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Neil Hemington
Chief Planner
Planning Directorate
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28th May 2017

Dear Neil,

Consultation on the draft Integrated Sustainability Appraisal Scoping Report for the National Development Framework

Thank you for your e-mail of 28th April 2017 consulting Natural Resources Wales on the Scoping Report for the Integrated Sustainability Appraisal (ISA) of the National Development Framework (NDF). Our comments on the Strategic Environmental Assessment (SEA) aspects are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, and in our statutory role as advisers to Welsh Government on the natural heritage and resources of Wales. Our further comments on the wider ISA are on those areas where we have expertise.

We present our key comments below, with more detailed comments in the attached Annex 1.

Our key comments are as follows:

1. We welcome and support the development of the NDF, together with your commitment to ISA and SEA, including your active engagement with us and other consultees through informative workshop sessions. We also welcome the clear and 'easy to follow' structure of the ISA report and accompanying appendices.
2. We welcome the prominence given to the State of Natural Resources Report (SoNaRR) as an important source of baseline data and key opportunities, as well as the emerging Natural Resource Policy (NRP), and Welsh National Marine Plan (WNMP) in particular.
3. We wish to see greater prominence given to the Sustainable Management of Natural Resources (SMNR), and clearer linkages to the SMNR principles through the NDF and accompanying ISA. The NDF should provide a framework to help ensure SMNR is applied equally and consistently to sustainably manage the environment and

natural resources of Wales, in line with the emerging Natural Resources Policy, and a key role for the ISA is to assess whether this is the case.

4. The ISA must be clear that all aspects of SEA are fully covered, and that the broadening of the scope to include SA alongside seven other appraisals has not lead to any of the statutorily required steps and considerations being lost or overlooked. As the integrated assessment is undertaken, ensure that the SEA aspects are presented in a way that allows easy external evaluation. In particular, how the 10 SEA topics are assessed and presented needs careful consideration.
5. We have made a number of suggested amendments and additions to the ISA Objectives and accompanying guide questions, and these can be found in our response to Question 4 in Annex 1.
6. In relation to the approach to the consideration of alternatives, we encourage you to consider whether analysis of national alternatives and the effective delivery of NDF policies may be most effectively delivered by applying a regional approach for intervention. If such an approach is considered appropriate by Welsh Government, we recommend that any regional approach set out in the NDF should be coterminous with the areas of Wales for which an 'Area Statements' will be produced (see our response to Question 5).
7. We are concerned that the ISA does not adequately address present day flood risk and impacts, focussing more on future risks as a result of climate change. It is our view that the NDF needs to look at opportunities to reduce present day flood risk and promote resilience measures, not just look at future risks. The NDF has an important role to play in guiding decisions through the planning process that ensure new development does not cause or exacerbate flood risks.
8. There is an issue regarding the way that Climate Change is dealt with in the ISA, where it appears to be linked to flood risk only. Climate Change will impact on many issues, not simply flood risk. The assessment (and the NDF itself) needs to acknowledge and address the full range of risks identified within the "*Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales*", for example in relation to water availability. In relation to this scoping report, without such an acknowledgment, we cannot be sure that the assessment will adopt the comprehensive, systematic approach to climate adaptation that is required.
9. It is our view that the ISA does not adequately recognise the importance of accessible natural green space. Accessible natural green space can provide important co-benefits for biodiversity, and physical and mental wellbeing, and the NDF has the potential role to play in its future provision. It should be highlighted as an issue and

an opportunity, referenced in the baseline, and referred to in the ISA Objectives and guide questions.

10. Following on from the above point, there is a need to emphasise the opportunity for the NDF to promote and make provision for nature based solutions and green infrastructure (including, for example, biodiversity networks) which can deliver multiple benefits for identified key issues.

We hope the above is of use. Should you have any queries regarding these comments, please do not hesitate to contact Roger Matthews or Anne MacDonald, via strategic.assessment@cyfoethnaturiolcymru.gov.uk.

Yours sincerely,

Howard Davies
Head of Corporate Planning

Annex 1

- Q1 Do you support the findings of the review of relevant plans, programmes and environmental protection objectives?
Are there any additional plans, programmes or environmental protection objectives you would like to add?
Are there any that you would like to remove from the review? (Section 3)**

General

It is our view that the principles of the sustainable management of natural resources (SMNR), as set out in the Environment Act (Wales) 2016 should be explicitly referenced and acknowledged.

We welcome the prominence given to the State of Natural Resources Report (SoNaRR) both here and in the analysis of baseline information. We also welcome the high profile mention of, and links to, both the emerging Natural Resources Policy (NRP) and Welsh National Marine Plan (WNMP), all of which are likely to have significant influence over the NDP.

Items to add to the review:

We suggest you also include Welsh Government's Wellbeing Statement. In addition, we suggest including the Welsh Government's Nature Recovery Plan.

Appendix A appears to be missing sector development legislation/plans. This may be because it is considered to sit underneath the named policies/plans already mentioned, but this doesn't seem to be the case in all instances, for example:

- UN Convention on Law of the Sea
- Petroleum Act
- DECC/BEIS Offshore Energy Plan and subordinate plans for offshore oil and gas licensing
- The Crown Estate Minerals Licensing Plan
- Shoreline Management Plans

In addition, we note that there is no reference to Area Statements. See our comments in relation to Question 5, consideration of alternatives. Regardless of this, given that it is anticipated that these documents will be key in the implementation of the Natural Resources Policy, it is our view that they should be included in the plans reviewed, if they are published in time for consideration. Area Statement production will start once the Natural Resources Policy is approved, with all of them published by the end of 2019. The NDP will need to take them in to account as they are published.

Correction to review list:

The Natural Resources Policy Statement (2015) is incorrectly attributed to NRW (Appendix A, page 4). This is a Welsh Government document.

Water

The review of plans should include the River Basin Management Plans (RBMPs) that are relevant to Wales - Natural Resources Wales produced the RBMPs for the Dee and Western Wales, and the Environment Agency have produced the plan for the Severn. Whilst we recognise that these plans are not produced at a national scale, they contain National Measures, which are set out in the RBMPs separately but that apply to Wales as a whole. It is our view that these National Measures should to be considered as there is a real opportunity for the NDF to help deliver them, for example implementing sustainable urban drainage etc. In addition, we have an all Wales delivery plan which sets out the timetable etc. for delivery, which should also be considered, and which we can forward on to you.

Appendix B, page 32, 3.1.5 Water Environment, Baseline condition and trends – there are a number of errors in this section. This includes the figure referenced (the title is wrong), and, more significantly, the baseline data quoted is incorrect. Currently it states that *‘In 2014 42% of water bodies in Wales were classified as being of ‘good’ ecological status compared to 21% in England. There was a slight decrease to 39% classified as being of ‘good’ ecological status in 2015’*. This is incorrect. In 2015 cycle 1 for Wales there were 37% of water bodies achieved good or better ecological status. For Wales in Cycle 2, in 2015 over 38% of water bodies achieved good or better ecological status. 39% relates to the overall figure (combined ecological and chemical) for Wales in Cycle 1 2015. 42% refers to the predicted number of water bodies in 2021.

Climate change

We support the reference to the “*Defra (2012) UK Climate Change Risk Assessment: Government Report*”, but would expect the corresponding document for the latest UK Climate Change Risk Assessment to be used as well, namely:

- UK Climate Change Risk Assessment 2017: Government Report
<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

Similarly, we support reference to the “*Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales*”, but would make the point that this is a relatively high-level document, and that the technical chapters of the full UK report would need to be accessed for more detailed information, link below:

- <https://www.theccc.org.uk/uk-climate-change-risk-assessment-2017/>

Flood Risk

Overall, we are satisfied that all relevant plans, programmes etc. in terms of flood risk and coastal erosion have been identified and reviewed. We suggest that the Key theme from the review in terms of flood risk could be expanded to include ‘*impacts on people /property*’.

Comments on sustainability themes in **Appendix A**

The Sustainability Themes identified in Table 1-2 (in terms of flood risk – page 10) capture the precautionary principle well in terms of new development and climate change adaptation. However, it is stated that the NDF will “*use natural features that contribute to flood management to reduce flood risk and coastal erosion*”.....and that “*this should be considered when determining the location and design of new development*”? Whilst this sounds good, we are less clear about how this will be delivered in practise. We would welcome greater clarity on exactly how the NDF will link flood defence/mitigation programmes with development management.

The theme related to the protection of water resources/quality (page 13) could be enhanced by including the greater use of Sustainable Urban Drainage Systems (SUDS) as an opportunity. It would also be good to see the sustainable use and disposal of water in all new developments captured (to include sewerage as well as surface water drainage).

Theme ‘*Create safe, sustainable, balanced and cohesive communities*’ (page 19) should include Wellbeing Goal 7. ‘Safe’ should include safety from natural hazards such as flood risk and coastal erosion.

Landscape

Appendix A, Page 17, Protect and enhance the local distinctiveness of our landscapes and the historic environment and its setting – the Historic Landscapes Register is included, and we therefore suggest also including statutory National Park and AONB management plans.

In addition, other related UK legislation that should be referred to includes:

- National Parks and Access to Countryside Act 1949
- Countryside Act 1968

Health and Wellbeing

We wish to highlight the importance of the new *National Survey for Wales* (NSW), an integrated survey by the Welsh Government, Natural Resources Wales, Sport Wales and the Arts Council. This will provide the key data for the population of Wales on a wide range of relevant social and economic aspects, including health and subjective well-being, participation in outdoor recreation and sport, and attitudes towards exposure to flood risk, climate change and biodiversity loss, and will therefore be a key source of data for the ISA

and the NDF on the population of Wales. The first results are due to be published on the 28th June 2017, with subsequent annual publication of data until at least 2021.

Economics

Additional strategies and plans that should be considered as part of the review are:

- *Green Growth Baseline Study* (2014), A report for Welsh Government prepared by Eftec on behalf of the Green Growth Steering Group
<http://www.cynnalcyrmru.com/wp-content/uploads/2015/02/Green-Growth-Baseline-Study1.pdf>
- *Growth within: A circular economy: vision for a competitive Europe* (2015). McKinsey Center for Business and Environment, jointly sponsored by the Ellen Macarthur Foundation and SUN
<http://www.mckinsey.com/business-functions/sustainability-and-resource-productivity/our-insights/europes-circular-economy-opportunity>

Energy

UK Plans and Programmes

- HM (Government) (2013) The Energy Act 2013
- HM (Government) (2016) the Energy Act 2016
- The Wales Act 2017

Wales Plans and Programmes

- Welsh Government's 2014 Energy Wales: A Low Carbon Transition Delivery Plan
- Welsh Government's 2015 Green growth Wales: Investing in the Future
- Welsh Government's 2015 Green growth Wales: Local Energy
- Energy Efficiency in Wales: A Strategy for the Next 10 years 2016-2026

Both the Green Growth documents are part of a programme aimed at fostering economic growth, development and social equity, while ensuring that our natural assets can continue to provide the resources and environmental services on which our wellbeing relies. They focus on the sustainable use of natural resources by stimulating investment and innovation, which will help create a new economic model, and deliver economic growth.

Biodiversity

Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, Lawton, J. (2010) – whilst this review was produced in relation to English sites, the principles of better, bigger, more joined up, more permeable landscape etc. apply equally to Wales.

The map of designated sites has some out of date information: all the marine sites currently described as potential SPAs, should be just SPAs (they were designated by the Minister in January).

**Q2 Do you agree with the sustainability issues that we have identified?
Are there additional issues that the ISA should consider? If so what are they?
(Section 4)**

General

To ensure SEA criteria are fully covered in this ISA, please ensure that Material Assets are considered appropriately. As presented, this currently only appears to consider housing and transport. In addition, the inter-relation between the effects on SEA topics also needs to be considered in the assessment process.

Scoping Report, page 21, Table 4.1, 2. A resilient Wales – in the opportunities column there is a need to emphasise the opportunity for the NDF to promote and make provision for nature based solutions which deliver multiple benefits for identified key issues.

In relation to Geology and soils, note that soil quality has deteriorated across all habitats except woodland.

In relation to Minerals and Waste, note that reducing demand is the first step to reducing waste, not recycling.

Biodiversity

Page 21, Table 4.1, 2. A resilient Wales, Biodiversity, flora and fauna – we are concerned that this section does not provide a clear and comprehensive summary of the issues and opportunities in relation to biodiversity. It is not just designated sites and species which are declining, most non-designated habitats and species are also declining in quality and quantity. Fragmentation is also a key issue, severing meta-populations, leading to local extinctions, and a greater vulnerability to the impacts of climate change. A clear priority and opportunity is the need to protect, create and maintain functioning ecological networks at a landscape scale. We suggest you refer to SoNaRR for a comprehensive view of issues.

Air quality

Air quality issues are wider than are described here. While health benefits are identified from reducing air pollution, as are ecosystem benefits, the fact that there are co-benefits needs to be strengthened.

The review of baseline data emphasises sulphur dioxide (and ozone) as an issue in Wales. However, it is our view that sulphur dioxide is not a significant issue in Wales, whilst nitrogen oxides (NO_x), in particular nitrogen dioxide, are, having been identified as such in all 22 of the Air Quality Management areas (AQMAs) in Wales - this needs reinforcing. In addition, there appears to be no mention of ammonia in this section – this is a significant omission as it is a key increasing pollutant in Wales with many localised hot spots breaching the relevant critical levels. Reductions in ammonia emissions (which include ultra-fine particles PM_{2.5}s) has co-benefits for both ecosystems and human health.

Water

The water section does not adequately reflect the significant water management issues in Wales. A cleaner, healthier water environment is beneficial to many of the 7 wellbeing goals and its importance should be highlighted. The River Basin Management Plans (RBMPs) include a Programme of Measures (local and National), and these should be referred to within the document (as part of duties under Section 3 (4) of the Water Framework Directive (WFD) (England & Wales) 2017 Regulations).

Whilst the document makes frequent reference to water features, it is important to consider that the WFD encompasses all water environments.

The NDF could and should play a bigger part in helping to enhance water bodies and the aquatic environment. For example Sustainable Drainage Schemes; preventing road and highways drainage from going straight to water courses; etc. Development planning needs to take into account WFD at an early stage.

Page 16, Table 3.3 - the review of plans and programmes identified that ‘protect and improve the quality of water resources’ is a key theme, and identified national well-being goals where the theme can contribute to. It is our view that this should include ‘A prosperous Wales’ as improved water quality leads to healthy habitats and species which in turn brings in tourists (in the same way that biodiversity does). ‘A Wales of cohesive communities’ should also be included as communities that have access to healthy aquatic habitats are more likely to be socially responsible and work together to ensure it stays that way.

Page 21, Table 4.1, 2. A Resilient Wales – the key issue that ‘*Terrestrial and marine biodiversity is under threat from development, pollution and climate change*’ should also include reference to *freshwater* biodiversity.

In relation to the key issue that flood risk ‘*is exacerbated by an increase in extreme weather events and this means that properties and businesses are increasingly becoming at risk*’, this should also include reference to land use practices and increased channel modifications leading to increased flow rates and subsequent erosion.

Page 23, Table 4.1, Key sustainability issues and opportunities, 3. A Healthier Wales – the 2nd bullet point should include reference to Sustainable Urban Drainage Systems (SUDS), and a healthier aquatic environment.

Appendix Page 34, 2nd paragraph – it is important to note that Wales isn't all a 'groundwater inner source protection zone'. It is all considered a Drinking Water Protected Area under the WFD, which is where the confusion may have arisen.

Climate change

There is a presentational issue, and potentially a more fundamental issue, regarding the way that Climate Change is dealt with in Table 4.1. In this table, and in relation to "A resilient Wales" Climate Change is linked to Flood Risk only. Climate Change will impact on many issues, not simply Flood Risk. There needs to be a clear statement within the table that the scoping report acknowledges the full range of risks identified within the "Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales", and that these various potential impacts are addressed within the relevant parts of the scoping report – for example in relation to water availability. Without such a statement we cannot be sure that the scoping report has adopted the comprehensive, systematic approach to climate adaptation that is required. In particular, we cannot be sure that issues regarding gaps in the data have been taken fully on board.

Flood Risk

We are pleased to note that 'Climate and flood risk' is captured as a 'Key Issue' in Table 4.1. Although flood risk is noted as a significant issue, ideally it should be made clearer that this is an issue for Wales now, and not just due to climate change. The text does identify that there is an "increasing risk to properties and businesses", however, the increased risk of flooding and the correlating impact on health and wellbeing has not been identified. The impact on the local economy as a result of flooding is also a key issue – not only in terms of direct clean-up/recovery/repair costs, but also from impacts such as disruption to local services, loss of trade to local businesses (including agriculture), working days lost, etc.

Under 'opportunities' the NDF also has a role to play in reducing the risk from *present* day flood risk, not just future risks resulting from climate change. Flood Risk and the management of that risk is an issue for Wales even without the increasing risk from climate change. For example, new development continues to be constructed in areas identified as being at flood risk. There are therefore increasing risks from flooding due to inappropriate development and decision making, not just as a result of climate change. This is not acknowledged in the document or by the relevant ISA objective (Obj.7).

Also, we would like to see the NDF provide support to the principle of directing development away from areas of flood risk, as well as providing guidance on location and design. Other

partners, such as the Lead Local Flood Authorities, Local Resilience Forums (flood management/flood preparation & emergency planning) and other key stakeholders such as the Wildlife Trusts and National Trust (and others) should also be identified as an opportunity to improve flood risk management, in particular as part of encouraging sustainable land and ecosystem management.

We have the following comments on Appendix B (Baseline Data) relating to flood risk.

Climate & Flood Risk - section 3.1.3

page 27. As stated previously, it is not just climate change that will exacerbate flood risk and put people at increasing risk – inappropriate development (building in present day flood risk areas/development of green spaces increasing run-off/poorly thought out drainage, etc.) is also an issue.

page 28. The impacts of flooding are significantly wider than those identified here. There is the damage to infrastructure and knock-on effects e.g. disruption to everyday lives such as commuting/accessibility, temporary (but possibly long term) loss of facilities and local services, impacts on local businesses/economy, impacts on health and wellbeing including increased pressure on health service provision, etc, some of which are difficult to quantify.

Water Environment – section 3.1.5

The NDF could also play a role in guiding decisions through the planning process that ensure new development does not cause or exacerbate flood risks

Table 3.2. (Key Issues) page 35

Climate and Flood Risk – as before flood risk is an issue currently, not just as a result of Climate Change. There could be links made here to an increasing risk to the health and wellbeing of people in Wales as a result of extreme weather and its impacts (including flood risk), as well as the negative impacts on local the economy/community.

Page 36 – opportunities (climate and flood risk)

The NDF needs to look at opportunities to reduce present day flood risk and promote resilience measures against that too – not just look at future risks.

Also, as highlighted under Q2, other partners/key stakeholders in addition to NRW, should also be identified, especially in terms of encouraging sustainable land and ecosystem management, and for emergency flood planning (which are all part of flood management).

Landscape

We are pleased that the protection and enhancement of landscape and the historic environment have emerged as a key theme of the review of plans, programmes and environmental objectives (P17). We are also pleased that the opportunities landscape

provides in contributing to Welsh Governments four key strategies (1.7), and social, environmental, cultural and economic wellbeing, is clearly recognised.

Figure 2 Landscape Features and Figure 3 Heritage Features – it would be beneficial if these two figures were clear that they illustrate a mix of statutory /non-statutory and national/local designations. Figure 2 should ideally be entitled Statutory Landscape Designations (which are the National Parks and AONBs). Country Parks are non-statutory local authority recreation designations and perhaps would better sit under a recreation or accessible green space map, the production of which we would support.

Landscape as a resource providing important cultural services for wellbeing also lies beyond designated landscapes and can be considered at different spatial planning scales. The table below sets out the range of Landscape resources which are available as mapped areas. Due to the overlap with habitat and historic environment considerations, it might not be practical to duplicate some of these on Figure 2 Landscape, but as areas of landscape resource, components contributing to landscape distinctiveness, destinations for communities and visitors for wellbeing and components of urban Green Infrastructure, the current discussion within the NDF regarding landscape would benefit from being broader.

Landscapes Valued for Distinctiveness and wellbeing	Spatial planning context		
	National (NDF)	Regional (SDF)	Local (LDP)
Designated landscapes	National Parks AONBS		
Non-designated landscapes	Heritage Coasts Registered Landscapes Historic Landscapes	Special Landscape Areas	
	Tranquillity		
	LANDMAP Outstanding overall evaluations Visual and sensory Historic landscapes Geological landscapes	LANDMAP High overall evaluations Visual and sensory Historic landscapes Geological landscapes	LANDMAP Moderate overall evaluations Visual and sensory Historic landscapes Geological landscapes

	Ancient woodland	semi-natural	Country Parks
	National Reserves	Nature	Forest Parks
			Local Nature Reserves
			Accessible Natural Greenspace
			Urban tree assessment

Page 23, 3. A healthier Wales – this refers to ‘*national green spaces*’ which is not a term with which we are familiar. This term is also used in Appendix B on page 47. It is unclear whether this is referring to national parks and AONBs, or some other green spaces. Clarity on this would be welcome.

Table 4.1 Key sustainability issues and opportunities

Page 24, 5. A Wales of cohesive communities - we suggest landscape character and quality needs to be considered as more specific rather than just landscape. This is because being more focused on what a scheme may contribute to would be more helpful down the line.

Many of the issues discussed in this section have a connection with the planning and design of the built environment, for example the location and form of housing development, access to safe open spaces, quality of the public realm, and opportunities for social interaction. The NDF should make clear the importance of, and enable, planning for cohesive communities within future areas of growth, across the full range of planning considerations, not simply the delivery of housing. Otherwise planning for social cohesion and healthy communities may be lost in the planning balance, because of economic issues such as developer viability. If this doesn’t happen there is a risk that we could continue to repeat the mistakes of the past.

We support consideration of the following additional points within the opportunities column:

- Appropriate guidance could be developed to clarify planning and design approaches that help support cohesive communities e.g. the integration of places and networks for health, habitats and climate resilience within housing and transport proposals.
- The NDF is focused towards the sustainable planning of new development. It would be helpful also to introduce regeneration and retrofitting as important planning means of addressing the social, health and wellbeing issues faced by existing communities.

Page 24, 6. A Wales of vibrant culture and thriving Welsh language, Landscape and Townscape Character – we welcome the inclusion of landscape in both the issues and opportunities columns, and are pleased that seascape has also been integrated. In addition, we welcome the suggestion of new guidance to assist in the protection and enhancement of this resource as part of the planning system.

In the issues column, it is stated that ‘*Wales is renowned for its high-quality landscapes with over 50% of the land area being nationally valued for its scenic quality and character*’. We would suggest adding ‘*including 25% of Wales which is internationally recognised as National Park or AONB*’. Similarly in the Key Issues on page 78 of Appendix B.

Also in the issues column we support the inclusion of distinctiveness, but would add (underlined) ‘*to enable appropriate levels of growth whilst retaining the distinctiveness and quality of places and landscapes*’.

Cultural Heritage and Assets - it is also important to recognise that assets in isolation, as well as their group value and collective landscape context, are important. We welcome recognition of their contribution to a sense of place and identity.

Appendix B, Page 6, 2.1.1, The Economy, Employment and Income in Wales – you may wish to consider adding:

- In 2013 Welsh National Parks accounted for over half a billion pounds of Wales GVA representing 1.2% of the Welsh economy (Valuing Wales’ National Parks, Arup Report 2013).
- In 2013 more than 12 million people visited Wales’ three National Parks, resulting in some £1 billion pounds’ worth of spend in the Welsh economy (Valuing Wales’ National Parks, Arup Report 2013).
- 38% of all jobs in Welsh National Parks are linked to the environment (UK Census 2011).

Page 8, SMEs and Micro-businesses – you may wish to consider adding:

- It is estimated that over 5,000 small businesses are located in Welsh National Parks, employing more than 29,000 people (Valuing Wales’ National Parks, Arup Report 2013).

Page 71, 7.1.2, Relevance to the NDF, 2nd paragraph – landscape is about character and quality, and it is important that this is recognised throughout the assessment process – for example, the text below should ideally have the additions underlined:

- ‘*These elements have been strongly shaped by human intervention and land-uses throughout history and the NDF will continue to play an important role in shaping this character and quality through its guidance on land-use planning. Landscape, townscape and seascape character and quality are important in terms of Wales’ strong sense of place and cultural identity with close links to the tourism industry.*’

It should also be noted that Protected Landscapes are now more accurately referred to as Designated Landscapes (both Welsh Government and Natural Resources Wales now use this term.)

In the Protected Landscapes section at the bottom of page 71, two points to consider as additions are:

- The National Parks and AONBs are national strategic assets contributing to the delivery of social, environmental, cultural and economic well-being goals for a quarter of Wales.
- More detailed information on these areas is updated on a five-yearly basis through the statutory review of National Park and AONB management plans.

Health and Wellbeing

Page 16, Table 3.3 – we are concerned that this table lacks a coherent, comprehensive set of social/health themes. In particular, we recommend the inclusion of the following:

- Increasing informal recreational use of the natural environment by local residents, which provides significant benefits to health, the economy, and community cohesion.
- Increasing opportunities for people to engage with their local environment, including environmental volunteering, allotments, and community growing schemes, which contribute to health and wellbeing.
- Improve opportunities for active travel, with a focus on interconnected, safe walking and cycling routes.

Page 23, Table 4.1, 3. A Healthier Wales – this should include reference to the role of the NDF in improving infrastructure and opportunities for Active Travel (walking and cycling). The provision of accessible natural green space should be highlighted as an issue and an opportunity.

Appendix B, page 18, 4.1.1 Health and Wellbeing

Relevance to the NDF – this should include reference to the role of the NDF in reducing the cost to the health sector through improving population-level health and wellbeing. This should focus on:

- health improvement (e.g. opportunities for physical activity and mental health benefits through outdoor recreation);
- health protection (e.g. through improving air quality)

Baseline conditions and trends – there is a lack of data on recreation use of the environment, and on participation in environmental volunteering. Given the numerous references to the recreational use of open greenspaces etc., it is essential that the baseline data includes the following (this will be provided by the new *National Survey for Wales*, reporting in June 2017):

- percentage of adult population taking part in outdoor recreation in Wales
- percentage of people meeting the recommended level of physical activity through participation in outdoor recreation in Wales
- percentage of the population taking part in environmental volunteering

For information, with regard to the lack of spatial data on greenspace in Wales, Natural Resources Wales is currently developing a new Green/blue space data set, which we expect to be available by the end of 2017.

In addition, Appendix B does not appear to include reference specifically to accessible natural green space. As you are aware there are important co-benefits here for biodiversity, and physical and mental wellbeing.

Energy

Issues and opportunities in relation to energy

There should be more consideration of smart energy technology as well as low carbon.

We consider the NDF has the following opportunities in relation to energy:

- Greater emphasis on reducing energy demand, to an extent that reflects the ambition implied in the Wales Carbon Budgets that are set by Welsh Government under the Environment (Wales) Act 2016.
- Aim to reduce emissions by highlighting the opportunities from natural resources (links to SMNR) and stressing the need to diversify the energy sector (encourage a greater energy mix, for security, affordability and climate factors). This would help realise the potential for energy efficiency, renewable energy and low carbon energy.
- NDF could realise the potential of the right technology in the right place (heat networks, wind, marine).
- NDF also has the potential to identify the need for, and support development of, energy infrastructure such as electricity transmissions and grid distribution.
- NDF has the potential to support decentralised energy networks; reflecting the objective of greater community and local ownership of renewable energy, whilst encouraging demand reduction.
- NDF has the potential to identify and support innovation and emerging energy technologies in decarbonising Wales.

Economics

Page 20, Table 4.1 Sustainability Issues and Opportunities, 1. A prosperous Wales - the document throughout talks in terms of economic growth rather than sustainable economic growth. It is our understanding that Welsh Government envisages economic renewal based upon:

- Balanced and sustainable growth
- Inward investment
- Increased employment

The Welsh green growth strategy contributes towards the aim of achieving sustainable growth. In view of this it would perhaps be more appropriate to state under “*Opportunities for the NDF to address*”:

“The NDF has a role to play in achieving balanced and sustainable growth, encouraging inward investment, increasing employment and promoting a green growth strategy to underpin prosperity and the transition to a low resource use (including low carbon) economy.”

Appendix A, Page 8, Table 1.2 - the duty under Section 6 of the Environment Act laid upon public bodies to maintain and enhance biodiversity is recognised, but the document rather tentatively goes on to argue “*Plans, programmes and environmental protection objectives (sic) that prioritise economic development without consideration of ecosystem resilience may conflict with this theme.*” The NDF has a key role to play in ensuring that the planning system helps steer development to the correct places.

Q3 Are there any particular topics or geographical areas of specific concern to you or your organisation? (Section 4)

General

Sustainable Management of Natural Resources – Wales' natural resources provides our basic needs; the air we breathe, the water we drink, and the food we eat. They give us energy, prosperity and security; they protect us and makes us healthier and our lives better. By unlocking the potential that lies within the natural resources of Wales, by managing them and using them in a more joined up way, they can help us face the challenges ahead. The Environment Act includes a requirement for Natural Resources Wales to embed the principles of SMNR throughout the way we work. Through applying these principles we can maximise our contribution to the wellbeing goals and pursue SMNR.

It is our view that the SMNR principles are directly relevant to the NDF, and we therefore wish to see a clear embedding of these principles in the NDF. The ISA should include an assessment of how well this has been achieved . See also our comments on SMNR under Question 6. We list the SMNR principles below, as set out in the Environment Act (Wales) 2016:

- a) manage adaptively, by planning, monitoring, reviewing and, where appropriate, changing action;*
- b) consider the appropriate spatial scale for action;*
- c) promote and engage in collaboration and co-operation;*
- d) make appropriate arrangements for public participation in decision making;*
- e) take account of relevant evidence and gather evidence in respect of uncertainties;*
- f) take account of the benefits and intrinsic value of natural resources and ecosystems;*

- g) take account of the short, medium and long term consequences of actions;*
- h) take action to prevent significant damage to ecosystems;*
- i) take account of the resilience of ecosystems, in particular the following aspects:*
 - i. diversity between and within ecosystems;*
 - ii. the connections between and within ecosystems;*
 - iii. the scale of ecosystems;*
 - iv. the condition of ecosystems (including their structure and functioning)*
 - v. the adaptability of ecosystems*

Climate Change

There is a particular issue around the way that Climate Change trends are considered in relation to new developments. Because of the inherent inertia in the way that earth systems respond to the temperature forcing caused by greenhouse gases, there are significant lags in the way that parameters such as global temperature, sea level and weather patterns change. This is important. Developments are generally planned to deal with likely climate conditions (and knock-on effects) over a particular period – say from 2020 to 2050. However, with climate change, we can reasonably project that conditions will change beyond the end date (in this case 2050) in a foreseeable way. Any development should therefore be required to consider how it would provide a suitable base for subsequent adaptation *beyond* its end date. This is a crucial aspect of thinking on behalf of Future Generations.

Economics

The SMNR principles have economic implications. For example, principles (f) (*take account of the benefits and intrinsic value of natural resources and ecosystems*) and (g) (*take account of the short, medium and long term consequences of actions*) together argue for giving priority to welfare analysis using Total Economic Value (TEV) rather than an inevitably short term Economic Impact Analysis approach (EIA). TEV is preferred by TEEB (The Economics of Ecosystems and Biodiversity), which is hosted by the UNEP. Please contact us if you would like to discuss this further.

Q4 Are there any changes you consider should be made to the ISA Objectives or Questions? (Section 5)

General

As a legislative requirement, the ISA needs to meet the requirements of the SEA Regulations. This includes adequately assessing the potential impacts of the NDF on the 10 SEA topics, together with the consideration of the inter-relationships between them. The objectives and questions therefore need to clearly and comprehensively cover the 10 SEA topics.

We have some concerns about the wording used in the ISA objectives and associated guide questions:

- Firstly we note that they are framed using a collection of ‘support/ encourage/ contribute/ promote’. We would welcome some clarity as to whether there is a hierarchy in the level of ‘encouragement’ each of these terms applies.
- Secondly, given the nature of the NDF (a framework that aims to ‘*provide a spatial context for the delivery of development and national planning policy in Wales over the next 20 years*’), it may provide greater certainty and clarity in the assessment if some of these objectives and questions were framed using terms such as ‘enable’ or ‘direct’, reflecting the NDF’s ability to do just that (rather than just *support* for example).

Scoping Report, page 36, Table 5.3, ISA Objective 17 – we support the addition of a guide question as follows:

- ‘*Improve the provision of nature based solutions to improve air quality, adapt and mitigate climate change, manage flood risk, improve health and wellbeing*’.

Scoping Report, page 36, Table 5.3, ISA Objective 17 – it is our view that the wording of this objective should be changed to ‘*To encourage the sustainable management of natural resources*’. In addition, guide questions to both Objective 16 and 17 should make reference to the principles of SMNR.

Table 5.5 has the wrong column heading – it should be ‘Impact assessment theme’ (or similar wording), not ‘SEA Directive topic’.

Climate change

Within Table 5.3 “ISA Objectives and questions”, our comments in relation to Question 2 and climate change apply equally here in relation to the ISA Objective 7 “To encourage climate change resilience, including contributing to the reduction and management of flood risk”.

As a separate point, the questions accompanying ISA Objective 6 “*To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficient and sustainable design*” should be tightened and “scaled” by adding the text “... *to an extent that reflects the ambition implied in the Wales Carbon Budgets that are set by Welsh Government under the Environment (Wales) Act 2016*”.

Flood Risk

ISA objective 7 relates to flood risk in terms of climate change resilience only. Flood risk and the impacts on people/property/economy etc. is an issue now and in the future, particularly when the impacts of climate change are considered.

To be fit for purpose, the objective should recognise current day risk and seek to influence decisions (nationally, regionally and locally) that direct development away from flood risk areas as well as promote features such as SUDS, flood/climate change resilience. It would be good to see the objective encourage (or direct) the enhanced protection of the floodplain as well as placing greater emphasis on developer responsibility in terms of protection/resilience against future risks as part of new development. This would help people/communities be resilient against (some) flood hazards now and in the longer term.

The 2nd question (*Will the NDF encourage all new development to be climate change resilient?*) should also be expanded to acknowledge current day flood risk. E.g. *“direct all new development away from areas of high flood risk and ensure appropriate resilience measures are incorporated to mitigate against present day flood risks (from all sources) and to future climate change impacts...”*(?)

It is not clear what is meant by the 3rd question *“Will the NDF promote the benefits of flood risk management?”*. The benefits to what? It is not clear whether this is focussed on climate change resilience, or whether it means some of the wider benefits that can be delivered through flood risk management (including for the environment, local economy, health and wellbeing etc.), or indeed something else entirely. This question needs greater clarification on what it is trying to achieve.

We suggest that there is a role for the NDF to help contribute/promote greater ‘awareness’ of flood risk in relation to planning, which is not reflected in the current guide questions.

Landscape

Page 35, ISA Objective 13 – in order to promote good design and urban green infrastructure, we would also welcome the inclusion of the following:

Amend 3rd guide question

- *‘Promote sensitive, place responsive design in development’?*

Add new guide question

- Encourage places and networks for people and nature within our townscapes?

Page 35, ISA Objective 14, 2nd guide question – we suggest amending this to *‘Encourage the conservation and enhancement of the historic landscape character’?* Also on page 79 of Appendix B.

Page 37, Table 5.2.2 Landscape – this should include reference to ISA Objective 14.

Biodiversity

We have some concerns that the current ISA Objectives and questions do not suitably refer to ecosystem resilience, and it is therefore not clear how this will be assessed. As you are aware, Section 6 of the Environment Act places a duty on Welsh Government to maintain and enhance biodiversity and promote ecosystem resilience. Ecosystem resilience should therefore be a key consideration. We will aim to provide you with additional comments in relation to this over the coming weeks.

Health and Wellbeing

Scoping report, page 31, Table 5.3, ISA Objective 2 – we support the following additional guide question:

- Support increase in green infrastructure, especially in urban areas, which can deliver multiple health benefits including reducing urban heat island effects, reducing surface water run-off, improving air quality, and providing mental health benefits.

Scoping Report, page 31, Table 5.3, ISA Objective 2 – with regard to the 5th guide question, we support the reference to open space, but wish to see access to ‘*natural green space*’ added to this question.

Scoping Report, page 36, Table 5.3, ISA Objective 16 – with regard to the 4th guide question, we support the reference to green space, but wish to see access to ‘*natural green space*’ added to this question.

Energy

Scoping Report, page 32, Table 5.3, ISA Objective 6 – Currently the Objective states: ‘*To create the conditions within which greenhouse gas emissions can be limited and encourage energy efficiency and sustainable design*’

We suggest changing this to:

To create the conditions within which greenhouse gas emissions can be reduced and limited...

In addition, we suggest the following additional guide questions in relation to ISA Objective 6:

- *contribute to reduction in Co2 emission from energy sector – consumption and generation?*
- *encourage reduction in energy demand and support the increase in energy efficiency*
- *support/enable/direct renewable and low carbon energy by identifying right development in right place?*

- *support innovation and encourage emerging technologies within energy system (thinking about battery storage, hydrogen, smart grid, transmission, distribution)?*
- *encourage and support more decentralised energy networks?*

Scoping Report, page 36, Table 5.3, ISA Objective 17 – we suggest the addition of the following guide question:

- *identify opportunities and promote development of renewable energy where appropriate?*

Q5 Do you have any comments regarding how reasonable alternatives should be developed?

At a Wales National level the NDF provides an opportunity to spatially express and integrate the priorities set out in other high level WG Policies, Plans and Programmes including the Natural Resources Policy, the Wales National Marine Plan and the Wales Infrastructure Investment Plan.

The State of Natural Resources Report, an assessment of the sustainable management of natural resources provides an evidence base that can help enable integration and synthesis between plans and programmes.

Analysis of national alternatives and the effective delivery of NDF policies may be most effectively delivered by applying a regional approach for intervention. If such an approach is considered appropriate by Welsh Government, we recommend that any regional approach set out in the NDF should be coterminous with the areas of Wales for which an 'Area Statements' will be produced.

As you are aware, NRW is required under the Environment (Wales) Act 2016 to prepare and publish statements (Area Statements) for the areas of Wales that it considers appropriate, primarily for the purpose of helping to implement the Natural Resources Policy.

Each Area Statement must:

- Explain why a statement has been prepared for the area, by reference to the natural resources in the area, the benefits which natural resources provide, and the priorities, risks and opportunities for SMNR which need to be addressed;
- Explain how the principles of SMNR have been applied in preparing the statement;
- State how NRW proposes to address the priorities, risks and opportunities, and how it proposes to apply the principles of SMNR in doing so;
- Specify the public bodies which NRW considers may assist in addressing the priorities, risks and opportunities.

The first Area Statements will include 6 terrestrial Area Statements, and a single marine Area Statement, which together will cover the whole of Wales as:

- South East
- South Central
- South West
- Mid Wales
- North East
- North West
- Marine

An initial spatial representation of the geographic extent of each Area Statement is illustrated in the attached Annex A. However, the priorities, risks and opportunities in the Natural Resources Policy will ultimately help to define the issues/ opportunities we need to address, and evidence we need to capture through Area Statements. It is those issues/ opportunities themselves which determine the scale at which we and others need to take action.

We at NRW are committed to a place-based approach with the organisation moving towards 6 operational areas that are aligned to Area Statements, and based on clusters of local authorities with whom we have an increasing relationship through the Public Service Boards. We will not be constrained by these boundaries – we will consider the appropriate spatial scale for action, and seek to operate accordingly. Throughout this process we will continually review how, where and in what form we need to provide information to support delivery mechanisms (such as land use planning) and help to engage different stakeholders.

The spatial boundary of each Area Statement is aligned to the administrative boundaries of local authorities, which should facilitate the delivery and monitoring of interventions. Therefore, applying the same boundaries to any regional approach of the NDF will facilitate the delivery of planning policies from the national through to the local scale.

Furthermore, the spatial extent of Area Statements are also broadly similar with other regional strategies/ programmes such as the; Cardiff Capital Region, Swansea Bay City Region, North Wales Economic Board and Growing Mid Wales. The alignment of these boundaries with Area Statements, and any regional approach in the NDF could help ensure the sharing of regional information, and the identification of regional synergies.

Whilst the NDF will focus on the deliverables within the land use planning system, we query whether the preparation of the NDF, together with the decision for the UK to leave the European Union, presents an opportunity to assess how the NDF will align with the land management system in Wales to ensure a consistent approach for the sustainable management of natural resources. We are aware of the Scottish Government's intention to ensure alignment between *Getting The Best From Our Land: A Land Use Strategy For Scotland 2016 – 2021* and its *National Planning Framework 3*, and consider there may be benefit of exploring how such alignment can be achieved in Wales.

We would welcome the opportunity for further discussion with you on our response to Question 5.

Q6 Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the NDF?

Sustainable management of Natural Resources

We would like to see further linking of the SMNR principles through the NDF, and for the ISA to cover this fully in its assessment of the NDF, as described below.

It is an SEA requirement for the Environmental Report to include '*The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects*'.

Where natural resource receptors (air, soil, water, etc.) are showing impacts, *any* further development (*including* permitted development or activity) has to be considered from an accumulative and in combination perspective. Where planning for development is prioritised in known vulnerable catchments or zones (whether highlighted as failing or at risk) the reasons for not achieving or being at risk could be exacerbated. Using the principles of SMNR, additional mitigation needs to be part of the planning prioritisation, assessment and conditions. It may be that there are measures to mitigate existing pressures which could allow further development and this can be taken into consideration for the Development Framework, both from an existing developed land use, or from a proposed development. Such an approach would guard against a new development or innovation being prevented because existing land uses / land managements are exerting a particular set of pressures.

For example, in South Wales, the Burry inlet is showing eutrophication. Any development which could add to that impact should include additional mitigation to reduce the impact on the group. Additional poultry units (even under permit levels) would require measures through the planning process to reduce water quality impacts which could exacerbate the existing eutrophication problem.

This approach has already been considered in Powys in relation to ammonia and the poultry industry, but a planning development which impacts on ammonia may not always be assessed in the same way. For example, new and additional poultry units are considered under cumulative impact on ammonia emissions but another development (e.g. pig units) which may also add to ammonia levels may not be drawn in to that consideration of cumulative impact. Also, in different authority areas there may not be the same level of understanding of risk and mitigation controls.

Hence a key opportunity for the NDF is to provide a framework to help ensure SMNR is applied equally and consistently to sustainably manage the environment and natural resources of Wales, in line with the emerging Natural Resources Policy, and a key role for the ISA is to assess whether this is the case.

Q7 Do you support the approach to the integration of the impact assessments?

Overall, we welcome the principle for an integrated approach which reflects the Wellbeing of Future Generations Act (WoFG) ways of working, as well as Sustainable Management of Natural Resources (SMNR) principles. Our key concern is that the legal requirements for Strategic Environmental Assessment (SEA) are adequately and sufficiently distinctly addressed as the assessment progresses. We need to be satisfied that the SEA elements of the appraisal do not get buried or diluted in the other assessments also being included.

The ISA states it is about the 'integration' of a number of wide-ranging Impact Assessments. Although this is a positive approach, the ISA will need to ensure that:

- the different IA's are properly integrated in decision-making, rather than being a 'bolt-together' of distinct approaches.
- a 'gaps' analysis should be undertaken to ensure that any key relevant impacts are not missing from the scope of the list of existing IAs

Page 11, Table 2.1 - under 'Health' this should include reference to the Public Health Outcomes Framework (PHOF), link below:

<http://gov.wales/topics/health/publications/health/reports/public-health-framework?lang=en>

Please note that these PHOF Indicators are currently undergoing a review, including the proposed development of some new indicators on the 'Built and Natural Environment', that will be of direct relevance to the NDF and its ISA.

Q8 Do you support the findings of the initial screening work for the impact assessments in Table 2-1?

Climate change

Table 5.5 “Integrated impact assessments and main ISA objectives of relevance” states that climate change has been screened into ISA Objectives 3, 4, 6, 7, 8, 9, 10, 16 and 17. When these Objectives are inspected in Table 5.3 “ISA Objectives and questions”, it is apparent that only Objectives 6 and 7 make any reference to Climate Change. This further emphasises the points made previously in relation to climate change that, unless the risks

identified by the “*Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales*” are explicitly embedded throughout the ISA Objectives, as appropriate, the scoping report will not address climate adaptation adequately.

Q9 Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments in Table 2-1?

Climate change

The scoping report could usefully refer to the Report Cards produced by NERC under the banner of the “*Living With Environmental Change*” (LWEC) partnership. In their own words LWEC's climate change impacts report cards “*present the latest evidence on how climate change affects different aspects of our environment, economy and society. They are designed for decision-makers at any level, but in particular for use by policy advisors, ministers and local authorities*”. Report cards have been produced in relation to: Agriculture and Forestry; Biodiversity; Water; Infrastructure; and Health. See:

<http://www.nerc.ac.uk/research/partnerships/ride/lwec/report-cards/>

Q10 Do you have any other comments?

The NDF is a 20 year plan. At present we rely heavily on European Union (EU) legislation to drive a range of environmental improvement programmes such as air and water quality. Brexit poses significant uncertainty for future environmental improvement drivers. Whilst the details of Brexit are still unknown, the document should identify at a high level potential issues for environmental improvement programmes in Wales in a post Brexit world.

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 came into force on 10th April 2017 – therefore, going forward, all references to the 2003 Regulations need to be updated.

Annex 2

An initial spatial representation of the geographic extent of each Area Statement (see answer to Q5)

