

Draft National Development Framework

1. NDF Outcomes (chapter 3)

Q1. 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

Q2. To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with most of them

2. Spatial Strategy (policies 1 - 4)

Q3. 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					

Q4. If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

While the key principles of the policies 1, 2 and 3 are broadly sound each contains strict caveats with in effect appears to limit the policy to specified development only (namely residential development, public service facilities and major trip-generating development respectively).

Instead these policies should aim to encourage a mix of suitable development in urban areas, including waste management infrastructure. Such is clearly an essential component of sustainable development, as it enables Wales to meet its ambitious targets for recycling and low carbon energy generation. Delivery of waste management development through the planning system therefore fulfils the NDF's objective for sustainable towns and cities and healthy places to live.

NDF policy should also reflect that there will be an increased requirement for additional waste management infrastructure as a result of Wales' ambitious waste policy for separate collections of various waste streams through. In responding to higher volumes of material collected through recycling systems, the waste management industry will be required to increase capacity at existing recycling facilities or provide a greater number of additional facilities to manage these segregate waste streams. The planning system clearly has a role in facilitating this change, either by making provision for waste sites or in offering flexibility through criteria-based assessment.

Conversely we're more supportive of the approach taken in policy 4 (rural areas) which recognises the need for the planning system to offer a positive framework for economic development within rural areas and with priority given to energy generation and the environmental economy (among others).

There are of course some local authority areas in Wales for which much of the administrative area is rural, and the criteria of policy 4 is broadly consistent with the unique locational requirements of some waste management technologies. Composting and anaerobic digestion (AD), for example, are generally more suited to rural than urban environments, while the siting of landfill development is of course dictated by the location of previous quarrying activities. There will of course be an on-going requirement for landfill capacity, even as Wales continues to achieve higher rates of recycling. This waste management option is the appropriate stage in the waste hierarchy for the management of waste streams which cannot be recovered or recycled, or do not meet the input specification of energy from waste.

3. Affordable Housing (policy 5)

Q5. 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?

No opinion

Q6. If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No Response

4. Mobile Action Zones (policy 6)

Q7. To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

No opinion

Q8. If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No Response

5. Low Emission Vehicles (policy 7)

Q9. 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?

Agree

Q10. If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Rural areas would equally benefit from the roll out of charging infrastructure to encourage the move to ultra-low emission vehicles, with such areas in particular likely to benefit from Government subsidy. The waste management industry is making progress in the transition from diesel powered vehicles to ultra-low emission collection vehicles but without appropriately located charging points in rural areas it would be difficult to service collections in these areas with ultra-low emission collection vehicles

6. Green Infrastructure (policies 8 & 9)

Q11. To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

No opinion

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

Q12. 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				X			
District heat networks		X					

Q13. 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?

Policy 10

By channelling large scale (>10MW) wind and solar development to within defined geographic 'search areas' only the NDF's policies are unnecessarily restrictive and in effect prevent such development on closed landfill sites outwith the 14 priority areas (on page 42).

There is scope for the planning system in Wales to adopt a more innovative approach to development opportunities on closed landfill sites, which not only ensures that such sites continue to provide a positive legacy long after cessation of landfilling activities but also enables Wales to fully realise its wider sustainable development and Circular Economy goals. Solar and wind farms are two examples of development opportunities which can be brought forward on closed landfill sites, and scope for which could be missed by the severe constraints imposed by the priority area approach within policy 10. An alternative criteria based approach should therefore be included within the NDF so as not to arbitrarily rule out these sustainable developments at locations outside the search areas.

Landfill sites are often in rural locations and any number of closed landfills may be outside the defined geographic search areas of policy 10. Landfill sites generally already have grid connections (for landfill gas management compounds) which utilise methane from the deposit of waste to generate electricity for the national grid, thereby allowing for a reduction of methane gas emissions. As landfill gas generation reduces over time the amount of electricity generated reduces and spare capacity in the grid connection becomes available. Closed landfill sites are eminently suitable for solar developments and can utilise the available grid connection therefore making use of otherwise redundant infrastructure, thus making development on these sites more cost effective, deliverable and more sustainable (through a reduced requirement for new infrastructure).

Policy 13

The scope of development to be brought forward under policy 13 should be broadened to include renewable energy and low carbon energy projects in recognition that the latter offers similar environmental benefits as the former.

The NDF should promote a diverse range of renewable and low carbon generating development through the planning system to help meet Wales' energy needs. However, the approach to encouraging renewable energy development (other than wind and solar) appears somewhat muted in policy 13 compared to the more positive approach of policy 10. For example, the presumption in favour of wind and solar development (in priority areas) should, at the very least, apply to other renewable energy development brought forward under policy 13.

Policy 14

We support the positive approach to encouraging district heating, and agree that such opportunities would most likely be viable in the larger cities and towns. However, given the barriers to development of district heating networks we are disappointed that policy 14 (and 15) is so light on detail and suggest that the NDF provides the enabling framework needed to allow relevant energy generating stations, including energy from waste facilities (EfW), to be co-located with other landuses and which maximises the opportunity for heat off-take.

The NDF could help in this regard by requiring local authorities to adopt more robust sustainability criteria within local plans, including renewable energy targets to help promote development of low carbon and alternative energy provision. Heat mapping should be a considered alongside other workstreams (such as waste management, population forecasts and housing needs) in developing the evidence base for the local plan process. Such mapping exercises would help improve local authorities' strategic understanding of the requirements of both CHP providers and heat users. All too often, CHP is considered by planners as a "bolt on" and something to consider after an energy from waste facility has secured planning consent.

Use of available heat from local EfW-CHP schemes, or a requirement to meet an agreed CO₂ reduction target could form a condition of planning consent for new housing and industrial development.

Policy 15

There is certainly merit in requiring energy masterplans for the largest development locations, although such should not be limited to residential (>100 homes) only. Some of the greatest opportunities to utilise heat from renewable energy generating stations in fact comes from the commercial and industrial sector.

Large scale development provides an 'anchor' for major heat loads and which helps reduce many of the potential barriers to the wider uptake of heat from (EfW) CHP. A source of major and reliable heat load, such developments would help mitigate the costs of installing a heat network which, once in place, would likely provide a more attractive prospect for other, smaller developments within the vicinity to then connect to the network. On this basis, we agree with energy masterplans being limited in scope to large scale development opportunities, but would suggest that such development be defined in the NDF (while thresholds are included for residential development, this should be extended to include office/industrial floor space). The NDF might also offer some steer on the criteria of an energy masterplan, and how that criteria would be enforced by local authorities.

The importance of energy masterplans should not be underestimated: unless the NDF can provide the planning policy framework to help deliver the associated heat network infrastructure and heat customers in the right place most EfW plants will likely remain "CHP ready" but nonetheless operate in electricity-only mode.

8. The Regions (policy 16)

Q14. To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale? 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.

Agree

9. North Wales (policies 17-22)

Q15. 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?

Neither agree nor disagree

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

Q16. 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?

Neither agree nor disagree

11. South East Wales (policies 27-33)

Q17. 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?

Neither agree nor disagree

Q18. 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.

We support the strategic policies (policy 16) for regional planning, and agree that planning for waste management and the circular economy should form a key pillar of the three strategic development plans.

Progress towards a Circular Economy – in which more of Wales' waste is recovered and used as a resource – not only relies upon a planning system capable of delivering new waste management facilities in time and in the right location, but one which affords the industry with the flexibility to adapt to changing and evolving business environments.

In practice this should allow for greater diversification of the waste industry, where recycling and waste recovery is promoted through the planning system and with policies and strategies designed to enable the movement of materials to areas where they can cost effectively input into the manufacturing process. Such an approach needs to be flexible enough to allow the movement of waste materials across local administrative boundaries. In brief, the planning system should enable the industry to deliver a network of integrated waste management facilities in which collected waste may be bulked or recycled in one location, recyclates processed at another, or residues treated or disposed of elsewhere.

However, it seems a curious omission that promoting the circular economy has been identified as a priority for the north and south east regions, but not for the mid and west Wales region.

It is also disappointing that reference to planning for waste management in each of the three strategic plan areas is rather light. Each ought to maximise the opportunities arising from potential investment in waste management and low carbon energy generation. In doing so, the following matters are likely to be of strategic importance for the NDF and planned for accordingly by local authorities:

- While Wales should have the right infrastructure to deal with its waste in a way that benefits both the economy and the environment.
- The decision by China to restrict imports of waste casts some doubt over the future of export of recyclates. More domestic facilities for recycling and reprocessing waste materials will go some way to making the waste and resources sector in Wales less vulnerable to volatile global commodity market. Facilities across the UK as well as in Wales should be utilised where appropriate to ensure the optimum functioning of the market and for mutual economic benefit.
- Ambitious targets in Wales' waste strategy, coupled with planned reforms to Extended Producer Responsibility will place even greater requirements for the delivery of additional waste management capacity.
- Waste management facilities process recyclable material to produce secondary resources for national and global commodity markets. Materials may flow through a number of different facilities across a broad geographical area in order to achieve the desired market specification. Local authorities and plan policies should therefore desist from seeking to impose catchment boundaries on waste treatment facilities. It is unrealistic to limit material flows to within any given administrative boundary, which in practice places local recycling facilities at a commercial disadvantage.
- Regional plans should include robust policies to support Wales' transition to a largely decarbonised heat sector. In practice, this should allow for sufficient provision (or sites) for energy from waste (EfW) within local plans which maximise the potential for use of heat through combined heat and power. Doing so will maximise heat offtake and therefore improve the environmental benefits of EfW, while allowing the remaining non-recyclable, residual waste to be treated in the most resource productive and environmentally beneficially way.
- In addition to this, there will still need to be some ongoing provision for landfill for non-recyclable, non-combustible wastes. Sensible development proposals on closed landfill sites which meet wider sustainability and climate changes objectives should be supported accordingly by plan policy.
- While modern waste management facilities strive to be good neighbours and can of course co-exist with other types of development, more sensitive development (such as housing) should be prevented from encroaching with 200m of existing (or allocated) waste sites. The proximity of housing to waste facilities can negatively affect site productivity and ultimately its economic viability.
- Recycling and waste treatment facilities require operational flexibility to respond to dynamic customer and market requirements like any other manufacturing and logistics industry and therefore planning authorities should provide for greater flexibility in planning conditions than that currently afforded. Control of waste inputs is more suited to NRW's permitting regime than the planning process, while the standard, '9-5, 5-day a week' consent condition is somewhat dated and increasingly incompatible with the modern, changing demands of the waste industry's customer base.

In identifying and establishing areas of green belt within Strategic Development Plans there must equally be recognition of the strategic nature of sustainable waste infrastructure, some of which is more suited to rural areas than towns and cities. As above, composting and anaerobic digestion are

two such examples and local authorities should be advised to take account of the specific benefits arising from such development and to apply added weight when considering the very special circumstances for proposals located within the greenbelt.

As landfills reach the end of their operational life (in some cases earlier than planned as legislative and economic drivers divert more waste away from landfill for recycling) this presents an ideal opportunity to "re-think" the future uses of such sites and consider how, upon restoration, they might usefully help meet Welsh Government policy objectives for sustainable development and the circular economy. The siting of landfill development is of course dictated by the location of previous quarrying activities (often on the urban fringe) and which means that greenbelt policy is often a factor when considering potential after-uses of such sites. While closed landfill sites have tended to be returned to low grade agricultural use, more innovative diversification of closed (and also some operational) landfill sites are increasingly being explored to help bring land back into productive use. Examples of such development on (closed) landfill sites (and thus potentially within the greenbelt) include solar parks, wind farms; heat recovery; energy storage; or production of energy crops.

12. Integrated Sustainability Appraisal

Q19. 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.

No Response

13. Habitats Regulations Assessment

Q20. 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?

No Response

14. Welsh Language

Q21. 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?

No Response

Q22. Please also explain how you believe the proposed NDF could be formulated or changed so as to have: 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 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.

No Response

15. Further comments

Q23. Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

It is unclear if the lack of meaningful provision (or reference) to planning for waste management is of consequence of relevant policy being contained elsewhere (eg. TAN21). As currently drafted the overlap with Planning Policy Wales and TAN21 is confused. In determining planning applications or preparing waste plans, it would be helpful if the Welsh Government clarified how much weight should be attached to relevant policies in the NDF, and those contained in PPW and TAN21.

16. Are you...?

Q24. Are you:

Submitting a response on behalf of an organisation

Submit your response

Q25. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Stephen Freeland
Organisation (if applicable)	Welsh Environmental Services Association
Preferred contact details (email/phone/post)	e-mail

Q26. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q27. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response