

From: [Amanda A Davies](#)
To: [NDE](#)
Subject: National Development Framework consultation
Date: 15 November 2019 16:09:54
Attachments: [draft-national-development-framework-response-form_ALGE_final.doc](#)

Please find attached response on behalf of the Association of Local Government Ecologists.

Amanda Davies

Ecologist | Ecolegydd

Access and Natural Environment | Mynediad a'r Amgylchedd Naturiol

Planning, Environment & Economy | Cynllunio, Amgylchedd ac Economi

Flintshire County Council | Cyngor Sir y Fflint

Tel | Ffôn |

Email | Ebost |

<http://www.flintshire.gov.uk> | <http://www.siryfflint.gov.uk>

<http://www.twitter.com/flintshirecc> | <http://www.twitter.com/csyfflint>

We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.

Opinions advice, conclusions and other information in this

message that do not relate to the official business of

Flintshire County Council shall be understood as neither

given nor endorsed by it or on its behalf, and consequently

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whatsoever in respect thereof.

Rydym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn ddi-oed i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.

Deallir na fydd unrhyw safbwyntiau, na chynghorion, na

chasgliadau nac unrhyw wybodaeth arall yn y neges hon,


nad ydynt yn berthnasol i waith swyddogol

Cyngor Sir y Fflint, yn cael eu cynnig na'u cadarnhau ganddo

nac ar ei ran, ac felly ni fydd Cyngor Sir y Fflint yn derbyn

unrhyw gyfrifoldeb am y rhannau hynny o'r neges.

Consultation Response Form

Your name	Amanda Davies
Your address	Ty Dewi Sant St David's Park Ewloe Deeside CH5
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<u>Association of Local Government Ecologists</u>

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Outcome 1 (digitally and physically well-connected)

Support – especially for development to be “well located in relation to accessible green and open spaces” - Recommend amendment

Outcome 2 (rural areas)

Qualified support - the requirement for “a balance to be found between development for job opportunities within preserving the character of rural Wales...” will rely on there being high quality, sensitively designed development.

Outcome 3 (regional approach)

Support the principal but we consider the NDF is light on spatial detail, despite its regions. We welcome building on the strengths of the “distinct underlying characteristics” of different parts of Wales. However, distinct environmental characteristics are an essential part of that and need reflecting “to achieve greater prosperity and well-being”. While LDPs would cover the local detail, there remains a huge scale gap to bridge from the NDF. Bridging might be assisted with reference to some of the national environmental datasets used in NRW's Area Statements and, in particular as an integrating spatial concept, their [National Landscape Character Areas](#).

Outcome 5 (Cities and large towns as magnets)

We must also create the environmental capacity if cities and towns are to grow sustainably. A pro-active rather than follow-up approach to creating the Green Infrastructure including space for nature is needed.

We welcome recognition that growing larger towns and cities requires investment in urban design and green infrastructure. But to be sustainable we need to shift our planning focus for strategic parts of the green infrastructure to pro-active work to create the settings within

which development can then be fitted. Techniques such as master-planning and advance woodland planting ahead of individual development proposals, as we have seen in the past in some of our business parks and new towns, need to be adopted. This would be a significant change from current practice, and programmes and projects for strategic green infrastructure creation including habitat creation are likely to be needed in parallel to what is achieved within the confines of individual development proposals.

Outcome 6 (forward thinking, positive attitude to economic development)

For sustainability, the forward-thinking positive attitude needs to be matched with a similar attitude to maintaining and enhancing biodiversity and ecosystem resilience through green infrastructure.

We welcome reference to culture, heritage & environment playing a positive modern role.

Outcome 9 – (Natural resources supporting a range of activities) and Outcome 10 (Biodiversity resilience)

We welcome both 9 and 10. We think that overall 9 is focused on ecosystem services whereas Outcome 10 is focused on biodiversity - but some text contradicts this: e.g. 9 refers to 'value in their own right' and 10 refers to 'valuing multiple benefits'. It would help to clarify these two more distinctly.

Outcome 11 (climate change)

Given the climate emergency, there is a case for promoting this outcome to be No. 1.

Otherwise it might be seen as No. 11 on a list of top ten!

It's wording also needs to reflect that addressing climate change is far wider than just decarbonisation.

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	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Policy 1 (sustainable Urban growth)
Conflicts in practice between 'compact' towns and 'higher density' development, and providing space for nature through green infrastructure.
Higher density creates tensions with providing adequate space for Green Infrastructure including gardens, parks, open spaces and street trees. There would be a conflict if in practice that means infilling gardens or not providing the necessary scale of green areas within a development.

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ALGE welcome Policy 8 and the recognition of the strategic framework for biodiversity enhancement and ecosystem resilience.

ALGE welcome the inclusion in Policy 8 of the identification of:

- areas which could be safeguarded as ecological networks, for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.*

“to ensure the enhancement of biodiversity and the resilience of ecosystems”.

The text to Policy 8 references supporting Green Infrastructure and safeguarding ecological networks so that they are not unduly compromised by development. In practice how will these corridors be safeguarded outside of planning? And what is proposed? For example is it the intention that actual Green Corridors are established between designated sites to provide for connectivity and future ecosystem resilience? It is noted that NRW have produced indicative maps to illustrate biodiversity themes and it would be appropriate to indicate these in the Spatial Strategy Map.

What is the definition of Green Infrastructure – is it footpaths and some urban trees; is it green roofs and living walls; is it actually ecosystem services and does it include eg CO₂-sequestration, oxygen production etc? Is it defined by WG or more locally?

ALGE welcome the NDF reference that the focus on urban growth requires an increased emphasis on biodiversity enhancement to ensure that the approach is sustainable (Page 33) and the value of green spaces in urban areas is vital for physical and mental well-being.

Policy 9 ALGE welcome this National Forest policy which is in line with the Strategic Green Infrastructure proposals however, to be in line with Policy 8, it needs to be “the right tree in the right place”.

A form of ‘landscape-scale’ planting that was identifiable as the National Forest could express spatially in many ways including natural regeneration and where appropriate, succession of native habitats.

We would welcome the opportunity for such a forest to have multiple purposes and benefits, including for green infrastructure and well-being.

To enable effective integration of Biodiversity enhancement etc. within relevant developments, National Forest and Green Infrastructure, there needs to be appropriate resources for baseline surveys and monitoring and/or access to national surveys, as well as for relevant training e.g. to LPAs if the proposed outcome¹⁰ is to be achieved.

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	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?

With regards to Policy 10 Renewable Energy and Presumption of development in Priority Areas. While National Parks, AONBs and Natura 2000 sites are excluded, SSSIs are not. The policy therefore has the potential to conflict with Policy 8 and NDF outcome 10 as well as PPW 10 (where there is a presumption against development likely to damage an SSSI). We also have concerns around priority habitats (section 7, environment act) and sites that are identified as locally important for biodiversity.

The Traffic light approach therefore needs to consider ecological designations and associated connectivity as well as landscape designations and be more specific, e.g. Priority Areas have a "Presumption For" but outside Priority areas it could be "Presumption against unless...".

Policy 11 and Wind and Solar Energy outside of Priority Areas references the need to demonstrate that "environmental benefits have been maximised and that there are no unacceptable adverse effects." Unacceptable adverse effects can be interpreted differently especially between developers, planners and wildlife organisations etc. and this wording needs to be more specific.

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

[illegible]

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	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

The creation/retention of "Green Corridors" within developments often conflicts with housing density and/or housing figure requirements. While Policy 16 references the spatial areas for strategic housing and employment growth and includes the identification of green corridors, we recommend that identification of well integrated green infrastructure within housing and employment growth areas is a separate bullet point (Page 46).

The regional policies need to reflect Policy 8 whatever the development proposal so that biodiversity enhancement and ecosystem resilience is not downgraded e.g. within National Growth areas.

We would welcome more guidance on the criteria for developing, and purpose of new Green Belts, and their relationship to SMNR. It is noted that the purpose is set out in PPW10 however clarification as to the possibility of any development in the green belt would be helpful – it is suggested that this could be limited to minor development which embraced high standards of place- making and GI.

Distribution of the Green Belt should consider potential unintended consequences leading to potential development pressure in sensitive areas such as Gwent Levels or even Wye Valley AONB. It is strongly recommended that the distribution of the Green Belt be redistributed to include and cover the whole of the Gwent Levels along the Historic Landscape designation helping protect this vulnerable landscape which comes under significant development pressure due to its location along the M4 corridor.

Page 63: The greenbelt and national growth areas make sense but will need a robust with well-informed SDF to support them. They should be underpinned by the values of ecosystem services truly sustainable development which protects existing communities.

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.

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?

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?

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.

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	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>
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