

# CONSULTATION

## Response Document



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### **Draft National Development Framework (Welsh Government)**

**15 November 2019**

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has around 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

We welcome the opportunity to participate in the draft National Development Framework consultation and would be happy to provide further information on this topic. We have omitted any questions not relevant to our expertise.

Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## Our Response

### 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?

Agree

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

Agree with most of them

We welcome the inclusion of wider environmental and social outcomes in an infrastructure plan, particularly outcomes 9, 10 and 11. The use of nature-based solutions, as stated in outcome 9, is essential to deliver multiple benefits where possible and the clear direction for decarbonisation through planning is welcome. These outcomes do, however lack a clear direction for changing practice and an urgency of providing adaptation to the climate emergency.

Although we are supportive of the outcomes in principle and their potential to deliver positive benefits to Wales, such aspirations in their current form remain very simplistic with a constraints framework on development unclear to deliver benefits for the natural environment. Their successful delivery is also dependant on the progression and implementation of other policies, initiatives and mechanisms for delivery.

For example, a focus on delivery of development within existing urban areas in order to safeguard good quality agricultural land is not sufficient on its own to achieve positive outcomes for agriculture and the direction that future development should take. How Welsh Government (WG) will continue to support farmers, particularly following the cessation of EU agricultural funding schemes will be key to ensure farming the land remains a viable business and source of income for landowners, as opposed to selling the land for development.

Outcome 2 mentions agriculture but should also include reference to the importance of the environment, tourism and forestry in supporting rural areas.

Outcome 10 should be extended to include provision of a net gain for biodiversity as outlined in Planning Policy Wales 10.

With respect to outcomes associated with delivery of green infrastructure, it is understood that this is to be guided by Area Statements. However, such Area Statements are yet to be prepared/finalised and thus likely to influence the timely roll out of new planning policy and site allocations.

## **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...**

### **Urban areas (Policies 1, 2 & 3)**

Disagree

### **Rural areas (Policy 4)**

Neither agree nor disagree

The statement on page 22 "It contributes to achieving decarbonisation and biodiversity objectives and supports national ambitions for improving health...Sustainable growth will involve setting an ambitious strategy for achieving biodiversity and green infrastructure enhancement in our urban areas. Effective and innovative nature-based solutions to the challenges of urban form, design and density will be required in order to reap the well-being rewards of living and working in exemplar, future-resilient settlements." is very positive and welcomed. This needs to be supported by a clear priority to retain, protect and manage existing mature habitat and green space.

It is understood that development will focus on urban centres, therefore, protecting rural areas from loss of countryside, shifting the focus from development of greenfield sites to development of brownfield sites within existing urban areas. However, brownfield sites can often be biodiverse, supporting a diverse assemblage of protected/notable species, and providing important reservoirs for wildlife in an otherwise urbanised environment.

Wales' main urban centres are predominantly coastal towns and cities. Cardiff, Swansea and Llanelli are located adjacent to the Severn Estuary Marine Site and are hydrologically linked to e.g. the River Taff (flowing through Cardiff) and River Tawe (flowing through Swansea) which may pose an ecological constraint to the development of some urban sites.

Therefore, being urban in nature does not automatically guarantee a site's suitability for development and/or sustainable development. In all instances, the suitability of future development will need to be assessed in relation to potential environmental and ecological impacts and the acceptability of a mitigation package to be put forward, with important sites safeguarded from development where appropriate. This needs to be made clear within the NDF.

We welcome the embedding of green infrastructure in policies 1 and 2. Implementing this will require a reprioritising of resources, for example the Local Authority Tree Officers. Rural areas also need green infrastructure and accessible green space as private land may not be accessible.

Policy 3, if applied to the Welsh Government forestry estate would have significant implications in rural areas. We welcome the offer of protection against over-utilisation for narrow commercial purpose at the expense of benefits to the environment which should include forestry.

### **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?**

Neither agree nor disagree

There is a risk of targets for priority housing being used to justify habitat damage. As mentioned previously, the suitability of future development will need to be assessed in relation to potential environmental and ecological impacts and the acceptability of a mitigation package to be put forward.

### **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?**

No opinion

Policy 6 should include that "considerable weight will be given to the need to increase mobile phone coverage, along with its associated economic benefits. Accordingly, there is a presumption in favour for new mobile telecommunications infrastructure, provided that there are no significant adverse landscape, climate or biodiversity impacts."

### **5. Low Emission Vehicles (policy 7)**

N/A

### **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?**

Neither agree nor disagree

It is positive to see so many statements of intent to protect the resilience and connectivity of ecosystems and use the development framework to integrate green infrastructure.

We welcome proposals for the implementation of a strategic framework for biodiversity enhancement and ecosystem resilience. However, the NDF still needs to place equal if not greater focus on an 'avoidance of impacts' to biodiversity, followed by mitigation and compensation for unavoidable impacts arising, with enhancement being undertaken in addition to this.

We welcome the aspiration that Welsh Government will identify areas to be safeguarded as ecological networks to ensure they are not unduly compromised by future development, with such safeguarded areas identified through the Green Infrastructure Assessment set out in the development plan. However, more information is needed on what the timeline for identification and implementation of such a scheme will be, and how this will stand up against the pressures exerted by the need to secure delivery of a housing supply across Wales in a timely manner. It will ultimately take time for the principles of the NDF to be reflected within the Local Development Plans (LDP) of each planning authority across Wales with each authority currently at different stages in the preparation and adoption of new LDP's, site allocations and green infrastructure policy and assessments.

We would welcome examples of where plans and planning decisions are demonstrating this intent.

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 local green infrastructure and established habitats.

We also welcome the inclusion of Area Statements in this policy as they should be fully integrated into the National Development Framework. We do recommend that the Framework includes more detail here on the ecosystem services that Area Statements will scope out, for example, opportunities for nature-based solutions for flood mitigation which can be an alternative to built infrastructure.

The final paragraph of policy 8 outlining the benefits of woodlands is welcome, however it should include reference to the Woodlands for Wales Strategy (2018). It should also set out what the planning system can deliver in relation to woodlands.

In respect of Policy 9, a national forest is an important concept which can provide a lead in terms of climate targets and there is potential to integrate this aspiration with proposed Welsh Government agricultural payment schemes for Welsh farmers post-Brexit. However, we have concerns over a policy which focuses exclusively on the commitment to development of a national forest, rather than consider the potential of a range of habitat types to deliver these functions. For example, coastal habitats such as salt marshes, which are under increasing pressure from development, are effective in sequestering carbon and further provide benefits to leisure and tourism.

Re-forestation as part of this scheme should not be to the detriment of other ecologically important habitats, protected species and ecosystem services. Any proposals and the suitability of a site for woodland planting should, therefore, be assessed on a case by case basis at the regional/local level with reforestation promoted on any particular site if it can contribute to a functional network as opposed standalone woodland units ecologically isolated from the wider network.

We welcome the multi-location approach, providing the habitats are well connected, and that it can act as a catalyst for woodland regeneration.

## **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...

### **Large scale wind and solar developments**

Disagree

### **District heat networks**

No opinion

It is promising to see greater emphasis on wind and solar development within planning proposals and a commitment to renewable energy. We are concerned about the statement “there is a presumption in favour of large scale on-shore wind and solar energy development in these areas, an acceptance of landscape change and a focus on maximising benefits and minimising impacts”. While we welcome that Natura 2000 sites, National Parks and AONBs are excluded, 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 enhancements as per the Biodiversity Duty (Environment (Wales) Act 2016). Irreplaceable habitats should be protected.

We would also like to know more about the criteria that was considered and assessed to identify Priority Areas.

Renewable energy developments including ancillary road and transmission line work can cause significant biodiversity damage and should be properly assessed on a case by case basis.

We welcome the intent to use renewable energy projects to “provide environmental benefits, such as contributing to resilient ecological networks, restoring degraded peatlands and restoring semi-natural grasslands on post-agricultural land”. We would welcome examples of where this has occurred.

Green infrastructure must be implemented alongside land-use policy change and substantive habitat restoration to reverse the declines in biodiversity.

## **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?**

Agree

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.

A Strategic Development Plan would be considered beneficial to further refine overarching, high level planning policy and ensuring such Strategic Development Plans are appropriate for a particular regional area. Ultimately, the principles of a Strategic Development Plan should ensure consistency in the application of planning principles at a local level but still allow enough flexibility to deliver the specific needs and/or protect the unique assets of any one local planning authority.

We would expect the Area Statements to provide the analysis of the spatial areas for “identification of green belts, green corridors and nationally important landscapes”, “a 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”.

## **9. North Wales (policies 17-22)**

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

Disagree

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

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

Disagree

## **11. South East Wales (policies 27-33)**

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

Disagree

## **North Wales**

We would expect consistency of the summary on page 48 with conclusions from North East and North West Area Statements once published. We would also expect cross-reference to Area Statements within the infographic on page 50.

The paragraph on page 49: “The management of natural resources and flooding and the protection and enhancement of areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure. Decarbonising society and responding to the threats of climate change should be central to all regional planning” does not provide a follow-through of the strategic importance of green infrastructure in urban areas. The Wrexham County Borough Tree Strategy<sup>1</sup> is an exemplar for how local authorities across Wales can deliver many of the policy aspirations described in this document.

Under policy 18, Strategic and Local Development Plans across the region should also consider the embedding of green infrastructure throughout in support of health and wellbeing outcomes and protecting natural resources.

The description of tourism on page 52 should recognise that the natural environment is a key resource that underpins tourism in this region, therefore it is important that this is preserved and enhanced.

## **Mid and South West Wales**

In respect to proposals to enhance existing ports and havens, the NDF should ensure proposed policies will remain consistent with the objectives within existing/emerging planning policy and legislation, for example, the Welsh National Marine Plan and Marine and Coastal Access Act 2009. This will ensure the proposals for delivery of onshore, and offshore development objectives do not conflict with objectives for the sustainable management of Welsh seas and coastline habitats.

Proposals to safeguard important ecological networks and habitats should not be confined to terrestrial habitats and communities but also encompass coastal habitats. For example, the Milford Haven Waterway supports several priority habitats, whilst the Skomer Marine Nature Zone is located directly offshore. There is disappointingly little reference to the protection and enhancement of the marine and coastal environment, or its inclusion within a green infrastructure network, despite the presence of large urban centres on the coastline and the sensitivity of such habitats to development and climate change.

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<sup>1</sup> [https://www.wrexham.gov.uk/assets/pdfs/env\\_services/trees/tree\\_and\\_woodland\\_strategy.pdf](https://www.wrexham.gov.uk/assets/pdfs/env_services/trees/tree_and_woodland_strategy.pdf)

While we welcome the recognition that the management of natural resources and flooding and the protection and enhancement of areas of landscape importance should inform strategic decisions, there is, as mentioned for North Wales, no follow-through on the strategic importance of green infrastructure in urban areas as outlined at the beginning of this document. Rural land-use policy is key in the protection and enhancement of the environment and landscape-scale approaches to enhancing the natural environment are needed.

There should be a cross-reference to Area Statements on page 57 and 60 under 'a resource rich region' where it is stated that "...Development plans should provide a framework for their management and enhancement, enabling them to be enjoyed by future generations and to provide economic benefits for the region's communities."

The final paragraph on page 60 should recognise that the natural environment is a key resource that underpins tourism in this region, therefore it is important that this is preserved and enhanced.

### **South East Wales**

We welcome the commissioning of I-tree report<sup>2</sup> by Cardiff City Council to understand the ecosystem services provided by Cardiff's trees. Cardiff has substantial woodland resource around its northern and western margins which should be protected and enhanced and we are pleased to see this is recognised in policy 28.

Brownfield sites earmarked for development in Newport (p.64), and across Wales, should be assessed for their value as green infrastructure and biodiversity hotspots. As mentioned in our response to the spatial strategy (question 2), these can be significantly important areas in terms of natural resources.

Policy 29 and 33 should be incorporated into one to ensure that the development proposed in policy 29 also supports the delivery of benefits to the natural environment from the Valleys Regional Park.

Policy 32 does not consider either the impacts of this expansion on outcomes for the natural environment or climate. A full assessment of potential environmental and ecological impacts and the acceptability of a mitigation package is required before such plans are accepted.

We are disappointed to see the outcomes related to natural resources (outcome 9 and 10) are largely unrepresented in the regional policies and are seemingly outweighed by economic development. The natural environment underpins the economy through ecosystem services and so these outcomes should be at the forefront of local strategies to ensure benefits of green infrastructure and resilient ecosystems are equally distributed.

All regions must implement landscape-scale approaches to protecting and enhancing the natural environment, working with nature-based solutions.

### **13. Habitats Regulations Assessment**

Any policy that influences the nature, density and location of future development, is likely to result in potential significant impacts on natural resources and should be progressed to Appropriate Assessment, particularly when adopting a precautionary approach. Furthermore, policies 1-4 refer to a preference for development of existing town and city centres. Many towns and cities where the potential for development is presumed are located across the Welsh coastline with direct links to the Severn Estuary Marine Site, whereas more rural towns and cities are often linked to riverine habitats of European Importance. As such, some spatial detail can be presumed.

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<sup>2</sup> <https://www.forestresearch.gov.uk/research/i-tree-eco/i-tree-eco-projects-completed/i-tree-eco-cardiff/>

#### **14. Welsh Language**

This section is largely outside of our area of expertise, however a multiple forest hub approach to the National Forest provides an opportunity to promote Welsh history, culture and language in distinctively regional ways.

#### **15. Further comments**

We welcome the First Minister's recognition of the relevance and importance of the natural environment and climate change to these plans. We also welcome the recognition of the value of green infrastructure by Julie James AM. These must be key considerations throughout.

It is essential, as outlined on page 6, that developments deliver for both society and the environment. However, addressing the climate and biodiversity emergencies as part of the development plan must be identified as red lines and not outweighed by economic development.

The section under "How does the NDF fit with wider Welsh Government policy?" (p.9-11) does not include reference to Area Statements produced by Natural Resources Wales (NRW)<sup>3</sup>. In general, there is a lack of cross reference to Area Statements or to the Biodiversity Duty under the Environment Act. These should be a key thread of the Development Framework.

The Challenges and Opportunities chapter (p.12-17) lack coherence with the separation of sections on natural resources and a living landscape on page 12 and the additional information on page 15. Paragraph 4 of page 15 makes no mention of the opportunity of working with natural processes. There is also no mention of the use of nature-based solutions. A cross-reference to Area Statements would also be appropriate under 'Diverse Regions' on page 14.

While we welcome the statements on page 15, it is not clear how this will be followed through in terms of the implications on constraints on development and it does not identify the need for a change in the culture in the planning and development community.

The considerations of climate and biodiversity crises outlined in the introduction do not carry through into the full document, particularly the regional policies. This is highlighted in the table on pages 70 and 71, where outcome 10 is only included in two of the regional policies and outcome 9 is only considered in four.

Having regard to Natura 2000 designated sites in terms of the Habitats Regulation Assessment is important, but consideration of the impacts of development on non-designated habitats is also necessary in order to ensure ecosystems are resilient.

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<sup>3</sup> <https://naturalresources.wales/about-us/area-statements/area-statements-overview/?lang=en>