Consultation Response Form

Your name	**Jerry Langford**
Your address	[redacted]
Preferred contact details (email/phone/post)	**jerrylangford@woodlandtrust.org.uk**
Organisation (if applicable)	**Coed Cadw – the Woodland Trust**

Submitted 15 November 2019

Note : We have answered "disagree" to the questions and this seems the only option that invites comment

Introduction

Coed Cadw/The Woodland Trust is the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales we have over 26,000 supporters. We manage over 100 sites in Wales covering 2,897 hectares (7,159 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native woodland

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	x	☐	☐	☐

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	*Don't know*	*No opinion*
☐	☐	x	☐	☐	☐

- If you disagree with any of the 11 Outcomes, please tell us why:

1. The inclusion of wider environmental and social outcomes in an infrastructure framework is greatly welcome, as is the clear steer that well-being and environmental outcomes are expected in addition to economic benefits. The green infrastructure requirements and the Wales Forest proposal are central to this, and we strongly welcome their inclusion into the remit of the NDF.
2. This thinking is not fully embedded throughout the document. It is not in the wording of many of the outcomes and not reflected in overview of challenges and opportunities on pages 12 and 14. This for example makes no mention of working with natural processes, use of timber in construction or of green Infrastructure or the new National Forest. Nor does not identify the need for a change in the culture in the planning and development community.
3. A very welcome transition in thinking is underway. but it is work in progress.
4. Our test of the outcomes and policies defined is whether they address the climate and biodiversity emergencies. Whilst there is consideration of decarbonisation and the role of woodland in carbon sequestration there is very little attention to the management of climate risks, or helping communities become resilient to climate change. The climate and biodiversity emergencies mean essential and urgent requirements need highlighting.

Community co-design

5. There are many references to communities, but the process of community engagement and co-design is barely discussed. There is an assumption in the wording of several outcomes that infrastructure development is necessarily imposed from outside rather than co-developed with the community. The starting point is often a proposition that aims to minimise for the proposer the extent and cost of the "offer" to the community, rather than to seek to maximise the benefits. The inevitable consequence is that communities have to expend their energy

fighting proposals, particularly in relation to environmental damage.

6. Clare Sain-ley-Berry, Head of Invest in Nature Cymru, puts this very well: "*From a community engagement point of view, it is utterly demoralising for community groups and volunteers to see areas that they may have cared and campaigned for being damaged without apparent consideration of its ecological value and the co-related benefits. In terms of embedding the value of biodiversity in wider public consciousness and decision-making, then this is a fundamental first step*."

7. There is an opportunity to learn from the recent experience of the fracking industry where an aggressive and arrogant approach has destroyed public support and damaged the industry's standing. This is also what happened with afforestation in the 1950-70s with persistent consequences for the industry's reputation and social licence.

Comments on the description of outcomes

8. Outcome 2 – Rural areas. Reference is made to agriculture but not to the environment, tourism and forestry. These are all economically important in supporting rural areas and closely interrelated with farming.

9. Outcome 3 – distinctive regions. There is abundant evidence of an intimate relationship between socio-economic inequality and environmental inequality. We would expect here reference to the extent of access to wildlife and accessible green-space, and to the role of natural environment in defining regional character and "place-making".

10. Outcome 5 – towns and cities. This does not emphasise the need for improved health and wellbeing to be a purpose and outcome of development in towns and cities. We consider that the NDF should present a national ambition to achieve 20% minimum tree cover in all urban areas, and the expectation that all new infrastructure developments contribute positively to achieving this.

11. Outcome 6 - Development Plans. Again the wording of this outcome does not require that development plans reflect the ambition elsewhere in the document requiring that development improves wellbeing, enhances environmental outcomes, and delivers decarbonisation.

12. Outcomes 9, - Natural Resources. The reference to reduction of pollution and the application of nature bases solutions are particularly welcome. There is no reference to the management of climate risks, for example water resource management or flood avoidance and mitigation.

13. Outcome 10 – Biodiversity. The intention to reverse biodiversity loss is very welcome. We suggest the outcomes needs to directly reflect that which is in the Welsh Governments Nature Recovery Action Plan, with more direct reference to safeguarding of priority habitats and species and habitat restoration to enhance resilience.

14. There is the opportunity for infrastructure projects to contribute to biodiversity recovery rather than continuing to help drive biodiversity decline. We welcome the recent letter from the Welsh Government to planning authorities highlighting the need to secure biodiversity enhancement as part of the consideration of development proposals. To do this there needs to be a requirement for every infrastructure development to contribute to nature recovery through a more explicitly defined and structured process leading to biodiversity net benefit. This should impose a clear "evaluate-protect-restore- create" hierarchy for the management of trees, woodland and other habitats.

15. Outcome 11 – Decarbonisation. We welcome the clear message on emissions reduction. Infrastructure developments must also address climate risk and adaptation and reflect changes needed in land allocation and management, including for the protection of peatland and woodland carbon stores, and to achieve substantial additional carbon sequestration.

16. Radical intentions require radical follow through. Outcomes, especially those relating to environment and carbon risk being aspirational with no clear follow through into changing delivery practice.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in…

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
Urban areas (Policies 1, 2 & 3)	☐	☐	☐	X	☐	☐	☐
Rural areas (Policy 4)	☐	☐	☐	X	☐	☐	☐

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

17. There are some very welcome statements on spatial strategy on pages 22, in particular the emphasis on green infrastructure provision and achieving decarbonisation and health benefits. These intentions are not translated into the wording of policy 1 on sustainable urban growth.
18. We suggest that this is where there should be an explicit commitment to a minimum 20% tree cover in all urban areas, and a clear requirement that all new infrastructure developments contribute positively to achieving this. We think this additional emphasis is essential if there is to be the significant change of culture, reprioritising of resources, and recognition of the vital importance of adequate land allocation for green-space. This will require more proactive investment in and by local authorities, including greater resourcing of Tree Officers.
19. We support the comments made by CIEEM that "*..being urban in nature does not automatically guarantee a site's suitability for development and/or sustainable development*" All sites will need to be assessed in relation their environmental and ecological value and potential impacts.

Brownfield sites including woodland can often be very bio-diverse and offer valuable green-space.

20. We suggest the scope of Policy 3 should be reviewed and clarified. There is an opportunity to identify publically owned land that could contribute to increasing tree cover in urban areas and to a new Wales National Forest. The Welsh Government has its own public forest estate, some in peri-urban areas, with great potential to deliver wide range of objectives beyond commercial timber production.
21. Attention to the rural economy seems rather cursory. Professor Terry Marsden has highlighted how a combination of centralisation and austerity has hollowed out the infrastructure supporting rural communities and business.
22. The headline text for Policy 4 on supporting rural communities also fails to highlight well-being needs and environmental quality. Residents in rural areas also need accessible green-space which may not be present in settlements surrounded by enclosed private land. The "*..positive links between mental well-being and access to green space*…" referred to on page 34 are not confined to urban areas.
23. This headline text for Policy 4 should emphasis the already diversified nature of the rural economy. The importance of the environmental economy, tourism and forestry is referred to in the text on page 29 (but not the water industry), but is considerably underplayed, with little reference to important strategic and spatial considerations which underpin these industries and agriculture.
24. Would expect cross reference here to regional priorities and opportunities identified in Area Statements, and generally more attention to the strategic opportunities and needs of the rural economy. This is of course particularly relevant to woodland and forestry both in terms of the opportunities this sector offers and the need for distributed rural infrastructure.
25. It would help the credibility of both the NDF and the Area Statement process if there was a clear description of how Area Statements will guide the priorities, opportunities and environmental constraints in spatial planning guidance.
26. The absence of any effective regulatory control of the expansion in numbers, size and impact of poultry units in mid Wales is a current example of a strategic failure in the planning system. In addition to identifying "preferred areas" for some sorts of development the NDF could provide a strategic framework for protecting foundational natural resources by setting limits on the acceptable impact on air quality and biodiversity of multiple developments in the same area.
27. We are surprised that there is no strategic discussion of road schemes, and note that the Future Generations Commissioner has queried the high proportion of the transport budget that is devoted to road building. The Trust always encourages the exploration of alternative sustainable solutions to traffic and congestion issues, such as increased public transport facilities and changes to travel behaviour. However, the Trust is not against road schemes in principle. We typically see that where avoidance is possible, it is not pursued as it would often incur additional costs to the project. It is concerning that Government and its agencies are contributing to biodiversity decline and rejecting the costs necessary to conserve irreplaceable habitats.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

28. Targets for affordable housing development should not encourage lowering of levels of protection for ancient woodland and mature trees and other valuable habitats. We will continue to monitor planning applications to assess this.
29. Targets for priority housing must not be used to justify habitat damage and lower environmental standards. Environmental inequality should not be acceptable in affordable housing developments. These should be no different to other housing developments in ensuring the well-being of residents and high environmental standards through sufficient green infrastructure provision.
30. All housing developments we suggest should seek to provide 25% green-space and tree canopy cover, ensuring that they positively contribute to meeting a 20% urban tree cover benchmark.
31. New housing and business developments that do not provided substantive green infrastructure are locking in poor health outcomes for their residents and users, especially if they are also generating additional new traffic.
32. The local provision of affordable timber frame housing should not be overlooked. The Elwy Working Woods co-operative successfully builds affordable housing using locally sourced timber. The NDF could endorse a strategic approach supporting other such initiatives throughout Wales, facilitated by timber availability from the Welsh Government forest estate.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor	Disagree	Strongly disagree	*Don't know*	*No opinion*

		disagree				
☐	☐	☒	☐	☐	☐	☐

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

33. We are concerned that statements of "presumption in favour" can be interpreted as justification for habitat and environmental damage. We think the qualification needs to be more strongly worded, given cases of damage to valuable street trees by the installation of mobile equipment and cabling.
34. We support the CIEEM proposal that the wording be changed to *"....no significant adverse landscape, climate or biodiversity impacts."*

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☒	☐	☐	☐	☐

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

35. This section contains many welcome statements of intent, including the commitment to reverse the decline in biodiversity, and *"...we will take strategic action to secure biodiversity enhancements, to safeguard ecological networks, and to maximise the use of green infrastructure and nature based solutions."* This needs an unequivocal commitment to ensure

infrastructure positively contributes net biodiversity benefit, rather than continuing to drive biodiversity decline.

36. We would welcome examples of where plans and planning decisions are demonstrating this intent and ask what monitoring Welsh Government will do to demonstrate this policy is being delivered and what mechanism is available to citizens if infrastructure developments fail to meet these ideals?

37. We suggest that the precise wording of these statements needs to be aligned with the objectives in the Welsh Governments Nature Recovery Action Plan (NRAP). The requirement must include the safeguarding of all habitats of principle importance, not just designated sites; delivering ecosystem reliance through habitat restoration and creation, and addressing drivers of biodiversity decline.

38. While we welcome the use of Natural Resources Wales' indicative maps for green infrastructure assessments, there is a danger that strategic mapping will overlook the fact that the greatest benefits come from the most intimate and local green infrastructure and established habitats, including street trees and gardens.

39. The value of this policy depends on it being fully embedded in the interpretation and delivery of all the other policies in the document. We think further cross referencing and work on decision making processes is necessary for that to be achieved.

40. The current situation is that we can provide examples where the planning system is currently not delivering these outcomes, for example in the approval of large numbers of new poultry units without consideration of their cumulative impact.

41. We are currently tracking some 70 cases of development threatening ancient woodland in Wales.

42. We suggest that a good role for the NDF is to re-enforce PPW 10 by imposing a framework and a benchmark which requires the delivery of these objectives. This includes replacing references to biodiversity enhancement with the requirement that developments must deliver "net biodiversity benefit"

43. The actual location and design of green infrastructure and of projects contributing to a Wales National Forest we think should be built through bottom up design and engagement.

44. The NDF is an opportunity to establish a requirement both in terms of the extent of green infrastructure and the process by which it is secured. Our specific suggestions are:-

The benchmark / target

45. We advocate a minimum 20% tree cover target for all urban areas, as called for by CCERA, and ask that this is included as a strategic national objective within the NDF. For all new infrastructure projects and developments the current SUDS requirement should be extended to a benchmark requirement of a minimum of 25% green infrastructure and tree cover. Anything less than this would hold back achievement of the tree cover target for all urban areas.

46. Such a requirement will incentivise the retention of pre-existing large trees, which provide far more substantial benefits than new planting. This would address the concerns of many local communities and reduce the levels of dispute arising from tree removal.

The delivery hierarchy

47. To meet the stated biodiversity objectives there is a clear hierarchy needed in the process of planning development:
    - Firstly, evaluate and protect what is most valuable habitat within and adjacent to the development site. There are well established techniques for doing this and valuing the

benefits provided – for example I-tree eco assessments, such as recently completed by Cardiff City Council and previously commissioned by Wrexham CBC and Bridgend Council.

- Secondly, co-design work to build on and extend that base, considering the full range of benefits that trees and green infrastructure can provide, and meeting the benchmark target of 25% cover.
- Thirdly, only once the on-site green infrastructure has been maximised, should there be additional habitat creation elsewhere.

A rigorous process to ensure delivery

48. This process needs to be a mandatory requirement imposed through planning consent. Our experience is at the moment planning authorities may fail to impose the necessary conditions, or cannot sustain them against appeal, and/or fail to monitor and enforce them.

49. It may be that the land allocation and GI provision is directly overseen by the local authority, funded by the developer, through a ring fenced fund. Such a mechanism could support a Wales National Forest, which could include substantive regional green infrastructure networks, designed and managed as a single coherent entity. An example is the Open Newtown Project.

50. Substantive community engagement is necessary at all stages, including pre-planning application. However it is not realistic to expect unsupported community organisations to take on responsibilities for this work, or for the provision and management of green infrastructure. It is very challenging for community and 3rd sector stakeholders to find the time resource to sustain engagement.

51. We welcome the statement that "*Safeguarding is intended to ensure that areas of land that are potentially important for expanding or connecting ecological networks, adapting to climate change or other pressures*" However it is essential that such safeguarding is enforced at local level as well as at the national strategic level. The greatest benefits come from the most local and intimate green infrastructure, and the longest established habitat and trees; There is a danger that a reliance on strategic mapping ignores both considerations and is used to justify the removal of valuable habitat and green space that is not located in the "strategic" or "priority" areas

Area Statements

52. More clarity on the interaction between the NDF and Area Statements would be welcome. Area Statements could identify where location dependent nature based solutions, such as woodland creation for flood mitigation, are needed at scale. Another example is areas where woodlands and high carbon soils should be protected as carbon sinks. Such projects can contribute to a new Wales National Forest.

Forestry and woodland expansion

53. The Welsh Governments Woodland Strategy should be referred to and reflected in the NDF. NDF regional policies could identify major centres for commercial forestry and timber processing, as well as major visitor sites and protected and designated woodland landscapes. The NDF can identify major strategic opportunities arising from the distribution of existing woodland cover, indicate where such opportunities could be substantially enhanced through woodland expansion, and identify significant extensive and strategic challenges such as the loss of species (larch and ash) and the over-centralisation of processing capacity

54. We agree with the statement on page 34 that increased tree cover will help build resilience on multiple fronts, for the timber industry, biodiversity, climate change mitigation and adaptation. It must not be a single purpose endeavour.

55. The NDF can reinforce what the planning system should deliver in relation to woodland,

including the protection and enhancement of the irreplaceable biodiversity resource of ancient woodland, the utilisation of timber resources within sustainable boundaries, and the prevent the marginalisation of stakeholders impacted by utilisation.

56. On woodland expansion the targets recommended to the Welsh Government by the Climate Change Committee are substantially greater than those reported on page 35, and the time scale considerably longer. This is achievable provided a suitably wide ranging strategy is adopted, and we have propose such a strategy.

A new Wales National Forest

57. We enthusiastically welcome the Welsh Government's plan for a new national forest for Wales to build on the limited forest resource we already have and to create/restore much more. It is an important concept that can lead a public engagement with significant woodland expansion that creates diverse forested landscapes.

58. A Wales National Forest can start a new and different conversation around woodland; one that does not repeat the mistakes of the forest expansion of the 1950s when a top down and divisive process destroyed public support for forestry.

59. It can re-invent the concept of "fforest" as a diverse and attractive wooded landscapes in which many things can happen, including housing and development. Landscapes in which people, trees and wildlife can be in proximity; where people live and work, enjoy leisure activities and interact with nature.

60. It is important that this new Wales National Forest is more than just a single site and does not just become a utilitarian delivery plan for the woodland expansion targets, or a rebranding of the existing public forest estate. These routes would waste a potentially inspirational idea. We believe the First Minister's intention is for something much more inclusive and inspirational.

61. We think it must be a bold, ambitious and innovative opportunity enabling stakeholders to work together to deliver a balance of activity. Contributing projects should help mitigate the climate change and biodiversity emergencies, increase tree cover and deliver health and well-being benefits, generate economic activity including timber production, make valuable contributions to the cohesion and regeneration of local communities, and celebrate practical and artistic skills.

62. We think it essential that public and stakeholder engagement is at the heart of developing activity, and the approach must be multi-location and multi- purpose. We see the programme operating on a national scale, connected from north to south and across both urban and rural locations. We see a truly national and distinctive Welsh brand, flexible to local circumstances, one that all in Wales identify with.

63. This engagement process needs to take place over an extended period of time. There is value in the early announcement of one or two demonstration sites provided these launch a process which invites far wider participation.

64. We have proposed a substantive scoping and engagement exercise encouraging stakeholders to come forward with suitable projects for development into full proposals. We are keen to facilitate this and can contribute our expertise in public engagement, funding development and partnership and project management. A sustainable delivery of the programme will require innovative mixed funding models, including assessing how natural capital valuations can guide priorities and investment. Major infrastructure developments can directly contribute though providing new tree cover as part of their biodiversity net gain obligation and by funding through a planning gain mechanism.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using…

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
Large scale wind and solar developments	☐	☐	☐	☒	☐	☐	☐
District heat networks	☐	☐	☐	☒	☐	☐	☐

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

65. We agree with the need to expand renewable energy generation but we think more clarity is needed in the decision making criteria if these developments are to avoid driving further biodiversity decline.

66. There is a significant presence of ancient woodland and trees, and many other habitats of value in the preferred development areas. These are vulnerable to damage from renewable energy developments, both from direct construction damage, and from ancillary works including access roads and distribution grid expansion. These may extend beyond the preferred areas. These impacts need to be transparently identified in applications.

67. We do not agree that levels of habitat protection should be lower in preferred development areas. Whilst there is reference in Policy 10 to protecting "nature conservation sites and species" and "natural resources or reserves" this is too ill defined and unspecific.

68. The statement on p41 on providing environmental benefits is welcome, but this needs to explicitly require the delivery of biodiversity net benefit, as discussed above.

69. We do not think the wording of the presumption in favour statement on P36 is acceptable. This statement needs qualifying to remove the implication that net loss of biodiversity is acceptable and to provide clear direction that development will not be acceptable where it will damage ecologically sensitive sites, including ancient woodland.

70. We support the CIEEM view: *"While we welcome that Natura 2000 sites, National Parks and AONBs are protected, there is potential for significant damage to biodiversity outside of protected areas. Planning decisions must always be determined on a case-by-case basis with sufficient Environmental Impact Assessment, follow the mitigation hierarchy and should deliver biodiversity net gain as per the Biodiversity Duty (Environment (Wales) Act 2016). Irreplaceable habitats should be protected."*

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

71. We would expect Area Statements to provide the analysis of the spatial areas for "*identification of green belts, green corridors and nationally important landscapes*", and the "*framework for the sustainable management of natural resources and cultural assets*" and "*ecological networks and opportunities for protecting or enhancing the connectivity of these networks*".

72. There is no follow through apparent into the regional policies of the strategic importance of biodiversity, and sustainable management of natural resources, or of green infrastructure requirements. This is further apparent in the chart on p 70 showing the relationship between the NDF policies and the outcomes it sets out to achieve. This shows minimal consideration of the natural resources and biodiversity outcomes under policies 19 onwards. This suggests that traditional economic thinking has predominated in the construction of regional policies.

73. In all regions the key resource that underpins many important industries is the natural environment, but this is not acknowledged and no reference to the need for environmental safeguarding. The need for landscape scale approaches to protecting and enhancing the natural environment is not referred to, nor the opportunities for working with nature solutions, despite this being a priority in Welsh Government's Natural Resource Policy.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

74. We would expect mention of the Wrexham CBC Tree Strategy is an exemplar for how local authorities across Wales can plan the delivery of the tree and woodland element of green infrastructure provision.

75. We have provided to the Petitions Committee our views on the A55 proposal. The Trust's position on the A55/A494 corridor is that we would object to any route that we consider would impact on ancient woodland and/or ancient trees.

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

76. The economy of Mid Wales is almost wholly dependent on the importance of natural environment. The safeguarding of this resource is crucial, but this point is not made. The sentence "*Development plans should provide a framework for their protection, management and enhancement*," should be modified by the inclusion of the word protection, as indicated.

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the

approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	*Don't know*	*No opinion*
☐	☐	☐	☒	☐	☐	☐

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

77. Again the absence of any consideration of natural resources, biodiversity and green infrastructure is notable, except for the reference to green belts.
78. Cardiff has substantial native woodland around its northern and western margins and this should be acknowledged as a significant resource and constraint on expansion.
79. Brownfield sites in Newport should be properly assessed for their value as biodiversity hotspots and as green infrastructure and recreational geen-space.
80. Policy 29 - Heads of the Valleys, and policy 33 - Valleys Regional Park seem curiously disconnected. We agree the Valleys Regional Park should be kept separate from the Wales National Forest, but there should be transfer of experience between the two initiatives.
81. Policy 33 - Cardiff Airport expansion This policy completely ignores the climate elephant in the room, this can only detract from the credibility of the NDF and the Sustainability Appraisal.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

82. It is not clear that this appraisal process clearly and effectively identifies environmental issues, or when it does, this has any impact on the policies drafted. For example the absence of any follow up on the recommendation that the proposals for Cardiff Airport and the Port of Holyhead be subject to more detailed analysis because of significant increases in carbon emissions.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

83. We support the comments made by RSPB and the Wildlife Trusts

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

84. A multiple forest hub approach to the Wales National Forest provides an opportunity to promote Welsh history, culture and language in distinctively regional ways.

85. A relative neglect of decentralised infrastructure in rural areas will disadvantage the Welsh language. See our response to Question 2

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

I. positive effects or 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, and
II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

See above

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

16. Are you...?

Providing your own personal response	☐
Submitting a response on behalf of an organisation	X

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	☐