



### Draft National Development Framework RSPB Cymru Evidence to CCERA Committee

1. RSPB Cymru welcomes the creation of a National Development Framework and the new tier of development plan that this creates by setting the direction of development in Wales up to 2040. We have focused our comments on the sections and policies aimed at protecting, enhancing and restoring biodiversity and the resilience of ecosystems.
2. We welcome the recognition, in Part 1, of the dual climate and nature emergencies. We recognise that the NDF is one part of a suite of documents that will seek to address both the climate and nature emergencies in tandem with the future sustainable growth and prosperity of the nation. The future review of Planning Policy Wales, the development of the Strategic Development Plans (SPD's) for the Regions along with Local Development Plans (LDPs) will be critical to delivering these outcomes.
3. In our response to the earlier consultation draft of the NDF (and briefing to this Committee) we stated that the cornerstone for nature recovery was the safeguarding and achievement of the favourable condition of our most important wildlife sites. In order to help achieve this, we had wished to see the inclusion of a specific protected sites policy covering at least Natura 2000 sites, SSSIs and Ramsar sites (either as part of what is now Policy 9, or as a standalone policy). This is particularly important because the latest reports show that very significant proportions of these sites are not in favourable condition<sup>1</sup>. We note with regret that this has not been explicitly included in this top tier spatial plan. We remain optimistic that this issue can be addressed within the SDP's and within the anticipated revision of Planning Policy Wales.
4. We do however welcome Policy 9 'Resilient Ecological Networks and Green Infrastructure' which allows for Welsh Government and key partners to identify and protect areas which could be safeguarded as ecological networks for their potential importance for climate change, habitat restoration or creation or provide key ecosystem services. Policy 9 does recognise that designated sites are central to ecological networks, and to protecting species. However, we would like to see an explicit mention of section 7 species and habitats listed as key drivers for habitat restoration and creation.

---

<sup>1</sup> Countryside Council for Wales (2006) Sites of Special Scientific Interest (SSSIs) in Wales: Current state of knowledge Report for April 2005 – Mar 2006 (unpublished).

Natural Resources Wales (2015) [https://cdn.naturalresources.wales/media/674546/nrw28788-life-natura-2000-report-december-2016-update\\_english\\_spreads.pdf?mode=pad&rnd=130970726370000000](https://cdn.naturalresources.wales/media/674546/nrw28788-life-natura-2000-report-december-2016-update_english_spreads.pdf?mode=pad&rnd=130970726370000000)

**5.** We also welcome the acknowledgment and commitment (in Policy 9) to the identification of strategic green infrastructure opportunities within development proposals. We fully support the requirement stated in the Policy to use nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being. However, we suggest the role of nature-based solutions in mitigating climate change (i.e. supporting decarbonisation) should also be emphasised, in this policy and elsewhere. We are pleased to see the NDF require Planning Authorities to include these areas within Development Plans and Strategies in order to promote and safeguard the functions and opportunities they provide.

**6.** It is heartening that nature restoration is seen as an important function of planning and development. We whole-heartedly welcome the commitment to Net Biodiversity Benefit and look forward working with the Welsh Government and others to develop policy in this area in a credible and timely manner.

**7.** In relation to the maps contained within the NDF and especially resilient ecological networks, we question the value of the map provided on page 21 showing 'Resilient ecological connectivity'. It is not clear what data this is based on, and its practical value in planning restoration is hard to see.

**8.** We note with optimism the commitment within the Framework to full suite of new documents and Plans that the Government wish to bring forward to help achieve this aim. We would however note with caution that the current lack of interaction with Marine Planning Policy and the NDF means that delivering offshore renewable energy projects will remain a significant concern in terms of nature protection and ecosystem resilience.

**9.** The policy support afforded to nature-based flood risk management solutions, and provision of biodiversity benefit in Policy 8 and to the National Forest within Policy 15 is welcomed.

**10.** We welcome and support the changes to Policies 17 and 18 in relation to the prevention of wind and solar developments of National Significance which have an adverse impact on nature. We particularly welcome criteria 3 and 4 of Policy 18, although we would have also expected to see specific mention of *priority* species and habitats (i.e. those listed under section 7 of the Environment (Wales) Act) in Policy 18. We will be looking for section 7 to be fully integrated into PPW policies including on the requirement for net biodiversity benefit.