

CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option

This consultation seeks your views on the emerging National Development Framework (NDF). The NDF will not be published in draft form until 2019 but the issues it should address, the Vision, the objectives and the Preferred Option for achieving these are set out in this consultation. These will shape how the NDF is prepared.

If you have any queries on this consultation, please email: ndf@gov.wales or telephone 0300 025 3261.

Data Protection

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing. .

Names or addresses we redact might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

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Welsh Government
Cathays Park
CARDIFF
CF10 3NQ

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CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option

Date:		
Name	Keith Davies	
Organisation	Natural Resources Wales	
Preferred contact details (Email address, phone number or address)	Ty Cambria 29 Newport Road Cardiff CF24 0TP	
Type <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input checked="" type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other groups not listed above	<input type="checkbox"/>
	Responding in a private capacity	<input type="checkbox"/>

We would like give stakeholders every opportunity to contribute to the preparation of the National Development Framework. To assist us with arranging engagement events, publicising consultations and keeping you up to date with progress on the NDF through our newsletter, we would like to include your contact details on our database.

Your details will not be used by us for any other purpose, and they will not be shared with any other organisation.

Tick the box, right, to OPT IN and be included on our engagement database, receive details of future engagement events and consultations, and receive the NDF newsletter by email

Q1a	Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?	X
	Yes	x
	No	
Comments		
Please see our response to the ISA Interim Report in our accompanying letter.		

Q1b	Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?	X
	Yes	x
	No	
Comments		
Please see our response to the HRA preliminary Screening Report in our accompanying letter.		

Q2a	Do you agree the NDF Vision is clear and, ambitious, yet realistic?	<input checked="" type="checkbox"/>
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>We welcome many aspects and aspirations within the Vision, but consider it should be amended to reflect the recommendations set out in our response to Question 2b.</p> <p>We also recommend that the Vision is reviewed and presented against the Well-being Goals.</p> <p>We consider that the vision set out in the NDF is broadly consistent with that set out within the draft Welsh National Marine Plan, but emphasise that as these planning processes develop, Welsh Government should seek to improve alignment of the vision and objectives across the marine plan and NDF to strengthen their delivery right across Wales.</p>		

Q2b	Do you believe any changes to the NDF Vision are required? If so, what are they?	<input checked="" type="checkbox"/>
	Yes	<input checked="" type="checkbox"/>
	No	
Comments		
<p>Sustainable Management of Natural Resources</p> <p>We welcome and support the aspiration in the opening paragraph to deliver sustainable places by supporting positive placemaking and ensuring development is directed to the right locations. We agree this will involve making the best use of resources to create and sustain accessible and healthy communities, and support prosperity for all. However, in addition to protecting the environment, an ambitious vision should seek to maximise opportunities to also enhance the environment. This should be recognised in the opening paragraph of the Vision.</p> <p>NRW has developed an evidence base to support this, as part of the State of Natural Resources Report (SoNaRR) the Area Statements and our work to spatialise the Natural Resources Policy priorities. This could be used as a resource to;</p> <ul style="list-style-type: none"> - better understand the existing ecosystem benefits delivered within a place - to inform decisions on the best location for new development 		

- to inform how and where to embed nature-based solutions in the layout and design of new development, and
- to help maintain and, where relevant, enhance the resilience of ecosystems alongside development.

SMNR is an approach which enables the understanding of the opportunities, constraints and the issues of place and is therefore essential in placemaking, and as an approach which seeks to maximise ecosystem benefits making an important contribution towards the delivery of places which are productive and enterprising, social and active, prosperous, and distinctive.

However, its successful delivery is dependent on decision-makers being aware, informed, and confident on how to consider the sustainable management of natural resources in decision-making. Our response to the recent consultation on a refreshed Planning Policy Wales indicates that we would welcome the opportunity to work with Welsh Government on how national planning policy and guidance guides its practical implementation within the planning system.

The NDF also offers the opportunity to embed this new approach within the planning system, providing a national framework for Strategic and Local Development Plans and major infrastructure.

To help embed sustainable management of natural resources in decision-making, we believe that the second paragraph should be amended to read:

"By 2040, we will help meet the well-being goals for current and future generations by embedding the sustainable management of natural resources into land use decision-making in ensuring Wales is a nation of:"

Distinctive and Natural Places

Whilst supportive of the aspiration set out under this category, its title, as currently drafted may be read as being limited to an aim to achieve distinctive natural places, rather than an aspiration to deliver both distinctive places, and natural places. To avoid confusion, it may be useful to distinguish between the two aims by referring to 'Distinctive places, and natural places'. Additionally, we suggest further clarity is required to explain whether the term 'natural places' extends to areas of green infrastructure within urban settings.

Whilst we recognise the need to ensure resilience to environmental risks, we consider that an ambitious vision for the NDF would also identify the need to reduce environmental risks, and include an aspiration to improve air quality. Whilst we recognise that it is impractical to list all environmental risks in the Vision, not referencing climate change in the Vision seems like an omission.

Additionally, the NDF should promote the use of nature-based solutions as the preferred method in addressing environmental risks on the need to consider nature-based solutions. This would be consistent with, and help support the delivery of, the Natural Resources Policy priority to deliver nature-based solutions. We therefore advise that this text should be amended to read "that we maximise nature-based solutions in ensuring we are resilient to environmental risks including ...".

Productive and Enterprising Places

Consistent with the Natural Resources Policy on renewable energy and resource efficiency, we suggest that the text is amended to read: “*where spatial choices have supported the transition to a low carbon, prosperous, and well-connected society through the delivery of energy efficient design, and appropriately located renewable energy schemes, sustainable transport routes, digital infrastructure and green infrastructure, supported key growth sectors...*”.

We welcome the aspiration to support the transition to a low carbon economy, but to ensure consistency with Planning Policy Wales (PPW), we suggest that the Vision should also include an aspiration to support a low resource/ circular economy.

Active and Social Places

We welcome the aim to deliver active and social places, and Wales’s environment, its green infrastructure makes an important contribution to it. We consider that the NDF Vision should, when referring to accessibility provide an aspiration that prioritises the accessibility by active travel modes, and an aspiration for communities to be supported by access to good quality outdoor recreation opportunities.

Q3a Do you agree with the NDF Objectives?		X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
We welcome and support many of the identified objectives. We consider that their delivery should be complementary.		
However, we recommend that they should be amended as set out in our response to Questions 3(b) and 3(c).		

Q3b Do you consider any additional objectives are required? If so, what are they?		X
	Yes	x
	No	
Comments		
2. Economic Prosperity and Regeneration		

The Welsh Government's Natural Resources Policy recognises the contribution of green infrastructure towards Wales's prosperity, resilience, and culture and we advise that an additional objective should be included which seeks to:

"Support the delivery of new, and protect existing green infrastructure to support the resilience of communities and businesses".

6. Natural Resources, Circular Economy & Flooding

Consistent with the Natural Resources Policy priority to deliver nature-based solutions, we advise that the NDF should include an objective that prioritises nature-based solutions over other forms of intervention:

"Maximise nature-based solutions in improving our resilience to environmental risks".

Appendix A to the consultation document identifies issues affecting soils. We suggest the NDF should include an objective to improve the quality and function of soils.

10. Health and well-being, and 12. Cohesive Communities

We consider that additional objectives are required which seeks to support the delivery of strategic frameworks (e.g. Valleys Landscape Park) that increases the provision of green infrastructure to support healthy lifestyles and the cohesiveness of communities.

Q3c	Do you consider any of the NDF Objectives should be amended or removed?	<input checked="" type="checkbox"/> X
	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> X
	<input type="checkbox"/> No	
Comments		
2. Economic Prosperity and Regeneration Objective 2.1: Consistent with the NDF vision to direct development to the right location, we advise that this objective is amended by inserting: " <i>and is informed by an understanding of ecosystem benefits delivered within place</i> ".		
4. Rural Wales Objectives 4.1 and 4.2: We advise that these objectives should also facilitate and support the ability of rural communities and businesses to implement schemes and measures that are intended to support the delivery of the sustainable management of natural resources.		
5. Housing Objective 5.1: We believe that the sustainable management of natural resources should have a key role in informing decisions on the best location for new development. We therefore believe that it should be explicitly identified as a relevant consideration in the delivery of the NDF Vision of directing development to the right locations		
6. Natural Resources, Circular Economy & Flooding		

Objective 6.2: We recommend that the text should be amended to read: “*To support the sustainable management of our natural resources that ensures the resilience of ecosystems and their functions for the delivery of multiple social, economic, environmental and cultural benefits, and facilitate nature recovery.*”

Objective 6.3: In addition to promoting and enhancing nationally important landscapes, the NDF should also recognise the value of all landscapes and the need for their protection and enhancement.

Objective 6.4: In addition to a strategic direction to managing flood risk, we believe the NDF should also seek to ‘reduce’ flood risk and the avoidance of locating development in flood risk areas, and define its role in the strategic decision-making for managing risks from coastal erosion.

Objective 6.6: We consider that the objective should be to ‘minimise’ rather than merely to ‘reduce’ pollution.

Objective 6.7: We welcome the recognition of the Welsh National Marine Plan (WNMP) in the consultation document, and the intention to support its objectives (6.7). The NDF and PPW will sit alongside the new WNMP and together set out planning policy for the whole of Wales and it is therefore important to ensure alignment and consistency between these documents. Decision-making for many activities that span the land-sea interface will need to take account of both marine and terrestrial planning objectives and policies and there is currently an opportunity, with all three documents under development or being finalised, to ensure appropriate alignment to support integrated decision-making.

Q3d	Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?	<input checked="" type="checkbox"/> X
	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> X
	<input type="checkbox"/> No	
Comments		
Please see our response to the ISA Interim Report in our accompanying letter.		

Q4a	Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the Preferred Option?	<input checked="" type="checkbox"/> X
	<input type="checkbox"/> Agree	
	<input type="checkbox"/> Neither Agree nor Disagree	

	Disagree	<input checked="" type="checkbox"/>
Comments		
<p>Whilst it seems that relevant factors have mostly been considered for each identified Option, we believe that the consideration of 'Alternative 4 – focussed on the sustainable management of Wales's natural resources' has failed to consider the opportunity SMNR provides to:</p> <ul style="list-style-type: none"> • understanding place in decision-making on the location, layout and design of new development (using evidence from Area Statements, and SoNNaR); • its potential to inform the need and delivery of nature-based solutions to improve resilience of development, through the delivery of multiple benefits. <p>In so doing, it fails to recognise the wider economic contribution that the SMNR approach can provide in directing development/ growth to the right location i.e. to areas that can accommodate change so that the need for costly modifications to development to address immediate or potential environmental risks (e.g. flood risk, climate change adaptation, waste management) is reduced.</p>		

Q4b	Do you have any comments on the assessment of the options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	<input checked="" type="checkbox"/>
	Yes	<input checked="" type="checkbox"/>
	No	<input type="checkbox"/>
Comments		
Please see our response to the ISA Interim Report, and to the preliminary HRA Screening Report in our accompanying letters.		

Q4c	Are there further alternatives/options that should be considered for the strategic direction of the NDF?	<input checked="" type="checkbox"/>
	Yes	<input type="checkbox"/>
	No	<input checked="" type="checkbox"/>
Comments		
We do not have any suggested alternative options that should be considered.		

Q5a	Do you agree with the NDF Preferred Option?	<input checked="" type="checkbox"/>
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	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>We are supportive of a preferred option that seeks to deliver sustainable places, which draws on the strengths from the considered Alternative Options. However, we have concerns as to how the Preferred Option has been presented according to structures and themes. These are set out in our response to Question 5f.</p> <p>Furthermore, the consultation document indicates that 'NDF policies will provide a framework to ensure the delivery of national projects and policies covering the marine/terrestrial planning regimes'. We welcome the intention for the framework to address integration across the land-sea interface but would welcome some additional clarification on the relationship between the NDF and the WNMP.</p> <p>When referring to 'all Wales', it would be useful to clarify if this extends to both the terrestrial and marine, and greater reference made to the role of the marine planning process as a counterpart to relevant aspects of NDF policy.</p>		

Q5b	Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	X
	Yes	X
	No	
Comments		
<p>Please see our response to the ISA Interim Report, and to the HRA Screening Report in our accompanying letters.</p>		

Q5c	Do you agree all the NDF Objectives are adequately addressed in the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		

We believe that many aspects of the NDF objectives are reflected in the NDF Preferred option. However, we believe that the following areas could be strengthened:

Placemaking

For the reasons indicated in our below response to Question 5f, we believe that the sustainable management of natural resources (SMNR) should be identified as a fundamental aspect of placemaking.

In its role in understanding place, and the issues, trends, opportunities, and constraints of place to inform the location, layout and design of resilient development, it can help support many of the identified NDF Strategic Policy Directions, such as:

- Directing renewable energy schemes to appropriate locations;
- Identifying areas that are resilient to growth;
- Support the foundational sectors of the economy;
- Inform decision-making on active travel;
- Inform regeneration to support health and wellbeing benefits.

As indicated in our response to Question 5g below, we welcome and support the intention to identify, protect and enhance nationally important green infrastructure, natural resources, ecosystems, and greater connectivity. 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 benefits (supporting the identified ‘Spatial Policy Directions), which we believe would be easier to convey if SMNR is embedded within the placemaking framework of the NDF.

NDF Objective 1. Climate change, decarbonisation and energy: As indicated in our response to Question 5g below, it seems that the NDF’s strategic policy direction to support transition to a low carbon economy and decarbonisation focuses on renewable energy deployment. We consider that the NDF presents an opportunity (consistent with the apparent aspiration within spatial aspect P1) to give direction on spatial decisions on the location, layout, and connectivity of development, communities, business and infrastructure that are reflective of the need to improve energy efficiency and reduce resource use. This, together with the proposals set out in the Brexit or Land consultation, would help deliver the ambition set out in the ‘Achieving our low-carbon pathway to 2030’ consultation document.

Similarly, in adapting to climate change consequences, the NDF should provide a strategic policy direction for managing coastal erosion risk.

We recognise that this may not be an omission, but reflective of the level of detail of this stage of the NDF, and would welcome further discussion on this matter with you.

Q5d	Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
We believe that the NDF Preferred Option complements the NDF Vision and does have the potential to help deliver it. However, embedding the sustainable management of natural resources in spatial decision making on the location, layout and design of development will, for the reasons outlined in our responses to Questions 2b and 5f, strengthen the planning system's ability, to better deliver the NDF Vision.		

Q5e	Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
Please see our comments to Question 5e.		

Q5f	The NDF Option is developed around 5 themes, reflecting the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; Wales' Regions. Do you agree with this approach?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
Clustering policies		

We recognise that aligning the structure of the Preferred Option with that of PPW could help ensure a consistent read across both policy documents. However, as indicated in our [detailed response](#) to the recent consultation on the Welsh Government's proposed refresh of Planning Policy Wales (PPW), we are concerned that clustering policies according to themes risks certain policy topics within a certain theme to be seen to be unrelated to other policy topics that are positioned within other themes. This endangers the NDF being read with a 'silo' approach according to theme ,rather than through adopting a whole system approach.

There should be clear early emphasis in the NDF that it should be read as a whole, and clear recognition that placemaking involves recognising and implementing measures that reflect and address inter-relationships between themes.

Placemaking

We are concerned that the current presentation of 'placemaking' as a distinct concept from the other identified 'areas' (distinctive, natural social, prosperous places etc) gives the impression that 'placemaking' is a framework that is separate and un-related to the other identified 'areas'. This is compounded by identifying 3 'spatial aspects' without explanation of how they have been identified, and how they relate to the other 4 'areas'.

We believe that placemaking involves understanding place, the issues, trends, opportunities, and constraints within it, and that the management (location, layout and design) of development is informed by that understanding to maximise the NDF Vision and Objectives (which should be informed and aligned with the wellbeing goals).

As indicated in our response to the NDF Vision (Question 2b), we believe that the sustainable management of natural resources (SMNR) is an essential tool in placemaking by providing a framework to understand place to inform decisions on the location, layout and design of development and improve the resilience of ecosystems but also of place. We therefore believe that SMNR should be identified as a specified 'spatial aspect' of placemaking within the NDF.

We therefore recommend that the strategic management of natural resources should be identified as an additional 'spatial aspect' of placemaking.

Rather than positioning 'placemaking' alongside the themes of 'active and social places', distinctive and natural places', and 'productive and enterprising places', we believe 'placemaking' should sit above the other three main themes to illustrate how these three themes are elements of, rather than separate to, 'placemaking'. We presented an alternative illustration to convey this thinking in our response to the recent PPW consultation.

Wales's regions

Whilst we do not object to a regional approach to be embedded within the delivery of the NDF, it is unclear from the information provided why this is considered to be beneficial, or how the boundaries of 'strong, resilient, and distinctive' regions will be identified. We suggest that the NDF demonstrates how a regional approach will help address the identified NDF Issues, and will help deliver the NDF Vision and Objectives.

Q5g	Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Comments

As set out in our response to Question 5f, we believe that the sustainable management of natural resources should be identified as an additional ‘spatial aspect’ of placemaking.

Notwithstanding the above, we have the following comments and suggestions to the identified ‘spatial aspects’ and ‘themes’ (‘spatial issues’ and ‘strategic policy direction’).

Placemaking; ‘Spatial aspects’

P1 Decarbonisation & Climate Change: We support the intention for the NDF to play a key role in decarbonisation, and help build resilience to the impacts of climate change. However, in the current range of policies identified in the Draft NDF the delivery of this agenda seems to focus on the deployment of renewable energy. We believe that the NDF should also provide a framework for spatial planning which is reflective on improving energy efficiency and low resource use e.g. district heating, smart grids, and supporting and connecting areas of growth with transport infrastructure which focuses on sustainable transport modes. This would involve developing an approach which spatially considers the demand as well as the supply of energy (including electricity, heat and transport), and to ensure consistency with the proposed approach in the consultation draft of PPW, reflective of the energy hierarchy.

Whilst supportive of the WG renewable energy targets, we believe its delivery should be strategic in ensuring that the mix of technologies, and the scale of deployment in different areas across Wales is informed by the need to maximise social, environmental, economic and cultural benefits. The NDF should provide direction on where and how nationally important infrastructure should be defined and located against which applications of Development of National Significance and the proposed Welsh Infrastructure Consents will be assessed. The evidence base referred to in relation to DN1-DN5 below can help inform the siting and design of major infrastructure.

Please see also our comments to PE1 below on the boundaries of Strategic Search Areas for locating large scale onshore wind powered schemes.

P2 Health and Wellbeing: It is widely recognised that green infrastructure can help deliver many benefits for health and wellbeing e.g. regulating water quality, managing air quality, opportunities for outdoor recreation. Consistent with the Natural Resources Policy priority to promote nature-based solutions, we believe that the NDF should

promote the need for preference to be given to maximise opportunities to protect, manage and create green infrastructure to help deliver the Welsh Government's aspirations for improving health and wellbeing.

P3 Cohesive Communities: Rather than ensuring the resilience of communities to environmental threats, we believe that the planning system and the NDF should have an aspiration to reduce the risk to communities, and improve air quality. Consistent with the Natural Resources Policy priority to promote nature-based solutions, we believe that the NDF should promote the need for preference to be given to maximise opportunities to manage environmental risks. Please see our response to DN1 – DN5 below on our current work to map Natural Resources Policy priorities, which could help the NDF identifying areas and/ or policies for intervention.

Themes:

DN1 – DN5: 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 (supportive of the identified 'Spatial Policy Directions'), which we believe would be easier to convey if SMNR is embedded within the placemaking framework of the NDF.

We are currently working to spatialise the Natural Resources Policy priorities, which we think would be valuable information for the NDF. In consultation with colleagues in Welsh Government, we have mapped:

- 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)

DN1: We recommend that policies should aim to positively "ensure the sustainable use of natural resources".

DN2: We believe that NDF should also aim to reduce environmental risks, and improve air and water quality. We also believe that the NDF should promote nature-based solutions as the preferred method to reduce environmental risks, and/ or improve resilience and water and air quality.

We also suggest that the policy direction should explicitly be set in the context of climate change and decarbonisation.

DN3: We welcome the intention for NDF policies to protect and enhance nationally important landscapes, seascapes, nature conservation sites and habitats. We assume this also extends to international nature conservation sites.

We believe that the policies should extend to protection from activities located within and outside the boundaries of designations, and should ensure their connectivity.

DN6: It is unclear what is meant by ‘new national cultural development’ and whether when identified, the NDF will provide a framework for their protection and/ or enhancement.

PE1: We welcome and support the intention for NDF to include provision to support the delivery of Welsh Government’s renewable energy targets. We anticipate that the NDF will provide a framework for nationally important energy generation, storage and distribution infrastructure, including grid infrastructure.

The boundaries of the Strategic Search Areas (SSAs) in Technical Advice Note 8 (TAN8): Planning for Renewable Energy were identified on the basis of empirical research available at the time of preparation. As indicated in our detailed response to the refresh of PPW, the physical features of turbines that are directed to these locations have changed since the inception of TAN8. Specifically, the height of these turbines is notably increasing and therefore the potential for the zone of theoretical visibility increases.

Additionally, the availability of new information since the publication of TAN8 e.g. an all Wales quality-assured LANDMAP visual and sensory evidence suggest a review of these boundaries is timely. The development of a NDF provides an opportunity to review current SSA boundaries in this or a future iteration of the NDF, informed by the evidence base outlined above.

PE2: Whilst generally supportive of the intention for the NDF to provide a framework for the delivery of decentralised, local energy generation and distribution, it is unclear what additional direction the NDF could provide that is not already set out in the Consultation Draft PPW including the expectation for local planning authorities to prepare Renewable Energy Assessments and identify local targets.

PE1/ PE2: Whilst we generally welcome and support the recognised role of the NDF towards renewable energy deployment, the role of the NDF to promote energy efficiency should also be considered and clarified.

PE8: We welcome the intention to develop a framework to support national transport infrastructure to decarbonise the transport network and improve air quality, and suggest that this framework should also include the strategic planning of electric vehicle charging infrastructure.

There is no reference in PE8 to any expansion of the road network. It would be useful to clarify whether the NDF is intended to identify such schemes/ routes.

PE10: We agree that the terrestrial planning system will have a role to play in onshore development associated with offshore renewable energy project (as a key NDF spatial issue identified in Annex A, p21). Additionally, terrestrial planning will have a bearing on many aspects of decision-making for marine activities e.g. in relation to ports and other coastal infrastructure, grid connection, and of course the geographic extent of the terrestrial and marine planning regimes inter-relate between high and low water mark. We believe greater clarity will be required on which plans should give strategic direction for decision-making for managing coastal erosion risks.

Whilst the WNMP is specifically referred to in the NDF under the theme of Productive & Enterprising Places, you'll be aware that the WNMP contains policies that influence a wide range of issues beyond productivity and enterprise, and these will have relevance for each of the other 'areas' identified under the Preferred Option which will influence other NDF policies e.g. DN3.

Whilst PE10 refers to National Marine Plan 'designations', it is not clear whether this is intended to refer to the recently consulted Strategic Resource Areas or other. We agree this is an important aspect of the WNMP policy to reflect within the NDF, but, as set out above, consider that it is important that all relevant marine planning policy is reflected across all relevant themes of the NDF.

Wales's regions

The evidence contained within SoNaRR and Area Statements will help to understand the opportunities, constraints and the issues of place and therefore essential in placemaking for the three proposed regions, and in delivering the stated aspirations.

Q5h	Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in <i>Prosperity for All: the national strategy?</i>	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
We agree with the statement in <i>Prosperity for all: the national strategy</i> that " <i>the right planning system is critical to delivering</i> " the strategy's objectives (page 6).		

We believe that the NDF objectives are consistent with the strategy's objectives, and that the many of the NDF Strategic Policy Directions are aligned with the strategy's objectives.

However, we would reiterate again that embedding the sustainable management of natural resources in spatial decision making on the location, layout and design of (including maximising the use of nature-based solutions to support) development will, for the reasons outlined in our responses to Questions 2b and 5f, strengthen the planning system's ability, to deliver many of the strategy's objectives, including:

- Drive sustainable growth and combat climate change;
- Promote good health and well-being for everyone;
- Build healthier communities and better environments; and
- Build resilient communities, culture, and language.

Additionally, as set out in our response to Question 5G we consider there should be greater focus on improving energy efficiency and promoting a low resource economy to help deliver the strategy's objective to "*Drive sustainable growth and combat climate change*", and "*Building resilient communities*" should provide a strategic policy direction for managing coastal erosion risks.

Q5i	Do you agree the NDF Preferred Option could be formulated or changed so as to have increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	<input checked="" type="checkbox"/> X
	Disagree	
Comments		
We have no comment on how the Preferred option could be changed to have increased positive effects on Welsh language usage.		

Q6a	Do you agree with the proposed changes to the Statement of Public Participation?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	<input checked="" type="checkbox"/> X
	Disagree	
Comments		
We have no comment on the proposed changes to the Statement of Public Participation.		

Q6b	Are there any other changes we should make to the Statement of Public Participation?	<input checked="" type="checkbox"/> X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Comments		
We have no suggested changes to the Statement of Public Participation.		

How to respond

Please submit your comments by **23 July 2018**, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to:</p> <p>ndf@gov.wales</p> <p>[Please include Preferred Option consultation in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>National Development Framework Team Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information

If you have any queries about this consultation, please:

Email: ndf@gov.wales

Telephone: 0300 025 3261