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15<sup>th</sup> November 2019

Dear Gemma,

## **Integrated Sustainability Appraisal Report for the Draft National Development Framework**

Thank you for consulting Natural Resources Wales on the Integrated Sustainability Appraisal Report for the Draft National Development Framework 2020-2040. Our comments are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, and in our statutory role as advisers to Welsh Government on the natural heritage and resources of Wales.

We provide a summary of our key comments below, followed by more detail on these, together with more specific comments.

In summary, our main comments are:

1. We welcome your commitment to Strategic Environmental Assessment (SEA) and Integrated Sustainability Appraisal (ISA). We also welcome the iterative and transparent way you have worked with ourselves and other consultees during the development of the Draft National Development Framework (NDF) and its ISA.
2. Whilst there are some innovative aspects to the assessment, for example the explicit consideration of short, medium and long term affects, however, in general the assessment methodology is complex, which makes identifying effects on specific receptors difficult. This complexity also means that aspects of the assessment required under the SEA Regulations are difficult to assess and verify (see pts. 9.1, 9.2 and 9.4 of this letter).
3. The assessment summary appears to include some discrepancies, which may limit its ability to effectively and robustly inform the plan-maker and wider audience of the likely environmental effects of the NDF in these areas (see pts. 9.3 and 9.5).

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Correspondence welcomed in Welsh and English

4. The consideration of climate change should be strengthened, especially around flood risk and the unsuitability of some sites in targeted growth areas for development due to present and future flood risk (see pts. 12 and 13).
5. We consider that the negative landscape impacts of renewable energy policies deserved greater consideration, especially the implications of the move from land that currently sits within Strategic Search Areas to land within Priority Areas for Renewable Energy (see pt. 15.2.3), and the potential for cumulative impacts (see pt. 15.2.4).
6. Recommendations for mitigation should be strengthened and made more comprehensive (see pt. 10).
7. Monitoring proposals require further development and should be more effectively targeted at areas where likely significant effects have been identified (see pt. 11).

We also present comments on specific topic areas, namely flood risk, water resources, landscape and geodiversity.

Our detailed comments are as follows.

8. Inconsistency between significant negative effects in Appendix B and the main report
  - 8.1. A number of Significant Negative Effects appear to be incorrectly summarised. Two significant negative effects (on ISA Obj. 8 - Air Quality and ISA Obj. 9 – Water Resources) have been identified in the detailed assessment matrices but are missing from both the Summary tables and from the Non Technical Summary. The significant negative long term impact of Policy 20 on Air Quality (p. 183) and Water Resources (p. 185), as identified in Appendix B, is understated as minor negative (i.e. pink in summary table when it is red in Appendix B) and the significant negative impacts of Policy 32 (Cardiff Airport) on air quality (ISA Obj. 8) are also understated – medium and long term are red in Appendix B but only pink in the summary. This error is repeated in paragraph 2.6.10 and in the Non Technical Summary 1.1.43 which only refer to significant negative long term effects on greenhouse gas emissions (Obj. 6).

We seek clarity as to whether this is simply an editing error between drafts, with the main report representing the most recent draft, or whether the significance of the effects illustrated in Appendix B is correct and the main report has overlooked significant negative effects identified in its own analysis, which could raise more significant concerns in the robustness of the assessment overall. Note that we have not been able to check each individual assessment cell in the matrices against the accompanying text.

9. Complexity and clarity

- 9.1.** The assessment is complex and challenging to get to grips with. The very extensive, cross-referenced assessment matrices are daunting and often hard to follow and understand. They could have been made more user-friendly and their presentation improved, for example by using column headings rather than repeating the label in each cell, or by providing a table of policy groupings. The page numbering is also confusing, with the main report and Appendix A in one sequence (pp. 1-78), but Appendix B starting again at page 1 (pp. 1-267), so that pp 1-78 could be in either Appendix B or the main report.
- 9.2.** Because of the complexity, readers are more dependent on the summaries in the text of the main report. There is a lack of clarity as to why certain aspects are highlighted in the summary of recommendations table (Table 2-10) and others are not. For example, recommendations on green infrastructure networks and flood risk are included, but recommendations on sustainable construction (p. 261) or geodiversity (p. 63 of Appendix B) are not.
- 9.3.** Certain summary tables contain significant errors. For example, Table 2-8 (Scores for all policies for all ISA objectives) omits a line for Policy 18 (North Wales Coastal Settlements), as well as mis-recording significant negative effects as minor negative effects as described in Point 1 above. We seek clarity as to whether these tables have been quality checked to ensure that they accurately reflect the conclusions of the assessments as set out in Appendix B.
- 9.4.** The complexity of the assessment makes it hard to track impacts on SEA receptors in the ISA as each is reflected in multiple ISA objectives and guide questions. For example, Table 1-6 'SEA Directive topics and main ISA objectives of relevance' shows Biodiversity as being relevant to Objectives 7, 9, 16 and 17, with each objective having between 5 and 13 decision aiding questions, only a few of which address biodiversity (Table 1-5). Only for Objective 16, which is primarily focussed on biodiversity, would negative impacts on biodiversity definitely translate into a negative score against that objective in the assessment. This limits the effectiveness of the ISA in transparently informing the plan-maker of the likely environmental effects of the draft plan, a key function of SEA. Whilst we support in principle the integrated sustainability appraisal approach, we have consistently maintained that it is essential that specific SEA requirements, as set out in the SEA Regulations, remain distinct.
- 9.5.** In places, the assessment does not appear to reflect the current version of the draft NDF or the ISA. For example, section 2.6.2 states that the NDF does not include a chapter on the spatial strategy, although in fact this is one chapter of current draft

NDF together with a suite of associated policies. Similarly, there appears to be some confusion in the ISA over whether the proposed National Forest is on one site or several, whereas the draft NDF clearly states that it will be on more than one site.

**9.6.** A key purpose of SEA and ISA is to provide an objective assessment of the environmental *etc.* effects of a plan - the priority given to addressing the various effects it highlights is more subjective, depending on, among other things, political will and available funding. Under Policy Grouping 7 (Renewable energy) the ISA text includes reference to '*an accepted degree of landscape change*' (p. 142-3). The assessment goes on to record no landscape impacts for Policies 11 and 13 (Wind and Solar outside of priority areas, and Other renewable energy developments). Both policies include wording that '*benefits are maximised and there are no unacceptable adverse effects on landscape*'. Whilst we recognise that these policies aim to avoid unacceptable adverse effects, they do not aim to avoid all adverse effects and the ISA should reflect this when assessing their effects. We therefore consider that the ISA should be recording a potential negative effect on landscape from these policies.

**9.7.** Table 2.9 (p. 58) summarises cumulative, synergistic and secondary effects together. However, presenting such diverse impacts across a range of policy types as one score risks oversimplifying and limiting its usefulness. For example, for Obj. 13 Landscape, the overall impact is assessed as being neutral, through including positive effects relating to green infrastructure and negative ones relating to wind and solar farms.

## **10. Mitigation and Recommendations**

**10.1.** Because of the length and complexity of the assessment matrices in Appendix B, readers are likely to rely more on the summaries presented in the main report text. The summary of recommendations to enhance the sustainability performance of the draft NDF, presented in Table 2-10, is therefore particularly important. However, this table does not present a comprehensive summary of the assessment, more a headline review, and the rationale over which points have been drawn out from the dozens of recommendations in the full assessment matrices in Appendix B is not clearly explained. We provide two examples below:

**10.1.1.** Important recommendations on geodiversity (p. 63 of Appendix B), biodiversity (p. 265) and sustainable construction (p. 95) are not included in this table. There are also no recommendations included to mitigate green greenhouse gas (GHG) emissions.

**10.1.2.** A key recommendation made on p. 54 of the main reports is not included in the table, namely to subject Policies 20 (Port of Holyhead) and 32

(Cardiff airport), which both have significant negative impacts on GHG emissions, to more detailed analysis of their contribution to GHG emissions to inform a targeted mitigation strategy.

## **11. Monitoring**

**11.1.** It is our view that the monitoring proposals set out in the ISA require further development. The current outline, set out on p.63, Table 2-9 (which should be correctly labelled Table 2-11) appears to be more aspirational than robust and workable. For example, '*Indicators related to condition of biodiversity designations... specifically in relation to the role of the NDF to be developed and agreed.*' For complex matters with many influences, we question whether it is realistic to be able to identify specific effects from the NDF separately from all the other influences.

**11.2.** We understand that the intention is to have an integrated monitoring framework for the NDF and ISA. Within this, we remind you of the SEA requirement to monitor likely significant environmental effects as predicted in the SEA, and so would like to see monitoring focussed in particular on the significant negative effects predicted in some areas, in particular against Objs. 6 (GHG) and 7 (Flood Risk).

**11.3.** For Obj. 7 (Flood Risk), we suggest that monitoring 'loss of functional floodplain as a result of development' should be included.

**11.4.** The *UK Climate Change Risk Assessment 17 (UK CCRA 17)* sets out climate risks for Wales, and these should be considered in their entirety when deciding on appropriate monitoring indicators. For example, ISA Objective 7 (Flood Risk) includes a decision aiding question (p.24) on encouraging 'all new development to be climate change resilient'. Climate change resilience is wider than just flood risk and should be adequately monitored. We recommend including a monitoring indicator around the reduction of wider climate risk and the attainment of climate resilient infrastructure.

**11.5.** We refer you to State of Natural Resources Report (SoNaRR) for additional potential monitoring indicators.

## **Comments on specific topics**

### **12. Climate Change**

We advise that the consideration of climate change should be further strengthened, and actions for adaptation and mitigation more integrated throughout the ISA and NDF.

**12.1.** The NDF should guide Wales in planning for and implementing climate change adaptation measures, to support long term sustainable development and a more

resilient Wales, and the ISA has a key role in evaluating and strengthening how it does this. Currently, decarbonisation aspects appear to get more attention than adaptation/mitigation. The ISA should more clearly highlight the current and future flood risks which may limit development within the focussed growth areas identified in the draft NDF, particularly in Policies 18 (North Wales Coastal Settlements) and 28 (Newport).

**12.2.** We consider that the *UK CCRA 17* should be included in section 2.1.3 in the list of particularly important national documents, together with the Climate Change Adaptation Plan for Wales (currently at final draft stage). Whilst flood risk is the main risk for Wales identified in the *UK CCRA 17*, there are many other risks and challenges to the delivery of climate resilient infrastructure which are set out in this document.

**12.3.** The assessment of Policy 5 – Delivering affordable homes - refers to sustainable construction methods but makes no recommendation that they be adopted. We suggest that this should be included as a recommendation along with the recommendation that *‘the sustainability of sites for development should be a primary consideration over where to situate new homes...’*, and both recommendations should be included in the Summary of Recommendations Table 2-10. Whilst there is a cost to the construction of sustainable new homes, building energy efficient homes which reduce energy use and emissions should actually make housing more affordable in terms of life-time costs even if it results in some additional up-front costs, as ongoing running costs will be significantly reduced. In addition, we consider it is likely that energy efficient and climate resilient communities will be more socially cohesive.

**12.4.** The assessment of Policy 25 – Haven Waterway – is significant positive for GHG emissions (p. 209 of Appendix B). The accompanying text however describes a range of positive and negative impacts. We suggest that this should more accurately be recorded as a mixed effect, not significant positive.

### **13. Flood Risk**

**13.1.** We have some concerns about the priority given to flood risk in the assessment and the NDF. This is a particular concern given that flood risk is likely to increase in the future due to climate change. The ISA highlights the potential for the regional development policies 23, 25, 27, 28 and 29 to have a negative impact on flood risk, but it is not clearly stated that flood risk should be a deciding factor when siting new development. Several of the priority areas for development (e.g. North Wales coastal arc, Newport) are already at heightened risk of flooding. Prioritising more development in these areas will increase the pressure to develop on or near flood plains with associated future problems.

**13.2.** Support for the redevelopment of brownfield sites is included in several NDF policies, but the future flooding constraints and compliance with Planning Policy Wales (PPW) may mean some of these sites are more suited to green infrastructure than housing or industrial development. These potential impacts are not currently reflected in the ISA. There are also potential impacts from exposure to flood risk on health and wellbeing, especially for housing developments.

**13.3.** We welcome the recognition in paragraph 2.6.8 of the extensive flood risk present in areas targeted in the Spatial Strategy, and the risk that the significant level of development proposed would place some new development in active floodplains. The assessment could be improved by looking longer term at how climate change is likely to exacerbate these current day risks. Climate change may mean that difficult decisions will need to be made, especially around the coast, where current and proposed development may not be sustainable in the longer term.

**13.4.** Table 2-10 – Summary of Recommendations and Welsh Government’s responses - whilst we accept and agree with the comments referencing PPW and TAN15, we do not agree that the draft NDF *clearly* identifies flooding as a significant issue which may constrain development in many areas. For example, the draft NDF states Welsh Government is “*determined to see development and growth in Newport*” (Policy 28), yet does not as part of the policy or supporting text acknowledge the already significant challenges flood risk presents to this area.

#### **14. Water resources**

**14.1.** We have concerns about whether the ISA correctly identifies all the potential impacts on water resources. Some of the places targeted for development, such as Wrexham and Deeside (Policy 17), and Newport (Policy 28), are in areas which may already be under water stress. The assessment for Newport identifies a potential impact on water quality, and there are several recommendations, including that development should only be permitted where there is adequate capacity in the local sewage system, and that new-builds should incorporate water efficiency measures to minimise consumption. By contrast, there is predicted to be no discernible impact on water resources in the Wrexham and Deeside area and hence no recommendations. We consider that similar impacts are possible in Wrexham and Deeside to those predicted in Newport, and that similar recommendations should therefore be included.

**14.2.** We also note that the summary of recommendations in Table 2-10 does not include any recommendations around mitigating impacts on water resources and quality. We recommend that broad recommendations are included that any

development in growth areas should be sited so that local sewage systems are not over-capacity, and that all new-builds should include water efficiency measures.

## **15. Landscape**

Landscape impacts are predicted from several NDF policies, many of which may be mitigated by sensitive siting and strategic green infrastructure. The impacts from renewable energy developments, particularly wind and solar power, will be significant and often cannot be mitigated. The urgent need to decarbonise energy supply leads to the acceptance in the policy of landscape change, but this does not reduce the impact on the landscape.

### **15.1. Green infrastructure – need for further guidance**

Better landscape design is often a key to creating appropriate, robust and resilient landscapes that can accommodate new development. There is potential for significant positive impacts on landscape and visual resources from policies that promote green infrastructure, but in order to realise this, we consider that the NDF will need supporting with further guidance to inform subsequent programmes and projects.

### **15.2. Renewable Energy policies**

The following comments relate to the assessment of the landscape impacts of Policies 10, 11, 12 and 13 (pp. 142-143).

#### **15.2.1. Acceptability of adverse impacts**

We note that the assessment states that Policies 11 and 13 would have a neutral impact, 'as the policy states that planning applications must demonstrate there are *'no adverse impacts' by way of... landscape and visual...*'. The current policy wording in the draft NDF (p. 40 of NDF) however states that there must be *'no unacceptable adverse effects...*'. This wording implies that some adverse impacts may occur but may be considered acceptable: if this is the case, the assessment should record a potential negative landscape impact.

#### **15.2.2. Balancing landscape and visual effects with the urgent need to decarbonise energy generation**

We consider that the policies relating to Priority Areas for renewable energy, and renewable energy outside of Priority Areas (Policies 10 and 11) would have a significant adverse effects on Wales's landscapes (not minor negative as set out in p. 142 of Appendix B), because of the scale of developments envisioned combined with the policy of accepting landscape change from wind and solar farm developments, often in rural, upland or undeveloped landscapes. This is particularly so for wind farms, that are known to have very significant visual effects. However, as the NDF sets out, the wider planning need is for a rapid decarbonisation of energy generation in the context of a climate emergency (see



pt. 8.6 above). Opportunities to mitigate the landscape and visual effects on this scale are limited. However, we understand that Welsh Government are commissioning further technical guidance on this subject, which we welcome.

**15.2.3.** The spatial pattern of Priority Areas in relation to Strategic Search Areas and the difference in landscape and visual effects

We recommend that the assessment consider in more depth the implications of the policy change from the former Strategic Search Areas (SSAs) to the proposed Priority Areas for Renewable Energy (PAREs). In particular, the spatial pattern of Priority Areas differs from the spatial pattern of SSAs that the Priority Areas would replace. Priority Areas are much larger than SSAs, reflecting the need to increase the amount and scale of developments. Whereas SSAs tended to be located on open rolling upland plateaux with forestry, Priority Areas tend to be also located on enclosed farmland in some areas, notably in parts of Ceredigion and Carmarthenshire. We note a strong correlation with Priority Areas avoiding large areas of LANDMAP's Visual and Sensory Aspect areas that were evaluated as 'high' or 'outstanding', which tend to be undeveloped, remote, tranquil upland areas and not lowland enclosed farmland.

As Priority Areas to some extent avoid the uplands, which society tends to value most highly for their natural beauty, this leads to some Priority Areas in lowland areas closer to where more people live, which would be likely to lead to more residential amenity effects. The assessment does not explore the issue of whether this is the correct option for the NDF in landscape terms for fitting in the Priority Areas.

**15.2.4.** Cumulative landscape and visual effects

We consider that potential negative cumulative landscape impacts deserve greater discussion and consideration in the ISA. As the Priority Areas identified in Policy 10 cover a significant land area, and as Policy 11 also allows for some large wind and solar farm developments outside of these Priority Areas, the effect, despite the spatial policy of the NDF, may be to allow much more flexibility to developers in their site search. In consequence, a developer is likely to choose the easiest and most productive locations to develop. This could lead to clusters of developments that would provide cumulative landscape and visual effects in some parts of Wales. The Cumulative, synergistic and indirect effects section of the ISA (p. 57) does not discuss this adequately and simply records mixed impacts (+/-) in Table 2-9.

**15.3.** Mobile Action Zones: risk of cumulative landscape and visual effects

NDF Policy 6 supports an increase in the scale and numbers of mobile telecommunications developments, and that there is a presumption in favour

provided there are no significant adverse landscape impacts. Although the assessment records a minor negative impact, we consider there could be a risk of significant adverse landscape and visual impacts occurring from the collective clutter that this form of development could produce. We agree with the mitigation suggested (p. 105) that such infrastructure should be '*carefully managed and located*' to avoid adverse landscape impacts, and further recommend that guidance on this is developed.

#### **15.4.** Compact towns and tension with space for urban green infrastructure

We consider that there is a potential for adverse impacts on landscape and townscape from the sustainable urban growth supported in Policy 1, although the ISA records only positive impacts (p. 77), not mixed effects. NDF Policy 1 sets up a tension between a desire for higher density development in compact towns, and the need more widely to significantly increase our planning and implementation of urban green infrastructure, including gardens, parks, open spaces and street trees. There would be a conflict if in practice the policy led to infilling gardens or not providing the necessary scale of green areas within a development. For example, in 2013, in Wales, just 1% of all urban tree cover (a principal component of urban green infrastructure) was found in areas of high-density housing, often being those areas experiencing the highest levels of deprivation. Private residential gardens made up 35% of Wales' urban areas, providing 20% of all our towns' tree canopy, being 29% of all urban trees (figures from Natural Resources Wales' *Tree Cover in Wales' Towns and Cities*, 2016, p. 64). This study also showed that 159 of Wales' 220 towns lost canopy cover between 2006 and 2013, including 7000 large trees and 20 hectares of urban woodland.

We suggest expanding the seventh recommendation in Table 2-10 Summary of Recommendations (which currently refers to consideration of the potential impact of dense urban development on air quality) so that it covers the potential implications for green infrastructure as well.

#### **15.5.** Area policies that favour development

The ISA identifies the potential for Policy 20 (Port of Holyhead) to have adverse landscape impacts on the nearby Anglesey Area of Outstanding Natural Beauty (AONB). We support the recommendation made on p. 192 around ensuring the AONB is protected or enhanced by development in the region. Likewise, Policy 23 has potential impacts on the Gower AONB, and we support the recommendation on p. 215 relating to the need for careful consideration of sensitive landscapes and seascapes or biodiversity assets to avoid adverse impacts. We suggest that these recommendations are included in Table 2-10 Summary of Recommendations in the ISA report.

## **16.** Geodiversity

We continue to have some concerns over the way geodiversity is considered in the assessment, as set out in our previous responses. In previous consultation responses Natural Resources Wales has asked for recognition that geodiversity has value in its own right, and that it should be explicitly included in the assessment, as opposed to simply being considered as part of biodiversity. The inclusion of geodiversity alongside biodiversity in Obj. 16 is welcomed. However, in the policy groupings, preferred options and NDF Outcomes in the ISA and NDF, the distinct consideration of geodiversity is lost (see also pt. 8.4 above).

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](mailto:strategic.assessment@cyfoethnaturiolcymru.gov.uk).

Yours sincerely,



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