

# Planning Aid Wales

## Local Development Plans Process Review

### Consultation response

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#### 1. About Planning Aid Wales

1.1 Planning Aid Wales is a not-for-profit charity which is core funded by Welsh Government. We work to help the communities of Wales to understand and engage effectively with the land use planning system.

1.2 Planning Aid Wales provides information, advice and training services to enable local communities to engage more effectively with planning. We also work with local planning authorities and Welsh Government to encourage effective community involvement in the planning process.

1.3 When responding to consultations on emerging national planning policy, Planning Aid Wales aims to identify and remove potential barriers which might prevent effective or manageable public involvement in planning.

#### 2. Consultation response

2.1 Our response is framed around consultation questions Q1, Q3, Q4, Q5 and Q10.

**Q1**

##### **Front-loading / alternative sites**

With the proposed greater front-loading of the process in terms of sites and a more defined and informative Preferred Strategy, do you agree that no-one would be disadvantaged by the elimination of the 'alternative sites' stage (Regulations 20&21)?

2.2 We support this revised approach to 'streamline' the consultation stages, with the proviso that efforts should be made to ensure that public engagement is specifically required to be more meaningful - both to improve sustainability and to ensure that the public 'voice' is heard alongside other sectors.

Q3

**Short-form Revision Procedure**

Where an authority is proposing to make partial revisions to an adopted LDP and the plan strategy remains sound, do you agree with the provision of the short-form revision procedure (quicker, shorter and more proportionate)?

2.3 The proposal will allow Local Planning Authorities to make partial revisions to adopted LDPs without providing opportunities for local communities to comment. Planning Aid Wales considers that the detail of this proposal needs to be fleshed out before the full implications can be quantified.

2.4 In particular, we would like to see more detail of the definition of what comprises a 'substantial revision' to development plan policies and what does not, and how this relates to the requirements to revise the sustainability appraisals.

Q4

**Soundness tests**

Do you agree with the proposed package of soundness tests?

2.5 Public consultation must be shown to have been effective, and to have resulted in changes that make the Plan more sustainable.

Q5

**Integrated approach**

a. Do you agree that an integrated approach to incorporating sustainability appraisal (including strategic environmental appraisal) fully into LDP preparation will produce savings and reduce complexity?

b. Do you agree that this integration would not conflict with any statutory process?

2.6 Planning Aid Wales agrees with the principle of introducing a more integrated approach to sustainability appraisal in LDP preparation.

2.7 A key principle of sustainable development is providing opportunities for the general public to influence decision-making. This principle is expressed in Planning Policy Wales as a key aim of the Welsh planning system. The early stages of LDP preparation is the logical point in the planning process to achieve the aim.

2.8 The consultation proposals will require changes to sustainability appraisal guidance. Planning Aid Wales will be happy to assist Welsh

Government to develop the section on community sustainability, and particularly the requirement for local planning authorities to invite local input into LDP preparation as an integral element of sustainability appraisal.

**Q10**

**Guidance package**

Do you agree with the principle of having a succinct two-document guidance package that excludes the need for *LDP Wales*? (Please note that we will in due course be revising the public guide, *Planning Your Community: A guide to Local Development Plans 2006*, to reflect changes taken forward.)

2.9 Planning Aid Wales recognises the need to make LDP guidance more succinct and can see benefit in providing guidance in fewer documents. However, we would expect the revised guidance package to continue to provide strong encouragement for community engagement during the early stages of the LDP preparation process. Early engagement in development plan preparation has been acknowledged by the Independent Advisory Group, the Minister for Natural Resources and others as an essential element of the planning system.

2.10 Proposed new Chapter 2 of Planning Policy Wales will make reference to ‘... *statutory requirements for engagement and consultation during LDP preparation; further guidance is in the LDP Manual.*’ Planning Aid Wales will be happy to help Welsh Government develop relevant sections of the updated LDP Manual to provide clear encouragement and justification for systematic community engagement during LDP preparation.