



Llywodraeth Cymru
Welsh Government

INTEGRATED SUSTAINABILITY APPRAISAL OF THE NATIONAL DEVELOPMENT FRAMEWORK

NON-TECHNICAL SUMMARY:
Appraisal of Draft National Development Framework:
ISA Report (incorporating Environmental Report)

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CONTENTS

PURPOSE OF THE NON-TECHNICAL SUMMARY	3
WHAT IS THE NATIONAL DEVELOPMENT FRAMEWORK?.....	3
WHAT IS THE INTEGRATED SUSTAINABILITY APPRAISAL?	3
ISA AND NDF PROCESSES SO FAR.....	3
HOW THE ISA HAS BEEN UNDERTAKEN	4
ISA Framework.....	5
ASSESSMENT OF THE DRAFT NDF.....	6
Appraisal Results – NDF Outcomes	6
Appraisal results – Issues and Options (assessed November 2017).....	7
Appraisal results – Preferred Option (assessed February 2018)	8
Recommendations.....	9
APPRAISAL RESULTS – DRAFT NDF (ASSESSED MAY 2019)	9
SPATIAL STRATEGY	9
POLICIES	10
AVOIDING, REDUCING OR MITIGATING NEGATIVE EFFECTS AND MAXIMISING POSITIVE EFFECTS – SUMMARY OF RECOMMENDATIONS	10
FINDINGS OF HRA AND HOW THESE HAVE FED INTO ASSESSMENT	11
MONITORING SIGNIFICANT EFFECTS	11
CONSULTATION AND NEXT STAGES	12

Purpose of the Non-Technical Summary

- 1.1.1 This document provides a summary in non-technical language of the Integrated Sustainability Appraisal (ISA) of the Welsh Government's Draft National Development Framework (NDF). Further details can be found in the full Draft ISA Report itself.

What is the National Development Framework?

- 1.1.2 The Welsh Government is currently preparing a NDF to provide a spatial context for development in Wales over the next 20 years. The NDF will be used to guide both public and private investment. Welsh Government's aim is to ensure investments and developments – whether large or small in scale - contribute to the broader ambitions of the Welsh Government and to the well-being of communities. Therefore, the NDF will influence how communities develop over the next 20 years and it is important that we have a comprehensive understanding of the positive and negative effects this could have as the NDF is developed. The NDF should be read alongside Planning Policy Wales (PPW) and does not repeat PPW, which provides planning policy on an all-Wales basis. The NDF replaces the Wales Spatial Plan.

What is the Integrated Sustainability Appraisal?

- 1.1.3 ISA is a process of appraising the contents of the NDF as it is written, against a series of sustainability objectives, in order to help promote sustainable development and test the NDF before it comes into force. ISA has, therefore, been undertaken throughout the preparation of the NDF and it has been able to feedback recommendations to improve the relative sustainable development performance of the NDF. The ISA is a Welsh Government requirement and it meets the legal requirements of the European Strategic Environmental Assessment (SEA) Directive. The ISA is high-level and considers both positive and negative effects of the NDF. The purpose of this is to help ensure that future land-uses in Wales over the next 20 years are sustainable.
- 1.1.4 One of the 'ways of working' that form part of the Welsh Government sustainable development principle is the need to take an integrated approach to what we do. The ISA, therefore, includes a number of other statutory and non-statutory assessments. This allows us to take a more rounded view of the sustainability implications and opportunities arising from the NDF. The ISA integrates the following assessments and legislative requirements: Sustainability Appraisal; SEA; Well-being of Future Generations Act (2015); Welsh Language (Wales) Measure 2011; Equalities Impact Assessment; Children's Rights Impact Assessment; Sustainable Management of Natural Resources and the Natural Resources Policy (Environment (Wales) Act 2016). The ISA also accounts for the non-legislative requirements of assessments relating to Rural Proofing; Health Impacts; Climate Change; and Economic Development.
- 1.1.5 A Habitat Regulations Assessment (HRA) process has been carried out separate to the ISA, which assesses the impacts of the NDF on Natura 2000 sites, which are protected by EU Law or treated as such through government policy. These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs), as well as candidate and potential SACs and SPAs, and Ramsar sites. The HRA seeks to ensure that the NDF will not result in a likely significant effect on any Natura 2000 site.
- 1.1.6 The integration of these assessments ensures that a collaborative approach is undertaken on different issues, sharing knowledge and recognising links between topics in a consistent and transparent manner.

ISA and NDF Processes So Far

- 1.1.7 The NDF preparation commenced with a process of evidence gathering and stakeholder engagement in Winter 2016/17. In Spring 2017, further work was undertaken to identify issues for the NDF following the engagement events. At this stage, initial ideas were developed for the potential NDF objectives and strategic options.

- 1.1.8 The first stage of the ISA (Scoping) also commenced at this time. In line with published guidance, the ISA Scoping stage included the following tasks:
- Set the scope and level of detail of the ISA;
 - Identify relevant plans, policies, programmes and initiatives that will inform the ISA process and the NDF;
 - Identify relevant information about existing and predicted future social, economic, cultural and environmental conditions in Wales at a national scale;
 - Identify key sustainability issues and opportunities; and
 - Present a framework for the ISA, against which the NDF can be appraised.
- 1.1.9 These tasks were reported in the Draft ISA Scoping Report which was consulted upon between 28 April and 21 July 2017. In addition, a stakeholder workshop was held early May 2017. The Draft ISA Scoping Report was issued to Natural Resources Wales and Cadw for comment. It was also sent to statutory consultees outside Wales that may be indirectly affected by the NDF, notably the Environment Agency, Natural England and Historic England; as well as wider stakeholders such as the Royal Society for the Protection of Birds (RSPB). The Final Scoping Report (April 2018) has been shaped through this engagement and involvement of stakeholders.
- 1.1.10 Drawing upon the consultation feedback, work began in Summer/Autumn 2017 on further developing outline NDF Objectives and Strategic Options. An initial, high-level, HRA Screening was undertaken at this time.
- 1.1.11 In November 2017, the initial NDF objectives and strategic options were subject to ISA and the results of this were fed back to the NDF team to influence their further development. The next iteration of objectives and options were then further subject to ISA and Preliminary HRA Screening in winter 2017/18. These findings were documented in an Interim ISA Report that accompanied consultation on the Issues and Options version of the NDF between 30 April 2018 and 23 July 2018.
- 1.1.12 The ISA at this stage comprised the following tasks:
- Testing the plan objectives against the SA objectives;
 - Developing the plan options;
 - Predicting the effects (including cumulative and secondary effects) of plan options and alternatives;
 - Evaluating the effects (including cumulative and secondary effects) of plan options and alternatives; and
 - Considering ways of mitigating negative effects and maximising beneficial effects..
- 1.1.13 The ISA was further refined and amended in light of the consultation responses received.
- 1.1.14 Based on the above, the Draft NDF has been produced in accordance with the five ways of working required by the Well-being of Future Generations Act. It has been a staged approach based on developing a series of realistic options and refining them to a preferred option, before moving on to a full draft plan. This work has been strongly influenced by public and stakeholder involvement and a cross-Government collaborative approach.

How the ISA has been undertaken

- 1.1.15 The geographical scope of the ISA has been driven by the geographical scope of the NDF i.e. the whole of Wales. The NDF is intended to apply until 2040 following publication in 2020. This timescale has been reflected in the ISA. The intention of the ISA is to enable the principles of sustainable development to be embedded into the NDF from the outset.

ISA Framework

1.1.16 A key output of the ISA Scoping Stage was the ISA Framework. The ISA Framework is the main assessment tool used during the ISA and comprises a series of 17 Objectives covering social, economic, cultural and environmental issues identified through Scoping. It is used to test the performance of the proposals proposed in the NDF. Our integrated approach to assessing the impact of the NDF brings together key assessments into a single appraisal framework. The ISA Objectives are listed in Table NTS-1. Each aspect of the NDF is appraised to determine how well it would contribute to or detract from each ISA Objective.

Table NTS-1: ISA Objectives in the ISA Framework, against which the NDF is appraised

No.	ISA Objective
1	To encourage and support improvements in educational attainment for all age groups and all sectors of society to help to improve opportunities for life
2	To contribute to an improvement in physical, mental and social health and well-being for all, including contributing towards a reduction in health inequalities across Wales
3	To create opportunities for an increase in employment across the country and promote economic inclusion
4	To create opportunities for sustainable economic growth, diversity and business competitiveness
5	To contribute towards the future well-being of the Welsh Language
6	To create opportunities within which greenhouse gas emissions can be reduced and limited and encourage energy efficient and sustainable design
7	To create opportunities to encourage the protection and improvement of air quality
8	To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings
9	To create the opportunities for the protection and promotion of Welsh culture
10	To contribute to the reduction and management of flood risk
11	To create opportunities to protect and enhance the quality and quantity of water features and resources
12	To create opportunities for the improved connectivity of communities and sustainable access to basic goods, services and amenities for all groups
13	To create the opportunities within which an improvement in social cohesion and equality can be achieved
14	To create opportunities for the provision of good quality, safe, affordable housing that meets identified needs
15	To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes

No.	ISA Objective
16	To create opportunities for the conservation and enhancement of biodiversity and geodiversity
17	To create opportunities for the sustainable management and use of natural resources, taking into account their benefits and intrinsic value

Assessment of the Draft NDF

1.1.17 The ISA is an iterative process which involves appraisal and feedback to the plan-makers at numerous stages of the NDF's development. To date, the ISA has appraised the following:

- Analysis of Future Trends – this considers how the baseline trends for the topics covered by the ISA Objectives are likely to develop in the absence of an NDF. It gives a useful benchmark summary against which the appraisal of the NDF can be compared;
- The NDF Outcomes (previously called NDF Vision and Objectives) (including Reasonable Alternatives to these);
- Strategic Options (Reasonable Alternatives) for the Spatial Approach (four options and a benchmark/Do-Nothing option);
- The NDF Preferred Option (the preferred Spatial Approach); and,
- The Draft NDF (including Spatial Approach, Policies and their Reasonable Alternatives).

1.1.18 The Draft NDF is structured in the following way:

- 1. Introduction;
 - *Sets out what the NDF is, how it fits with wider Welsh Government policy and how it fits with strategic and local development plans.*
- 2. Wales: An Overview of Challenges and Opportunities;
 - *Sets out an overview of Wales and the some of the key demographic, economic, environmental and social trends; and identifies the challenges and opportunities that have shaped the first NDF*
- 3. NDF Outcomes;
 - *Sets out the 11 NDF Outcomes which are a collective statement of where the Welsh Government wants Wales to be in 20 years' time.*
- 4. Strategic and Spatial Choices: The NDF Spatial Strategy;
 - *Sets out the spatial strategy, the guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.*
- 5. The Regions.
 - *Sets out the NDF policies for Wales' three regions.*

1.1.19 The appraisal in the ISA has focussed on chapters 3, 4 and 5 of the Draft NDF; the Outcomes, Spatial Strategy and Regional Policies, and their reasonable alternatives.

Appraisal Results – NDF Outcomes

1.1.20 The compatibility assessment of the NDF objectives was undertaken in three iterations and is presented in the Interim ISA Report¹. The commentary provided in Table B-2 of the Interim ISA

¹ Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]

Report presents the iterative process of assessment, and how the ISA recommendations have been taken into account, where relevant. This demonstrates that the majority of the recommendations of the ISA have been incorporated into the NDF.

Appraisal results – Issues and Options (assessed November 2017)

1.1.21 The Interim ISA Report documents the appraisal of the NDF Alternative Options and Preferred Option. Four Alternative Options for the NDF were developed together with a Benchmark Option which comprises not producing an NDF. Each option was subject to ISA in November 2017. A full description of the NDF Alternative Options can be found in Appendix C of the Interim ISA Report². In summary, these options were:

- Alternative Option 1 – An option focussing growth in the strongest market areas
- Alternative Option 2 – An option focussed on creating strong communities across all Wales
- Alternative Option 3 – An option to deliver decarbonisation and climate change objectives
- Alternative Option 4 – An option focussed on the sustainable management of Wales's natural resources
- Benchmark Option - Do Not Prepare the NDF

1.1.22 Appendix C of the Draft ISA Report also provides reasoning for why these options were carried forward or otherwise.

Alternative Option 1

1.1.23 Overall, alternative Option 1 performs worse than the other options when assessed against the full suite of ISA objectives. Whilst the option is likely to create employment and economic opportunities by directing growth to the strongest market areas such as the city regions, these benefits would not be spread across the whole of Wales including to areas which are in need of investment. Whilst it could result in greater economic growth in the largest towns and cities, it could increase inequality between urban and rural areas and between more and less prosperous areas such as in the Valleys and North Wales coast. Consequently, this could have adverse effects on health and well-being, social cohesion and equality in those areas. The option is not strongly driven by the principles of sustainable development and economic growth would take precedent over the natural and built environment which could lead to negative effects in these areas.

Alternative Option 2

1.1.24 Alternative Option 2 performed significantly better than alternative Option 1. The option focuses on local needs across a wider area, which may reduce inequalities and lead to an increase in benefits across all communities. Improving accessibility within rural communities and reversing population decline could lead to an increase in access to and the viability of provision for facilities, including open space and increasing access to the natural environment, that may have major beneficial effects. The option supports the creation of sustainable communities, well designed and planned places which would look to enable adaption to risk from climate change. No strong negative effects were predicted for this option.

Alternative Option 3

1.1.25 The assessment of alternative Option 3 also led to the prediction of strong positive effects. The option would anticipate the risks from climate change to ensure that future development patterns consider, are shaped by, and build resilience to these risks. It places a strong emphasis on planning how settlements will grow and interconnect, which could lead to significant beneficial effects. The option also seeks to build climate change resilience into communities, businesses, and the natural environment. The option would deliver renewable energy generation to the most appropriate locations and provide a framework to support its delivery. Some renewable energy developments

² Interim ISA Report, available online at: <https://gov.wales/sites/default/files/consultations/2018-04/180430-interim-isa-report.pdf> [Accessed 290519]

have potential for significant landscape (and townscape and seascape) and visual impacts although this will depend on the design and location. Further, there is some uncertainty over whether the option might result in, cumulatively, negative effects on biodiversity/geodiversity; as many of the areas deemed suitable for renewable energy schemes could include undeveloped greenfield sites near to existing rural communities. No strong negative effects were predicted for this option.

Alternative Option 4

1.1.26 Strong positive effects were predicted against seven of the ISA objectives in the assessment of alternative Option 4. The option includes significant emphasis on the climate change resilience. The option would seek to deliver the principles of sustainable development, including the reduction of pollution, avoiding impacts. It has a very strong focus on preserving the natural environment, despite also promoting a degree of rural development. It recognises how the natural environment underpins economic sustainability and has a very strong focus on environmental protection.

Do Nothing

1.1.27 No strong effects were predicted for the 'do nothing' option. Although the Wales Spatial Plan and other policies and strategies would continue to be in place without the NDF, trends, such as higher than average deprivation in the South Wales valleys and some North Wales coastal towns, are likely to continue, leading to a mix of potentially positive and negative effects without the implementation of the NDF.

Appraisal results – Preferred Option (assessed February 2018)

1.1.28 Following the assessment of the Alternative Options, the Welsh Government team refined the NDF Options, and developed a first draft of the Preferred Option. Feedback from the ISA of this Preferred Option was then used to refine a final version of the Preferred Option.

1.1.29 The 'Preferred Option' was developed around five themes, reflective of Planning Policy Wales, Edition 10 (PPW):

- Placemaking;
- Distinctive & Natural Places;
- Productive & Enterprising Places;
- Active & Social Places; and
- Wales's Regions.

1.1.30 None of the Alternative Options 1 – 4 were considered to be entirely preferable as they each demonstrated negative outcomes to varying degrees and would not deliver the balanced sustainable development required. Welsh Government therefore developed the Preferred Option by integrating the benefits of each Alternative Option with one another whilst minimising potential negative effects. The ISA of the Preferred Option in early 2018 subsequently predicted strong positive effects six of the ISA objectives, with no strong negative effects predicted.

1.1.31 In early 2018, the Preferred Option sought to provide a strong policy framework that ensured health and well-being outcomes, for both current and future generations, were central to decision making. A regional approach was preferred in order to ensure that access to community services and facilities for disadvantaged and deprived communities could be improved, especially in rural areas. The decarbonisation and climate change agenda was designed to enhance Wales' resilience to the effects of climate change, which would also have been likely to lead to cumulative and long-term benefits for health and well-being. The Preferred Option also sought to create opportunities for significantly improving the connectivity of communities and sustainable access to facilities.

1.1.32 The overarching 'placemaking' theme of the Preferred Option in 2018 highlighted that economic inclusion should be an important principle in the NDF, and that the planning system must build places that create jobs, enhance skills and employability and provide an environment for businesses to grow and thrive. A key element of the Preferred Option was the transition towards a low carbon economy, which was predicted to lead to a wide range of positive sustainability impacts. The

proposed regional approach, which including identifying city regions and growth deal areas, was predicted to have the potential to further economic benefits and provide a strategic focus for investment.

- 1.1.33 Decarbonisation and climate change are key foundations of the NDF, and aspects relating to this were integrated throughout the Preferred Option in early 2018. Measures included: a transition to a low carbon economy, active travel measures, the decarbonisation of transport, generation of energy from low carbon energy sources, and the implementation of green infrastructure measures. However, the strategy also included a requirement for improvements to, and the expansion of, the existing national road network. In the long term, this was predicted to have the potential to lead to an increase in traffic volumes, with subsequent impacts on greenhouse gas emissions and air quality. At the same time, road building was predicted to have the potential to improve air quality within some local communities.
- 1.1.34 Overall, the Preferred Option in 2018 would have been likely to contribute towards the protection and enhancement of nationally important landscapes; seascapes; and nature conservation sites and habitats whilst also strengthening ecosystem resilience and facilitating the provision of new green infrastructure in places across Wales. However, the proposed requirement for improvements to and the expansion of the national road network was predicted to have the potential to lead to an increase in traffic volumes in the long-term, leading to negative effects associated with this, such as exacerbated noise pollution in South East Wales. This could be further exacerbated by the development of city regions and growth areas. Significant infrastructure projects, such as for transport or energy purposes, would also have posed a risk to natural landscapes, although these could likely be mitigated to some extent on a project-level basis.

Recommendations

- 1.1.35 Although strong positive effects were predicted for social and economic indicators, it was considered through the ISA that the potential for the NDF to contribute to environmental sustainability in particular could have been strengthened. In order to improve the potential for the Preferred Option to contribute towards the ISA objectives, a number of recommendations were made, which were considered by the Welsh Government. These recommendations and how they were considered are recorded in the appraisal table for the Preferred Option in Appendix B. Feedback from the ISA of the Preferred Option was then used to refine the final version of the Preferred Option at the time and this was consulted on alongside the Interim ISA Report (April 2018).

Appraisal results – Draft NDF (assessed May 2019)

- 1.1.36 Following the several rounds of appraisals, recommendations and consultations, the Welsh Government prepared the Draft NDF. The Draft NDF policies have been prepared to deliver the NDF Outcomes and the NDF Spatial Strategy. The July 2019 Draft NDF (assessed May 2019), including its Spatial Strategy and 33 Policies has been appraised for their likely effects against each of the ISA Objectives for their likely impacts in the short, medium and long terms. A summary of the assessment findings for each of these elements is provided below, followed by an analysis of the likely cumulative, synergistic and secondary impacts of all Draft NDF proposals in-combination.

Spatial Strategy

- 1.1.37 The Spatial Strategy proposed in the NDF would be expected to result in predominantly positive sustainability impacts. Overall, the strategy would be expected to help facilitate enhanced accessibility and increased capacity of education and health services throughout Wales. The strategy would also facilitate excellent access to open spaces and the countryside for new people, which is important for physical and mental well-being. The support for significant economic growth and new housing that satisfies needs should help to reduce poverty and homelessness and better enable people of all backgrounds in many regions of Wales to pursue healthy and high-quality lifestyles. The strategy would be likely to help contribute towards significant economic growth in Wales, particularly in urban areas. The range of employment opportunities in regions across Wales,

and the accessibility of these opportunities for areas currently most employment deprived, is likely to be significantly boosted. The proposed spatial strategy would be expected to help ensure that identified housing needs are satisfied at national, regional and local levels.

- 1.1.38 The proposed approach would direct the majority of new development towards existing urban regions and this should enable more sustainable development that facilitates lower-carbon living for people due to the good access to public transport modes and the shorter distances needed to travel to access key services and amenities.
- 1.1.39 Focussing new development in these areas could also lead to reduction in the risk of environmental pollution in more rural areas. Development in existing towns and cities would be expected to be able to make a more efficient and sustainable use and management of natural resources, particularly soils, due to opportunities for using brownfield sites, existing building and reused materials, leading to positive effects.
- 1.1.40 The strategy would be likely to help enhance Welsh culture to a minor extent, primarily due to the protection afforded to rural areas where cultural and traditional places and activities are prominent. Likewise, impacts of the proposed approach on Welsh language are likely to be somewhat limited.
- 1.1.41 The strategy focusses on three clusters of major towns and cities. In these regions there is a risk that the significant level of development proposed would lead to an increase in flood risk. It should be recognised that situating development in the main towns and cities could limit these effects due to the plentiful opportunities for using brownfield sites and enhancing the presence of green infrastructure.

Policies

- 1.1.42 The NDF policies would be expected to have neutral or positive effects on the social and economic ISA Objectives which are related to improving education, health, economy, employment, connectivity, social cohesion and housing. More mixed impacts were identified for the ISA Objectives relating to the protection of the natural environment, including energy and greenhouse emissions, air quality, flood risk, water, landscapes and townscapes, cultural heritage, biodiversity and geodiversity as well as natural resources. For most of these, it is unclear whether the positive or negative effects would outweigh the other. In many cases the adverse effects relate to the increase in resource consumption and emissions as a consequence of new development. New development typically involves, for example, a degree of increase in local car use, water and energy consumption, land take or alteration to the surrounding townscape or landscape character. The policies in the NDF seek to provide a framework to minimise or reduce these effects whilst also promoting sustainable development in order to meet the social and economic needs of the country.
- 1.1.43 Significant negative effects in the long-term were identified for policies P32 and P20 as they would encourage and support the expansion of Cardiff airport and the Port of Holyhead, both of which would be expected to lead to a potentially significant increase in greenhouse gas emissions as a result of increased air and shipping movements and associated vehicles. It is recommended that these proposals be subject to more detailed analysis of their contribution to emissions which could then inform measures to mitigate these impacts.
- 1.1.44 For each policy, the Welsh Government considered various reasonable alternatives including a do-nothing (i.e. have no policy) approach. The appraisals of the preferred options are alongside the appraisals of their reasonable alternatives to enable quick comparisons between them. These assessment results helped the Plan-makers with their decision making over which of the policy options to pursue, amend or reject.

Avoiding, reducing or mitigating negative effects and maximising positive effects – summary of recommendations

- 1.1.45 During the iterative process of the ISA, the NDF has incorporated a range of recommendations that have helped to enhance the overall sustainability performance of NDF proposals. Throughout the

appraisals of Draft NDF policies recommendations have been made for each policy against each ISA Objective, where appropriate, in order to help avoid or mitigate negative effects and to help maximise positive effects. Recommendations made in this ISA Report to help enhance the sustainability performance of the NDF can be summarised as including:

- The NDF should maximise opportunities to strengthen links and connectivity between rural areas and more isolated communities with essential services, amenities and goods including education facilities, health services, employment areas, communal spaces and a diverse range of natural habitats.
- Increased provision of green infrastructure to enhance the natural environment, including to facilitate the free movement of wildlife as well as attractive and safe walking and cycling routes for people. In particular, this network should seek to connect people with places of employment. The green infrastructure network can also be designed, managed, laid out and situated in a strategic approach to enhance the other ecosystem services it would provide, including filtering air pollutants, capturing carbon, filtering water, reducing flood risk, enhancing local character, protecting views and preserving soils.
- The NDF could include greater focus on flood risk in Wales and how this will change as a result of climate change, particularly as the NDF seeks to support development in various regions where there is extensive flood risk such as Newport, Cardiff and Deeside.
- The NDF could more closely considered the potential impact of dense development in urban location on air quality and the extent to which this can be managed through the design and layout of development.
- Development in town and city centres could be required to enhance existing townscape character through high-quality design measures, considerate layout and potentially vernacular architecture whilst also enhancing the accessibility of places and networks for people and nature within our townscapes. The potential for heritage and culture-led regeneration should be recognised here.

Findings of HRA and how these have fed into assessment

- 1.1.46 A separate HRA process has accompanied and informed the NDF-making process. The June 2019 HRA Report has made it clear that it is difficult at this very high-level stage of the development planning process in Wales to determine how European designated sites may or may not be affected by strategic policy decisions. However, it is important to note that the potential implications for Natura 2000/ Ramsar sites have been considered throughout the development of the Plan such that early avoidance of the issues (and/or reduction of risk) has been a key element of the process.
- 1.1.47 The HRA has determined the type of impacts that could occur through implementation of the policies and flags up mitigation measures that would need to be considered when producing lower-tier plans. This has provided a precautionary extra level of protection to Natura 2000/Ramsar sites which it is considered will, in addition to the legal requirement for HRA of lower-tier plans and projects, provide sufficient safeguarding to be able to confirm that no adverse effects on integrity are anticipated.

Monitoring Significant effects

- 1.1.48 The ISA has identified the likely effects of the NDF on ISA Objectives over the short, medium and long terms. An indication of the certainty of these effects was also provided. However, there is a risk that the sustainability impacts of the NDF, including the impacts of specific policies or the cumulative impacts of policies in-combination, are different to those anticipated, such as due to unforeseen circumstances. It is therefore an essential component of delivering sustainable development to monitor the impacts of the NDF in relation to the predicted impacts. Regular monitoring then enables the relevant authorities to alter plans as necessary should unexpected negative effects arise or expected positive effects not arise.
- 1.1.49 A draft monitoring framework, comprising those effects being sought to be monitored. has been proposed in the ISA Report. Indicators to be monitored will be subject to discussion with Welsh

Government and published in the Final ISA Report. In addition to monitoring the extent to which the NDF results in the impacts identified in the ISA, the monitoring framework provides an indication of the impacts of the NDF on the environmental baseline in Wales and this can be compared with the future trends of this baseline.

Consultation and Next Stages

- 1.1.50 The Draft NDF and its accompanying documents, including this ISA Report, will be consulted on in the Summer of 2019 with various bodies, including the statutory bodies of Natural Resource Wales and Cadw, as well as the general public. Consultation responses will be reviewed and considered during the preparation of the Final NDF and its accompanying Final ISA Report. The ISA Report will be updated in line with any changes made to the NDF as it transitions from a Draft to a Final version.

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