delivery of Welsh Government policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes, including the Sustainable Management of Natural Resources.</p> <p>4.1 & 4.2.1 These comments are noted and will inform the draft NDF which will provide more details on the NDF's strategic approach.</p> <p>4.2.2. At this stage of the Integrated Sustainability Appraisal, it is considered to be likely that the Preferred Option will result in both negative and positive impacts on climate change. There is a commitment to take action on climate change, however the strategy could potentially also include a commitment to improving the national road network to an extent which could potentially exacerbate road transport associated greenhouse gas emissions. An uncertain score is therefore recorded at this stage, although the next stage</p>
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		<p>climate adaptation into Welsh Government's work programmes.</p> <p>2. Comments on the Assessment of NDF Objectives (Consultation question 3d 'Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?')</p> <p>2.1 Natural Resources</p> <p>2.1.1 Implications for natural resources We note that for five NDF Objectives, the links with ISA Obj. 17 (Natural Resources) are uncertain, or dependent on implementation measures (Table B-1, Testing the Plan Objectives against the ISA Objectives). We would like to see more emphasis in the Preferred Option on how these impacts will be assessed, and how implementation measures will be developed to maximise positive impacts and minimise negative ones.</p> <p>2.1.2 Low resource use economy – NDF Objective 6.5 We recommend that greater emphasis is given to managing the transition to a low resource use economy, as implied in the Well-being of Future Generations prosperity goal: 'An innovative and productive low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately'. NDF Objective 6.5 'To ensure resource efficiency, minimise the unsustainable use of resources and support the development of the circular economy' goes some way to this, but needs to be strengthened and given greater prominence. The aim should not be 'to minimise the unsustainable use ...' but 'to eliminate the unsustainable use of renewable resources and manage the depletion of non-renewable resources to a rate consistent with identifying alternatives...'. 2.1.3 Links between natural resources and culture It is our view that it is incorrect to assess the links</p>	<p>of the Integrated Sustainability Appraisal will permit more detailed and quantified assessments against this Integrated Sustainability Appraisal Objective.</p> <p>4.2.3 These comments are noted and will inform the draft NDF which will include a greater level of detail on policies and projects.</p> <p>4.3.1 It is considered that the wider landscape context has been included within the assessment framework, through Integrated Sustainability Appraisal Objectives 7, 13, 14 and 17. However, this will be considered more closely in the next iteration of assessment. Locally significant places and landscapes are supported and valued through appropriate Local Development Plan policies and allocations, and through the national planning policies contained in Planning Policy Wales. As the NDF is a strategic document, there will be some issues which, despite their high importance, will nevertheless be best dealt with at a local level. The relationship between national, regional and local scales will be reflected on further during NDF preparation.</p> <p>Table 3-2. The comments made will inform the next stage of work on the draft NDF.</p> <p>4.4.1 The NDF will support the delivery of Welsh Government policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes, this will include Biodiversity and Natural Resources.</p> <p>4.4.2 Protecting geodiversity and incorporating geological features in the design of development are important national planning principles established in Planning Policy Wales. As the NDF is a strategic document, there will be some issues which, despite their high importance, will nevertheless be best dealt with at a local level. These issues of scale will be reflected on further during NDF preparation.</p>
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		<p>between Culture & Heritage with Bio and Geodiversity and Natural Resources to be zero (Table B-1). This is because there are significant links between the management of our natural resources and our cultural heritage (e.g. National Parks, landscape paintings, poetry, place names, appreciation of wildlife, etc.). The industrial revolution and exploitation of mineral wealth (coal, slate, metals, stone etc.), and the distinctive culture of the Valleys, are all founded on geodiversity. This is recognised in the 'compatible' assessment of NDF Obj. 6 (Natural Resources, Circular economy and Flooding) and ISA Obj. 15 (Welsh Culture). However, it is not recognised in the 'no link' assessment of NDF Obj. 7 (Culture & Heritage) and ISA Obj. 16 and 17 (Bio- and Geodiversity, and Natural Resources respectively). In contrast, we note that in Table 3-2, Summary of Elements taken forward to the Preferred Option, under ISA Obj. 15, the role of the natural environment and landscape as a distinctive part of Welsh culture, is expressly acknowledged and included.</p> <p>2.2 NDF Objective 3 - City Regions & Growth Deals</p> <p>In comparison with the other objectives, it is striking how poorly NDF Obj. 3 (City regions and Growth Deals) performs in the ISA. Only one ISA objective is assessed as compatible (1, Economic Growth), four ISA objectives are assessed as incompatible (7 - Flood risk; 8 - Air quality; 9 - Water resources; and 16 – Bio and Geodiversity) and the remaining eleven ISA objectives are assessed as compatibility uncertain or dependent on implementation measures. We recommend that careful thought is given to how this NDF objective is developed and implemented to ensure more balanced benefits.</p> <p>2.3 NDF Objective 6.3 - Landscape</p> <p>We recommend that the NDF objective relating to landscape (6.3) should reflect the principle that all</p>	<p>4.5 The NDF will support the delivery of Welsh Government policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes, this will include Sustainable Management of Natural Resources.</p> <p>5.1.1. Nationally important ecosystems are to be defined through Natural Resources Wales's ecosystem services and opportunities mapping. This mapping relates to the principles of the Sustainable Management of Natural Resources which will be taken into account during preparation of the NDF..</p> <p>5.1.2 The use of a glossary will be considered for the draft NDF if terms are deemed to not already be well defined or used within existing Government policy and therefore require explanation.</p> <p>5.2 Comment noted. The changes to the Scoping Report as a result of the consultation have fed through to the later stages of the Integrated Sustainability Appraisal, as part of the iterative process.</p>
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		<p>landscapes matter. This principle originates from the European Landscape Convention. We therefore suggest the following change to NDF Obj. 6.3:</p> <p>From:</p> <ul style="list-style-type: none"> • To protect, promote and enhance nationally important landscapes, <p>To:</p> <ul style="list-style-type: none"> • To protect nationally important landscapes and to promote and enhance all landscapes <p>3. Comments on the Assessment of NDF Options (Consultation question 4b 'Do you have any comments on the assessment of the NDF Options as set out in the Integrated Sustainability Appraisal interim report...?')</p> <p>3.1 Assessment of Option 4 – A spatial strategy focussed on the sustainable management of Wales' natural resources</p> <p>Sustainable Management of Natural Resources (SMNR) is an integrated policy objective of Welsh Government designed to set out an approach to managing and using natural resources to ensure that the needs of both current and future generations can be met – whatever those needs are deemed to be. It is not an "either/ or".</p> <p>To illustrate this, we draw your attention to the measures of SMNR that Welsh Government have asked Natural Resources Wales to report on as part of the State of Natural Resources Report (SoNaRR). They are:</p> <ul style="list-style-type: none"> • Natural resources are not continuously declining and are not being used faster than they can be replenished; • The health and resilience of our ecosystems across the four attributes of ecosystem resilience is not being compromised and where there is a need, is being enhanced; • The supply of different ecosystem services is being optimised (for ecosystem resilience and supply of benefits for well-being); <p>The benefits derived from ecosystem services are</p>	
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		<p>being fairly and equitably distributed and the contribution they make to well-being (across all the wellbeing goals) is meeting our basic needs and is not declining now or in the long term. We therefore consider that there is no logic or reason to suggest that there is a national policy conflict between the Sustainable Management of Natural Resources and sustainable economic growth, or good quality, safe, affordable housing. If Option 4 were identified as 'Prioritising ecosystem restoration and resilience', then the negative assessment in relation to objectives 4 and 12 might be better substantiated, but as our bullets above show, SMNR is broader than that, and includes ecosystem services and equitable distribution of benefits derived from them. The economy is changing and facing new challenges, including Artificial Intelligence, automation, digitalisation, nanotechnology and 3-D printing. These new challenges require new ways of thinking to enable inclusive growth and maximise the potential of economic activity in Wales. The systems thinking that underpins SMNR is necessary to address challenges such as these and applies just as much to urban areas as to their hinterlands and the rural areas of Wales. Far from being a brake on the economy, or an optional extra, this sort of approach is essential to finding a way through the challenges the future will bring. It is our view that well-being is an inclusive concept, which can be described in terms of social, economic, environmental and social domains. It is not the case that, for example, 'economic well-being' can be traded off against 'environmental well-being' or 'social well-being'. We are not trying to argue that well-being depends on the extent, condition, connectivity and diversity of natural assets alone, rather that these are components which contribute to well-being overall.</p>	
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		<p>more clearly that the Preferred Option has been assessed as having negative effects on greenhouse gas emissions. Furthermore, we query why the recommendation that new road-building should include measures to mitigate long-term impacts (p.120) has not been incorporated at this stage.</p> <p>4.2.2 We note that although the Preferred Option is assessed as +/- with regard to climate change, three out of four Alternatives were assessed as + or ++ (only Option 1 was assessed as -). We query why there are no very positive effects recorded for the Preferred Option given the strong policy commitment for action on climate change, and the range of very positive aspects of the alternatives available for inclusion. It is not clear to us whether this is just to do with how mixed very positive and negative effects are recorded in the ISA matrices, or whether there is scope for bringing through more of the very positive aspects to the Preferred Option. We recommend that this is given further consideration.</p> <p>4.2.3 Greater clarity is needed about the position of the Preferred Option regarding road building. The expansion of the road network, as identified in AS5 ('National road network is identified. Improvements to existing and expansion of the national road network are identified'), and PE8 of the Preferred Option, is identified in the ISA as being the main reason for negative impacts on greenhouse gas emissions (p.120, Table D-1). However, in the final version of the Preferred Option, AS5 has been deleted, as it is included under PE8 (as stated on p123). The wording of PE8 does not specify support for expansion of the road network ('Nationally important roads, railways, ports and airports are identified. Proposals for new infrastructure investment including rail electrification, public transport hubs and metro schemes are identified.'). Clarification would be welcome as to whether the expansion of</p>	
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		<p>the road network is included, in which case it should be clearly and transparently stated.</p> <p>4.3 ISA Objective 13 – Landscape</p> <p>4.3.1 The assessment of the Preferred Option recorded a mix of positive and negative impacts on landscapes. We recommend more consideration of the wider landscape context, alongside protection and enhancement of the most important landscapes. We suggest taking forward to the Preferred Option the following point from Alternative 3: ‘...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.’</p> <p>We suggest the following additions to help increase positive impacts and reduce any adverse effects:</p> <p>Recognition that all landscapes matter, not just nationally important ones.</p> <p>Referring to Table 3-2, Summary of elements taken forward to the Preferred Option, we suggest the following could be added (new text suggestions in bold):</p> <ul style="list-style-type: none"> • ISA objective 2: 11th bullet point An increase in green spaces; quality and well-being functions • ISA objective 7: additional bullet point Developing a sustainable pattern of living and locational choices • ISA objective 8: additional bullet point Green Infrastructure within urban areas for air scrubbing • ISA objective 9: additional bullet point Water responsive urban design and integrated Suds • ISA objective 12: additional bullet point Ensuring widest range of well-being benefits and 	
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		<p>their spatial requirements are factored into site layouts at planning and design stages</p> <ul style="list-style-type: none"> • ISA objective 13: additional bullet point Sustainable planning and design that is responsive to its character, social and environmental context • ISA objective 14: 2nd bullet point Recognising the importance of historic landscapes, parks and gardens • ISA objective 16: additional bullet point Green Infrastructure planning within urban and peri-urban environments <p>4.4 ISA Objective 17 - Biodiversity and geodiversity</p> <p>4.4.1 Suggestions for strengthening Biodiversity in the Preferred Option</p> <p>We suggest there should be direct reference to the following in this section:</p> <ul style="list-style-type: none"> • the nationally Protected Sites series (SSSIs, SACs, SPAs and Ramsar sites); • the Environment Act Section 6 Duty and Section 7 Species and Habitats lists; and • Area Statements. <p>4.4.2 Suggestions for strengthening Geodiversity in the Preferred Option</p> <p>Whilst we welcome the consideration of geodiversity alongside biodiversity, there needs to be an appreciation of the differences between the two, and of how development can take geodiversity into account. Geodiversity is often important and apparent in urban areas, for example building stones, both local and imported, can have an important influence on the character of urban areas. Industrial sites, such as quarries and mines, can have important geodiversity features. Improving the road network can improve our knowledge and appreciation of geodiversity, if geologists are allowed access during construction, and the road design allows cuttings and exposures to be conserved and safely accessible following completion of the road.</p>	
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		<p>Whilst geodiversity is considered within UNESCO Geoparks, NNRs, SSSIs and RIGS, there are also opportunities to ensure an awareness of geodiversity in the wider landscape through planning decisions, for example the design of road cuttings, aftercare of quarries, etc.</p> <p>4.5 ISA Objective 17 - Natural Resources</p> <p>We note that the Preferred Option achieved a very positive score against ISA Objective 17 (Natural Resources). The detail of the commentary (p.126) however indicates a degree of uncertainty ('could help...', 'could lead to...'). It is important that as the NDF develops close attention is paid to ensure that the possible benefits are realised. See also our comments on transition to a circular and low resource use economy in 2.1.2 of this Annex.</p> <p>5 Other comments</p> <p>5.1 Consistency with relevant plans and policies</p> <p>5.1.1 The NDF appears to refer to a new concept which has not previously been identified in the Natural Resources Policy, namely 'nationally important ecosystems' (in DN4 on p.24). Clarification on what these are and how they will be identified would be welcome.</p> <p>5.1.2 It is also important to be clear on the definition of terms to avoid the potential for any confusion. DN3 (p. 24) refers to 'nationally important landscapes, seascapes, nature conservation sites and habitats'. We recommend that these are clearly defined within the NDF and ISA.</p> <p>5.2 Responses to Scoping consultation report</p> <p>We welcome the transparent way in which comments received on the ISA Scoping Report have been documented and considered, with the response to each point set out in comprehensive tables in the Consultation – Summary of Responses Report. We note however that many of these changes relate to the Scoping Report itself, and it is not always clear what impact these</p>	
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			changes to the scope of the ISA have had on the draft NDF and the ISA of the Alternative and Preferred Options.	
41	Individual	Yes	In general I support the consultation response submitted by Calon Cymru Network. As such I am not filling in the rest of the boxes except for Q5a, where there is an added note.	Noted.
42	Glandwr Cymru, the Canal and Rivers Trust in Wales	Did Not Answer	No Comment	
43	The Coal Authority	No	No Comment	
44	Theatres Trust	No	No Comment	
45	Older People's Commissioner for Wales	Did Not Complete Form	No Comment	
46	Sustrans Cymru	No	No Comment	
47	Minerals Products Association	Did Not Complete Form	No Comment	
48	Carmarthenshire County Council	No	No Comment	
49	Nuclear Decommissioning Authority c/o GVA	No	No Comment	
50	World Wildlife Fund Cymru	Did Not Complete Form	Section 4.2 (Recommendations) of the ISA states that the "although strong positive effects are 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." This is expanded upon on page 126 of the ISA which highlights that improvements could be made by ensuring "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	<p>These comments are noted and will inform the draft NDF which will include a greater level of detail on policies and projects.</p> <p>The NDF will support the delivery of Welsh Government policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes, this will include the National Natural Resources Policy and Sustainable Management of Natural Resources. The consultation comments and Integrated Sustainability Appraisal outcomes will feed into the draft NDF.</p> <p>The infographic reflects the integrated impact assessments that are being undertaken for the NDF,</p>

			<p>strengthen". While this should be done, the results of this appraisal suggest that, as a whole, the NDF does not sufficiently integrate the environmental pillar of sustainability and instead is focused towards maximising social and economic outcomes.</p> <p>It appears that in several circumstances the NDF's preferred option is of the view that interventions which lead to social and economic benefits are to be enacted throughout all of Wales, while those which benefit the environment are to be limited to a small number of specific sites. This risks undermining coherent networks of ecological systems and thus threaten wider biodiversity and the resilience of our natural resources. In short, it appears that the NDF does not take all reasonable steps to implement the national Natural Resources Policy, and thereby does not fulfil the purpose of the SMNR as defined by Section 3 of the Environment (Wales) Act 2016 (EWA).</p> <p>Finally, the consultant provided infographic (consultation page 10) under the Integrated Impact Assessment section does not appear to include SMNR. Given the interconnected nature of the EWA and the 'A Resilient Wales' Goal it is important that SMNR is included here to demonstrate integration.</p>	<p>both statutory and non statutory. The 'environmental' section on this represents the various impact assessments that are required to be undertaken, such as the Strategic Environmental Assessment and Habitats Regulations Assessment. It also includes any other environmental statutory requirements, such as those covered by the Environment (Wales) Act. These requirements have and will continue to be addressed during NDF preparation.</p>
51	Swansea Council	Did Not Answer	<p>The ISA is comprehensive and very detailed, and it is welcomed by the Council. The process demonstrates how the issues have been incorporated into the Integrated Sustainability Appraisal (ISA) and how the Well-being of Future Generations Act sits at the core of the process. The ways of working are also addressed i.e. integration and prevention - the tool itself, involvement - the stakeholder events and the consultation process. It would have been useful to have seen the breath of the stakeholders involved to understand how the diversity of the population has participated in the development of the</p>	<p>The Integrated Sustainability Appraisal Scoping Report establishes the environmental baseline and the likely evolution of this baseline without the implementation of the NDF. This has fed through to the Integrated Sustainability Appraisal Framework, against which all policies and proposals for inclusion in the NDF are assessed. Where the Integrated Sustainability Appraisal identifies and addresses potential positive and negative impacts of the NDF, it can be seen as being in-comparison to the likely evolution of the baseline, having regard to future trends. It is also a requirement of the Strategic Environmental Assessment (SEA) Directive, with SEA forming part of the NDF evidence base, to</p>

		<p>Framework to date, e.g. children and young people / a children's rights approach?</p> <p>Regarding the long term way of working, the Council welcomes the 20 year approach to the long term taken in the ISA, however there does seem to be a gap in the assessment around future trends and their impact on the preferred option / the framework. Whilst there is some inclusion of the future trends outlined in the Welsh Government Future Trends Report in the April ISA Scoping Report it does not seem to have translated across into the interim ISA. For example in Appendix C, the appraisal of alternative and preferred options – What would Wales in 2040 look like - does the forecasting section take into consideration the potential impacts of future trends and potential intervention points, or is the forecast based on the 'as is' picture?</p> <p>If the preferred option has not been tested against future trends it is suggested that this would be a useful exercise as the framework is developed, the questions asked in the Future Commissioner Office's Future Generations Framework for Projects for example would offer a good test:</p> <ul style="list-style-type: none"> • How do these trends affect your project, and what impact could your project have on these trends? • How does your project mitigate, facilitate or make the most of these trends? • How can you embrace long-term opportunities, recognising potential short-term needs? <p>The Council welcomes the breath of environmental issues addressed in the ISA objectives and the broad focus the ISA places on the economy, moving away for traditional targeted economic benefits to a broader more inclusive, diverse and innovative focus on a range of growth and investment opportunities i.e. city deals, decarbonisation, travel / transport and renewable energy, allowing for a more diverse, resilient and</p>	<p>identify whether effects are short, medium or long term, as well as their permanence and reversibility. This will be seen more clearly in the next stage of the Integrated Sustainability Appraisal.</p> <p>The ways of working have shaped the way we have worked on the NDF, including engagement. Details of the engagement undertaken on the NDF to date can be found here: https://gwedddill.gov.wales/topics/planning/national-development-framework-for-wales/getting-involved/?lang=en We have engaged with children and young people on the NDF and will continue to do so during forthcoming stages of its preparation. The Integrated Sustainability Appraisal documents contain the methodology for impact assessments undertaken on the NDF, which includes Children's Rights Impact Assessment.</p> <p>The Welsh Language (Wales) Measure 2011 and the Environment (Wales) 2017 Act are included within the review of plans, policies and programmes and have informed the Integrated Sustainability Appraisal Framework.</p> <p>The comments are noted on Objective 1, this does address skills alongside the economic development objectives within the framework.</p>
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			<p>sustainable economic future which can support and capitalise on regional skills and specialisms. Due to the importance of natural environment to planning and planning to the natural environment it is assumed that the requirements of the Environment Act were considered as part of the scoping process as suggested in the Figure 1.2 it would be useful if this could be made more explicit along with other relevant legislation i.e. Welsh Language Measure.</p> <p>In contrast, ISA Objective 1 is rather specific and could have been made more inclusive by not only focusing on education attainment but on skills and achievement which is a more useful measure of success in the development of an ambitious, confident, skilled and successful society.</p>	
52	Newport City Council	No	There is little to comment on at this stage. Once more detail emerges on more specific policies or schemes, the ISA will have more meaningful information to consider.	Noted.
53	Cylch yr Iaith	Did Not Complete Form	No Comment	
54	Monmouthshire County Council	Did Not Complete Form	No Comment	
55	c/o Lichfields	No	No comment.	
56	Welsh Local Government Association	Yes	<p>Whilst the integrated sustainability appraisal is complex it is useful to understand the impacts across a range of issues and to set out the rationale for the preferred option. The evidence for the range of impacts and their scale are difficult to determine given the broad strategic nature of the current iteration of the document.</p> <p>One aspect that is concerning is the lack of positive impact around biodiversity. Clearly it is difficult to assess this as much depends on the actual development that comes forward but a</p>	The comments are noted and the positive role around biodiversity and green infrastructure will be addressed in more detail in the draft NDF.

			greater focus on green infrastructure and the role that plays in place making may be required.	
57	Inland Waterways Association (IWA)	No	No Comment	
58	Penarth Town Council	Yes	<p>The Town and Community Council (CTC) Sector's central interest stems from representing communities at a grassroots level.</p> <p>The Cabinet Secretary notes in the introduction to this Consultation the need to work across Government policy areas, whilst highlighting the importance of 'Prosperity for All' with regards to Planning in the overall National Strategy.</p> <p>Land Use Planning at this National level is particularly difficult both conceptually and operationally, depending on the nature of the content identified. It needs to be supported by commitment to - and embedded in - potential legislative change and policy covering local economies. This could include future tax potential/revenues generated locally and potential governance arrangements, amongst other things. This is briefly mentioned in Prosperity for All.</p> <p>Local Government Reform and the nature of governance is one obvious issue not covered here. As is evident from this Consultation and the earlier Planning Policy Wales (PPW) Consultation, reliance is placed on community mechanisms such as identity and community cohesion. Any evaluation or assessment or future work should consider this.</p> <p>Whilst none of the Options are obvious Aunt Sally's, Option 1 and the treatment of markets might be considered too simple; it does not confront recent discussions on agglomeration economics, urban theory or mitigations argued by proponents of markets. The others follow the</p>	<p>These comments are noted and will inform the draft NDF which will include a greater level of detail on policies and projects.</p> <p>The NDF will be a statutory land use development plan which will support delivery of national targets and objectives. It will not cover all aspects of the planning system, including policy matters which are best determined at a local level. It is not the intention for the NDF to repeat policies already contained in PPW</p> <p>The National Strategy – Prosperity for All – sets out the Welsh Government's intention to introduce a new regionally focussed approach. The Economic Action Plan takes this forward and identifies 3 regions. This regional footprint will be the basis for a range of Welsh Government policy and, in order to develop a consistent and joined-up cross government approach to policy development and implementation, it is important that there are common spatial areas. Ministers have introduced Chief Regional Officers for each region to support this policy development and implementation. Comments on the different options are again noted. The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF.</p>

			<p>imperatives of more specific agendas are obvious positives but cannot stand alone.</p> <p>In relation to the commitment to Community Cohesion etc., the ISA states that “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”. See Q 3a</p> <p>In general some, spatial illustration and context would help given that you are proposing regional arrangements. The underlying principles and functional relations used in this Regionalisation scheme are not covered in any detail, in contrast to the existing Wales Spatial Plan where questions of regional identity and functionality were argued at length.</p> <p>The high-level nature of the assessment and narrative form make it difficult to assess, in particular how conclusions have been reached between the assessment of different options.</p>	
59	Campaign for National Parks	Yes	<p>We strongly support the use of rural proofing as part of the Integrated Impact Assessment approach set out on page 10 of the consultation document. We would expect the implications of this to be explained more fully as further progress is made on the development of the NDF. It will also be essential that further stages of assessment take account of the specific context which applies in designated landscapes, including the additional planning protections which apply in these areas.</p>	<p>Comments are noted and the Rural Proofing Assessment will continue to be undertaken as part of the Integrated Sustainability Appraisal and set out at the next stage of reporting. Existing designations including landscapes feed into the Sustainability Appraisal process. Such designations will be fully taken into account during the process of determining policies and proposals to include in the NDF.</p>

60	Care and Repair Cymru	Did Not Complete Form	<p>We are pleased to respond to the emerging National Development Framework and the Vision, Objectives and the Preferred Option contained within it in the context of creating a Wales where all older people can live independently in safe, warm, accessible homes. We also welcome the opportunity to contribute towards the development of the NDF by outlining several Key points without which we feel Welsh Government is unlikely to achieve its housing and health targets.</p> <p>We are happy to see that Welsh Government has recognised the need for good quality housing as the “bedrock of communities and form the basis for individuals and families to flourish in all aspects of their lives”. The home is the starting point for good physical and mental health and we are delighted that is reflected in the policies developed by Welsh Government in Taking Wales Forward, Prosperity for All and in A Healthier Wales. We are also fully supportive of the renewed emphasis on the preventative agenda and throughout our activities and services support this agenda in several ways. For example, through our Rapid Response Adaptations Programme, our extensive work on the preventing falls agenda, delivering a bespoke, tailored service that provides advice, assistance, benefits advice and income generation, energy advice as well as practical works including aids, adaptations, larger building works and project management.</p> <p>Taking Wales Forward, Prosperity for All and subsequently A Healthier Wales all recognise and highlight that investing in the quality and quantity of homes has significant impact on health and reduces pressure on other public services. Government policy also stresses the importance of working with a wide range of partners and sectors to be able to deliver its objectives.</p>	The comments are noted. Engagement with stakeholders on the NDF will continue during its preparation.
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61	Community Housing Cymru	No	No Comment	
62	Innogy Renewables UK Ltd	No	No Comment	
63	Planning Aid Wales	No	No Comment	
64	One Voice Wales	Yes	<p>The Community and Town Council (CTC) Sector's central interest will be as a consequence of representing communities defined legally and with responsibilities as Local Authorities with a grass roots representational role.</p> <p>The Cabinet Secretary in the introduction to this Consultation, notes the need to work across Government policy areas whilst highlighting the importance of Planning in the overall National Strategy -Prosperity for All.</p> <p>Land Use Planning at this National level is particularly difficult both conceptually and depending on the nature of the content identified operationally. It needs to be supported by commitment to and embedded in parallel potential legislative change and policy covering local economies - future tax potential/revenues generated locally and potential governance arrangements, amongst other things. This is briefly mentioned in Prosperity for All.</p> <p>Local Government Reform and the nature of governance is one obvious issue not covered here. As is evident from this Consultation and the earlier Planning Policy Wales(PPW) Consultation, reliance is placed on community mechanisms - identity and community cohesion. Any evaluation or assessment or future work should have regard to this.</p> <p>Whilst none of the Options are obvious Aunt Sally's, Option 1 and the treatment of markets might be considered too simple, does not confront recent discussion on agglomeration economics or urban theory and mitigations argued by proponents of markets. The others follow the imperatives of more specific agendas are obvious</p>	<p>These comments are noted and will inform the draft NDF which will include a greater level of detail on policies and projects.</p> <p>The NDF will be a statutory land use development plan which will support delivery of national targets and objectives. It will not cover all aspects of the planning system, including policy matters which are best determined at a local level. It is not the intention for the NDF to repeat policies already contained in PPW.</p> <p>The National Strategy – Prosperity for All – sets out the Welsh Government's intention to introduce a new regionally focussed approach. The Economic Action Plan takes this forward and identifies 3 regions. This regional footprint will be the basis for a range of Welsh Government policy and, in order to develop a consistent and joined-up cross government approach to policy development and implementation, it is important that there are common spatial areas. Ministers have introduced Chief Regional Officers for each region to support this policy development and implementation.</p> <p>Comments on the different options are again noted. The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF.</p>

			<p>positives but which cannot stand alone.</p> <p>The ISA states in relation to the commitment to Community Cohesion etc that “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 ‘Place-making’ 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”. See Q 3a</p> <p>In general some, spatial illustration and context would help particularly as you are proposing regional arrangements. The underlying principles and functional relations used in this Regionalisation scheme are not covered in any detail, in contrast to the existing Wales Spatial Plan where questions of regional identity and functionality were argued at length.</p> <p>The high-level nature of the assessment and narrative form make it difficult to assess, in particular how conclusions have been reached between the assessment of different options.</p>	
65	Geoconservation Cymru	Yes	<p>The NDF completely misses the opportunity to embed, once and for all, geodiversity and geoconservation in the relevant sections covering biodiversity, bioconservation, landscape, soils etc. at the Nationally and regionally/locally important scales.</p> <p>Every one of these elements, and others identified below, has a strong – and sometimes controlling – underpinning in the underlying and surface geology of Wales, and hence its geodiversity and geological resources and services.</p> <p>We have made these representations in several recent Welsh Government Consultations, with UK and internationally accepted definition and pedigree, regarding it as essential that the full range of natural environment indicators and</p>	<p>Integrated Sustainability Appraisal Objective 16 is “To create opportunities for the conservation and enhancement of biodiversity and geodiversity” in recognition of geodiversity’s importance for climate and biodiversity, as well as other factors of sustainable development.</p> <p>Protecting geodiversity and incorporating geological features in the design of development are important national planning principles established in Planning Policy Wales. As the NDF is a strategic document, there will be some issues which, despite their high importance, will nevertheless be best dealt with at a local level. These issues of scale will be reflected on further as part of the NDF process.</p>

		<p>processes are understood by all those who will apply the NDF in future.</p> <p>The following short list of examples of opportunities lost are taken from your own documents, and sequencing of environmental elements and principles:-</p> <p>Foreword, NDF Consultation Document</p> <p>“There is greater recognition now more than ever of the importance of joined-up and strategic thinking....By planning our infrastructure and development together, we can ensure that they complement rather than compete against each other....”</p> <p>3. NDF Objectives, p 13 of the NDF Consultation Document – with our proposed inserts underlined</p> <p>6.1 To strengthen the resilience of biodiversity and geodiversity assets, including habitats, species, and designated sites</p> <p>The principle of geodiversity inclusion here would then run through “...sustainable management of our natural resources and facilitate nature recovery” (6.2), “nationally important landscapes.” (6.3) and other elements of 6.4 – 6.7, and “To promote, protect and enhance national cultural and historic assets.” and many other elements of the overall IPA, including Climate Change, Rural Proofing and Health – and individual themes in Section F : Natural Resources</p> <p>As well as playing a vital role in the biodiversity, habitats, landscapes, history, and cultures (including both agricultural and industrial) of Wales, a public understanding and appreciation of the role of geodiversity educates us to key aspects of sustainable development and public health and well-being.</p> <p>Geodiversity is also the source of our global understanding of climate change, not only in the past but active geological processes – through their very sensitivity - also act as a key warning of the nature and rate of current climate change.</p>	
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			<p>On all of the above counts, we therefore consider it essential that the importance of geology and diversity is recognised fully in the NDF (and all other relevant areas of policy in Wales). This can be achieved initially by the relatively simple task of inserting these terms in key parts of the NDF where bio- is also cited.</p> <p>Not to do so undermines the holistic, joined-up totality of sustainable development you seek to achieve, and ignores the scientific expertise, value, spirit and purpose not only of Geoconservation Cymru – Wales but also GeoconservationUK, the British Geological Survey, Natural Resources Wales and a wider range of statutory and voluntary UK and international agencies.</p>	
66	Dyfodol I'r iaith	Yes	<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>We are pleased that the Interim Report now recognises the Government's aim to create one million Welsh speakers by 2050. It should be noted, however, that it requires much more than just recognition, and the appraisal tool will have to act in practice to contribute proactively towards this goal. We will expand on this below, but I would like to emphasize from the outset that there is a need for a much more robust policy and guidance framework for the Welsh language in the planning field if the Integrated Sustainability Appraisal will achieve a well-being goal for the Welsh language.</p> <p>Although the objectives are welcomed, Welsh must penetrate through each step and be considered as more than individual consideration - the impact of this, as reflected in the Planning Policy, is to turn Welsh into consideration marginal. Taking into account the tangible weaknesses of the TAN 20 and the lack of guidance on how to consider the Welsh language</p>	<p>The Welsh language will be an integral consideration in developing the full NDF, in accordance with legislation and planning policy.</p> <p>Many of the matters raised relate to Planning Policy Wales and TAN 20. The role of the NDF is to sit alongside Planning Policy Wales and set spatial planning policy, therefore it is not the right platform for some of the suggestions made in this representation.</p>

		<p>through all levels of planning regime, we cannot see how the Appraisal can give true consideration to the Welsh language without its holistic support. I would have more emphasis on local input as outlined in Option 2, and we will press on that preferred option to consider further how to incorporate these elements.</p> <p>To be clear, if the Appraisal wants to support the Welsh language, we will argue that, as a minimum, we need:</p> <ul style="list-style-type: none"> • Planning Policy that requires relevant and appropriate consideration to the Welsh language in relation to individual planning applications. • A TAN 20 which provides better guidance on how to consider Welsh, with a standardised and recognised methodology of how to consider implications for the Welsh language. • to consider and determine Areas of Linguistic Sensitivity. There is no doubt that development (housing, jobs, shops etc) in Welsh-speaking communities causes adverse effects on the balance and use of the language in them. The document should identify the similarities and advise planning authorities to take steps to protect and promote the language in Welsh speaking communities (ie where more than 25% speak the language). • to establish a Statutory Consultee to protect the interests of the Welsh language, as it currently exists in relation to environmental issues and monuments. <p>Rydym yn falch bod yr Adroddiad Interim bellach yn cydnabod nod y Llywodraeth i greu miliwn o siaradwyr Cymraeg erbyn 2050. Dylid nodi fodd bynnag, bod angen llawer mwy na chydabyddiaeth yn unig, a bydd rhaid i'r teclyn Arfarniad weithredu'n ymarferol i gyfrannu'n rhagweithiol tuag at y nod hwn. Byddwn yn</p>	
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			<p>hybu'r iaith mewn cymunedau Cymraeg (hy ble mae dros 25% yn siarad yr iaith).'</p> <ul style="list-style-type: none"> Sefydlu Ymgynghorai Statudol i warchod buddiannau'r Gymraeg, fel sy'n bodoli ar hyn o bryd mewn perthynas â materion amgylcheddol a henebion 	
67	Campaign for the Protection of Rural Wales	Yes	<p>ISA Report</p> <p>The ISA Report is commissioned to make sure that the principles of sustainability are embedded in all aspects of the NDF. It is mainly about scoping and methodology. This is understandable and necessary, but its position as Question 1a confuses the issue and deflects attention from the meat of the Consultation. With a suitable initial footnote and a one or two-line summary, it (and the HRA text as covered by Question 1b) would have been better located as final appended items thus leaving the present set of Questions from 2 onwards as the meat of the Consultation.</p> <p>It is nevertheless in danger of limiting the scope of the NDF to matters of national significance using the criteria of existing designations. It does not provide any indication of how lower-tier locally significant areas, or more comprehensive spatial aspects reflecting both tiers, would be considered. This therefore raises concerns that that there will be no strategic land use policy elsewhere, with abrupt and ill-informed policy changes at the often-arbitrary cliff-edge border of the national designations. There is a real danger that areas which are not nationally designated will be ill-considered or ignored. Worse still, there is an implicit assumption that this exercise should only be concerned with high-grade, important, or 'the best' areas, with no recognition of the role or the potential of those lower down the order, which need policies to enhance them and to enable them to play a fuller role. As a result, there could</p>	<p>Whilst comments made regarding the format of the consultation questions are noted, it is considered all questions and supporting information provided as part of the consultation gave stakeholders the opportunity to fully consider the issues and provide their comments at this stage of the NDF process.</p> <p>The NDF will be a statutory land use development plan which will support delivery of national targets and objectives. As the NDF is a strategic document, there will be some issues which, despite their high importance, will nevertheless be best dealt with at a local level. The relationship between national, regional and local scales will be reflected on further as part of the NDF process.</p> <p>Habitats Regulations Assessment is concerned with likely significant effects on Special Protection Areas, Special Areas of Conservation and Ramsar sites. It is important that all effects on the sites are considered within the holistic theme of sustainable development and they are therefore scoped into the Integrated Sustainability Appraisal.</p> <p>The protection of national landscapes will be reflected through the NDF's policies and proposals, but it is to be recognised landscape national planning policy is already covered in Planning Policy Wales (PPW). It is not the intention for the NDF to repeat policies already contained in PPW. Locally significant places and landscapes are supported and valued in national planning policy which should be reflected at a local level by appropriate Local Development Plan policies and allocations.</p>

		<p>be no such thing as a spatially cogent national development framework.</p> <p>Habitat Sites At p6 the ISA report confusingly scopes in these nationally important sites: yet they are considered (again) specifically in the HRA report covered by Question 1b of the Consultation. Comments are therefore only made there.</p> <p>Landscape The conservation, enhancement, and understanding of landscape is the key activity and raison d'être of CPRW which this year (2018) celebrates its 90th anniversary. While national landscape designations may be said to have 'cherry-picked' some of the country's finest areas, it is a generally recognised principle that 'all landscapes matter', as articulated most completely in the Preamble to the European Landscape Convention. Consequently, it is impossible and unhelpful to consider this topic at all in an NDF without such a spatially comprehensive approach and a parallel and informed consideration of the land uses which form and help maintain our landscapes.</p> <p>On p10 under the heading 'Appraisal of NDF Objectives' the ISA Report claims it has 'strengthened consideration of landscape' (NDF objective 6). Where is the evidence? Where is the detail? Then in 6.3 p11 we find this refers to Nationally Important Landscapes only; locally special landscapes are not included, and the comprehensive approach described above is not even on the agenda.</p> <p>ISA Framework Appendix A – omissions This Appendix consists of a series of tables setting out 'decision aiding questions' which the NDF should address. The final Table on p37</p>	<p>At the current level of detail, it is not possible to assess the likely impacts of the NDF on sustainable soil management, peatland or the development of brownfield land. Subsequent stages of the Integrated Sustainability Appraisal will assess these considerations in more detail where appropriate, with appropriate avoidance or mitigation measures recommended where necessary.</p> <p>.</p>
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			<p>includes three key items namely, 'Does the NDF create opportunities ... ? ... within which soil quality can be maintained and/or enhanced? ... to protect peatland? ... to develop brownfield land where this is sustainable?</p> <p>As explained here in answer to Question 3a below, none of these important issues is dealt with satisfactorily, and the word 'peat' is never even used in the body of the NDF.</p>	
68	Royal Society for the Protection of Birds	Yes	<p>Application of the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.</p> <p>From an environmental perspective, the European Directives for the environment provide the greatest assurance we have that safeguarding the natural environment is properly accounted for in decision making around development and many of our comments focus on how their requirements for plan assessment have been applied.</p> <p>The lack of rigour applied to the SEA Regulations undermines our confidence in the findings reported in the Interim Integrated Sustainability Appraisal (ISA) Report. Unless significant improvements are made, the approach being taken risks failure to comply with the SEA Regulations.</p> <p>As the elements of the Environmental Report ("ER"), required by the SEA Regulations, are not easily discernible from the ISA Report, we would like to see a composite ER appended to each future iteration of the ISA.</p> <p>It is not clear how the preferred option aligns with the Natural Resources Policy and how it will contribute to SMNR. This is disappointing because of the NDF must explain how, in preparing the Framework, the Welsh Ministers have taken into account relevant policies set out in the national natural resources policy published</p>	<p>Further to this consultation, a meeting took place with the RSPB during which it was demonstrated and agreed that the Interim Integrated Sustainability Appraisal Report was not intended to be a detailed policy appraisal and formed a non-statutory interim appraisal process. The Integrated Sustainability Appraisal Report (incorporating Environmental Report) will incorporate the requirements of an Environmental Report that satisfies the Strategic Environmental Assessment Directive.</p> <p>Following this meeting, engagement on the structure of the Integrated Sustainability Appraisal Report, which will report on the appraisal of the draft NDF, has been undertaken. This will ensure that all of the legal requirements will be demonstrated in a way that is clearly understood. A separate Environmental Report will not be necessary. The Integrated Sustainability Appraisal Report will include full consideration of environmental issues, and it will fully take into account the National Natural Resources Policy and Sustainable Management of Natural Resources. The NDF will therefore, in turn, support the delivery of national strategies on the natural resources of Wales. Area Statements are not yet finalised. When available, they will be considered within the Integrated Sustainability Appraisal as part of the iterative process. Consultation and engagement on the Integrated Sustainability Appraisal, to ensure a full consideration of all issues required to inform the NDF, will continue as the NDF is progressed.</p>

		<p>under section 9 of the Environment (Wales) Act 2016 (3 Environment (Wales) Act 2016, Schedule 2 (8) (2).).</p> <p>A composite ER will help to demonstrate the NDF's delivery of SMNR and how it has been influenced by the NRP.</p> <p>We note the Integrated Sustainability Appraisal is an iterative (repetitious) process. However, the current consultation seeks comment only on the 'Interim ISA report'. Each of the ISA documents must form part of future consultations.</p> <p>We also note that the 'Strategic Environmental Assessment' has been integrated within the Sustainability Appraisal. We would like to see more rigour applied to the SEA Regulations (The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.) and feel this would provide an opportunity for you to demonstrate the plan's application of the sustainable management of natural resources (SMNR). There is no mention of 'Environmental Assessment' in the ISA integrated appraisal figure 1-1 (within the grey ring).</p> <p>As the elements of the 'Environmental Report', required by the SEA Regulations, are not easily discernible from the ISA interim report, we would like to see composite 'Environmental Report' appended to each future iteration of the ISA.</p> <p>Although not subject of the current consultation, Appendix B of the ISA scoping report identifies baseline data and key issues and opportunities relating to biodiversity, flora and fauna (section 3.1.2). Although some data sources are cited, detailed references are not provided. It is inconceivable that no significant data gaps have been identified for this topic. This section should draw from sources such as NRW's SoNaRR, Protected Sites and Species Monitoring Reports and emerging Area Statements.</p> <p>Furthermore, there is no reference to the intrinsic</p>	
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		<p>value of biodiversity within this issues section and the opportunities identified do not follow the spirit of the recent consultation on PPW v10 (e.g. on biodiversity benefits or 'net gain') or of the Habitats Regulations (Regulation 41. The Conservation of Habitats and Species Regulations 2017) which enable development plan policies to encourage:</p> <p>'the management of features of the landscape which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems of marking field boundaries) or their function as "stepping stones" (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.'</p> <p>This Regulation is also omitted from Appendix A of the ISA scoping report which fails to provide clarity on NDF's legal and policy context. The Natural Resources Policy prioritises nature based solutions, including ecologically resilient networks, which such policies would complement.</p> <p>Furthermore, it is a requirement for the Welsh Ministers to explain how, in preparing the NDF, they have taken into account relevant policies set out in the national natural resources policy published under section 9 of the Environment (Wales) Act 2016 (Environment (Wales) Act 2016, Schedule 2 (8) (2)).</p> <p>Identifying the NDF's interaction with environmental protection objectives and other plans, policies and programmes is an essential element of an 'Environmental Report'. The Environmental Report must include:</p> <ul style="list-style-type: none"> • An outline of the contents and main objectives of the plan or programme, and of its relationship (if any) with other relevant plans and programmes. • 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 	
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		<p>taken into account during its preparation. Unless significant improvements are made, the approach being taken risks compliance with the SEA Regulations.</p> <p>As the context, baseline, issues and opportunities are not appropriately defined, the Interim ISA Report does not provide a credible assessment of alternatives. Sources of information relating to each 'decision aiding question' are unclear meaning the assessment results cannot meaningfully be evaluated. We provide examples later in response to more specific questions on the assessment findings (see response to question 4b).</p> <p>The lack of prominence given to priority species and habitats within the Sustainability Objectives of the ISA is also of concern, especially because of Welsh Ministers' duties towards them under s7 (and all public bodies' duties under s6) of the Environment (Wales) Act 2016 and opportunities to achieve this through the SEA Regulations. We question why, given the Welsh Ministers Duty, s7 species, habitats and assemblages are not a focus for the plan's environmental assessment methodology?</p> <p>The level of detail provided in the options is not sufficient for a rigorous assessment at this stage and suggest further assessment of the options when this detail is available (e.g. para. 3.1.3 of the HRA explains: "Given the very high-level nature of these options, formal HRA screening was not undertaken at this stage...However, given the lack of spatial detail within the options, the assessment could not provide any firm conclusions.").</p> <p>The lack of rigour applied to the SEA Regulations undermines confidence in the findings reported in the Interim Integrated Sustainability Appraisal (ISA) Report.</p> <p>The methodology should be improved and, given the very high-level nature of the options, once</p>	
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			more detail is available on them, the options appraisal should be revisited. We would welcome further involvement to help refine, and integrate with the assessment processes 'Issue F. Natural Resources – Sustainable Management of Natural Resources (SMNR) - Wales Today & Drivers of Change'.	
69	Neath Port Talbot County Borough Council	No	No Comment	
70	Redrow Homes (South Wales) Ltd	Did Not Answer	No Comment	
71	EDF Energy	No	EDF Energy has no comment on these question	Noted.
72	National Museum for Wales	Did Not Complete Form	No Comment	
73	Friends of the Earth	Yes	The SEA process is a stronger, clearer process than Sustainability Appraisal. Keeping the SEA process distinctly marked in the ISA would help to ensure that it is transparent that the requirement of SEA have been met, and the environmental impacts of options properly assessed.	The Integrated Sustainability Appraisal incorporates the requirements of both Strategic Environmental Assessment and Sustainability Appraisal and can be seen to provide the benefits of both in one report.
74	Coriolis Energy	No	No Comment	
75	Vattenfall Wind Power Ltd	Did Not Answer	No Comment	
76	Home Builders Federation	No	No Comment	
77	Promoters of St Brides New Settlement Opportunity	Did Not Answer	No Comment	
78	Future Generations Commissioner	Yes	My team will continue to engage with the Welsh Government to ensure that the work on the NDF including the Integrated Sustainability Appraisal delivers the Well-being of Future Generations Act to the fullest extent. I note that a real effort has been made to use the Act in this work. I also recognise the involvement	The comments on the work undertaken to date to integrate the NDF with the Well-being of Future Generations Act are noted and welcomed. The Welsh Government will continue to liaise with officials from the Well-being of Future Generations Commissioners office on the NDF as it is progressed.

		<p>work which has been carried out in the formulation of this document and the ISA work which is well demonstrated in ISA Interim Report. In relation to the integration of impact assessments, work is being undertaken in Welsh Government to develop an integrated impact assessment and this should be considered here. The integrated assessment should clearly outline how the proposals contribute to the seven well-being goals. It is important to note that this should be considered at the beginning of the process to develop proposals which maximise their contribution to the seven wellbeing goals and apply the five ways of working as well as considering the potential impacts of preferred options.</p> <p>I welcome the mapping of the NDF objectives against the goals' titles in the ISA Interim report (Table A-1 ISA Framework) but I believe that using the goals descriptors in the Act should have helped framed the questions so that they are closer to the statutory definition of the goals. It is important that the NDF aligns to the new concept of well-being the Act requires public bodies to achieve. This would ensure that the assessment work does not use more traditional concepts under the goals titles for example in relation to the economy – the definition in the Act is a much wider one of prosperity.</p> <p>In addition to this, the main future trends affecting Wales (included in the Future Trends report) should have been one of the core elements of the assumptions used in the ISA Appraisal of the Alternative Options. I hope that this will be included clearly in the next steps of the work.</p> <p>Finally, the consultation document (p.13-14) and the ISA Interim Report (Table A-1 p.30) refer to different objectives. They highlight different elements which proves quite confusing and varies in the scope of the implementation of the Well-being of Future Generations Act. For example, the</p>	<p>The Integrated Sustainability Appraisal for the NDF preceded the wider Welsh Government integrated impact assessment work but generally reflects the approach in this process; bringing together the range of impact assessment duties in a coherent framework, reducing complexity and duplication.</p> <p>The Integrated Sustainability Appraisal was started early on in the NDF process and has informed all of the stages to date. It has been shaped by the five ways of working which have and will continue to be explained in the reports at each stage.</p> <p>The Integrated Sustainability Appraisal Framework reflects the Well-being goals and ensures the NDF maximises its contribution to them. The Scoping report, based on the plans, policies and programmes review, environmental baseline, likely evolution of this baseline and the key sustainability issues presents the Integrated Sustainability Appraisal Framework. Within these, future trends in Wales are addressed and fed through to the Integrated Sustainability Appraisal Framework.</p> <p>The Integrated Sustainability Appraisal Framework is comprised of 17 Integrated Sustainability Appraisal Objectives. Each proposal in the NDF will be assessed for its likely impacts on each of the Integrated Sustainability Appraisal Objectives.</p> <p>The NDF Issues and Options Objectives were appraised within the Interim Integrated Sustainability Appraisal Report for their compatibility with each Integrated Sustainability Appraisal Objective, the results of which are in Appendix B of the Interim Integrated Sustainability Appraisal Report.</p>
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			<p>section 2 of the ISA Interim Report refers to 17 ISA Objectives but the consultation document lists 27 NDF Objectives.</p> <p>Clarification on the correlation between the two sets of objectives would be welcomed to guide our comments.</p>	
79	Taylor Wimpey South Wales	No	No Comment	
80	Ceredigion, Powys CC Growing Mid Wales Partnership	Yes	<p>The integrated nature of the Integrated Sustainability Appraisal (ISA) is supported.</p> <p>The environmental, biodiversity and geodiversity weaknesses identified in Table 4.1 and Appendix B against the ISA Objectives 6, 13 and 16 are addressed in the ongoing NDF design.</p> <p>Development of the NDF must ensure that these aspects achieve the equivalent of '++' in ISA or other assessments as these aspects are critical.</p>	These comments are noted and will inform the draft NDF which will include a greater level of detail on policies and projects.
81	Cymdeithas yr iaith	Yes	<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg.</p> <p>Here is a translation of the response received in Welsh.</p> <p>The report claims that the preferred option will have a positive impact on the Welsh language, but it does not provide any robust evidence to support that. We believe there is a significant danger that the preferred option, instead, will have a detrimental impact on the Welsh language.</p> <p>Mae'r adroddiad yn honni y bydd yr opsiwn a ffefrir yn cael effaith gadarnhaol ar y Gymraeg, ond nid yw'n cynnig unrhyw dystiolaeth gadarn i gefnogi hynny. Credwn fod peryg sylweddol y bydd yr opsiwn a ffefrir, yn hytrach, yn cael effaith andwyol ar y Gymraeg.</p>	<p>The Preferred Option is a sustainable balance of priorities and objectives. The emphasis on regional planning and sustainable urban growth is directly intended and expected to enable the planning system at local levels to develop policies and take decisions that support national ambitions for the Welsh language.</p> <p>In accordance with legislation and planning policy, we will consider how the Welsh language is affected by the NDF during its preparation and seek to maximise potential benefits.</p>
82	Individual	No	No Comment	
83	HM Prison and Probation Service in Wales	Did Not Complete Form	No Comment	

84	CAMRA	Did Not Complete Form	No Comment	
85	Flintshire County Council	Did Not Complete Form	No Comment	
86	CADW	Did Not Complete Form	No Comment	

Question 1b

Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?

Rep Number	Yes/No	Representation	Response/ Proposed Change
1	No	No Comment	
2	Did Not Complete Form	No Comment	
3	Yes	At this stage it is good to see wide assessment and consideration, but again without greater spatial visualisation it is difficult to 'see' how options could impact on habitats for better/worse without reaching very generalised conclusions. Certain basic assumptions can be made in terms of spatial distribution of certain designations, but this is such high level analysis at this stage without having a greater spatial understanding of what the preferred and alternative options would entail – although we note this is an early screening stage.	These comments are agreed and understood. The draft NDF will include a greater level of detail on policies and projects.
4	Did Not Complete Form	No Comment	
5	Did Not Complete Form	No Comment	
6	Did Not Answer	No Comment	
7	Did Not Complete Form	No Comment	
8	No	No Comment	
9	Yes	This is also, 'A write-only' document	We note that the document is technical in nature and produce this in as accessible a

Rep Number	Yes/No	Representation	Response/ Proposed Change
			format as possible.
10	No	No Comment	
11	Did Not Complete Form	No Comment	
12	Did Not Complete Form	No Comment	
13	No	No Comment	
14	Did Not Complete Form	No Comment	
15	Yes	In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management Independent management accreditation is required to achieve this Thank you	This comment is not relevant to the Habitats Regulations Assessment directly.
16	Yes	The Vision and Objectives are too general, and lacking in spatial detail, to enable a meaningful assessment at this stage.	These comments are noted. The draft NDF will include a greater level of detail on policies and projects.
17	Yes	As Point 1a above.	Noted.
18	No	No Comment	
19	No	No Comment	
20	No	No Comment	
21	No	No Comment	

Rep Number	Yes/No	Representation	Response/ Proposed Change
22	No	No Comment	
23	No	No Comment	
24	No	No Comment	
25	No	No Comment	
26	Did Not Complete Form	No Comment	
27	No	No Comment	
28	Did Not Complete Form	No Comment	
29	Did Not Answer	N/A	
30	Yes	<p>1b1 We agree that although renewable energy projects may have adverse impacts on local ecological systems, in the long term renewable energy infrastructure is essential to decarbonisation and to efforts to reduce air pollution and slow the rate of human-induced climate change.</p> <p>1b2 We think that attention to Green Infrastructure should include a priority to strengthen networks of “multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits in local communities”, in the words of guidance from the UK Ministry of Housing, Communities and Local Government (21.1.2016). We agree that “opportunities to improve connectivity between European sites should be explored and incorporated into policy where possible”, but point out that currently insufficient effort goes into protecting existing sites of European importance (for example see ‘Failure to Restore Lost Protected Landscape’, West Wales News Review, 21.1.2016).</p> <p>1b3 We agree with the following paragraph, 5,1,3: “under the Habitats Regulations it is necessary to assess the potential in-combination effects of the NDF with other current or proposed Plans and Projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed”.</p>	These comments are noted. The draft NDF will include a greater level of detail on policies and projects.
31	No	N/A	
32	Did Not Complete Form	No Comment	
33	Did Not Complete Form	No Comment	

Rep Number	Yes/No	Representation	Response/ Proposed Change
34	Did Not Complete Form	We have no comments to make at this time.	Noted.
35	No	No Comment	
36	Did Not Complete Form	No Comment	
37	Yes	National Park Wales are in broad agreement with the HRA, and only have a comment on Q4b below.	Noted.
38	No	No Comment	
39	No	No Comment	
40	Yes	<p>Please see our response to the HRA preliminary Screening Report in our accompanying letter. [the contents of this letter is set out below]</p> <p>We welcome and support Welsh Government's commitment to the HRA process. We also welcome the informal opportunities we have had to provide comments as the preliminary HRA screening has developed.</p> <p>2. At this relatively early stage in its the development, the specific policies that the NDF will include remains uncertain. We therefore support the precautionary approach taken by Welsh Government, screening the majority of objectives and strategic policy directions in for further consideration under HRA as the NDF and the HRA develop. We agree that as the NDF moves forward, and specific policies are developed, the potential for them to impact on European sites will be become clearer, and it will then be possible to assess these individual policies in greater detail at that time.</p> <p>3. We have concerns that strategic policy direction R1 in Table 4 on Pg. 20, which provides a framework to support growth, is being screened out at this stage of the plan's development. Based on the limited information available at this stage of the NDF's development, it appears to us that this could have the potential to impact upon European sites. We do not consider that relying on the future inclusion of cross-cutting policies to protect European sites would allow this strategic policy direction to conclude no likely significant effects at this stage. It is our view that it should be screened in at this time, allowing assessment of the specific policies that subsequently flow from it as they develop.</p> <p>4. To ensure a consistent and transparent approach to determining when it is appropriate to 'defer down' the HRA to a lower-tier plan or project level, both the HRA Preliminary Screening Report and the HRA Rules of Thumb document should clearly set out how these decisions will be made.</p> <p>5. We continue to have some concerns regarding the HRA Rules of Thumb document, which we set out in more detail in Appendix 1 (pts. 8 to 18). In particular, this document should:</p> <ul style="list-style-type: none"> i. explain how mobile and typical species are defined, and how they will be considered in the HRA; and ii. clarify the wider applicability of the identified buffer distances. <p>1 Introduction</p>	<p>These comments are noted and will inform the next stage of the HRA of the draft NDF.</p> <p>2) Comment is agreed – the policies and proposals as they are developed further will be re-screened.</p> <p>3) Comment is understood and strategic policy direction R1 will be screened in.</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
		<p>6. Pg. 2, 1.1.6 – we suggest that all references to conservation objectives should be directed to Core Management Plans (and their equivalent in England) only, which are up kept up to date on Natural Resources Wales’ and its sister agencies websites.</p> <p>4 Preliminary screening of the NDF preferred spatial option</p> <p>7. We note references to ‘deferring down’ HRA to lower tier plan and project level in Table 4. We suggest it would be useful to clearly set out the circumstances when deferring down assessment to a lower level is acceptable and appropriate in both the Preliminary HRA Screening Report and the HRA Rules of Thumb document. Despite the name often given to this approach (‘deferring down the HRA’), this way of ascertaining no adverse effect on site integrity in the higher level plan is not a way of deferring or delaying the assessment process, but a way of securing mitigation measures in a lower level plan or at project level, where they cannot be secured in detail in the higher level plan due to the level of detail available at this stage. In other words, to take this approach the plan-maker must be confident that it is possible for the policy to be delivered in a way that avoids adverse effects on site integrity at the lower tier plan or project level.</p> <p>The following is adapted from the DTA Publications HRA Handbook. In order to ascertain that there would be no adverse effect on the integrity of a European site, a plan-making body may only rely on mitigation measures in a lower tier plan or at project level (i.e. defer down) if the following three criteria are all met:</p> <ul style="list-style-type: none"> i. The higher-level plan assessment cannot reasonably predict any effect on a European site in a meaningful way; whereas ii. The lower tier plan or project level, which will identify more precisely the nature, timing, duration, scale or location of development, and thus its potential effects, will have the necessary flexibility over the exact nature, timing, duration, scale and location of the proposal to enable an adverse effect on site integrity to be avoided; and iii. The HRA of the lower tier plan or project is required as a matter of law or Government policy. <p>There are two key points here:</p> <ul style="list-style-type: none"> i. Firstly, if the HRA of a policy at the NDF level can reasonably predict certain effects on European site(s) in a meaningful way, then it should be undertaken at this level to the extent appropriate to the information available at this stage. ii. Secondly, it must be the case that a project level HRA will have the necessary flexibility over the exact nature, timing, duration, scale and location of the proposal to enable an adverse effect on site integrity to be avoided – if not, then deferring down is not appropriate. <p>8. Pg. 20, Table 4, R1 – we have concerns that this strategic policy direction, which provides a framework to support growth, is being screened out at this stage of the NDF’s development. Based on the limited information available at this stage of the NDF’s development, it appears to us that policies that flow from this could have the potential to impact upon European sites. We do not consider that relying on the future inclusion of cross-cutting policies to protect European sites would allow this strategic policy direction to conclude no likely significant effects at this stage. It is our view that it should be screened in at this time, allowing assessment of the specific policies that subsequently flow from it as they develop.</p> <p>HRA Rules of Thumb</p> <p>9. Pg. 6, Table 8 – whilst we recognise that the tables in this section are not intended to be comprehensive, this</p>	<p>4) The comment is agreed and this approach will be set out in more detail at the next stage.</p> <p>5) The comment is agreed and further detail will be set out at the next stage.</p> <p>6) The comment is agreed and further detail will be included at the next stage.</p> <p>7) The comment is agreed and further detail will be included at the next stage. The reference to the DTA handbook guidance is</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
		<p>table does appear to understate the non-bird interest of estuarine Ramsar site fauna. In particular, it should include reference to fish (which includes species such as sea trout and eel, not protected under SAC designations).</p> <p>10. As we have previously identified, the Rules of Thumb document doesn't include explanatory text on mobile or typical species. It would be useful to include this information, together with highlighting the need for their consideration as part of the HRA process. We provide definitions below.</p> <p>a. Mobile species – these are species that are interest features of European sites in their own right, but which require consideration beyond European site boundaries because they are migratory, or forage or roost etc. 'off-site', or whose populations require movement and mixing across fragmented sites (at a meta-population scale). Species that fall in to this category in Wales include:</p> <ul style="list-style-type: none"> • Bats • Migratory fish – shad, sea lamprey, river lamprey, salmon, sea trout and eel • Marsh fritillary • Otter • Hen harrier • Wintering birds • Great crested newt • Sea mammals • Seabirds <p>Therefore, European sites whose qualifying features include mobile species, such as those listed above, which may be affected by the NDF irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected, may need to be considered through HRA.</p> <p>b. Typical species – these are species that are not interest features in their own right, but which are the typical species of a habitat which is an interest feature, and which are often referred to in the conservation objectives. They only require consideration within the European site boundaries. At the high strategic level of plan HRA it is often not possible to consider them in any detail, but the potential need for them to be considered in future project level HRAs should at least be highlighted here.</p> <p>11. Pg. 10, 3.2.3 – policies that refer to Developments of National Significance (DNSs) do require HRA consideration at plan level to the extent that it is reasonable and meaningful, before they can be 'deferred down' to lower tier plan or project level (see pt. 7 above). A similar example (for a Nationally Significant Infrastructure Project (NSIP)) to this is the tidal lagoon policy in the developing Welsh National Marine Plan (WNMP), in relation to which the WNMP HRA was unable to conclude no adverse effects on site integrity, and which therefore has been taken through to the derogations set out under Article 6(4) of the Habitats Directive, at plan level.</p> <p>12. Pg. 10 - In relation to several of the NDF Proposals listed under 3.2, direct loss of habitat is also a potential impact due to land take, e.g. under 3.2.6 Housing and 3.2.7 Mineral concessions.</p> <p>13. Pg. 10, 3.2.9 – this paragraph on natural resource management/ecosystem services should acknowledge that this management itself could have impacts on European sites that would require HRA (as has been acknowledged</p>	<p>useful, and we will make sure that 'deferring down' is only recommended when these criteria are (transparently) met. We will therefore make this clear in the amended version.</p> <p>8) See response to point 3.</p> <p>9) The comment is noted and further detail will be included at the next stage.</p> <p>10) The comments are noted and further detail will be included at the next stages.</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
		<p>in the preceding Preliminary HRA Screening Report).</p> <p>14. Pg. 11, 3.3.3 Impact Pathways to consider – we continue to have some concerns regarding the specific buffers that have been set out in this section, because of the potentially significant influence on the HRA screening that these buffers may subsequently have. There are inevitably many uncertainties about subsequent projects that may come forward and be supported by policies in the NDF, regarding their nature, timing, duration, scale and location, etc., and therefore the potential impacts that they may have on European sites. Therefore, any guidance on the HRA at this plan level needs to take a precautionary approach. It is not clear if all of the buffers provided are based on a precautionary approach, or on specific pieces of project-level casework that may not have wider applicability. We would welcome clarity for all of the buffers set out in the document, on this question.</p> <p>For example, the document quotes studies for the Morecambe Bay Partnership (Liley et al., 2015) which identified a distance of 3.45 km as being the average distance people will travel for a day trip to a designated site. Based on this it states that if an NDF proposal could lead to large housing developments within 3.5 km of a Natura 2000 site, it should be screened in for consideration under HRA. It is not clear if the Morecombe Bay study figures would also be appropriate for all proposals for large housing developments across Wales. The caveat set out at the foot of pg. 11 (“These distances are for guidance only, where a potentially significant effect is identified, a thorough assessment of the impact pathways and distance over which an effect could occur would be undertaken on a case by case basis during the full HRA of the NDF”) does not provide reassurance because it only applies after a proposal has been screened in or out using the information provided in this document.</p> <p>Note that we have not considered and confirmed each of the specific buffers set out in the document individually.</p> <p>Pg. 11, 3.3.3, Direct habitat loss, 4th bullet pt. – this bullet point refers to permanent or temporary loss of habitat within an area of land outside the designated site that could be functionally linked to it. This is a key place where there should be reference to mobile species collectively (as described in pt. 10 above).</p> <p>16. Pg. 11, 3.3.3, Habitat degradation, 2nd bullet pt. – this bullet point refers to a 3km buffer from European sites for increased sedimentation and pollution entering watercourses. This would appear to be incorrect. It should reflect the other bullet points relating to watercourses (e.g. pg. 12, Effects on water quality or quantity, 1st bullet pt.), where the buffer is 3 km from a watercourse, followed by checking for hydrological links to downstream European sites.</p> <p>17. Pg. 15, 4.1.2, Rules 3 and 4 – these rules refer to collating qualifying features and conservation objectives, and refer the user to this HRA Rules of Thumb document to source this information. We are concerned that this document does not contain detailed or comprehensive information on either of these areas. We advise that users should refer to Core Management Plans (or there equivalent in England) when seeking this type of information.</p> <p>18. Pg. 16, Rule 6 – in relation to this Rule, it is worth highlighting the recent People over Wind ruling from the Court of Justice of the European Union (CJEU), which states that “...in order to determine whether it is necessary to carry out...an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.” CJEU case c-323/17, paragraph 40.</p> <p>19. Pg. 16, Rule 6 – also in relation to this Rule, the last sentence states ‘...or incorporating appropriate wording to ensure that any future development brought forward under the policy/strategy/proposal is required to undertake HRA</p>	<p>To note, we did not exclude mobile species (and indeed were very much considering the implications for these species beyond N2K site boundaries in the Rules of Thumb document), just that we didn’t define the term in detail. We will use this helpful definition of mobile species at the next stage of the assessment. This is agreed, however it will be necessary to distinguish between those individuals</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
		prior to permission being granted' when referring to measures that would avoid or mitigate a potential impact. Whilst we support being clear in this document that HRA will be required at project level, it should be noted that undertaking HRA at a lower tier level does not remove the requirement to undertake HRA at this plan level, as far as is reasonable and meaningful (see pt. 7 above).	<p>species that are actually associated with a designated site and those that aren't (as only the former require HRA).</p> <p>We will make this distinction and use the definition of typical species and interest features in the revised report (and/or the re-screening).</p> <p>11) The comment is noted and we will include the DTA 'deferring down' criteria at the next stage.</p> <p>12) The comment is noted and the impact will be included at</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
			<p>the next stage.</p> <p>13) The comment is noted and further detail will be included at the next stage.</p> <p>14) We will look into the issue of buffers at the next stage of assessment and provide clarity on the issue. We will be precautionary, but not to the extent that development is precluded without good reason.</p> <p>3.3.3 – see response to 10.</p> <p>16) This will be reviewed and changed</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
			<p>as appropriate.</p> <p>17) The comment is agreed and understood and the text will be changed.</p> <p>18) The comment is noted, we are aware of this ruling, and will reconsider this Rule in light of the wording of the ruling.</p> <p>19) As above, we will consider more carefully the issue of 'deferring down'.</p>
41	Did Not Answer	No Comment	
42	Did Not Answer	No Comment	
43	No	No Comment	
44	No	No Comment	

Rep Number	Yes/No	Representation	Response/ Proposed Change
45	Did Not Complete Form	No Comment	
46	No	No Comment	
47	Did Not Complete Form	No Comment	
48	No	No Comment	
49	No	No Comment	
50	Did Not Complete Form	See 1a	Noted.
51	No	No Comment	
52	No	There is little to comment on at this stage. Once more detail emerges on more specific policies or schemes, the HRA will have more meaningful information to consider.	Noted. The draft NDF will include a greater level of detail on policies and projects.
53	Did Not Complete Form	No Comment	
54	Did Not Complete Form	No Comment	
55	No	No Comment.	
56	No	No Comment	
57	No	No Comment	
58	Did Not Answer	No Comment	
59	No	No Comment	

Rep Number	Yes/No	Representation	Response/ Proposed Change
60	Did Not Complete Form	No Comment	
61	Yes	The habitats assessment appears to thoroughly consider 6(4) of the Habitats Regulations. Our members consider that, even with the UK's impending departure from the European Union, it seems unlikely that this area of law will be addressed by Parliament in the short to medium terms, so we agree that proper consideration of the regulations is appropriate.	Noted.
62	No	No Comment	
63	No	No Comment	
64	Did Not Answer	No Comment	
65	Yes	Simply to add that, by its very nature and purpose, specific reference to geodiversity and geoconservation are missing from the HRA – which therefore compounds their exclusion elsewhere.	These comments are noted; however, we do not consider that this is the function of the Habitats Regulations Assessment and will be addressed within the Integrated Sustainability Appraisal.
66	Yes	Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh. We note that "General Aspiration" and "screened out" has been to realize the Welsh Government's objectives in relation to the Welsh language in this context. We believe that this confirms our comments above and that the wider context fails to offer adequate support to the Welsh language.	These comments are noted; however, Welsh Language impacts are not within the

Rep Number	Yes/No	Representation	Response/ Proposed Change
		Nodwn mai “Dyhead cyffredinol” a chafod ei “sgrinio allan” yw gwireddu amcanion Llywodraeth Cymru parthed y Gymraeg yn y cyd-destun hwn. Credwn fod hyn yn cadarnhau ein sylwadau uchod a bod y cyd-destun ehangach yn methu cynnig cefnogaeth ddigonol i'r Gymraeg.	function of the Habitats Regulations Assessment and will be addressed within the Integrated Sustainability Appraisal.
67	Yes	<p>Habitats Regulations Assessment</p> <p>We note the conclusion in Summary and Next Steps p22, 5.1.3. that: ‘Under the Habitats Regulations, it is necessary to assess the potential in-combination effects of the NDF with other current or proposed, Plans and Projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed’</p> <p>Para 5.1.5 also explains that a further detailed HRA Screening will be undertaken and a draft HRA will then be published alongside the draft NDF.</p> <p>We are concerned that the scope of the assessment (when it is eventually made) will be confined to Natura 2000 sites.</p> <p>As with landscapes, we believe that all habitats matter, in ‘every part of Wales’, as stated in the Environment (Wales) Act 2016. An NDF worthy of its name should be scoped so as to include both recognition of the top tier and support for the enhancement and enrichment across the environmental spectrum. There is also a need to stress the interaction between habitats and landscape, and to include consideration of the land uses and policies that can or could sustain them.</p>	The draft NDF will include a greater level of detail on policies and projects. We do not consider that broader consideration of sites for habitats and landscapes is the function of the Habitats Regulations Assessment and will be addressed within the Integrated Sustainability Appraisal.
68	Yes	We welcome early consultation on the HRA and we would welcome continued involvement throughout the process. We see this as a vital HRA. The way it is conducted will be a ‘model’ for all other strategic and local development	These comments are

Rep Number	Yes/No	Representation	Response/ Proposed Change
		<p>plans prepared in Wales.</p> <p>In para. 3.1.3, the HRA explains: “Given the very high-level nature of these options, formal HRA screening was not undertaken at this stage...However, given the lack of spatial detail within the options, the assessment could not provide any firm conclusions.”</p> <p>We agree with this - we do not consider it appropriate to undertake screening at the ‘preliminary’ stage. However, elements of the preferred option are screened out (DN3, DN4, AS2, AS3, R1). We recommend re-screening all elements of the preferred option.</p> <p>A better spatial expression of the Natura 2000 Network and ranges of qualifying mobile species could be provided. The ‘Arcadis’ maps are particularly hard to read (Figures 1&2).</p> <p>There may be further SPA / MPA designation whilst the NDF is being prepared, which the report should acknowledge (Assessing the contribution of Welsh MPAs towards an ecologically coherent MPA network in 2016. JNCC. http://jncc.defra.gov.uk/pdf/JNCC_NetworkProgressWelshWaters_Final.pdf).</p> <p>The summary of the conservation objectives relevant to the Natura 2000 designations does not identify relevant environmental issues to the NDF. We suggest using Natural Resources Wales’ indicative feature condition reports (https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/find-protected-areas-of-land-and-seas/indicative-feature-condition-assessments-for-european-marine-sites-ems/?lang=en) and any equivalent terrestrial reports as the basis for describing these and identifying pressures attributable to the NDF.</p> <p>Evidencing assertions on the range of mobile species and impact pathways (e.g. ‘prevailing wind’) would further help scope the assessment. The 20km buffer of SPA and Ramsar sites (with bird interest features) needs to be based on the best available science and referenced accordingly. This is also vital to the consideration of in combination impacts, for example with emerging proposals in the Wales National Marine Plan.</p> <p>We have concerns regarding ‘rule of thumb’ number 6 which does seem to accord with the recent ‘People Over Wind v Coillte Teoranta’ (Case C-323/17) judgement of the Court of Justice of the European Union, which clarifies mitigation cannot be considered when screening for Likely Significant Effects.</p> <p>Natura 2000 and Spatial Planning (http://ec.europa.eu/environment/nature/knowledge/pdf/Natura_2000_and_spatial_planning_final_for_publication.pdf) highlights modelling tools for spatial planning prioritisation. We would like to understand more about the techniques and methodologies likely to be used when preparing Appropriate Assessments.</p>	<p>noted. The draft NDF will include a greater level of detail on policies and projects and will be screened at this next stage.</p> <p>The maps will be improved for the next stage of work. The most up-to-date Core Management Plans and appropriate references will be used at the next stage of the assessment.</p> <p>We will look into the issue of buffers at the next stage of assessment and provide clarity on the issue. We will be precautionary, but not to the</p>

Rep Number	Yes/No	Representation	Response/ Proposed Change
			<p>extent that development is precluded without good reason.</p> <p>The comment on Rule of Thumb Number 6 is noted and we will reconsider this Rule in light of the wording of the ruling.</p> <p>We will continue to engage with RSPB as work on the NDF progresses.</p>
69	No	No Comment	
70	Did Not Answer	No Comment	
71	No	EDF Energy has no comment on these question	Noted.
72	Did Not Complete Form	No Comment	
73	Yes	Care should be taken in identifying and assuming need without having understood the impacts of projects. The UK Government has tried to remove the question of 'need' from major infrastructure projects such as nuclear and airports and roads, and this has led to inevitable environmental impacts because the principle of the projects is then difficult to assess properly, and for environmental impacts to be considered on a parity with perceived economic	Part of the purpose of the HRA during early stages of the NDF's

Rep Number	Yes/No	Representation	Response/ Proposed Change
		<p>growth. There must remain the possibility for development to be refused if the environmental impact is unacceptable, even if the policy supports the principle of the development.</p> <p>The NDF should also provide transition and continuity in the event of withdrawal from the European Union that European protected habitats will retain the highest level of protection. It is unclear how the NDF will deal with this situation.</p>	<p>preparation (especially the Rules of Thumb document) is to ensure that the planners preparing the NDF understand these key environmental issues so that development in certain areas is indeed deemed unacceptable.</p> <p>Our preparations for the UK's Exit from the European Union ensure our environmental legislation, including that derived from European directives, will remain in force.</p>
74	No	No Comment	

Rep Number	Yes/No	Representation	Response/ Proposed Change
75	Did Not Answer	No Comment	
76	No	No Comment	
77	Did Not Answer	No Comment	
78	Did Not Answer	See my response within Q5b.	Noted.
79	No	No Comment	
80	Yes	The preliminary Screening Report appears to be thorough.	Noted.
81	Did Not Answer	No Comment	
82	No	No Comment	
83	Did Not Complete Form	No Comment	
84	Did Not Complete Form	No Comment	
85	Did Not Complete Form	No Comment	
86	Did Not Complete Form	No Comment	

Question 3d

Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?

Rep Number	Yes/No	Representation	Response
1	Yes	<p>We are pleased to see the references to mental health and wellbeing as well as physical health and inequalities. Also pleased to see that health and wellbeing is referenced across all the objectives.</p> <p>1.2 – Health Boards are not the only health stakeholders. PHW and other public health agencies such as the Chartered Institute of Environmental Health need to be included here.</p> <p>3.1 should this read 2017 and not 2018 in the heading?</p> <p>The preferred strategy could also advocate for broad health impact assessments (HIAs) to be carried out in the placemaking, LDP and planning application process. HIA is a key section in the Public Health (Wales) Act 2017.</p>	<p>The draft NDF, which will include a greater level of detail on policies and projects, will allow a clearer understanding of delivery mechanisms. It is recognised that it is not just the role of the NDF to deliver good placemaking and all sectors will need to work with other mechanisms to achieve maximum opportunities. Consultation and engagement on the NDF will continue to enable input from stakeholders, including health agencies.</p> <p>The heading for 3.1 should read 2018.</p> <p>The role of Health Impact Assessment is commonly discussed in relation to the planning system, as planning is understood to have a significant impact on the determinants of health at national and local levels. The importance of health considerations within the planning context is reflected in Planning Policy Wales, including reference to the valuable contribution of Health Impact Assessment to plan-making. Consideration is also being given to where a mandatory Health Impact Assessment requirement has potential to add greatest value, as part of the development of regulations under the Public Health (Wales) Act 2017. This scoping phase includes consideration of how Health Impact Assessments could best apply to different aspects of the planning system.</p>
2	Did Not Complete Form	No Comment	
3	Did Not Answer	No Comment	

4	Did Not Complete Form	No Comment	
5	Did Not Complete Form	No Comment	
6	Did Not Answer	No Comment	
7	Did Not Complete Form	No Comment	
8	No	No Comment	
9	Yes	Another write-only document	The document is published online, making it available to the wider public. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary that will help make the appraisal process and findings more easily understood and accessible.
10	No	No Comment	
11	Did Not Complete Form	No Comment	
12	Did Not Complete Form	No Comment	
13	No	No Comment	
14	Did Not Complete Form	No Comment	
15	Yes	In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management Independent management accreditation is required to achieve this Thank you	This comment is not relevant to the Integrated Sustainability Appraisal directly.
16	No	No Comment	
17	Yes	See 1a.	Noted.
18	No	No Comment	

19	Did Not Answer	No Comment	
20	No	Making the objectives more succinct as recommended by the report is supported as the aim of the objective is much clearer.	Noted.
21	No	No Comment	
22	No	No Comment	
23	Did Not Answer	No Comment	
24	No	No Comment	
25	No	No Comment	
26	Did Not Complete Form	See 3a ³³	Noted.
27	Yes	The assessment is limited by the structure and content of the initial iteration and consequently has not addressed the issues we have raised above.	Noted.
28	Did Not Complete Form	No Comment	
29	Did Not Answer	N/A	
30	Yes	3d1 More information on the evaluation criteria employed would be helpful. However, in broad terms we think the assessment was carefully and rationally undertaken, but in our view there is insufficient evidence about the selection process to create the preferred option.	<p>The detail of the Integrated Sustainability Appraisal Framework used to assess the Plan can be found in the Integrated Sustainability Appraisal Scoping Report here: https://gweddiill.gov.wales/topics/planning/national-development-framework-for-wales/integrated-sustainability-appraisal-for-the-ndf/integrated-sustainability-appraisal-scoping-report-for-the-national-development-framework/?lang=en</p> <p>The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF.</p>

³³ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

31	No	N/A	
32	Did Not Complete Form	See 3a ³⁴	Noted.
33	Did Not Complete Form	No Comment	
34	Did Not Complete Form	We have made comments about the NDF Objectives in question 3c.	Noted.
35	No	No Comment	
36	Did Not Complete Form	No Comment	
37	Yes	<p>6 .3 National Landscapes - National Park Authorities Wales are pleased to see that the ISA was able to enhance NDF Objective 6 in terms of the inclusion of nationally important landscapes (additional of 6.3) through iteration.</p> <p>8. Transport – Agree that the second iteration of this objective is more positive than the first, due to the focus on decarbonisation and sustainable transport. However, the objective does still focus on the improvement of infrastructure so there is still some element of uncertainty around environmental/landscape impacts.</p> <p>Strongly agree with the assessment of Objective 3 City Regions and Deals.</p>	Noted. The next stage of appraisal will enable a more detailed assessment to be undertaken, including on how the decarbonisation agenda might interact with the need for new built infrastructure and potential corresponding environmental / landscape impacts.
38	No	No Comment	
39	No	No Comment	
40	Yes	Please see our response to the ISA Interim Report in our accompanying letter. See 1a and 1b	Noted.
41	Did Not Answer	No Comment	
42	Did Not Answer	No Comment	
43	No	No Comment	
44	No	No Comment	

³⁴ ³⁴ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

45	Did Not Complete Form	No Comment	
46	No	No Comment	
47	Did Not Complete Form	No Comment	
48	No	No Comment	
49	Did Not Answer	No Comment	
50	Did Not Complete Form	see 3a ³⁵	Noted.
51	Did Not Answer	Appendix B clearly demonstrates how the NDF objectives have been assessed against the ISA objectives, a comprehensive suite which align well to the improving well-being, however how do the objectives take consideration of / have been assessed against future trends as part of their long term impact and success? Assessing with consideration for future trends would further strengthen the ISA process and the success of the Framework during its development and delivery.	<p>The Integrated Sustainability Appraisal Scoping Report, based on the plans, policies and programmes review, environmental baseline, likely evolution of this baseline and the key sustainability issues presents the Integrated Sustainability Appraisal Framework. Within the contents of this Report, future trends in Wales are addressed and fed through to the Integrated Sustainability Appraisal Framework.</p> <p>In accordance with requirements of the Strategic Environmental Assessment Directive, the next iteration of the Integrated Sustainability Appraisal will also indicate whether impacts of proposals in the NDF are expected to be short, medium or long term as well as their permanence and reversibility.</p>
52	No	No Comment	
53	Did Not Complete Form	No Comment	
54	Did Not Complete Form	See 3a ³⁶	Noted.

³⁵ ³⁵ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

³⁶ ³⁶ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

55	No	No Comment	
56	No	No Comment	
57	No	No Comment	
58	Did Not Answer	No Comment	
59	No	No Comment	
60	Did Not Complete Form	See 3a ³⁷	Noted.
61	No	No Comment	
62	No	No Comment	
63	No	No Comment	
64	Did Not Answer	No Comment	
65	Yes	See our responses above.	Noted.
66	Yes	<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh. The conclusions are very ambiguous in terms of the Welsh language, although the assessment stated that the effect would be positive. Without a broader consideration within the Framework, and without policy or guidance that would show how this would be implemented in practice, we fear that keeping the status quo in terms of the Welsh language is the best that could be expected. This falls very far from contributing to the aim of creating one million Welsh speakers by 2050.</p> <p>Amwys iawn oedd y casgliadau o safbwynt y Gymraeg, er i'r asesiad ddatgan y byddai'r effaith yn un gadarnhaol. Heb ystyriaeth ehangach o fewn y Fframwaith, a heb bolisi na chanllawiau fyddai'n dangos sut y byddai hyn yn cael ei roi ar waith yn ymarferol, ofnwn mai cadw'r statws quo o safbwynt y Gymraeg yw'r gorau gellid ei ddisgwyl. Mae hyn yn disgyn yn bell iawn o gyfrannu at y nod o greu miliwn o siaradwyr Cymraeg erbyn 2050.</p>	<p>The Preferred Option is a sustainable balance of priorities and objectives. The emphasis on regional planning and sustainable urban growth is directly intended and expected to enable the planning system at local levels to develop policies and take decisions that support national ambitions for the Welsh language.</p> <p>In accordance with legislation and planning policy we will assess through the Welsh language assessment the impacts of the NDF and seek to maximise potential benefits.</p>
67	Yes	These are set out in our response to Question 1a	Noted.

³⁷ ³⁷ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

68	Yes	<p>See response to 1a above.</p> <p>With respect to SA objectives 16 (Biodiversity & Geodiversity) & 17 (Natural Resources), it is unclear how the conclusions for each of the NDF objectives in Table B-1 have been made. The ISA methodology (Table A-1) does not identify which information has been used to answer the decision aiding questions when undertaking the assessment.</p> <p>From table B-2, it is unclear how SA objectives 16&17 have influenced the NDF objectives.</p> <p>No internal compatibility analysis of plan objectives is provided. This would helpfully identify tensions and focus assessment work and plan refinement. It would also help to identify synergies which could lead to opportunities for multiple benefits.</p>	<p>Justifications are provided in each assessment for the scores arrived at, which are intended to be indicative. In the next version of the Integrated Sustainability Appraisal, when more detailed assessments are prepared, it will be increasingly apparent what the key decision-making criteria have been. Typically, it is a holistic conclusion for each Integrated Sustainability Appraisal Objective based on multiple interacting criteria.</p> <p>Recommendations for amendments to the NDF Objectives are not solely based on the requirements of specific Integrated Sustainability Appraisal Objectives. It is expected that assessments against all Integrated Sustainability Appraisal Objectives, including 16 and 17, in an iterative process will influence proposals in the next version of the NDF.</p>
69	Yes	<p>As a general observation, it is noted from the ISA objectives assessment that the support for city region deals and growth deals is not compatible with a number of ISA environmental and social objectives. Although the objective has been shortened, its effects have not changed and it remains part of the NDF. A full explanation and justification for this should be given.</p>	<p>The draft NDF will contain further details and assessment will be documented within the Integrated Sustainability Appraisal Report.</p>
70	Did Not Answer	No Comment	
71	Yes	<p>The Integrated Sustainability Appraisal (ISA) interim report provides a useful overview of the relationship between the Wellbeing of Future Generations Act, NDF and the actual definition of sustainability. As it stands presently, it provides a useful description of the goals of the Well Being approach, key issues and the opportunities that the NDF can address. EDF Energy believes that, as it stands, the ISA provides a useful framework for the assessment of NDF objectives rather than delivering the actual assessment at this stage.</p>	<p>Noted.</p>

72	Did Not Complete Form	See 3a ³⁸	Noted.
73	Yes	<p>We disagree with the assessment of Objective 5 on page 40 of the Interim ISA report. This is graded as positive on flood risk, social cohesion, landscapes and townscapes, and natural resources. There is nothing in the objective itself that secures these outcomes – particularly as it links market housing to areas of growth implying development pressures attached to existing built environment.</p> <p>It is unclear why city regions and growth deals having been assessed negatively or unknown is still included in the draft NDF objectives.</p>	<p>The Objective directs new housing towards locations where positive impacts on these Integrated Sustainability Appraisal objectives are possible and where negative impacts are unlikely, such as due to more brownfield opportunities or less sensitive natural landscapes nearby. The next stage of the Integrated Sustainability Appraisal will provide detailed assessments of proposals based on their specific locations and will be better placed to identify any potential negative impacts.</p> <p>The draft NDF will contain further details on policies and proposals, and assessment will be documented within the Integrated Sustainability Appraisal Report.</p>
74	No	No Comment	
75	Did Not Answer	No Comment	
76	No	No Comment	
77	Did Not Answer	No Comment	
78	Yes	<p>As I said above I welcome the work done to use the Act in this process, but I believe that the goals descriptors should have been used instead of the titles to ensure the different facets of the statutory meaning of the goals were taken into account in the assessment and the objectives could have been organised following the well-being goals.</p> <p>Once more I find confusing that the list of ISA objectives does not correspond to the list of NDF Objectives in the consultation document.</p>	<p>Noted. The goals have informed the plan objectives and the Integrated Sustainability Appraisal documents this.</p>
79	No	No Comment	
80	Did Not Answer	Refer to 1a above	Noted.

³⁸ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

81	Did Not Answer	No Comment	
82	No	No Comment	
83	Did Not Complete Form	No Comment	
84	Did Not Complete Form	No Comment	
85	Did Not Complete Form	No Comment	
86	Did Not Complete Form	No Comment	

Question 4b

Do you have any comments on the assessment of the NDF Options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?

Rep Number	Yes/No	Representation	Response
1	No	No Comment	
2	Did Not Complete Form	No Comment	
3	Did Not Answer	No Comment	
4	Did Not Complete Form	No Comment	
5	Did Not Complete Form	No Comment	
6	Did Not Answer	No Comment	
7	Did Not Complete Form	No Comment	
8	No	No Comment	
9	Yes	Write-only	The documents are published online, making them available to the wider public. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary that will help make the Integrated Sustainability Appraisal process and findings more easily understood and accessible.
10	No	No Comment	
11	Did Not Complete Form	No Comment	
12	Did Not Complete Form	No Comment	
13	No	No Comment	

Rep Number	Yes/No	Representation	Response
14	Did Not Complete Form	No Comment	
15	Yes	In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management Independent management accreditation is required to achieve this Thank you	This comment is not relevant to the Integrated Sustainability Appraisal or Habitats Regulations Assessment directly.
16	No	No Comment	
17	No	Difficult document to decipher. Future documents should be all encompassing and not constantly relying on additional appendices which makes the document more complex that it should.	The documents are intended to be as user-friendly as possible, whilst also providing a high-level appraisal of the NDF Options. The next stage of the Integrated Sustainability Appraisal will include a Non-Technical Summary which will help make the Integrated Sustainability Appraisal process and findings more easily understood and accessible.
18	No	No Comment	
19	No	No Comment	
20	Did Not Answer	It appears that the Integrated Sustainability Appraisal considers the possible positive and negative effects of each option. There is no reason to disagree with the findings of the ISA.	Noted.
21	No	No Comment	
22	No	No Comment	
23	No	No Comment	
24	No	Sufficiently thorough to proceed.	Noted.
25	No	Sufficiently thorough to proceed.	Noted.
26	Did Not Complete Form	See 4a ³⁹	Noted.
27	Yes	In principle the hybrid option would seem most appropriate, but it is not clear that the benefits from alternative options have actually been fully incorporated. Option 1 (growth of strongest market areas) could be regarded as where we are now, and the assessment of positives and negatives	The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF.

³⁹ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		seems fair. If the Preferred Option will introduce a different approach it would be useful to spell out in what ways will the preferred option lead to different outcomes? The reservations about Options 3 (decarbonisation) and 4 (SMNR) in Appendix C perhaps reflect the challenges of radical change rather than inherent unsuitability. There is no reason why economic activity under option 4 has to be limited to only the land management industries. Options 3 and 4 together underpin the sustainability and long term viability of all other options including the preferred option.	A number of broad options were considered at this preferred option stage to set the direction for the draft NDF. The suggested alternatives raised as part of this consultation will be considered at the next stage of plan development. The Integrated Sustainability Appraisal Environmental Report will set out the alternatives considered.
28	Did Not Complete Form	No Comment	
29	Did Not Answer	N/A	
30	Yes	4b1 HRA assessments at this stage are premature, as the report makes clear.	The draft NDF will include a greater level of detail on policies and projects and subsequent HRA will be undertaken.
31	No	N/A	
32	Did Not Complete Form	See 4a ⁴⁰	Noted.
33	Did Not Complete Form	No Comment	
34	Did Not Complete Form	CLA Cymru has no comments at this time.	Noted.
35	No	No Comment	
36	Did Not Complete Form	No Comment	
37	Yes	Page 9 of the HRA –With regard to NDF Objective 7.1, it is suggested that there are possible impact pathways between the objective and European sites, for example disturbance from additional visitors to	These comments are noted and agreed.

⁴⁰ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		historic sites, or severance and fragmentation arising from historic site maintenance or management. It may still be possible to screen out Objective 7.1 however, subject to a requirement to include policies to protect designated sites in lower-tier plans in the Recommendation / Mitigation Options column.	
38	Yes	No Comment	
39	No	No Comment	
40	Yes	Please see our response to the ISA Interim Report, and to the preliminary HRA Screening Report in our accompanying letters. See 1a and 1b	Noted.
41	Did Not Answer	No Comment	
42	Did Not Answer	No Comment	
43	Did Not Answer	No specific comments to make	Noted.
44	No	No Comment	
45	Did Not Complete Form	No Comment	
46	No	No Comment	
47	Did Not Complete Form	No Comment	
48	No	No Comment	
49	Did Not Answer	No Comment	
50	Did Not Complete Form	see 4a ⁴¹	Noted.
51	Yes	The breadth and depth of the ISA process does provide a robust assessment of the options, and the outcome of the 5 preferred option 'Sustainable Places' which draws on the strengths of options 1 – 4 is	The Integrated Sustainability Appraisal Scoping Report, based on the Plans, Policies and Programmes Review, environmental baseline, likely evolution of this baseline

⁴¹ ⁴¹ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		appropriate and demonstrates the value of the ISA process. The process would be strengthened if the impacts of future trends were more comprehensively considered as part of the ISA process as outlined in the answers to questions 1a and 3d.	and the key sustainability issues presents the Integrated Sustainability Appraisal Framework. Within the contents of this Report, future trends in Wales are addressed and fed through to the Integrated Sustainability Appraisal Framework. Future trends will be considered in greater detail in the next version of the Integrated Sustainability Appraisal when more detailed assessments can be prepared.
52	No	No Comment	
53	Did Not Complete Form	No Comment	
54	Did Not Complete Form	See 4a ⁴²	Noted.
55	No	No Comment	
56	No	No Comment	
57	No	No Comment	
58	Did Not Answer	No Comment	
59	No	No Comment	
60	Did Not Complete Form	No Comment	
61	No	No Comment	
62	Yes	It is not clear whether the ISA interim report was informed by the Issues paper (at appendix A of the consultation document), or whether the ISA Framework and Objectives were informed by a review of plans, policies and programmes and national scale evidence base such as the National Indicators for Wales, Wellbeing of Wales statistics, Future Trends report and the State of Natural Resources Report (SoNaRR). The Integrated Sustainability Appraisal (ISA) interim report appears to be limited as far as it relates to the analysis on renewable energy, despite renewable energy being a core	The Issues & Options paper was not finalised until the Integrated Sustainability Appraisal Scoping Report had been finalised and an iterative process was adopted throughout. The Issues & Options were therefore informed by a review of plans, policies and programmes and the environmental baseline, as well as the emerging evidence base, for which there has also been an iterative process. Further background studies are also being

⁴² Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		component across the alternative options appraised, and a 'central theme' of the Preferred Strategy. Although the legal target under the Environment Act to reduce emissions by a minimum of 80% by 2050 is referred to as a 'key driver' which all development plans should support, relevance at the national scale is not recognised. The Future Trends report recognises that "Wales will require a major decarbonisation of energy generation" to meet the "challenging" targets, and that "Wales has great untapped growth potential to generate energy". These are strategic challenges that need a strategic response in the NDF and should under-pin the 'needs case' that the NDF should articulate to provide a positive planning platform for development. It is noted that there has been analysis of the Ways of Working under the Wellbeing of Future Generations Act as it relates to the process of undertaking the ISA. This is insightful, though perhaps a more impactful way of applying the Ways of Working would be to consider relevance to the development of the Preferred Strategy and Objectives. For example, do the Objectives sufficiently address the longer term considerations, such as decarbonisation targets, and infrastructure planning?; do the Objectives sufficiently consider the national scale problems that need to be avoided?; do the Objectives sufficiently integrate the relevant national infrastructure planning considerations?; is the process of developing the NDF collaborative and involving?	<p>undertaken, which will inform the draft NDF and Integrated Sustainability Appraisal.</p> <p>The Welsh Government recognises the importance of renewable energy to delivering its decarbonisation and energy objectives (as well as other objectives). The NDF has an important role in ensuring the planning system positively supports the delivery of renewable energy development.</p> <p>The NDF, along with the Integrated Sustainability Appraisal, will be consulted on alongside various levels of engagement at all stages and is considered to have been prepared in accordance with the five ways of working, as well as being both collaborative and involving. The details of engagement undertaken and future work can be found here: https://gweddill.gov.wales/topics/planning/national-development-framework-for-wales/getting-involved/?lang=en</p>
63	No	No Comment	
64	Did Not Answer	No Comment	
65	No	No Comment	
66	No	<p>Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh. See responses to Q4a and C1b above.</p> <p>Gweler ymatebion i C4a a C1b uchod</p>	Noted
67	Yes	This is set out in our response to Question 1b	Noted.
68	Yes	For general observations on the HRA see response to q1b above. Many of the conclusions drawn in tables C-16 & C-17 are requirements of the NDF which should be set in the contextual section of the Environmental Report (see response to question 1a) rather	The outcome of the assessments for each NDF Option show Option 4 to have mostly positive impacts, with potentially minor adverse impacts identified only for Integrated Sustainability Appraisal Objectives 4 and 12.

Rep Number	Yes/No	Representation	Response
		<p>than being presented as findings of the options appraisal. In some instances, assessment judgements are made about the relative performance of options rather than assessing each one individually against the relevant SA objective. This is not a consistent approach. How have the relative benefits of option 4 been introduced to the assessments of other options? E.g. Table C-1 "However, it is less likely than option 3 to deliver a reduction in inequalities nationally." and Table C-8 "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."</p> <p>We are concerned that conclusions drawn within the assessment of option 4 (the sustainable management of natural resources / natural resources option) are, in places, overly pessimistic. The principles of SMNR set a context for natural resource use that reminds developers and society that the environment can no longer be considered "free goods" to be exploited without consequence.</p> <p>The fact that many of the following statements, each relating to option 4, are not supported by evidence demonstrates the significant subjectivity of this part of the assessment. The benefits of ecosystems – e.g. to health, activity and nature based solutions are overlooked: C-1 "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."</p> <p>C-2 "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."</p> <p>C-3 "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."</p> <p>C-4 "The option supports a narrow approach to sustainable growth with limited impact on national prosperity and economic diversity."</p> <p>C-10 "The option has little focus on children or protected characteristics beyond this."</p> <p>C-12 "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</p>	<p>In that sense, NDF Option 4 performed better than NDF Option 1 and only slightly worse than NDF Options 3 and 5.</p> <p>Currently, there is a lack of detail and evidence to provide more quantifiable assessments of each option than is currently provided as detail on matters such as scale, type and distribution of development proposals is unknown. The assessments are intended to be objective and factually based despite the large degree of uncertainty and assumptions involved. The draft NDF will contain further detail on policies and projects. Further detail on the assessment of policies and projects will be provided in the Integrated Sustainability Appraisal Report to accompany the draft NDF.</p> <p>The NDF should be read alongside national planning policy contained in Planning Policy Wales (PPW). Environmental factors are being given due consideration in preparation of the NDF. PPW provides guidance on topic based considerations, including on environmental topics such as ecosystems and green infrastructure. The NDF will provide a strategy on future development at a national scale for Wales.</p>

Rep Number	Yes/No	Representation	Response
		<p>in appropriate areas to meet identified needs.”</p> <p>With reference to table D1 (SA Objective 16), we are also concerned that the Welsh Government’s response to the appraisal recommendations for the preferred option (the recommendation suggests greater integration), puts structure before substance. We question why the Welsh Government is resisting treating environmental enhancements equally with other ‘placemaking’ considerations? The NDF is the biggest possibility for us to demonstrate integration of environment with the statutory purpose of planning.</p> <p>Table D1 (SA Objective 16) recommendation: 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.</p> <p>See recommendation under ISA objective 9 in relation to SMNR principles.</p> <p>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.</p> <p>Welsh Government response: 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.</p> <p>15</p> <p>If all policies are to be taken as equal, what is the plan’s role in reconciling conflict between them? A sustainable approach would be</p>	

Rep Number	Yes/No	Representation	Response
		to integrate these issues. If they are to remain separate – through cross referencing is necessary to ensure the coherence of the NDF.	
69	No	No Comment	
70	Did Not Answer	No Comment	
71	No	EDF Energy has no comment on this question	Noted.
72	Did Not Complete Form	No Comment	
73	Yes	As above comments on the ISA and HRA.	Noted.
74	No	No Comment	
75	Did Not Answer	No Comment	
76	No	No Comment	
77	Did Not Answer	No Comment	
78	Did Not Answer	No Comment	
79	No	No Comment	
80	Did Not Answer	<p>The GMW Partnership recommends that:</p> <ul style="list-style-type: none"> • Option 1 ‘Focusing growth in the strongest market areas’ should be rejected as not meeting GMW Partnership’s aspirations and as inconsistent with meeting WBFG objectives; • Benchmark Option – to not prepare an NDF should be rejected as non-compliant with legislation; • Option 2 ‘Focussing on creating strong communities across Wales’ is welcomed as best fitting with the aspirations of the GMW Growth Deal, recognising that Option 3 (to deliver de-carbonisation and climate change objectives) and 4 (focused on the sustainable management of Wales’ Natural Resources) are necessary and important components of delivering Option 2. <p>Not enough weight is given to climate change and sustainable management of natural resources (SMNR). Why were options 3 and 4 only considered separately rather than together before moving on to consider a hybrid with the others, if this was then still necessary?</p>	<p>A number of broad options were considered at this preferred option stage to set the direction for the draft NDF. The suggested alternatives raised as part of this consultation will be considered at the next stage of plan development. The Integrated Sustainability Appraisal Environmental Report will set out the alternatives considered. The Integrated Sustainability Appraisal Report will fully take into account the National Natural Resources Policy and Sustainable Management of Natural Resources. The NDF will therefore, in turn, support the delivery of national strategies on the natural resources of Wales, including with regards to climate change.</p>

Rep Number	Yes/No	Representation	Response
81	Did Not Answer	No Comment	
82	No	No Comment	
83	Did Not Complete Form	No Comment	
84	Did Not Complete Form	No Comment	
85	Did Not Complete Form	No Comment	
86	Did Not Complete Form	No Comment	

Question 5b

Rep Number	Yes/No	Representation	Response
1	Yes	Everything appears to be included but it needs to be translatable in practice. Care also needs to be taken not to increase any inequalities between the regions and the communities that reside and work in them.	The comments are noted and will inform the draft NDF which will include further details.
2	Did Not Complete Form	No Comment	
3	Did Not Answer	No Comment	
4	Did Not Complete Form	No Comment	
5	Did Not Complete Form	No Comment	
6	Did Not Answer	No Comment	
7	Did Not Complete Form	No Comment	
8	No	No Comment	
9	Yes	Stop asking about these all the time – more effort seems to have gone into them than the actual NDF	The Integrated Sustainability Appraisal and Habitats Regulations Assessment provide an important part of the evidence base underpinning the strategic approach that will be set out in the draft NDF.
10	No	No Comment	
11	Did Not Complete Form	In terms of 'optioneering', a sensible and pragmatic approach appears to have been adopted to developing a 'Preferred Option', having full regard for the Habitats Regulations Assessment and the Integrated Sustainability Assessment in reaching that position.	Noted.

Rep Number	Yes/No	Representation	Response
12	Did Not Complete Form	No Comment	
13	No	No Comment	
14	Did Not Complete Form	No Comment	
15	Yes	In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management Independent management accreditation is required to achieve this Thank you	This comment is not relevant to the Integrated Sustainability Appraisal or Habitats Regulations Assessment directly.
16	No	No Comment	
17	No	No reference to landslips which are a growing issue in Wales. Welsh Government needs to adopt a National Housebuilding Programme or Policy for affordable housing. Too much power is given to National Resources Wales and more should be done to protect the 'green belts' of the communities.	These factors are taken into account in informing several Integrated Sustainability Appraisal Objectives, against which every proposal in the NDF will be assessed.
18	No	No Comment	
19	Did Not Answer	No Comment	
20	No	No Comment	
21	No	No Comment	
22	No	No Comment	
23	Did Not Answer	No Comment	
24	No	No Comment	
25	No	No Comment	

Rep Number	Yes/No	Representation	Response
26	Did Not Complete Form	See 5a ⁴³	Noted.
27	Yes	It is not clear how or whether all of the most positive features of the various alternative options have been transposed into the final “hybrid” Preferred Option. This repeated phrase used in Welsh Government’s rejection of a range of recommendations in Appendix D “...The preferred Option should be considered as a whole and seeks to deliver sustainable development...” raises fears that there is still a view that social and environmental considerations can be traded away in favour of economic outcomes.	The narrative between how the assessment of the options has informed the resulting preferred option will be expanded upon in the Integrated Sustainability Appraisal Report to accompany the draft NDF. Full consideration of social, economic and environmental factors will continue to be undertaken in developing the NDF’s spatial approach.
28	Did Not Complete Form	No Comment	
29	No	N/A	
30	Yes	5b1 CCN broadly agrees but would like more precision in the expression of aspirations. For example (P3), “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.” The creation of employment opportunities also requires local entrepreneurship , funding availability, skills development, a sound market and ongoing profit potential. Planning has a supportive and not a generative role. This point	<p>The comments regarding aspirations of the NDF are noted. In developing the draft NDF, informed by the responses submitted during this consultation, it is important to consider how the NDF vision and objectives shape the emerging NDF and deliver the necessary outcomes. The draft NDF will contain further details on policies and projects.</p> <p>It is not that the Habitats Regulations Assessment screening is premature, just that we recognise that it has relatively limited application as there is not much of a spatial element to the NDF at this early stage.</p>

⁴³ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		could be made more clearly in the NDF. 5b2 The HRA screening report is premature at this stage. This appears to be a view shared by the author/s of the report.	
31	No	N/A	
32	Did Not Complete Form	No Comment	
33	Did Not Complete Form	No Comment	
34	Did Not Complete Form	CLA Cymru has no comments at this time.	Noted.
35	No	No Comment	
36	Did Not Complete Form	No Comment	
37	Yes	SA Broadly agree with assessment of the Preferred Option Agree that the preferred, hybrid, option incorporates the most positive elements of the alternative options considered. HRA The HRA sets out the twelve overarching objectives of the NDF preferred option. Comments at Q1b and 4b apply. Distinctive and National Places – The assessment summary refers to the 'Distinctive and Natural Places' theme. The assessment refers to the potential negative landscape impacts from nationally significant transport or renewable energy infrastructure proposals. It also refers to development in more rural areas leading to negative effects against the areas of dark skies and tranquil areas. The assessment does not	The Integrated Sustainability Appraisal is not required to reiterate or set out the purpose of National Park Authorities. The Integrated Sustainability Appraisal includes the protection and enhancement of natural landscapes in Integrated Sustainability Appraisal Objective 13.

Rep Number	Yes/No	Representation	Response
		mention or consider the statutory purposes and duties of National Park Authorities. The first purpose of the National Park Authorities is to conserve and enhance the natural beauty, wildlife and cultural heritage, therefore these 'negative effects' could potentially have an adverse impact on the landscapes.	
38	No	No Comment	
39	No	No Comment	
40	Yes	Please see our response to the ISA Interim Report, and to the HRA Screening Report in our accompanying letters.	Noted. These are covered in question 1a and 1b.
41	Did Not Answer	No Comment	
42	Did Not Answer	No Comment	
43	Did Not Answer	No specific comments to make	Noted.
44	No	No Comment	
45	Did Not Complete Form	No Comment	
46	No	No Comment	
47	Did Not Complete Form	No Comment	
48	No	No Comment	
49	No	No Comment	
50	Did Not Complete Form	see 5a ⁴⁴	Noted.
51	Yes	The breadth and depth of the ISA process does provide a robust assessment of the preferred	Future trends and the likely evolution of the environmental baseline, which includes health, is accounted for in the Integrated Sustainability Appraisal

⁴⁴ Responses to this question can be found: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Rep Number	Yes/No	Representation	Response
		option 'Sustainable Places'. As stated in earlier questions when using the Well-being of Future Generations as a lens the process would be strengthened if the impacts of future trends were more comprehensively considered as part of the ISA process. Likewise in addressing the involvement way of working more detail on the depth and breadth of the engagement with stakeholders, specifically those considered as traditionally hard to reach would further strengthen the 'robustness' of the process.	<p>Scoping Report which fed into the preparation of the Integrated Sustainability Appraisal Framework. Every proposal will be assessed against the Framework.</p> <p>In the next version of the Integrated Sustainability Appraisal, where more detail on proposals will be available, assessments will determine if impacts are likely to be short, medium or long term in order to satisfy requirements of the Strategic Environmental Assessment Directive.</p> <p>The NDF, along with the Integrated Sustainability Appraisal, has been shaped by the Well-Being of Future Generations Act, will be consulted on, alongside various levels of engagement, at all stages and is considered to be both collaborative and involving. The details of engagement undertaken and future work can be found here: https://gweddill.gov.wales/topics/planning/national-development-framework-for-wales/getting-involved/?lang=en</p>
52	No	No Comment	
53	Did Not Complete Form	No Comment	
54	Did Not Complete Form	No Comment	
55	No	No Comment	
56	No	No Comment	
57	No	No Comment	
58	Did Not Answer	No Comment	
59	No	No Comment	
60	Did Not Complete Form	No Comment	
61	No	No Comment	
62	No	No Comment	
63	No	No Comment	

Rep Number	Yes/No	Representation	Response
64	Did Not Answer	No Comment	
65	Yes	Emphasis on national important places, habitats, etc. appears to be too narrow. It excludes the importance of regional and even local places to specific and individual communities (if the aim is to create sustainability at all levels and for all communities), and the potential for sites in the latter categories to become important over time at a national level (and vice versa).	The NDF will set the direction for Strategic Development Plans and Local Development Plans which are required to be in conformity with the NDF. This will ensure that development plans at all levels are consistent and work together. Nationally, regionally and locally significant places and habitats etc. are supported and valued through national planning policies contained in Planning Policy Wales. It is not the intention that the NDF repeats policies already contained in Planning Policy Wales.
66	No	Dyma gyfieithiad o'r ymateb a dderbyniwyd yn Gymraeg. Here is a translation of the response received in Welsh. See the comments already mentioned. Gweler y sylwadau a nodwyd eisoes.	Noted.
67	Yes	Habitats Regulation Assessment It is obvious that until more information is supplied on the detailed implications of the NDF proposed policies no proper assessment can be made on impacts on habitats etc. This is conceded at paragraph 5.1.3 p22 of the Habitats Regulations assessment where it states the following: 'Under the Habitats regulations it is necessary to assess the potential in-combination effects of the NDF with other current or proposed, Plans, or projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed.'	Noted.
68	Yes	See response to 1a, 4b and 5a above. We suggest you revisit the assessments and incorporate their findings in to a composite Environmental Report and publish it alongside the draft NDF next year.	Comments to be considered in informing the next iteration of the Integrated Sustainability Appraisal Report. It is noted that only a high level of assessment was undertaken at this stage.

Rep Number	Yes/No	Representation	Response
		<p>The assessment of the preferred option is undertaken to a different standard to that of the alternative options. They should be considered equally.</p> <p>The summary assessment of the preferred option explains:</p> <p>'Policies included within the Distinctive & Natural Places them...should lead to positive effects for landscape and ecology.'</p> <p>However, the policies are yet to be drafted so the assertion is premature.</p> <p>A likely significant effect, why doesn't the summary draw attention to the conclusions that: 'Strengthening national important ecosystem resilience could lead to significant positive effects...'</p> <p>Throughout the commentary provided, the assessment omits benefits ecosystem resilience has across all sectors and NDF issues.</p>	<p>It is noted that a separate Environmental Report will not be created. However, the structure of the forthcoming Integrated Sustainability Appraisal Report, to accompany the draft NDF for consultation, has been consulted on with stakeholders, including the RSPB, to ensure that it will be easily understood, including in relation to how it meets legal requirements.</p>
69	No	No Comment	
70	Did Not Answer	No Comment	
71	No	EDF Energy has no comment on this question.	Noted.
72	Did Not Complete Form	No Comment	
73	Yes	<p>There is a lack of quantitative environmental information and no separate environmental report labelled environmental report. There is Appendix A: Issues that covers environmental information. The ISA report is an assessment rather than a data report.</p>	<p>The next version of the Integrated Sustainability Appraisal will incorporate the requirements of an Environmental Report.</p>
74	No	No Comment	
75	Did Not Answer	No Comment	
76	No	No Comment	

Rep Number	Yes/No	Representation	Response
77	Did Not Answer	No Comment	
78	Yes	I heard with concern that during a stakeholder workshop in the Assembly participants believed that the Integrated Sustainability Appraisal and Preliminary Habitats Assessment did not been adequately assess the species and habitats requirements of the regulations. I would welcome some reassurance in this respect.	The Habitats Regulations Assessment and Integrated Sustainability Appraisal of the NDF will satisfy the Directives and be legally compliant in light of case law.
79	Yes	In respect of the Habitats Regulations Assessment screening report, the “People over Wind” judgement of April 2018 needs to be considered moving forward due to the potential impact it will have. In particular, “the recent ruling requires that regard must first be given to the impact of the plan or proposal in assessing, whether or not, an Appropriate Assessment is required without having regard to mitigation measures”. In practice, where councils have currently taken into account mitigation measures in relation to a scheme, this could now result in delays to applications in all of the following stages: Permission Granted, Appeal, Resolution to Grant as well as the promotion of sites through the development plan. This potential impact needs to be noted moving forward.	The Habitats Regulations Assessment and Integrated Sustainability Appraisal of the NDF will satisfy the Directives and be legally compliant in light of case law.
80	Yes	Is it not the aim of the Welsh government that all actions in whatever sphere contribute to EACH of the Wellbeing Goals? Therefore, why does the ISA only match some of the Wellbeing goals to each assessed aspect? How is Resilient Wales being interpreted through the ISA? It seems to focus on individual and community (human) resilience but ignores Ecosystem Resilience despite the definition in the WBFG Act.	The NDF will have an important role in contributing to the achievement of the well-being goals and the approach to the Integrated Sustainability Appraisal helps us to understand where the NDF can maximise that contribution. The goals have been integral to the work so far as well as the ways of working.
81	Did Not Answer	No Comment	

Rep Number	Yes/No	Representation	Response
82	Yes	As per previous	Noted.
83	Did Not Complete Form	No Comment	
84	Did Not Complete Form	No Comment	
85	Did Not Complete Form	No Comment	
86	Did Not Complete Form	No Comment	

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