



Welsh Government Consultation – summary of responses

National Development Framework Proposals relating to the Statement of Public Participation

November 2016

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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1. Abbreviations

HRA	Habitats Regulations Assessment
LDP	Local Development Plan
NDF	National Development Framework
EP	Engagement Plan
SPP	Statement of Public Participation
SDP	Strategic Development Plan
SA/SEA	Sustainability Appraisal / Strategic Environmental Assessment
WG	Welsh Government

2. Consultation on the Draft Statement of Public Participation

The first stage in the NDF process requires the preparation and consultation on the draft Statement of Public Participation (SPP). The SPP sets out how the public and other stakeholders will be involved in the development of the NDF, the key stages and timetable.

A consultation was held between the 1st February and 25th April 2016. 33 responses were received during the consultation from the following:-

Type of organisation	Number of Responses
Business / consultant	2
Local planning authority	9*
Government agency / other public sector	10
Professional body / interest group	6
Voluntary Sector	6
Total	33

This report sets out the responses that were received and considers the issues that were raised. It identifies changes to the Draft SPP, which it is considered will strengthen the Welsh Government's approach to public participation across the NDF process.

3. List of Respondents

Business / consultant

Dwr Cymru, Welsh Water
National Grid PLC

Local Planning Authority

National Parks Wales
Caerphilly County Borough Council
Swansea City Council
Ceredigion County Council
Denbighshire County Council
City of Cardiff Council
Carmarthenshire County Council
Merthyr Tydfil County Borough Council **
Rhondda Cynon Taff County Borough Council **

Government agency / Other public sector

Chepstow Town Council
Abermule with Llandyssil Community Council
Llanbadarn Fawr Community Council
Barry Town Council
Pontardawe Town Council
Cyngor Tref Conwy Town Council
Mold Town Council
Public Health Wales
Natural Resources Wales
Mochdre with Penstrowed Community Council

Professional body / interest group

Law Society
RTPI Cymru
Welsh Local Government Association
Friends of the Earth Cymru
Health and Safety Executive
Guide Dogs Cymru

Voluntary sector

CH Cymru
Campaign for the Protection of Rural Wales
Wales Environment Link
Usk Civic Society
Tai Pawb
Planning Aid Wales **

**** received late**

4. Summary of Changes

Change	Section of SPP to Change	Details of Change
A	Timetable at 2.1	The timetable has been amended to give more time to consider the responses arising during stage 6. The period has been increased from 3 to 4 months
B	Table at 2.1 stage 4	The details of the stage have been amended to include reference to engagement and a call for evidence and projects
C	1.4, table at 2.1, 3.2, 3.3, 3.4, 3.5, 3.7, 3.8, 3.9	The SPP has been amended to make a clearer distinction between how information will be made available across the NDF process, activities during the consultation periods and engagement across the process
D	2.2	The SPP has been amended to explain that a new SPP will be published if either the process or timetable change
E	Appendix 1	The SPP has been amended to delete Appendix 1
F	4.2	The SPP has been amended to explain the SA/SEA will incorporate other types of plan appraisal into the process, such as health, equality, language and disability

5. Responses to Questions & Consideration of Issues Raised

Question 1 - Do you agree with the NDF preparation timetable?

Question 1	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	1	0	1	0
Local Planning Authority	4	4	1	0
Government Agency / Other Public Sector	3	2	0	5
Professional Body / Interest Group	2	1	1	2
Voluntary Sector	0	3	2	1
Total Responses	10	10	5	8
Statistical Review	30.5%	30.5%	15%	24%

Summary of Responses

The response to question 1 was positive with over 60% of respondents agreeing with the NDF timetable or expressing no opinion. The responses reflect one of the key challenges in preparing a development plan – that of balancing the need to prepare a plan expediently against the need to ensure there is sufficient time to collect and consider evidence and involve people in the process.

The responses identify the need for the NDF process to be aligned with work on City Deals and the City Region, the Marine Plan and the preparation of SDPs. The Welsh Government fully recognises the importance of these relationships and will ensure that there are opportunities for discussion and engagement with all involved in the development of these plans and programmes.

The concerns expressed by those disagreeing with the draft NDF timetable are acknowledged. The SPP will be amended to better explain the evidence gathering stage and the engagement work that will support the NDF process.

Changes to SPP

CHANGE A

A comment was made that the time given to considering the responses received at the main issues, options and preferred option stage and then prepare a consultation report within 2 months was ambitious and that the timescale should be amended to 4 months to be consistent with stage 9. This comment is accepted and the SPP should be amended accordingly.

Change - Amend stage 6 of NDF timetable.

CHANGE C

Concerns were raised that the opportunities for public participation were limited and that there is a distinction between consultation and engagement. Concerns were also raised that the approach set out in the Draft SPP did not accord with the principles established under the Aarhus convention.

The provisions in section 60B of the PCPA 2004 (procedure for preparation and publication of framework) allow for a process of consultation in relation to the NDF which complies with the Aarhus convention. The drafting of the provisions were informed and underpinned by the obligations of the Convention.

In accordance with the WBFG Act and the ways of working it promotes, the NDF will be developed in accordance with the 5 principles of sustainable development, including the principles of collaboration and involvement.

In light of the comments received during this consultation, it is recognised that the SPP would benefit from a clearer explanation of the terms 'stakeholders', 'engagement', 'involvement', and 'consultation'. The SPP will be amended to be clearer on these terms. The SPP will also be amended to state that development of the NDF will involve a range of different meetings, workshops and events across the NDF process and not only at the key consultation stages.

The role of the SPP is to set out how and when the NDF will be consulted on and the steps that will be taken to involve members of the public in its preparation. It sets out how the public can get information across the process

and the steps that will be taken at key stages to involve them during the consultations.

To record and manage the WG's approach to embedding collaboration and involvement across the NDF process, an Engagement Plan will be prepared. This will be a dynamic record of how activities across the whole process have supported the development of the NDF and will be published on the WG NDF web pages. It will provide a transparent record of how the NDF is being developed and the meetings and events that support the NDF process.

Stage 4 will involve people (alongside the development of the SA/SEA) and the SPP will be amended to make this clear.

The NDF process will ensure there is sufficient opportunity for involvement and collaboration, with scrutiny undertaken in accordance with the requirements of the Wales (Planning) Act in the National Assembly.

Change - The SPP will be amended to be clearer on the role of 'stakeholders', 'engagement', 'involvement', and 'consultation'.

The SPP will be amended to include a reference to the Stakeholder Engagement Plan and an explanation of its role.

The SPP will be amended to explain how a range of different meetings, workshops and events will be held across the NDF process and not only at the key consultation stages.

Question 2 - Do you agree that three periods of public consultation are sufficient?

Question 2	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	2	0	0	0
Local Planning Authority	8	1	0	0
Government Agency / Other Public Sector	4	1	0	5
Professional Body / Interest Group	1	1	2	2
Voluntary Sector	3	2	0	1
Total Responses	18	5	2	8
Statistical Review	55%	15%	6%	24%

Summary of Responses

The majority of respondents agreed that three periods of public participation were sufficient. Only 6% of respondents did not agree. This is welcome and supports the balance the Welsh Government has struck between consulting and developing the NDF.

In light of some of the responses, particularly those not agreeing with the consultation periods, the SPP will be amended to better explain the evidence gathering stage and the engagement work that will support the NDF process. Change C under Question 1 above considers these issues and the changes required.

Changes to SPP

CHANGE D

A comment was raised in relation to the timetable and the potential need for additional consultation.

The four year timetable is considered appropriate and aims to strike a balance between delivering an expedient process, whilst allowing sufficient time for engaging and consulting people.

It is not anticipated that additional consultation will be required. The point however is noted and the SPP will be amended to recognise that additional consultation may be undertaken if required.

Change – Amend para 2.2 to note if an additional consultation was required, an updated SPP would be published.

Question 3 - Do you agree that the periods of public consultation are in the right place to ensure stakeholders can participate in the development of the NDF?

Question 3	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	2	0	0	0
Local Planning Authority	8	1	0	0
Government Agency / Other Public Sector	2	2	1	5
Professional Body / Interest Group	1	1	2	2
Voluntary Sector	2	2	0	2
Total Responses	15	6	3	9
Statistical Review	46%	18%	9%	27%

Summary of Responses

Only 9% of respondents indicated that they considered the periods of public consultation were not in the right place. This is welcome and supports the Welsh Government's approach of setting out the full NDF process in the SPP so that the public can see the stages that precede consultation.

In light of some of the responses the SPP will be amended to better explain the evidence gathering stage and the engagement work that will support the NDF process. Change C under Question 1 above considers these issues and the changes required.

Changes to SPP

CHANGE B

A comment was made that there should be opportunities to provide data and evidence to the process.

The NDF process will include a call for evidence and projects. The SPP will be amended to reference this.

Change – Amend the timetable under paragraph 2.1 for stage 4 to read;

“Gather evidence, develop the vision, objectives and options

Undertake Engagement

Call for Evidence & Projects”

Amend the timetable under paragraph 2.1 for stage 7 to read;

“Prepare draft NDF

Undertake Engagement”

Question 4 - Do you agree with the methods to support continuous engagement? Are there additional methods that should be used?

Question 4	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	2	0	0	0
Local Planning Authority	6	3	0	0
Government Agency / Other Public Sector	5	1	0	4
Professional Body / Interest Group	2	2	0	2
Voluntary Sector	2	1	2	1
Total Responses	17	7	2	7
Statistical Review	52%	21%	6%	21%

Summary of Responses

The majority of respondents supported the approach to continuous engagement with only 6% indicating that they did not agree with the approach outlined in the Draft SPP. This is welcome and supports the Welsh Government's approach.

Some of the comments express the need for two-way discussions, face to face meetings and making sure that the WGs approach and tone is inclusive and does not overload those participating in the NDF process. These comments are supported and the SPP will be amended to better explain the evidence gathering stage and the engagement work that will support the NDF process. Change C under Question 1 above considers these issues and the changes required.

Question 5 - Do you agree with the methods to support engagement at key stages? Are there additional methods that should be used?

Question 5	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	2	0	0	0
Local Planning Authority	6	1	2	0
Government Agency / Other Public Sector	3	1	1	5
Professional Body / Interest Group	1	4	0	1
Voluntary Sector	1	3	1	1
Total Responses	13	9	4	7
Statistical Review	39.5%	27.5%	12%	21%

Summary of Responses

The majority of respondents agree with the methods to support engagement at key stages and only 12% disagreed. This is welcome and supports the Welsh Government's approach set out in the Draft SPP.

Similar to question 4, respondents have raised issues relating to two-way discussions, engagement before key stages and an approach that runs across the NDF process rather than a 'one-off' approach at key stages. These comments are supported and the SPP will be amended to better explain the evidence gathering stage and the engagement work that will support the NDF process. Change C under Question 1 above considers these issues and the changes required.

Question 6 - Are there additional groups/bodies that could be added to those listed in Appendix 1 of the draft Statement of Public Participation?

Where they can be identified, all bodies and organisations identified by respondents will be added to the consultation database.

List Of Groups & Bodies Suggested
Welsh Government Stakeholder Group
<p>Planning Directorate Health/NHS Directorate Finance Division</p>
Core stakeholder group
<p>The Met Office CADW SDP Panels Public Service Boards Public Health Boards English LEPs (and other relevant English bodies) Planning Inspectorate Environment Agency & Countryside Council for Wales should be listed individually as forestry commission is NRW Welsh Water (as well as Dee Valley and Severn Trent Water) HSE</p>
General Stakeholders
<p>Scottish Government RTPi Scotland Scottish Strategic Planning Authorities All Welsh Local Planning Authorities (inclusive of National Parks) All Councils and Community/Town Councils Public Health Wales and Health Boards Shelter Cymru Cymorth Cymru TPAS Cymru</p>

Welsh Tenants
Welsh Language Society
The Emergency Services
Eisteddfod
Unison
Universities and colleges in Wales
Wales Environment Link
representatives of schools / governing bodies
public health services
Sustrans
CBT
Keep Wales Tidy
Alliance for National Parks (Cymru)
Campaign for National Parks
Conservation of Upland Powys
Cambrian Mountain Society
The Gower Society
Open Spaces Society
Plant Life Cymru
Wales Environment Link
4 Wales Biodiversity Information Services
Welsh Archaeological Trusts
Wildlife and Wetlands Trust
Woodlands Trust
Wye and Usk Foundation
The Welsh Historic Gardens Trust
The Georgian Society
Society For the Protection of Ancient Buildings
The Water Conservation Trust
The Royal Commission on the Ancient and Historical Monuments of Wales
[RCAHMW]
Council for British Archaeology Wales
The Marine Conservation Society
The Royal Society for the Protection of Birds Cymru
The British Trust for Ornithology
The Wales Ornithological Society
National Trust Wales
Butterfly Conservation Wales
Buglife Wales - Invertebrate Conservation Trust
Children's Commissioner
Future Generations Commissioner
Minerals Products Association
The Welsh Planning Consultants Forum
Gwent Association of Voluntary Organisations is mentioned but none of the other county or regional associations of voluntary organisations covering other parts of Wales

Adjoining English LPAs
Energy companies
Representative body for the interests of the Gypsy, Traveller, Roma communities
Usk Civic Society
National Grid
National Infrastructure Commission
Port operators
Firms on the National Procurement Service Wales' Solicitors' Panel for Planning and Environment work
Other Solicitors' firms operating in Wales with recognised planning and environmental expertise
Other UK government departments

Changes to SPP

CHANGE E

There were a number of comments regarding the Stakeholder lists in the Draft SPP. The inclusion of the stakeholder groupings within the Draft SPP was intended to illustrate the range of bodies the WG will consult with. In light of the comments received during this consultation, it is considered these lists are unhelpful. They potentially create confusion and give the impression that different groups will be treated in different ways.

Given these lists will constantly evolve as organisations are added (or ask to be no longer involved) there is limited value in retaining them in the SPP.

Change - Remove Appendix 1 from the SPP

Question 7 - Are there any additional comments you wish to make on the draft Statement of Public Participation?

Question 7	Yes	Neither agree nor disagree	No	Did not answer
Business / Consultant	2	0	0	0
Local Planning Authority	6	0	3	0
Government Agency / Other Public Sector	7	0	3	0
Professional Body / Interest Group	4	0	2	0
Voluntary Sector	4	0	2	0
Total Responses	23	0	10	0
Statistical Review	70%	0%	30%	0%

Summary of Responses

There were a range of additional comments raised. These included the need to ensure Welsh Water are involved in the development of the NDF; the importance of the link between the NDF and the Wellbeing Act; the potential for events to impact upon the NDF timetable; the need to consider the spatial aspects of all major infrastructure; and the importance of ensuring the SA/SEA process is wider than an environmental assessment.

Changes to SPP

CHANGE F

The SA/SEA process will adopt an integrated approach and will take the opportunity to include health and equality assessments alongside environmental ones. The SPP should be amended to make this clear.

Change - The SPP will be amended to explain that the SA/SEA process will follow an integrated approach and other plan appraisals will be incorporated into the assessment process.