

Glandŵr Cymru – the Canal and River Trust in Wales – is responsible for managing Welsh waterways such as the Llangollen, Montgomery, Monmouthshire and Brecon, and Swansea Canals. These waterways offer a journey through the unique industrial, cultural and natural heritage that Wales has to offer.

They are a living testimony to Wales' proud industrial history, often in striking ways. There is a very good reason why the Pontcysyllte Aqueduct is one of only three World Heritage Sites in Wales, attracting half a million people every year to see this awe-inspiring feat of engineering.

Our beautiful canals and rivers are not just a wonderful tourist destination for visitors from home and abroad - research shows that being next to water also makes you feel happier and healthier. The National Development Framework is therefore a perfect opportunity to ensure that as many people as possible are given the opportunity to take advantage of the health and wellbeing benefits that waterways give us, learning about Wales' proud industrial heritage as they do so.

It is for these reasons that I am pleased Glandŵr Cymru is responding to this consultation on the National Development Framework.

Steve Thomas CBE  
Chair of Bwrdd Glandŵr Cymru

## **Consultation Response Form**

Your name	Helen Edwards National Spatial Planning Manager/ Rheolwr Cynllunio Gofodol Cenedlaethol
Your address	<div></div> <div></div>
Preferred contact details (email/phone/post)	helen.edwards@canalrivertrust.org.uk
<u>Organisation (if applicable)</u>	Glandŵr Cymru, the Canal & River Trust in Wales

## 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

It is very difficult to establish if the outcomes are a realistic vision for the NDF. For many of them it is not clear what the measures of success will be. To determine if they are realistic, clarity is required about the indicators that will be used to measure and monitor the progress and success of the outcomes.

Outcome 1. Reference to “accessible green and open spaces” should be replaced with “accessible green-blue infrastructure and open spaces”. Waterways have the capacity to make a difference to personal, community and societal wellbeing and therefore should be included within Objective 1. Whilst waterways generally fall within the definition of ‘open space’ a change in the terminology is requested. Reference to green-blue infrastructure rather than green spaces would more clearly encompass the benefits of waterways and would also be consistent with Objective 5, providing that reference to green infrastructure is also changed to green-blue infrastructure in that objective too.

Outcome 7 should be more ambitious. The most beneficial mode of travel to society, with associated health and wellbeing benefits, is active travel. Glandŵr Cymru believes that life is better by water. Research we have commissioned shows that simply spending time by waterways can improve happiness and life satisfaction, adding to the benefits of active travel using canal towpaths.

Whilst it is important to embed sustainable transport infrastructure into new developments, the planning system can also play an important role in creating active travel networks. It can be appropriate for development to enhance existing infrastructure, such as canal towpaths, to provide part of an active travel network

which serves the community. The Welsh Government's National Development Framework should therefore acknowledge and support the creation of active travel networks including the enhancement of existing infrastructure, via the planning system. This should be acknowledged in the ambition.

Outcome 10. Glandŵr Cymru is supportive of efforts to protect and enhance biodiversity. Our waterways are a valuable part of the strategic and local green-blue infrastructure network. They also provide an important wildlife route and act as stepping stones for mitigation against habitat loss, dispersal and the genetic exchange of plants. They provide opportunities to enhance biodiversity and ecological resilience.

## 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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:

Glandŵr Cymru is pleased to note that tourism and leisure is recognised as an economic activity with strong links to the rural area and that priority should be given to this. Visitors to our Pontcysyllte Aqueduct have quadrupled since its designation as a World Heritage Site a decade ago. Nearly 500,000 people now visit the Aqueduct every year from all over the world, with tourists from 52 countries signing the centre's visitor book last year. Glandŵr Cymru also have ambitions to make the Monmouthshire and Brecon Canal a go-to sustainable destination for well-being, developing Environmental Study days for younger people and health walks for people of all ages.

### 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 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?

## 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## 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.

### Policy 16 Strategic Policies for Regional Planning

Policy 8 recognises the multi-functionality of green infrastructure, with identification of 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. Policy 16 however does not appear to recognise the wider functions of green infrastructure requiring that the Strategic Development Plan should only establish for the region "ecological network and opportunities for protecting and enhancing the connectivity of these networks". The promotion and safeguarding of the functions and opportunities that green-blue infrastructure provides need to be recognised at a regional level.

#### North Wales Region

The inland waterway network by its very nature crosses many administrative boundaries. It is important that this is recognised in policy development. The regional map on page 50 should include the inland waterway connectivity with England. The region should consider the interlinkage with Shropshire.

Glandŵr Cymru welcome the recognition that strategic and local development plans in North Wales should consider the main tourism areas, the type of visitors they attract and the infrastructure required to support the existing area and future growth. Visitors to our Pontcysyllte Aqueduct have quadrupled since its designation as a World Heritage Site a decade ago. Nearly 500,000 people now visit the Aqueduct every year from all over the world, with tourists from 52 countries signing the centre's visitor book last year. Glandŵr Cymru and our partners are currently exploring plans

to develop the Trevor Basin Area within the Pontcysyllte Aqueduct World Heritage Site, enhancing visitor attractions and facilities in order to maximise the economic impact of tourism. We are currently in the process of finalising these plans, which will include proposals that safeguard the World Heritage Site, maximise economic and community benefits, and enhance visitor attractions and dwell time whilst balancing the needs of community, residents and visitors.

The Glandŵr Cymru waterway in this region forms an integral part of its distinctive heritage, with the canal based Pontcysyllte World Heritage site. We support the statement that “the region’s distinctive heritage should be preserved and enhanced by high quality development”.

### Mid and South Wales Region

The inland waterway network by its very nature crosses many administrative boundaries. It is important that this is recognised in policy development. The regional map on page 57 should include the inland waterway connectivity with South East Wales. The region should consider the waterway interlinkage with South East Wales. In time with the restoration of the Montgomery canal, linkages to Shropshire will also need to be acknowledged.

The inland waterways of the Mid and South West region form part of the large and diverse tourism industry in the area and its distinctive heritage. The two most recent visitor attraction surveys have identified the Monmouthshire and Brecon Canal as the most visited attraction in the Brecon Beacons National Park. The restoration of the Montgomery Canal to Newtown will add to the offer. Glandŵr Cymru supports the requirement for a positive framework to support growth and ensure that communities are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to support and grow their economies.

### South East Wales

The inland waterway network by its very nature crosses many administrative boundaries. It is important that this is recognised in policy development. The regional map on page 63 should include the inland waterway connectivity with the Mid and South West region. The region should consider the waterway interlinkage with the Mid and South West region.

Glandŵr Cymru welcomes the recognition that the Heads of the Valley area has the potential to build on its tourism offers and proximity to the Brecon Beacons National Park. As well as providing a resource on the doorstep of communities in Torfaen, the Monmouthshire & Brecon Canal provides a ready-made connection into the Brecon Beacons National Park. Glandŵr Cymru is already working on a Visit Wales funded project at Pontymoel. Along with Torfaen and Caerphilly CBC the Monmouthshire and Brecon Canal Adventure Triangle aims to develop outdoor recreation and leisure activities along the canal in Torfaen and Caerphilly.

The identification of a national growth area in South East Wales and the production of Strategic Development Plans to facilitate delivery will provide an opportunity to recognise the contribution a complete reinstatement of the infrastructure of the

Monmouthshire & Brecon Canal could make to the area.

A part of the Monmouthshire & Brecon Canal is included within the Blaenavon Industrial Cultural Landscape World Heritage site. It appears that this world heritage site does not feature in the framework for the South East region. Given its international importance, its existence and role in the future of the South East region should be specified.

## **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?

### Policy 8 – Strategic Framework for biodiversity enhancement and ecosystem resilience

Glandŵr Cymru is pleased that Policy 8 recognises that multi-functionality of green infrastructure. However, there is no clarification that the term green infrastructure includes blue infrastructure. Blue infrastructure is also multi-functional and can deliver environmental, social and economic benefits. In addition to our waterways being a valuable part of strategic and local ecological networks, “Assessing the wellbeing impacts of waterways usage in England and Wales” written by social impact consultancy group Simetrica, reveals that any visit to a waterway is associated with higher levels of life satisfaction and visiting regularly is associated

with even higher levels of life satisfaction. Given the context of Policy 8 Glandŵr Cymru therefore consider that it is important that blue space is also recognised. To reflect this the term green-blue infrastructure should be used.

**16. Are you...?**

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

<b>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</b>	<input type="checkbox"/>
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