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To: [NDE](#)
Cc: [Chief Executive Office](#)
Subject: Environment Agency response to the Draft National Development Framework
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Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
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[image006.gif](#)
[NDF Wales consultation Environment Agency response.docx](#)

Good afternoon

Please find attached the Environment Agency's response to your consultation for the Draft National Development Framework.

Regards

Caroline

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Response to Welsh Government consultation

Draft National Development Framework

Summary

We welcome the opportunity to respond to Welsh Government's consultation on its draft National Development Framework (NDF).

The NDF covers a range of issues including housing, energy, economy, transport and the environment. It identifies where nationally significant developments should take place, where key growth areas are and what infrastructure and services are needed. The range of issues and spatial nature of the NDF means there is significant potential for it to directly impact Environment Agency interests in England.

Our response to this consultation explains how proposals in the NDF could affect aspects of the environment that lie within the Environment Agency's interest, how potential impacts can be managed and how mutual opportunities could be realised.

1.0 INTRODUCTION

1.1 Our comments focus on how proposals and policies in the NDF:

- have potential to affect key environmental issues within the Environment Agency's remit, including flood risk, water quality, water resources, climate change, biodiversity and environmental net gain and waste management, and
- interact with receptors in England via pathways from Wales across the border.

1.2 The Environment Agency is a statutory consultee for about 20,000 planning applications a year and for all local plans, strategic development strategies and neighbourhood plans in England. In this capacity we seek to create great places that bring communities together and improve physical and mental wellbeing. We do this by advising local planning authorities on key aspects of the environment so proposed developments and plans contribute to creating sustainable development. It is important that environmental issues are considered and addressed at a catchment scale, and our advice helps local planning authorities identify and address environmental issues across their district boundaries.

1.3 The Environment Agency's key issues regarding the draft NDF are summarised below. Our answers to the specific consultation questions are in the appendix to this document, and we ask that the points we raise in section 2 below are taking into account in addition to our answers to the consultation questions.

2.0 KEY ISSUES FOR THE ENVIRONMENT AGENCY

2.1 Potential for cross border impacts in England from proposed major growth areas and strategic infrastructure proposals – identifying likely risks and mitigation and promoting cross border co-ordination, where needed

2.1.1 Growth areas and strategic infrastructure proposals in the NDF are mainly located close to the border with England. Consequent development activity is likely to be significant and could have impacts via various pathways to receptors in England. These include:

- changes to flood risk, existing and proposed flood risk management infrastructure and water quality downstream in England
- significant increase in waste generation and the potential for waste to be transported long distances to be processed, including to England
- additional pressure on water resources, including water resources shared with England

2.1.2 We understand that much of the detail regarding the nature and scale of development in growth areas will be developed through Strategic Development Plans for each of the 3 regions. The risks identified above can be managed by the NDF promoting a strategic approach when considering implications for flood risk, water quality, water resources, air quality and waste management when developing proposals for growth areas through Strategic Development Plans. In doing this we believe the following issues should be considered.

2.1.3 **Flood risk** - we believe the NDF should promote a catchment based approach to managing flood risk. We are unsure if a strategic level flood risk assessment has been produced to understand the broad flood risks for the identified growth areas. Such an assessment is important to inform planning for growth areas and would help to identify strategic risks and potential mitigation needs that could inform the development of board flood risk management strategies for the NDF. One such mitigation strategy is use of natural flood risk management. We believe there is a strong opportunity for natural flood risk management to be included in NDF policies (e.g. as part of policy 8 and 9). We also recommend the NDF should promote consideration of the potential for accommodating respective housing needs either side of the Wales-England border, in order to ensure development is in lowest flood risk areas (e.g. as part of policies 1 to 4).

2.1.4 **Waste management** – we recommend waste management is included in the ‘NDF model of influence’, to ensure it is considered a strategic issue. This will help ensure growth and development promoted by the NDF has a supporting waste management infrastructure that adheres to best practice. It is also important the NDF promotes a structured approach to waste management that:

- promotes the ‘proximity principle’ where waste processing is close to where its generated, minimising carbon emissions due to transport of waste and promoting local employment opportunities
- manages the reduction of risks from waste crime
- ensures waste is not disproportionately handled by a few sites where costs are lowest, at the expense of promoting handling and treatment further up the waste hierarchy.

2.1.5 The NDF can facilitate the achievement of this by specifically referencing these objectives as part of policies 1 to 4. We feel this is especially important as supporting policies in current Technical Advice Notes for waste don’t reflect current best practice in waste management, such as circular economy.

2.1.5 To ensure consistent ‘end of waste’ management procedures across the border, a degree of consistency with waste management policy in England will be important. Liaison with waste policy makers in England when refining waste policies for the NDF, and subsequent Strategic Development Plans will facilitate this.

2.1.6 Water resources – The NDF recognises that climate change could increase pressure on water resources, and the location of growth areas provides the opportunity to consider where water will be needed and how to safeguard resources. It also reflects that Wales currently transports water to areas of demand. This will include areas of England including Cheshire, Wirral and West Midlands.

2.1.7 However, we are not aware of an evidence base underpinning the NDF that considers how water availability might change in the future due to climate change, growth proposed by the NDF and wider growth across the border in England. It is important the NDF demonstrates such evidence has been considered so it can reflect the likely water availability risks and set high level mitigation principles. This will help ensure provision is made (e.g. as part of policies 1 to 4) for sufficient water resources to serve proposed growth areas for the lifetime of development it proposed by the plan, in the context of water needs for wider growth across the border in England and water needs for the natural environment.

2.1.8 Water quality – The NDF recognises clean water as a valuable resource to the environment and for growth. This is reflected in the key NDF outcomes. Major growth can affect water quality and climate change is likely to affect water quality too. However, there is no reference to an evidence base that considers how current water quality could be affected by climate change and proposed growth areas. It is important the NDF demonstrates such evidence has been considered so it can reflect the likely risks to water quality and identify high level strategies to manage risks (e.g. as part of policies 1 to 4). It's is important the NDF is underpinned by evidence collected at a catchment scale, considering how water will flow along rivers and through the ground across the border to England (and vice versa).

2.1.9 There is an opportunity as part of policy 8 to reflect the importance of blue infrastructure, as well as green infrastructure impact, in enhancing biodiversity and seeking ecosystem resilience, and to reflect that climate change has the potential to have an adverse impact on existing ecosystems and biodiversity if left unmanaged. The NDF also has the opportunity to promote high level mitigation to manage risks as part of the Spatial Development Plans (policy 16), particularly where there are problems already, for example in the River Wye and River Severn catchments.

2.1.10 Air quality - The NDF focuses on health impacts of air quality in urban areas. As air quality is transboundary, affecting biodiversity, commercial forests and crop plants, it is important the NDF includes provisions for working with adjacent regulatory bodies (including the Environment Agency and others such as neighbouring planning authorities, including those in England, and Natural England) to ensure a coordinated approach to managing sources of air pollution and air quality. This could be covered as part of policy 8. The NDF also has the opportunity to promote high level mitigation to manage risks as part of the Spatial Development Plans (policy 16), particularly in locations where there are likely to be air quality issues, for example where intensive agriculture is prominent and sensitive habitats are present.

2.2 Strategic management of environmental risks and maximise improvement opportunities

2.2.1 Climate change resilience and adaptation – climate change will have implications for water quality, water availability and flood risk that will manifest at a catchment scale and beyond. Growth and development can exacerbate these impacts – but with good risk management growth and development can also present opportunities to reduce the overall impact of climate change on these environmental factors.

2.2.2 Given the strategic nature of climate impacts and the location of many growth areas close to the border with England, it is important the NDF promotes a coordinated approach to understanding the risks and developing strategic mitigation measures. This will ensure the NDF promotes a robust framework for local plans that provide the detailed framework to deliver growth and development.

2.2.3 The Environment Agency is keen to understand the effects of a 4°C temperature increase by 2100 and how we can prepare for the likely implications. While we are committed to supporting the UK's efforts to limit greenhouse gas emissions by striving to be a net zero organisation ourselves by 2050, we recognise achieving this globally relies on actions taken by many other nations, who may not share our approach. On this basis, we believe planning for a 4°C temperature increase by 2100 scenario will provide a robust framework to ensure development is resilient for its lifetime. The Environment Agency are currently liaising with colleagues in Natural Resources Wales regarding our respective approaches to updating our climate change allowances for flood risk assessments to ensure our respective approaches work well together and are not in conflict. This includes consideration of how a scenario of a 4°C temperature increase by 2100 is likely to affect flood risk. We recommend the NDF's policies provide a framework for sustainable growth (for example as part of policies 1 to 4) that reflects robust climate change resilience standards to ensure its proposals are deliverable in the context of the wider spatial planning framework.

2.2.4 Furthermore, there is an opportunity for the NDF to build on its adaptation policies related to biodiversity and ecosystem resilience in Policy 8 to set a framework for resilience and adaptation planning. It could be expanded to incorporate flood risk, water quality and water resources, overheating in buildings and urban heat island. Stronger links to shoreline management plans, flood risk management plans, climate change allowances for flood risk and river basin management plans would help facilitate this.

2.2.5 **Carbon reduction and climate change mitigation** – The Draft NDF makes clear commitments to reducing greenhouse gas emissions and creating a sustainable decarbonised society in its strategic outcomes and in many of its policies. This includes through promotion of low carbon transport and buildings, low carbon and renewable energy sources and through green infrastructure and a national forest.

Environment Agency objectives to improve land management not only seek to achieve improvements for flood risk management and water quality, but also help to achieve carbon sequestration through soil management, upland afforestation and restoration of peatland and other habitats. We recommend the NDF promotes cross border engagement to optimise opportunities to secure these land management measures.

Furthermore, we have already noted in our response that we recommend early and strategic engagement with the Environment Agency to manage potential environmental risks from renewable energy infrastructure. This will also help ensure deliverability of important infrastructure that will help achieve the carbon reduction goals.

2.2.6 **Flood and Coastal Erosion Risk Management Strategy** - It is important the NDF and any supporting infrastructure plans, ensures strategic flood risk is considered and there is coordination with the Environment Agency, accounting for the Environment Agency's FCERM Strategy, to manage these risks. We expect the FCERM Strategy to be finalised and laid before parliament for approval this calendar year. This Strategy has a time horizon to 2100 and seeks to take a much broader view of flood and coastal risk management, moving from a narrow view of protection, to one

of resilience. This acknowledges that building higher and higher flood defences will not always be possible or appropriate. It introduces a commitment to develop and explore the concept of resilience standards – a way of improving flood and coastal resilience across the country. Ways of managing flood and coastal resilience will vary from place to place, with the responsibility on the best combination of ‘tools’ resting with the most appropriate decision maker.

2.2.7 Our Draft FCERM Strategy also introduces the concept of adaptive pathways. This is a positive way to pre-plan adaptation actions for a range of different climate scenarios before they are needed. This approach is useful because flooding and coastal change is not static, but constantly changing. A dynamic approach that can be reviewed over time in response to changing risks can avoid potential over or under adaptation, and help to keep options for adaptation open. Adaptation pathways need to be planned holistically and in conjunction with other infrastructure providers, so that plans for growth and development can be aligned with other infrastructure plans.

2.2.8 Our Draft FCERM Strategy also acknowledges that in some places, adaptation in the long term to flood risk or coastal change may not be possible, and that the relocation of some existing development and infrastructure may need to be planned – i.e. ‘build back better and in better places’. A proactive approach to this can help to minimise the impacts of relocation on local places.

2.2.9 We encourage closer alignment between the NDF and our FCERM Strategy on these important principles. This could be achieved through policies 1 to 4, and through policy 16 to inform the Spatial Development Plans that will emerge from the NDF.

2.2.10 **Net gain** – Environmental net gain was identified in the Government’s 25 Year Environment Plan, which sets a comprehensive and long term approach to protecting and enhancing the natural landscapes and habitats of England. Growth and development provide significant opportunities to enhance the natural environment and the assets and services it provides for society. It can also be a way of improving resilience to natural hazards and the predicted impacts of climate change. On this basis there is an opportunity for the NDF to provide a policy framework to identify strategic opportunities for biodiversity net gain, wider net gain and enhancement of natural capital to better align with emerging approaches in England to meet aspirations of the 25 Year Environment Plan. This could be included as part of policies 8 and 9.

2.2.11 Given the NDF proposes many growth areas close to England, the NDF should promote a strategic approach to identifying net gain opportunities at a regional and local level, including cross border opportunities in England, for the delivery of net gain that maximises benefits for the wider environment.

2.3 Management of impacts from key growth industries

2.3.1 **Renewable energy** – The NDF promotes significant growth for renewable energy that will see significant infrastructure being built to harness tidal, wind and solar energy.

2.3.2 Tidal lagoons on Welsh shores proposed in Severn Estuary/Bristol Channel, and potentially in North Wales have the potential to impact English rivers and shores, in particular migratory fish that require English river habitat as part of their lifecycle. Increase in renewable energy generally is likely to result in additional powerlines to access the national grid in England, particularly in mid-Wales where there is a strong drive for onshore wind energy generation. Transmission infrastructure tends to be in river valleys and can result in an increase in impermeable surface area, speed of surface water runoff can be affected, potentially increasing river flows and flood risk.

2.3.3 It is important the spatial context set by the NDF recognises these risks as part of policies 10, 11 and 13 and facilitates join up with relevant Environment Agency functions to ensure adequate protections can be put in place.

2.3.4 **Mineral extraction** – The NDF promotes minerals extraction as important growth industry for some regions of Wales, with many areas promoted for these industries being located close to the border with England. Minerals activities in Wales close to the border with England can pose significant flood risk and ground and surface water issues in England, accepting there are existing arrangements to manage cross-border issues through our respective permitting regimes that minerals activities can pose.

2.3.5 It is important the spatial context set by the NDF recognises these risks as part of policies for those regions where minerals extraction is a prominent industry, and facilitates join up with relevant Environment Agency functions to ensure adequate protections can be put in place. This could be achieved through policy 16 (informing the development of the Spatial Development Plans) and through the policies for those regions where minerals activity is most prominent (for example policies 22, 26 and 33).

FURTHER INFORMATION

Welcome discussions on further development of the proposals with Welsh Government to explore these issues further.

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October 2019

APPENDIX – RESPONSE TO CONSULTATION QUESTIONS

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

We recommend stronger reference to climate change adaptation or resilience is included in outcome 11 – 'What should resilience cover?'. Currently across the NDF seems focused only on biodiversity and ecosystem resilience – there is an opportunity to think about resilience to a wider range of risks and receptors. Also outcome 11 would strengthened if it set resilience and adaptation planning thresholds, e.g. thinking about resilience to a scenario of 4°C temperature increase by 2100.

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

We do not disagree with the principles set out. However, we feel there are some key gaps.

Policy 8 provides a framework for ecosystem resilience to climate change, but there is a gap in terms of securing resilience to climate change in the built environment and built infrastructure. This could be addressed as part of delivering policies 1-4. This should include resilience of the built environment to a range of climate risks including flooding, limited water availability, overheating/exposure to excessive heat and urban heat island.

In terms of housing delivery, it is important to take a strategic approach across LPA borders (inc. those in England) to ensure delivery of new housing is as sustainable as it can be, including ensuring housing is located in areas of lowest flood risk areas and does not result in high risk of increasing downstream flood risk. To achieve this, the NDF should promote a strategic approach to delivering housing, including consultation with local authorities and key organisations outside of Wales such as the Environment Agency.

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 checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

No comment.

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 checked="" type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

No comment.

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 checked="" 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?

No comment.

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

We do not disagree with the policy as written, but there are key gaps. The policy is strong on identification of green infrastructure assets and safeguarding these when development is brought forward. However, there is a clear opportunity for significant enhancements and environmental gains where new growth is delivered and the NDF should provide a clear framework to facilitate this as part of Policy 8. In doing this it is important to consider opportunities across local authority borders, including those in England, as this will provide greatest opportunities to maximise benefits for the environment. On this basis, taking a strategic approach to planning green infrastructure and ecosystem resilience is important, including consultation with local authorities and key organisations outside of Wales such as the Environment Agency.

We would like to see explicit reference to natural capital (currently not mentioned in the NDF) and the value of incorporating a natural capital approach into planning for sustainable growth. Net gain in natural capital assets and services should be stated as a desired outcome of housing and infrastructure growth in the NDF. By providing valuations (physical and/or monetary) of natural capital, decision makers can take better account of the environment in their plans to allocate resources, to develop and promote wellbeing and the growth of the economy. Baselineing of natural capital resources is critical to understanding whether losses and gains are being delivered through development. The NDF should refer to the SoNaRR (State of Natural Resources Report 2016) commissioned by the Welsh Government which is country-wide assessment of the health and resilience of Wales' ecosystems.

Policy 9 provides a relatively narrow view of the benefits of an increase in woodland cover, focusing on benefits for ecosystems, decarbonisation, timber and leisure. Increasing forestry can also help reduce flood risk, managing increasing risk of flooding due to climate change and reducing urban heat island where tree cover is increased in urban areas. Particularly regarding flood risk, the potential benefits can occur quite far downstream into neighbouring authorities, including those in England. Therefore a strategic approach to planning a national forest is important, including consultation with local authorities and key organisations outside of Wales such as the Environment Agency.

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 checked="" 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 checked="" 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?

For policies 10 and 11 it is important to consider impacts of additional powerlines needed for renewable energy schemes. These tend to be in river valleys and result in an increase in impermeable surface area, speed of surface water runoff can be affected, potentially increasing river flows and flood risk. Its likely powerlines will be needed to access the national grid in England, particularly for schemes in mid-Wales where there is a strong drive for onshore wind energy generation. Where this is the case, liaison key organisations and the Environment Agency is likely to be important and we recommend this is promoted by the NDF policies.

While policy 13 regarding 'other renewable energy developments' does not specifically reference tidal energy, it is fairly prominent in the NDF, mentioned as an opportunity in the 'Challenges and opportunities' section and for some of the regions. Tidal energy schemes can present significant environmental challenges such as for migratory fish that can have impacts far up and down stream and shorelines. On this basis we recommend reference to addressing the challenges of tidal energy is included in policy 13, along with promotion of strategic liaison with key organisations, including those in England such as the Environment Agency where impacts are likely to travel that far.

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>
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West 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 checked="" 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 checked="" 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.

We are supportive of the principle of developing regional plans for the 3 regions, and in doing this we recommend policy 16 promotes consultation with a range of national, regional and local partners and organisations, including those in England, such as the Environment Agency, given likely cross border impacts and opportunities.

Below is a summary of the key issues for the Environment Agency for each region. See the covering letter to this response for more detail on these issues and how recommendations on how to address them in NDF policies 1 to 16. We recommend the respective policies for the 3 regions seek to address the issues listed below.

North Wales

- Potential for cross border impacts in England from proposed major growth areas and strategic infrastructure proposals regarding flood risk and water quality (e.g. the impact of urbanising upstream catchments as part of growth in Wrexham and Deeside on flood risk management and water quality targets in England), water resources (e.g. impact of growth in North Wales on water availability for Cheshire and The Wirral) and waste management (e.g. the impact of growth in Wrexham and Deeside and in the North Wales coastal settlements is likely to affect waste generation and could affect waste processing across the border).
- Increased mining activity Wrexham and Flintshire could potentially have impacts across the border in England, particularly regarding waste flows and sustainable waste management.
- There is opportunity to liaise across the border with England to identify housing that minimises exposure to flood risk and identify how growth can contribute to delivering net gain for the environment (e.g. in those growth areas close to the border such as in Wrexham and Flintshire)

Mid and south west Wales

- Potential for cross border impacts in England from proposed growth areas and strategic infrastructure proposals regarding flood risk and water quality (e.g. the impact of urbanising upstream catchments as part of growth in Mid Wales on flood risk management and water quality targets in England),

water resources (e.g. impact of growth in across the region on water availability for West Midlands) and waste management (e.g. the impact of growth in Wrexham and Deeside and in the North Wales coastal settlements is likely to affect waste generation and could affect waste processing across the border).

- Increased mining activity in Pembrokeshire and Ceredigion could potentially have environmental impacts across the border in England, particularly regarding waste flows and sustainable waste management.
- Increase renewable energy generation in Mid Wales could affect flood risk in England (e.g. where additional powerlines to access the national grid in England are located in river valleys, increasing impermeable surface area, speed of surface water runoff and river flows).

South east Wales

- Potential for cross border impacts in England from proposed major growth areas and strategic infrastructure proposals regarding flood risk and water quality (e.g. the impact of urbanising upstream catchments as part of growth across the towns and cities south east Wales on flood risk management and water quality targets in England), water resources (e.g. impact of growth in North Wales on water availability for West Midlands) and waste management (e.g. the impact of growth across the towns and cities in south east Wales, but particularly in Cardiff and Newport, is likely to affect waste generation and could affect waste processing across the border).
- There is opportunity to liaise across the border with England to identify housing that minimises exposure to flood risk and identify how growth can contribute to delivering net gain for the environment.

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.

Recommendations for the ISA objectives are listed below.

Objective 7 - add the following to the decision adding questions:

- encourage a strategic approach to assessing and managing flood risks at a catchment scale and delivering growth across local authority boundaries to ensure vulnerable development is in lowest flood risk areas possible
- ensure flood risk assessment accounts for the impact of a range of climate change, including a scenario of a 4°C increase by 2100.

Objective 8 - add the following to the decision adding questions:

- encourage opportunities to reduce air emissions from intensive agriculture.

Objective 9 - add the following to the decision adding questions:

- encourage a strategic approach to assessing and managing risks to water quality and water resources.
- encourage assessment of the impact of a range of climate change on water quality and resources, including a scenario of a 4°C increase by 2100.

Objective 11 - add the following to the decision adding questions:

- encourage consideration of the potential of climate change to exacerbate social inequality and address this risk.

Objective 16 – add the following to the decision adding questions:

- encourage valuation (physical and/or monetary) of natural capital.
- encourage development to deliver net environmental improvements (i.e. not just ensuing development doesn't cause net damage).

Objective 17 – add the following to the decision adding questions:

- reduce amount of waste generated;
- promote waste processing close to source.

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?

No comment.

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?

No comment

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.

No comment

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?

None

16. Are you...?

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

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	<input type="checkbox"/>
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