

From: [Pearson, John](#)
To: [NDE](#)
Subject: Consultation Response from National Trust to the NDF
Date: 11 November 2019 19:55:42
Attachments: [image001.png](#)
[NT NDF response Final.docx](#)

Please find attached the response to the NDF Consultation by National Trust. Thank you.

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Ymgynghorydd Cynllunio Defnydd Tir, Cymru

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RESPONSE BY NATIONAL TRUST TO THE NATIONAL DEVELOPMENT FRAMEWORK

The National Trust exists to care for the special places of Wales so that they can be enjoyed forever by everyone. Established over 124 years ago, our primary purpose is to promote the preservation of special places for the benefit of the nation. We place great importance on the conservation, management and enjoyment of the natural and historic environment both within and beyond our boundaries. We care for 157 miles of beautiful Welsh coast, 45,000 hectares of land, 97% of which is registered as agricultural land, and ten of the fourteen peaks over 3000 ft. We are the guardian of 18 of Wales's finest castles, houses, gardens and industrial sites. We care for archaeological sites, designed and cultural landscapes, buildings, architecture and parks and gardens, 175 Scheduled Ancient Monuments and 381 listed buildings. We currently have approximately 240 agricultural tenancies, 6000 volunteers and welcomed 1,600,000 visitors to our properties in the last year. There are 186,000 of our members who live in Wales.

We welcome the opportunity to comment on the consultation draft of the National Development Framework (NDF). The National Trust supports the principle of strategic planning and the preparation of an all Wales framework planning document. We support the consultation process completed by Welsh Government and mechanisms to seek input into what is a challenging process at a strategic level.

In summary we consider the NDF to be:

- **overly dominated by its approach to solar and wind generation;**
- **has missed an opportunity to help drive forward the longer-term planning for Wales;**
- **the framework does not address the wider action needed to tackle climate change and the climate crisis; and**
- **we consider the plan either needs to remove the detail for electricity generation or bring forward greater detail and spatial specificity for policy areas such as: coastal change management areas; biodiversity enhancement; national forests; electricity infrastructure landscape improvements; mobile action zones; public transport priority areas.**

The views of National Trust are provided below:

Overview. The NDF is the highest tier of development plan and is fundamentally a strategic overview. The framework and priorities are welcomed; however, we consider the plan is dominated by renewable electricity generation, at a level of detail that is not repeated consistently through the strategic policy areas.

We would recommend that this level of detail be taken forward within a revised TAN8, or alternatively other detail brought forward within a revised NDF.

We feel the current format and content of the NDF has missed an opportunity in its longer-term planning for Wales and in acting against climate change and the wider opportunities for Wales to play its part and tackle the climate crisis declared by Welsh Government.

The structure of the "Challenges and Opportunities" is unclear. The list on pages 12-14 seems to be different to those as sub headed on pages 15-17. Might this be clarified, eg Climate Change; Ecosystems; Coast; Water Resources; and Travel having the same sub header?

Outcomes. The NDF sets out 11 outcomes as the Welsh Government's ambitions for Wales. We would suggest that several issues covered in the NDF are better addressed at a lower tier of development plan at PPW/SDP/LDP level.

We support the identification of Outcome 11, and its identification as “the challenge of climate change”. The outcome focus on decarbonisation is too narrow and needs to take on board the wider issue of flood risk, coastal change and adaptation. We feel this wider issue will help direct future investment in terms of flood resilience and coastal change and consider updated Shoreline Management Plan mapping could have helped inform the spatial outcomes of the NDF (like that delivered for renewable electricity generation).

We would like to see some detail on how success will be measured by Welsh Government with the current wording and specificity for the 11 Outcomes.

We consider the NDF should bring forward an Action Plan so there is clarity on the timescale and additional detail that will be brought forward for many of the policy areas (eg National Forest, Mobile Action Zones).

Strategic and Spatial Choices. The map on page 25 lies at the heart of the NDF spatial strategy. We would consider that it is too focussed on the current position, and not sufficiently ambitious or clear on the future strategic direction for Wales (other than renewable electricity generation). To be truly forward thinking could the NDF be the focus for:

- transport investment (as it is clear for renewable electricity generation), and add greater specificity in relation to public transport proposals; expansion of National Park and AONB areas;
- identification of undergrounding of high voltage electricity cable infrastructure;
- biodiversity enhancement
- National Forests; and
- Shoreline Management Plan specificity for coastal adaption

These may all be areas of greater spatial clarity for a lower tier of development plan, but the approach to renewable electricity generation does bring forward the inconsistency of approach to other policy matters.

We would wish to draw attention to paras 167 and 168 of the National Planning Policy Framework which identifies the following:

167. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

- a) be clear as to what development will be appropriate in such areas and in what circumstances; and*
- b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.*

168. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

- a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;*
- b) the character of the coast including designations is not compromised;*
- c) the development provides wider sustainability benefits; and*

d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast

We support greater detail in the final NDF and would encourage a spatially specific approach to Coastal Change Management Areas, as that detailed for renewable energy generation. We would consider the framework for this process could be in place through the ongoing work on Area Statements and through resourced and updated Shoreline Management Plans. We would wish to see greater emphasis and resource provided to this area, and equity to the spatial detail provided for renewable electricity generation.

We consider that a new policy is required for this area to ensure integration of marine and land use planning in the coastal zone. We consider para 167 and 168 of the NPPF might be a useful starting point for the NDF.

Policy Commentary

Policy 6. Planning in Mobile Action Zones.

There is a need for clarification of this policy in terms of identification of specific action zones, will this be done within the NDF (similar to that for renewable electricity generation?) or left to SDP and or LDP level? Mobile Action Zones bring with it potentially significant infrastructure with landscape implications, particularly given the increasing height and scale of permitted development proposals. Could this policy also introduce the need for integration with landscape policy with undergrounding and design issues.

Policy 7 Ultra Low emissions vehicles.

Support is given to this policy and approach, with the need for clarity on when detail will emerge. We are taking forward a proactive approach to the challenge of Electric Vehicle use through our fleet and car park infrastructure. The challenge of data connectivity alongside power delivery in rural locations across Wales will need to be addressed in an effective roll out and coordinated programme of EV charging points. We hope the NDF will place a greater emphasis on the transition to ULEV including EV, and the joined-up approach needed to deliver short and medium-term solutions.

Policy 8 Strategic Framework for Biodiversity Enhancement and Ecosystem Resilience.

Support is given to the policy commitment to reversing the decline in biodiversity and increasing the resilience of ecosystems. We support the policy requirements and need to demonstrate innovative nature-based approaches to site planning and design in the built environment. We recognise the value that Area Statements could bring forward to identify opportunities for ecological networks and ecosystem services. We would hope that resources are provided to enable the Area Statement process to fulfil its potential within both NRW and Local Authorities across Wales. The NDF could play an important part in clarifying the role of Area Statements. We consider the NDF should bring forward greater specificity in relation to Developments of National Significance (DNS). We consider there is a case for defining strategic opportunities in relation to DNS, and a greater and specified role for nature recovery opportunities could be identified. We support the rewording of the policy to replace biodiversity enhancement with net biodiversity gain and the wording needs to ensure that all developments must demonstrate this (rather than should).

Policy 9 National Forest

Support for the policy but need for clarity on the spatial delivery of this policy. The text states “will identify areas”, as opposed to the specific boundary identification of wind and solar. The

development of a National Forest is welcome but needs to be clearly backed up with a mechanism for delivery and connection to land management payment schemes. Glastir Woodland has not succeeded in meeting the current aspiration to create 100,00 hectares of new woodland. There could be big opportunities around SE Wales Valleys, Brecon Beacons and Snowdonia NP's, but cultural conflict with open hill and common land and traditional use for stock rearing. We think the aspiration is low and we need to increase tree cover to a minimum of 25-30 %.

Policy 10, 11 and 12 Wind and Solar Energy in Priority Areas.

Support is given to the recognition of the future role for renewable energy within the NDF. We are surprised, however, in the level of detail provided to renewable electricity generation, and inconsistency with all other policy areas within the NDF. We express concern about the lack of detail and policy specificity for other areas of climate change mitigation and adaption across Wales. We recognise the landscape challenge brought forward with this policy.

We are broadly supportive of a greater ambition for renewable energy in Wales, as appropriate in any particular area, and acutely aware of the challenge that this policy brings forward in other areas, including landscape issues.

In relation to Policy 10, we consider the red, amber, green approach to be confusing. The potential consequences of this policy are that all areas of Wales (other than National Parks and AONB) are considered as in scope for large scale wind and solar development, and acceptance of landscape change. Clarity on this policy is clearly needed and would suggest that more criteria-based detail is needed.

Paragraph P12 on page 40 states that 'proposals close to the boundaries of National Parks and AONBs must demonstrate that the development will not undermine the objectives that underpin the purposes of the designation'. We welcome this statement, but it is unclear whether it is intended to apply to proposals inside as well as outside of Priority Areas. It should be made clear that it applies everywhere close to the boundaries of designated landscapes. Accordingly, we recommend that P12 is moved into Policy 12, where it will carry more weight than in supporting text, and edited to remove repetition as proposed below:

- Policy 12. 'Large scale on-shore wind and solar energy development is not acceptable within National Parks and Areas of Outstanding Natural Beauty. Proposals inside and outside of Priority Areas close to the boundaries of these designated areas must demonstrate that the development will not undermine the objectives that underpin the purposes of designation'.