

Planning Policy Branch  
Planning Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

[ndf@gov.wales](mailto:ndf@gov.wales)

20<sup>th</sup> July 2018

Dear Sir/ Madam,

## **National Development Framework: Issues, Options and Preferred Option**

We welcome the opportunity to respond to the above consultation.

The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. This requires that in the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development.

## **Well-being of Future Generations (Wales) Act**

There is much that we welcome and support in the Vision, Objectives and in the Preferred Option of the emerging National Development Framework (NDF). However, whilst we welcome the intention to closely align the structure of the Preferred Option with the structure of the consultation draft Planning Policy Wales (PPW) (Edition 10) which in turn has been informed by the requirements of the Well-being of Future Generations (Wales) Act, it would have been useful to demonstrate how the NDF Vision aligns with the wellbeing goals and ways of working as they should be the main drivers and/ or aspirations for any plan with effect in Wales.

## **Embedding the sustainable management of natural resources within placemaking**

We welcome the intention for the NDF to support the sustainable management of natural resources. However, we consider that it should be considered as a fundamental component of placemaking within both the NDF and the new PPW. We believe that the sustainable management of natural resources (SMNR) is an essential tool in placemaking, providing a

framework to understand place thereby informing decisions on the location, layout and design of development and improving the resilience of ecosystems and place by giving preference to adopting nature-based solutions to manage environmental risks. We therefore believe that SMNR should be identified as a specified 'spatial aspect' of placemaking within the NDF.

## **Nationally important natural resources and ecosystems**

We welcome and support the intention to identify, protect and enhance nationally important green infrastructure, natural resources, ecosystems, and greater connectivity. However, we recommend that the intention to develop a policy framework to protect and enhance nationally important ecosystems and green infrastructure should be explicitly linked to the delivery of defined economic, environmental, social and cultural benefits. We are currently working to spatialise the Natural Resources Policy priorities, which we think would be valuable information for the NDF and the new Public Goods Scheme proposed in the Brexit and our Land consultation. In consultation with colleagues in Welsh Government, we have mapped the following with direct relevance to the land use planning system:

- green infrastructure and opportunities for improvement to achieve a range of benefits;
- areas that contribute to natural flood management, and opportunities for their improvement;
- areas that are currently important for habitat connectivity, and optimal areas to improve habitat connectivity;
- opportunities for improving water quality; and
- woodland planting opportunities to meet the Welsh Government's target for expanding woodland planting that maximises a range of ecosystem services; (e.g. recreation, carbon storage, flood regulation)

The Area Statements and their underpinning evidence being developed by Natural Resources Wales as required by the Environment Act will also help inform future spatial allocations.

We would welcome the opportunity to further discuss this work with you and how it can support and be reflected in the NDF with respect to the identification of nationally important resources and informing the location, siting and design of major infrastructure to ensure the right development in the right location integrating 'grey' and 'green' infrastructure.

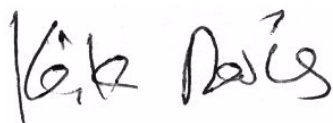
## **EU Transition**

The NDF will reflect the Welsh Government's infrastructure priorities and provide a framework for their strategic location and development. However, the effective delivery of certain forms of infrastructure, for example strategic green infrastructure which deliver nature-based solutions to environmental risks, will also depend on the Welsh Government's Land Management Programme as proposed in Brexit and our Land: Securing the future of Welsh farming. It will be helpful to indicate how the NDF will interface with the Welsh Government's land management framework for post EU transition.

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

We trust that our advice will be useful to you. If you have any queries in relation to our detailed response, please contact myself in the first instance at:  
[keith.davies@cyfoethnaturiolcymru.gov.uk](mailto:keith.davies@cyfoethnaturiolcymru.gov.uk)

Yours faithfully,

A handwritten signature in black ink that reads "Keith Davies". The signature is written in a cursive style with some loops and a small flourish at the end.

Keith Davies  
Planning, Landscape, Energy and Climate Change Manager