



October 2018

Summary of CPRW's 24pp response to Welsh Government's Consultation on its National Development Framework (NDF)

CPRW is disappointed with the NDF in its present form. It lacks the necessary integration with the system it aims to support, particularly in relation to development planning.

Initially – and confusingly – the consultation pro-forma describes the two background reports – the Integrated Sustainability Appraisal (ISA) and the Habitats Regulations Assessment (HRA) which set the scope for the NDF's coverage. The ISA fails to be spatially comprehensive and limits its scope to existing nationally significant designations, thus ignoring the maxim that 'all landscapes matter', as stated in the European Landscape Convention. By its own admission, the HRA is incomplete, and contains insufficient detail; moreover, there is no sign that the inter-relationship between landscapes and habitats is to be assessed in the NDF.

CPRW has major reservations – borne of imprecision in the document - about the NDF's role. It aims to promote a cohesive approach to land uses across Wales but does not explain how it would influence the key functions of existing rural agencies, achieve harmony with Planning Guidance and Local Development Plans, or be reflected in the ongoing version 10 of PPW (Planning Policy Wales).

The underlying theme in CPRW's answers to the NDF's 24 Questions is that its 'Vision' is impaired. It even fails to implement the specific scoping advice set out in its own ISA to consider Soils, Peatland and Brownfield land. Indefensibly, it also fails to specify key data resources covering the physical environment such as NRW's LANDMAP or the Welsh Government's recently transformed Agricultural Land Classification (ALC) - which has a specific role in influencing development on the Best and Most Versatile ('BMV') farmland.

CPRW supports the 12 NDF Objectives in principle, but has major reservations, stemming from the erratic text in the Consultation document:

1 Climate change, decarbonisation and energy

The NDF's 'Key Spatial Issues' are no more than selective and superficial pen-portraits of regions of Wales, which are not internally uniform or spatially distinct. The texts on various options fail to grapple with the renewable energy conundrum and its environmental consequences or to mention the key role of tidal energy, perhaps the most controversial yet potentially productive technology.

Nevertheless, the proposed 'bespoke infrastructure consenting process' is said to be streamlined but is otherwise unclear, being intended to encourage growth in the renewable energy sector - and 'provide certainty to renewable energy promoters. To CPRW this latter phrase sounds uncomfortably like by-passing the role of the planning system and its safeguards for landscape and visual impacts. There is instead a need to rewrite TAN8 in view of evolving policy changes, the increased size of wind turbines and their deployment far-offshore, and the development of large-scale solar projects.



2 Economic prosperity and regeneration

In rural areas the NDF fails to acknowledge that landscape and habitats are key resources in themselves and that policies need to be in place to help sustain them through the primary land uses of farming and forestry. A particular concern of CPRW is the future of the uplands of rural Wales where farming and thus the whole local economy is critically dependent on financial support, irrespective of any form of Brexit.

Nevertheless, mainstream farming and forestry on better quality land are productive uses and key to the economy and landscapes of rural Wales. The NDF needs a clearer vision for these primary producers and the value-added developments that they enable, like quality meat processing, marketing local produce and using home-grown timber.

3 City Regions and Growth Deals

CPRW wishes to see the NDF encourage investment away from the south and south-east of Wales to stimulate the sub-economies and hinterlands of rural towns.

4 Rural Wales

Primary land uses should become resilient by being encouraged to produce more than just high-quality food and timber - by means of parallel public goods in terms of tourism, conservation and recreation; and by producing value added products in their local economy. But this should not create carte-blanche for proliferation of industrial-scale livestock enterprises or those which do not need to be located in the countryside.

5 Housing

CPRW supports affordable and rented homes which can help sustain the indigenous and younger rural population, particularly those associated with primary land uses - but the local retiring population can still be priced out of suitable homes. CPRW understands the desire of those attracted to work in or retire to high quality rural landscapes, but notes that despite the vitality this can bring, widowed partners can be left unable to drive and marooned in areas with no suitable public transport.

6 Natural Resources, Circular Economy and Flooding

CPRW supports the specific aims of the NDF in principle, but again has reservations:

6.1 Strengthen the resilience of biodiversity assets – but ...

This should focus wider than Natura 2000 sites. Non-designated locations are even more vulnerable, and there is a need to recognise the value and importance of all habitats and create new sites at both national and local level.

6.2 Achieve sustainable management of our natural resources – but ...

This fails to mention or adequately consider rock and geological resources, forests and woodlands, soil quality, peatland conservation, and water resources; a parallel topic should cover terrestrial habitats, water bodies, rivers and coasts.



6.3 Protect and promote nationally important landscapes – but ...

This is inadequately relegated to a minor aspect of flooding policy when it should be a fundamental matter for the NDF at the heart of rural policy, facilitated by LANDMAP, and emphatically not confined to national or any designations.

6.4 Provide strategic direction to manage and adapt to the threat of flooding:

The problems are recognised but need better enforcement of planning conditions

6.5 Develop a circular economy:

Beyond re-using old materials, recycling and refurbishing, a more imaginative approach should reduce waste, obsolescence and pollution in the first place, using the natural environment to help absorb pollutants, plus careful re-development of brownfield sites.

6.6 Reduce pollution and improve air, noise and water quality:

Planning enforcement against noise from wind turbines must be more effective and diligent before any local programme is rolled out around communities in the settled lowlands. Air Quality Management Areas (AQMAs) tend to be focused on monitoring, rather than actively finding solutions to change traffic habits and reduce trapped pollutants. Water quality has been insufficiently addressed and needs specific attention to catchment land use, including agriculture, forestry and permitted development.

6.7 Support the delivery of the objectives of the Welsh National Marine Plan:

The ND seems to side-step this broader issue by deferring to a separate initiative.

7 Culture and Heritage

The NDF identifies sports facilities as part of our existing culture but so are theatres, cinemas, local halls for amateur events, churches and chapels and land uses which unite the indigenous population and can contribute to the local economy.

8 Transport

The NDF does consider the footpath and bridleway networks. Its objectives for conventional road and rail transport routes are in conflict with the M4 relief road across the Gwent levels which will increase traffic, inhibit public transport and active travel as alternative travel modes, and lead to increased carbon emissions and air pollution.

9 Welsh Language

CPRW supports the aim to increase the number of Welsh language speakers and foster their needs, thus helping to sustain the cultural identity of rural areas in particular. Nevertheless, there is a need for bi-lingual flexibility in certain areas.



10 Health and Well-being

High quality local landscapes and recreational networks of all public rights of way are important to the well-being of all age groups and abilities. Rural residents of all ages in isolated communities have specific problems in relation to emergency services and transport to and from hospitals. Local amenity planting, including highway tree management, all contribute to well-being, as does locally-produced distinctive food.

11 Digital Infrastructure

We support enhanced mobile and wireless coverage across isolated rural communities which has a special role in, allowing independent enterprises to prosper, publicise their work and operate efficiently. A co-operative approach can reduce mast numbers.

12 Cohesive Communities

We encourage linkages between rural communities for mutual benefit, which could also assist the circular economy.