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Please find attached a consultation response from the Alliance for Welsh Designated Landscapes

**Draft National Development Framework  
Welsh Government Consultation:**



**Response by the**

**Alliance for Welsh Designated Landscapes**

**and**

**Campaign for National Parks**

**November 14th 2019**

## **Welsh Government Draft National Development Framework:**

### **Consultation Response by the**

### **Alliance for Welsh Designated Landscapes in conjunction with the Campaign for National Parks**

1.1 The Alliance for Welsh Designated Landscapes<sup>1</sup> (the Alliance) represents the interests of National Parks, Areas of Outstanding Natural Beauty and other designated landscapes in Wales together with their adjoining marine environments.

1.2 The Campaign for National Parks is also an independent national voice for the 13 National Parks in England and Wales. It has been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

1.3 Both organisations draw on a large pool of experts from among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and further afield. Our collective mission is to inspire everyone to enjoy and look after designated landscapes – the nation’s green treasures.

1.4 Our response focuses on the implications of the Draft National Development Framework on the circumstances within and those which affect both National Parks and Areas of Outstanding Natural Beauty (AONBs) in line with our collective remits. We highlight and justify in particular why the strategic role of Wales’ designated landscapes must be specifically accounted for in the primary tier of the Welsh planning hierarchy; the National Development Framework

### **General comments**

1.5 The Alliance and CNP welcome the opportunity to comment on this refreshed national strategic planning approach. We recognise the importance of this document in aligning, articulating and directing Wales’ future planning framework in a manner which delivers the goals of the Well-being of Future Generations (Wales) Act 2015 and its associated principles.

1.6 In the context of Wales’ designated landscapes and the roles played by the relevant Planning Authorities in these areas when discharging their planning functions, we also recognise the significance this document must have in providing a clear and creative interface with the provisions of the Environment (Wales) Act 2016.

1.7 Given this context, we specifically draw your attention to what we feel is a significant omission from the current document.

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<sup>1</sup> Since 2014, the Alliance has had a long-standing involvement in the legal and policy framework for Designated Landscapes and experience of the management challenges they face. It brings together the expertise of the Brecon Beacons Park Society, Friends of Pembrokeshire Coast National Park, Cymdeithas Eryri the Snowdonia Society, Gower Society, CPRW, National Trust Wales, Cymdeithas y Cerddwyr/ Ramblers Wales, RSPB Cymru, YHA Cymru, BMC Cymru and Wildlife Trusts Wales.

## The spatial significance of Wales' Designated Landscapes

1.8 Designated landscapes account for 25% of Wales' land area with their international status reflecting their long history and acknowledged experience in promoting vibrant working landscapes within a sensitive context. Their legacy of adaptive planning and the positive stewardship of those nationally important natural and cultural heritage qualities which make these areas special, mean they play a specific national environmental, social and economic place making role.

1.9 Given their acknowledged international importance, we are particularly disappointed that specific recognition of their status and spatial role is not fully recognised and expressed as an important consideration in the rationale of the National Development Framework.

1.10 The strategic significance of these landscapes has been repeatedly recognised by Welsh Government and is emphasised by the words of the most recent Ministerial Statement<sup>2</sup> as follows:

*"...all of Wales' existing designated landscapes will be retained and their current purpose of conserving and enhancing natural beauty will not be weakened."*

1.11 That same statement thereafter calls on designated landscapes managing bodies to take a specific role in delivering on a series of Welsh Government development, wellbeing and resource management priorities including:

*"... the Nature Recovery Plan, a refreshed woodland strategy, the decarbonisation agenda, and Cymraeg 2050. Its 10 cross-cutting themes aim to improve resilience and realise the full value of Wales' landscapes:*

- *Landscapes for everyone*
- *Exemplars of the sustainable management of natural resources*
- *Halting the loss of biodiversity*
- *Green energy and decarbonisation*
- *Realising the economic potential of landscape*
- *Growing tourism and outdoor recreation*
- *Thriving Welsh language*
- *All landscapes matter*
- *Delivering through collaboration*
- *Innovation in resourcing "*

1.12 In conclusion, the statement states

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<sup>2</sup> Ministerial statement: Valued and Resilient: Priorities for National Parks and Areas of Outstanding Natural Beauty, Welsh Government, July 27<sup>th</sup> 2018

*“I am committed to ensuring AONBs and National Parks are valued for their natural beauty by our people, communities and country – and, that our designated landscapes deliver rich ecosystems, vibrant and resilient communities and opportunities for outdoor recreation for all of the people of Wales.”*

1.13 It is clear from this endorsement of designated landscapes, that the Welsh Government view these areas, both individually and collectively, physically and spatially as special places where specific and very distinctive place making characteristics exist and which have a specific role to play in the future wellbeing of Wales.

1.14 Effectively the Welsh Government has identified the nation’s designated landscapes as spatially distinct areas where specific planning and land management frameworks exist to safeguard not only their exceptional qualities but also the unique opportunities they offer to realise a huge range of public wellbeing benefits.

1.15 Given their recognised national spatial role, we anticipated the specific and different circumstances associated with the nation’s most valued landscapes would be explicitly recognised in the strategic “Placemaking” framework proposed in this emerging NDF.

1.16 To the contrary and disappointingly, the NDF pays scant regard to the specific manner by which the integrity and resilience of these essential components of the nation’s environmental infrastructure will be realistically safeguarded.

1.17 Given the co-existence of some of Wales’ most important natural resources within their boundaries, (especially those enabling the Welsh Government to combat the challenges of climate change), the unquestionable strategic asset value and diverse range of public benefits provided by designated landscapes, have been disregarded.

1.18 Simply mapping their spatial extent and reflecting on the need to shield them from inappropriate industrial scale renewable energy development is totally inadequate.

1.19 As the NDF (Page 9), aims to express *“the spatial priorities for planning and development where national-level consideration is required...”* the Plan must not only indicate those areas or assets where the focus for development is desirable but also by default locations where specific sensitivity and justified restraint is similarly needed. As the document rightly notes *“...Our landscapes are amongst the best in the world...”* Such acclaim deserves a correspondingly comprehensive visible strategic policy response.

1.20 Just as certain urban areas are recognised as *“nationally important places”* and recognised in the draft NDF’s Hierarchy of Placemaking as locations highly suited for growth, so we contend that Wales’ designated landscapes must equally be recognised as *“nationally important places”* given the diversity and quality of the nationally important environmental, social and economic assets within their boundaries.

1.21 We therefore do not accept that the one line statement (Page 24) *“In areas designated for their landscape or ecological importance, protection against inappropriate development remains in place...”* is at all adequate to reflect the spatial importance or crucial green infrastructure role these internationally designated landscapes play.

1.22 Welsh Government and those with statutory responsibilities for designated landscapes rightly expect these special places to contribute to the implementation of the NDF. Designated landscapes provide the perfect geographical models for how, in rural Wales, spatial place making can be successfully implemented as a focus for the NDF approach.

1.23 We therefore believe the current NDF must be revised to rectify this omission thereby providing the necessary policy framework to protect the integrity of these fundamental components of the nation’s physical infrastructure.

1.24 For this reason, we therefore believe the commentary in PPW10 para 6.3.5 - 6.3.10 inclusive, should be reflected by a specific NDF Policy recognising designated landscapes as places with a compelling spatial identity and having an unique strategic planning role i.e.

- National assets with distinctive national and local heritage values which individually and collectively provide a diversity of unique public wellbeing benefits.
- Places where the most sensitive approaches to development and land use are expected.
- Places which offer innovative and sustainable land use opportunities to reinvigorate rural prosperity and community life and to tackle climate change.

1.25 Accordingly, the inclusion of a Designated Landscape Policy supported by a commentary centred on the justification we have provided, would then fill the current gap. This suggested additional NDF Policy would read as follows:

## **Policy XX: Designated Landscapes**

Wales' National Parks and AONBs, as identified on the Spatial Strategy diagram, are internationally recognised; places with exceptional natural and cultural heritage qualities which must be respected, safeguarded and where possible enhanced through sensitive planning and stewardship.

To ensure the continued protection and resilience of those features and special qualities which make designated landscapes nationally important, the location, scale, and implementation of all development within these areas or their settings must

- Pay full regard and respect to the statutory Purposes of National Parks and AONB.
- Reflect the duty relevant bodies must deliver in having regard to Designated Landscape Purposes.
- Meet the highest environmental standards.
- Contribute to the sustainable management of their natural and cultural values, including measures to tackle climate change.

In addition and within the spatial framework and remit of this NDF;

- Major developments should not take place in National Parks or AONBs except in exceptional circumstances.
- Development at Centres of National and Regional Growth should not intrude into or detrimentally affect the integrity and setting of designated landscapes.

1.26 The inclusion of this Policy we contend, will make the NDF spatially complete and strategically sound.

## **2. Detailed response to the Questions**

### **Q1. NDF Outcomes**

#### **Response**

***We support these outcomes in principle subject to the following caveat:***

2.1 Given our general comments above, we believe that Outcomes 9 and 10 should more precisely reflect the clear differential of distinctiveness and quality which exists between different geographical areas across Wales.

2.2 We further believe specific recognition must be given in Outcomes 9 and 10 to the crucial role the nation's green / blue infrastructure plays to public wellbeing. These respective outcomes should therefore refer explicitly to the need to safeguard and enhance the architectural framework and connectivity these nationally important green/ blue infrastructure assets provide.

### **Q2. Spatial Strategy**

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

#### **Response**

2.3 We are pleased the Plan includes due recognition of the needs and challenges facing rural areas and their respective communities. In this context however, we believe specific reference to and a clear policy for development within Wales' designated landscapes, as we have suggested in our General comments, would be beneficial.

2.4 Without this addition, the NDF's proposed hierarchy of plans and planning relationships distorts the existing status and functions of the statutory plans prepared and adopted specifically for and affecting Wales designated landscapes.

### **Q4. Mobile Action Zones (Policy 6)**

#### **Response**

**We support this policy subject to the following.**

2.5 Although the implications of this Policy within designated landscapes of Wales are uncertain, we note Policy 6 clearly states there must be 'no significant adverse landscape impacts', arising from such development. We suggest the addition of a reference to PPW10 policy on designated landscapes, could helpfully be included to make it clear that the Precautionary Principle should be adopted when the Mobile Action zones are proposed in these areas.

### **Q6. Green Infrastructure (Policy 8)**

#### **Response**

2.6 We support the general aim of this Policy subject to the following caveats:

2.7 It is disappointing that the document reflects a limited interpretation of the concept of Green Infrastructure. At present it focusses almost exclusively on the issues



of biodiversity recovery, connectivity and the need to promote action primarily in urban areas. The concept however does not appear to embrace the importance of the environmental services and public benefits the “blue” element of the environment provide, namely the quality of Wales’s rich legacy of open waters, rivers, canals and coastal waters.

2.8 The term “Green Infrastructure” must therefore be more specifically and inclusively defined to reflect Wales’ important network of both blue and green resources. At the very least a definition of the scope of green infrastructure should be included in the document, preferably to embrace this extended dimension.

2.9 Likewise the manner in which Green Infrastructure is expressed doesn’t encompass the totality of the landscapes by recognising those heritage assets and manmade infrastructure (walls, buildings, heritage artefacts etc.) which in many instances provide valuable environmental connectivity and typify the unique historical continuity and multi-dimensional character of Wales’ landscapes. That being the case we suggest this section is retitled to read “**Environmental Infrastructure**”, a more inclusive term for all the natural and cultural resources and the valuable services and public benefits they provide

2.10 Given the above, we conclude the Plan gives insufficient recognition to the status of the country’s “nationally significant environmental resources” (both natural and cultural) and the fundamental pivotal role they play in safeguarding the nation’s future.

2.11 Given the imperatives of climate change and the importance ascribed to promoting the long term sustainable management of the nation’s natural resources, it is disappointing, indeed worrying that the Plan doesn’t recognise and define the role of “**Areas of National Resource Significance**”

2.12 Having noted the current Welsh Government’s “*Sustainable Farming and Our Land*” consultation document, clearly acknowledges specific “resource areas” as being of such importance to the nation’s future wellbeing, that they should be ascribed special resource safeguarded / management status, we believe this same land use principle should be specifically included in the NDF.

2.13 In addition to spatially defining these critical “**Areas of National Resource Significance**”, the NDF should include clear strategic policies to ensure the status and functional integrity of these nationally important natural and cultural resources are safeguarded.

2.14 We note the principle of designating “Natural Resource areas” is effectively promoted by Policy 9 through its ambition to establish a National Forest. If this desire relates to one nationally important natural resource, we question why it should not apply equally to others, such as carbon rich soils, water resources and those heritage landscapes which deliver a multitude of public benefits.

**National Forest. (Policy 9):**

**We reserve our position on this issue.**

2.15 Whilst cautiously supporting this Policy, the concept of a National Forest remains ill-defined and the spatial consequences of this proposal very vague. In particular the relationship between this concept and the long standing spatial land use strategies and sensitive management practices adopted in designated landscapes, has not been recognised nor accounted for.

2.16 Greater clarity is therefore required to understand whether this policy relates to specific area(s) or merely an aspiration to increase the geographic coverage of woodland by a given amount. If it is the latter, then the NDF fails in its objective to provide the necessary strategic means to understand how and where this increase should be achieved.

2.17 Equally if this strategic spatial approach applies to woodland, then there seems no reason, as mentioned previously, why it should not apply to other natural and physical assets (upland carbon or water resources), or those areas where agriculture, open access, or habitat enhancement are deemed national priorities. We believe recognition of the spatial importance of this broader menu of primary land uses should be acknowledged and articulated in the NDF. By default those nationally important landscapes where these valuable resources individually exist or are collectively concentrated but which have no current legal status or protection, should feature in the document.

2.18 Greater synchronisation of intent is therefore required between the proposed NDF approach and the propositions in the recent Sustainable Farming and Our Land consultation, to fully understand the land use implications and consequences of a National Forest proposal on the individual Placemaking agendas for rural Wales and those communities which would be affected by such a proposal.

#### **Q7i. Renewable Energy and District Heat Networks (Policies 10-13)**

**Large scale wind and solar developments:**

***We challenge the soundness of this analysis and the integrity of its conclusions***

2.19 We acknowledge a series of desk top studies<sup>3</sup> have been undertaken to inform the assessment of those areas in Wales which may have potential to be identified as Priority Areas for large scale wind and solar deployment.

2.20 Notwithstanding this, we express significant reservations as to the comprehensiveness of the information used in these studies and hence the soundness of their conclusions, for the following reasons.

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<sup>3</sup> Assessment of on-shore wind and solar energy potential in Wales

Stage 1: Development of Priority areas for wind and solar energy

Stage 2 : Refinement of Priority Areas for wind and solar energy, Arup June 2019

1. We note that the geographical areas of National Parks and AONBs are rightly recognised as “*fixed determinants*”, providing no scope for the deployment of major wind or solar energy installations within them. However we do not agree with ARUP’s conclusions<sup>4</sup> at Page 24 Para 3.2.2 that:

- Landscapes of High or Outstanding value (as recognised by LANDMAP)
- Historic landscapes (as recognised by LANDMAP)
- Areas of peat deeper than 45 cms

... should individually or collectively be classified as “*variable determinants*” rather than fixed determinates when assessing those areas adjacent to designated landscapes which may or may not be suitable as Priority Areas.

We find this approach completely inconsistent with all accepted current planning practices where the significance of any aspects of LANDMAP data classed as Outstanding or High, are recognised as important material planning considerations, which objectively define not only an area’s landscape character but also its quality and sensitivity.

2. We likewise believe the legitimacy of the ARUP’s conclusions are further compromised by virtue of the “*Stage 2: Refinement of Priority Areas for wind and solar energy*” document<sup>5</sup> clearly stating at Page 16, Para 3.1.3.

*There is no Wales-wide sensitivity assessment for wind energy or solar development.*

Despite noting that 12 out of the 22 Local Authorities in Wales have undertaken such studies, this information has been disregarded. Equally where the data does exist, no attempt has been made to account for these Local Authority findings to confirm or otherwise the legitimacy of the boundaries of those Priority Areas within what ARUP define as the “visual setting area” of designated landscapes.

To the contrary the ARUP assessment<sup>6</sup> concludes at Page 29, Section 3.2.3.

### ***Sensitivity studies***

#### ***Summary implications for Refinement***

*While the importance of such studies is recognised, the limited coverage across Wales and the slightly varying approaches of these studies has meant that these studies have not been used any further in the consideration of the refinement of the priority areas.*

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<sup>4</sup> Stage 2 : Refinement of Priority Areas for wind and solar energy, Arup June 2019

<sup>5</sup> Op cit

<sup>6</sup> Op cit

2.21 The exclusion of any comprehensive landscape sensitivity assessment from the evaluation process therefore by default means the ARUP analysis cannot be considered complete.

2.22 Given these deficiencies there is neither transparency nor the necessary evidence based assurances to demonstrate that any Priority Wind and Solar Areas identified within the visual setting of a designated landscape can be fully and objectively justified.

2.23 The exclusion of these fundamental aspects of the landscape character evaluation from the ARUP scoping analysis, therefore clearly distorts the overall objectivity of the assessment and hence the soundness of its conclusion.

2.24 We therefore contend a review of the acceptability of those Priority as Areas described by ARUP as being “*visible from within a Designated Landscape*” and further refinement of the corresponding separation buffers between these respective areas, should be undertaken to account for the deficiencies mentioned above.

2.25 We further question why other forms of renewable energy generation, notably the scope of offshore wind and other marine technologies, and the role of microgeneration at domestic and farm level, have not been promoted by the NDF. Their less intrusive nature and in the case of microgeneration the obvious advantages of connecting these later generating opportunities to local transmission infrastructure, make them highly relevant to the context of this aspect of the NDF.

2.26 In addition given the NDF’s definitive recognition that designated landscapes will be protected from large scale renewable energy developments, we therefore maintain Policies 11, 12 and 13 should be amended to similarly indicate

*“Designated landscapes and their settings will be safeguarded from the impacts of proposals to upgrade or extend the existing high voltage transmission networks needed to link any Priority Wind and Solar Energy Area to the National Grid.”*

2.27 In addition we also contend, the relevant criteria associated with Policy 12 should specifically include (and Policies 11 and 13 reference) both the Major Development test (the Silkin Test) and the responsibilities of Local Planning Authority’s to have regard to Section 62 and Section 85 of the 1995 Environment Act’s and their “Duty of care” to Wales’ designated landscapes.

2.28 With regards to the text of Policy 10 and 11 we note they state

*Policy 10: Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been minimised...*

*Policy 11: Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:..*

2.29 We highlight with respect to their respective wording, it is the role of the relevant Planning Authority, not the applicant to determine the nature, extent and scale of these adverse impacts on each or all of the listed criteria. The wording of this Policy should be amended accordingly.

#### **Q8. The Regions (Policy 16)**

**We agree with this policy subject to the following caveat.**

2.30 Given the special planning responsibilities and circumstances prevailing within designated landscapes and in particular the unique and specific planning functions of National Park Authorities, (NPAs), the NDF should clarify the status and role, between the respective Statutory plans prepared for these areas, and their relationship to any proposed Strategic Development Plans which may geographically coincide or include these areas.

2.31 The NDF should clearly state that Wales' National Parks will not be included in any Strategic Planning areas and the strategic planning functions with these areas will continue to be the responsibility of NPAs. Similarly the NDF should clearly state that the policies of designated landscape plans should form part of the strategic context for any SDP prepared for adjoining areas.

#### **Q9. North Wales (Policies 17-22)**

##### **Response**

2.32 We believe cross reference should be made in this section to our proposed additional Designated Landscape Policy given the special planning circumstances within and affecting the four designated landscapes in North Wales

2.33 We also believe that the full range of the social, economic and environmental implications of Wales' cross border connections / connectivity with the North West of England and the influence these have on the various anticipated strategic outcomes, have not been fully explained or accounted for in any meaningful way.

2.34 That being the case we believe the text of this section should make specific reference to the fact that *"the consequences of centres of national growth at Deeside and Wrexham should not encroach or adversely affect land within or a visible from the Clwydian Range and Dee Valley AONB"*

2.35 In addition we support the consultation response from the Snowdonia Society, which proposes an amendment to draft Policy 12 to ensure that proposals for large scale wind and solar energy, both inside and outside of Priority Areas, close to the boundaries of designated landscapes must demonstrate that the development will not undermine the objectives that underpin the purposes of designation.

2.36 We also support the Society's response on draft Policy 22 seeking clarification whether any possible small new nuclear power station at Trawsfynydd would be

determined at Welsh or UK government level and whether it would be treated as 'major' development.

2.37 We agree with the Society proposed additional wording in that Policy to make clear that any such proposal should be of a design that responds positively to the sensitive landscape and visual setting and special qualities of the Snowdonia National Park.

### ***Transport Links between North and South Wales (Policy 21)***

#### **Response**

2.38 We are disappointed the NDF does not clearly explain the WG's plans for effective and sustainable transport infrastructure links between North and South Wales, given its desire to create and provide greater national and regional connectivity and a fairer distribution of wealth and prosperity especially for the more rural areas of Wales. We believe in this context the solution to this challenge must take into full consideration the sensitivity of traversing the landscapes of two National Parks.

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

#### **Response**

2.39 We note with disappointment the current draft version of the NDF, whilst suggesting the establishment of the Valleys Regional Park, does not consider the opportunities for the *"growth and expansion of other nationally important landscapes"* as promised in the previous scoping version of the NDF.

We therefore believe a key area for inclusion in the NDF in this respect is the Cambrian Mountains. Their landscape values are recognised in all the relevant contemporary landscape character and ecosystems assessments as being of outstanding national significance. This is further reinforced by the fact that the "Energy Priority Areas" proposed in the map associated with Policy 13, noticeably excludes the Cambrian Mountains, which we welcome.

The NDF should therefore specifically recognise the spatial importance and national value of the Cambrian Mountains as an indispensable element of the nation's Green infrastructure. We propose the following policy is included in the Mid and West Wales section to safeguard and enhance the resilience of this "Area of National Resource significance"

#### **Policy XX Cambrian Mountains**

*The Welsh Government recognises the outstanding national landscape and ecosystems significance of the Cambrian Mountains area. Strategic and Local Development Plans should therefore*

- *Embed these principles into their planning frameworks*
- *Safeguard the area's character and enhance the crucial ecosystems services these landscapes provide.*

*The Welsh Government will work with the Local Authorities, the third sector and key partners including Natural Resources Wales in bringing the benefits of designated landscape status to the Cambrian Mountains.*

It would be useful if the indicative area of the Cambrian Mountains was visually expressed on the Mid Wales regional diagram on page 57 of the draft NDF.

2.40 We repeat our contention (See General comments) this set of Policies should fully reflect the special circumstances within and affecting the four designated landscapes in Mid and South West Wales and the proposed policy framework we advocate for them.

2.41 We also highlight the need for the NDF to specifically reflect and refer to our proposed Designated Landscapes Policy given the juxtaposition of the Pembrokeshire Coast National Park to the Milford Haven Waterway and the potential for future conflict given that major infrastructure and / or commercial developments attracted to the Enterprise Zone, could have a substantive impact on the sensitivity of the National Park landscape.

2.42 We therefore contend the spatial relationship between these potentially conflicting national interests needs to be recognised. Policy 25 of the NDF should therefore include the guiding parameters which would avoid such conflicts. Their inclusion in this document would thereby avoid any subsequent tensions arising when the preparation of a subsequent Strategic Development Plan for this area, is undertaken.

2.43 Similarly the geographical relationship between the Brecon Beacons National Park to the Heads of the Valleys area equally requires greater consideration, given the nature of the various development proposals which are likely to be attracted to these areas and the affect they will have on these designated landscapes.

#### **Q11. South East Wales (Policies 27-33)**

##### **Response**

2.44 We repeat our contention (See General comments) that this set of regional Policies should fully reflect the special circumstances within and affecting the two designated landscapes in South East Wales and the proposed policy framework we advocate for them.

2.45 As mentioned above, the juxtaposition of the Brecon Beacons National Park to the Heads of the Valley Growth area (Policy 29 -30) and the proposed the Regional Park (Policy 33) requires more detailed consideration in these policies, given the nature of the various development proposals which are likely to be attracted to these areas and the affect they will have on these Protected Landscapes and the Wye Valley AONB.

2.46 We believe the following text should be therefore be included in this section

*“ .. the consequences of centres of national growth should not encroach or adversely affect land within or a visible from the Brecon Beacons National Park or Wye Valley AONB”*

## **Q12. Integrated Sustainability Appraisal**

### **Response**

2.47 Although the NDF has been subjected to an Integrated Sustainability Appraisal, it is particularly challenging to trace and hence understand how the specific aspects of landscape character, quality and sensitivity and therefore the continued protection and resilience of these characteristics (specifically those in designated landscapes), have been accounted for in deriving the various conclusions set out in the ISA Objectives 13 and 14 of this Appraisal, namely

*13. To create opportunities for the protection and enhancement of the local distinctiveness of our landscapes, townscapes and seascapes*

*14. To create opportunities for the protection, conservation and enhancement of the historic environment, historic assets and their settings*

2.48 Thereafter, it is equally problematic understanding how these factors have then been weighted and assessed in relation to other aspects of the sustainability and public wellbeing agendas, given these two particular Objectives receive a **++ rating** in the Appraisal, i.e. *“Strong positive – likely to result in progress towards the objective (significant)”*

2.49 A more complete explanation of how the merits of landscape quality are accounted for in this ISA weighting process should be available.

## **Q14. Welsh Language**

2.50 We offer no specific opinion on these matters, but in principle is strongly supportive of amendments to the NDF that would assist in supporting a flourishing Welsh language.

## **Q15. Further comments**

### **Response**

2.51 The relationship between the NDF / SDP and the emerging Natural Resource Area Statements, which will eventually cover all designated landscapes, is not clearly explained.

2.52 We are therefore concerned as to how the content and ambitions of these two different documents will set the focus for development and resource management in designated landscapes and as a consequence the overarching function of a Protected Landscape's Management Plan. This relationship needs to be specifically clarified in the subsequent version of the NDF.

2.53 Our response to the previous scoping draft of the NDF in relation to proposition DN3 welcomed and supported the desire for...



*“...nationally important landscapes, seascapes, nature conservation sites and habitats will be identified, along with opportunities for growth and expansion.”*

- 2.54 Except in the case of the Milford Haven, the NDF document does not appear to make any reference to the interface or implications of those nationally significant aspects of the Marine Plan which could have landfall implications on the four coastal designated landscapes in Wales. The implications of offshore renewable energy generation and also increased offshore dredging should be more specifically addressed.

For further information about any aspect of this response, please contact:

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