

CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option

This consultation seeks your views on the emerging National Development Framework (NDF). The NDF will not be published in draft form until 2019 but the issues it should address, the Vision, the objectives and the Preferred Option for achieving these are set out in this consultation. These will shape how the NDF is prepared.

If you have any queries on this consultation, please email: ndf@gov.wales or telephone 0300 025 3261.

Data Protection

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing. .

Names or addresses we redact might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Your data will be kept for no more than three years.

Under the data protection legislation, you have the right:

- to access the personal data the Welsh Government holds on you;
- to require us to rectify inaccuracies in that data

- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

The contact details for the Information Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 01625 545 745 or 0303 123 1113

Website: www.ico.gov.uk

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ

Email: Data.ProtectionOfficer@gov.wales

CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option		
Date:		
Name	Ed Gittins FRTPI - IWA Honorary Consultant Planner	
Organisation	Inland Waterways Association (IWA)	
Preferred contact details (Email address, phone number or address)	Island House, Moor Road, Chesham, Bucks HP5 1WA 01494 783453	
Type <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input checked="" type="checkbox"/>
	Other groups not listed above	<input type="checkbox"/>
	Responding in a private capacity	<input type="checkbox"/>

We would like give stakeholders every opportunity to contribute to the preparation of the National Development Framework. To assist us with arranging engagement events, publicising consultations and keeping you up to date with progress on the NDF through our newsletter, we would like to include your contact details on our database.

Your details will not be used by us for any other purpose, and they will not be shared with any other organisation.

Tick the box, right, to OPT IN and be included on our engagement database, receive details of future engagement events and consultations, and receive the NDF newsletter by email



Q1a	Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?	X
	Yes	
	No	x
Comments		

Q1b	Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?	X
	Yes	
	No	x
Comments		

Q2a	Do you agree the NDF Vision is clear and, ambitious, yet realistic?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	x

Further comments

We preface our comments by providing the context for our representations on the NDF Vision.

The Inland Waterways Association is the membership charity that works to protect and restore the country's 6,500 miles of canals and rivers. IWA is a national organisation with a network of volunteers and branches who deploy their expertise and knowledge and work constructively with navigation authorities, government and other organisations – particularly the Canal and River Trust. The Association also provides practical and technical support for restoration projects directly through its expert Waterways Recovery Group, through its Honorary Consultant Engineers and Planners, or via its website which contains a wealth of planning information and a Restoration Hub.

IWA and its Branches and Members continuously engage with the Planning system in relation to all development which directly or indirectly affects the use and management of the inland waterways network. The Association therefore has a deep and on-going interest in the future of Planning in Wales.

Our specific comments concerning the NDF Vision reflect the IWA's recognition of the major contribution rivers and canals make not only to valued landscapes, recreation and well-being but also as heritage assets. Our current support for canal restoration schemes in Wales – principally the Swansea, the Neath & Tennant, the Mon & Brec and the Montgomery – will undoubtedly open up new linear recreational/tourist corridors but will at the same time restore historic navigations and promote the interpretation and enjoyment of Wales' industrial and commercial heritage.

If there was any doubt as to the importance and combined benefits to tourism, commerce and heritage arising from an active historic waterway, this is admirably demonstrated by the Llangollen Canal which makes a huge contribution to the rural economy as a heritage asset with World Heritage Site status.

With regard to NDF 2020 to 2040 : Sustainable Places, we welcome and support the reference to historic and cultural assets being protected, promoted and enhanced (ie: first bullet point). Subsequently, however, we consider that the NDF underplays the significance of heritage assets and conservation as a key facet of Wales' future economic prosperity and well-being.

We also consider phrases in the first paragraph such as “make the best use of resources” and “protect the environment” are eminently supportable but are too broad in their meaning and likely interpretation.

We believe this can be clarified and rectified to some extent with minor modifications to the text. (see Q2b below).

Q2b	Do you believe any changes to the NDF Vision are required? If so, what are they?	X
	Yes	x
	No	
Comments		
<p>1st paragraph : for “,make the best use of resources” - insert: “, make the best use of natural and man-made resources including heritage assets”.</p> <p>1st paragraph : for protect our environment” - insert : “protect our natural and historic environment”.</p> <p>First bullet point : The word “historic” appears in the text – which we support – but the meaning has gone awry; presumably the word “that” should be deleted.</p>		

Q3a	Do you agree with the NDF Objectives?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	x

Comments

We broadly support the stated NDF Objectives as the basis for policy formulation but comment as follows:

In line with our comments on Vision above, we welcome the reference to historic assets under 7. Culture and Heritage (viz: 7.1).

Under 8. Transport, we urge the recognition of waterways for sustainable transportation and suggest amended wording (Q3c below).

With regard to 10. Health & Well-being, we consider there should be a specific reference to the promotion of recreational and leisure facilities here. (Q3c below).

Q3b	Do you consider any additional objectives are required? If so, what are they?	X
	Yes	x
	No	

Comments

Consideration might be given to the promotion of mixed or multi-uses and associated mitigation measures as a separate Objective in order to clarify or qualify certain other Objectives. (See Q3a and Q3c).

Q3c	Do you consider any of the NDF Objectives should be amended or removed?	X
	Yes	x
	No	

Comments

Under 8, Transport, as there are opportunities to use rivers and canals for sustainable modes of transport, (for example, electric boats, water taxis and ferries), we would wish to see the wording of 8.1 to read:

“To support a reduction in travel by private vehicles and a growth in walking, cycling, public transport and other sustainable land and water-based travel”.

With regard to 10 : Health & Well-being, amend to read : *10.1 To support healthy and active lifestyles and improve the provision of and access to recreational and leisure facilities.*

Finally, and most importantly, the concepts and benefits of the multi-use of land and infrastructure do not feature in the NDF Objectives. Whilst fully supporting the emphasis given to natural resources and biodiversity under 6., it should also be recognised that this can be achieved alongside other uses, sometimes without any material harm but widely if alongside appropriate mitigation measures.

Similarly, with regard to growth and development generally, it is important that the text makes clear that this can normally co-exist with bio-diversity objectives subject to appropriate mitigation. Unless this is clarified, specific objectives will be cited as of greater importance than others and it is clear that this is not the intention of the long list of NDF Objectives but should be left for detailed evaluation of the priorities in any particular case.

Q3d	Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?	X
	Yes	
	No	x

Comments

Q4a	Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the Preferred Option?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q4b	Do you have any comments on the assessment of the options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	X
	Yes	
	No	x
Comments		

Q4c	Are there further alternatives/options that should be considered for the strategic direction of the NDF?	X
	Yes	
	No	x
Comments		

Q5a	Do you agree with the NDF Preferred Option?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q5b	Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report ?	X
	Yes	
	No	x
Comments		

Q5c	Do you agree all the NDF Objectives are adequately addressed in the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	x
Comments		
See comments above under Q3.		

Q5d	Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q5e	Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q5f	The NDF Option is developed around 5 themes, reflecting the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; Wales' Regions. Do you agree with this approach?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		
<p>Whilst supporting the “Themes” approach, we offer the following detailed comments:-</p> <p>2. Distinctive & Natural Places : we support the context referring to “natural resources” and “culture and heritage”.</p>		

DN5 : it needs to be clear that “green infrastructure” includes “blue infrastructure” as well .We note this point was forcibly made by the Canal & River Trust in its representations on Draft Planning Policy Wales: Edition 10 and endorsed by IWA.. CART stated then: “Given the role of inland waterways we therefore consider that reference to green infrastructure....is an inadequate description of the breadth of these assets/resources. A truly sustainable place should explicitly include a recognition for the integration of both green and blue infrastructure”.

IWA restate their support for this view and wish to see the NDF make this point absolutely clear.

PE8 : We seek the inclusion of “rivers” and “ canals” in the text to read: “*Nationally important roads, railways, ports, airports, rivers and canals will be identified*”.

AS4 : We seek a reference to waterborne travel in relation to active travel infrastructure to state: “*National active travel infrastructure (including for walking, cycling and waterborne modes of travel) will be identified*”.

Q5g	Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q5h	Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in <i>Prosperity for All: the national strategy</i> ?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q5i	Do you agree the NDF Preferred Option could be formulated or changed so as to have 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?	X
Agree		x
Neither Agree nor Disagree		
Disagree		
Comments		

Q6a	Do you agree with the proposed changes to the Statement of Public Participation?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Comments		

Q6b	Are there any other changes we should make to the Statement of Public Participation?	X
	Agree	
	Neither Agree nor Disagree	x
	Disagree	
Comments		

How to respond

Please submit your comments by **23 July 2018**, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to: ndf@gov.wales</p> <p>[Please include Preferred Option consultation in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>National Development Framework Team Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information

If you have any queries about this consultation, please:

Email: ndf@gov.wales

Telephone: 0300 025 3261