



**Planning Aid Wales**  
*Community engagement in planning*

**Cymorth Cynllunio Cymru**  
*Ymgysylltiad y gymuned a chynllunio*

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# BUSINESS PLAN

# 2018-2021

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**BETTER COMMUNITY ENGAGEMENT IN PLANNING**



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*"For all the people of Wales to be able to fully and effectively participate in a fair, transparent and responsive planning system"*

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# WELCOME



It is my great pleasure to present our 2018-2021 Business Plan.

As an innovative and responsible organisation, we continue to uphold our commitment to our core values and the principles of good governance, whilst actively pursuing our strategic priorities. For the coming three years our priorities will be:

1. Building understanding, collaboration and engagement in the planning system in Wales.
2. Strengthening and growing Planning Aid Wales.
3. Exploring and delivering new opportunities for positive community engagement in planning.

Our Directors, staff and volunteers will work together to achieve our priorities and make new inroads to delivering better community engagement in planning. With strong and ongoing Welsh Government support, we will strengthen our offer to promote greater collaboration between planners and communities.

Over the coming year we will publish an Impact Report that will consider the value of community engagement to the planning system in Wales as well as demonstrate the real value Planning Aid Wales delivers year on year.

I would like to thank all of those who give up their time to support our cause; Planning Aid Wales achieves so much thanks to efforts of our volunteers and Directors, all of whom share our vision for a fairer, more transparent and responsive planning system. We are fortunate to have a committed and highly skilled staff team that will no doubt excel in delivering the activities in this Business Plan.

A handwritten signature in black ink that reads "Gayle Wootton".

**Gayle Wootton**  
**Chair**



I am proud to present this business plan as the new Chief Executive of Planning Aid Wales.

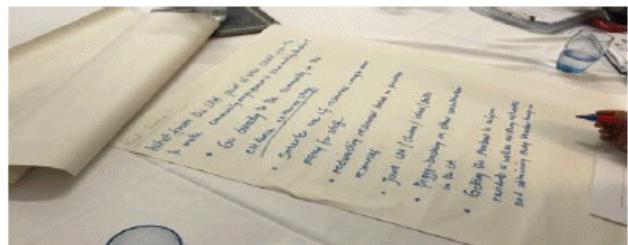
I would like to extend my thanks Gayle Wootton, Chair, the Management Board and the staff team for helping develop this plan.

The aspirations in the plan take into account the external operating environment and internal events over the past year, proposing options for strategic and operational development for the next three years. The plan will be a 'live document' that will:

- Be used to demonstrate the impact and value for money PAW can deliver in the planning system for Welsh Government, future funders and future partners.
- Act as the core tool to guide staff activities and a new performance monitoring process.
- Be monitored quarterly and reviewed annually by the Management Board.

I look forward to working with Welsh Government, planning authorities, community councils and other stakeholders to help make the planning system more engaging in the coming year.

**James Davies**  
**Chief Executive**



# ABOUT PLANNING AID WALES

Planning Aid Wales promotes and facilitates meaningful community engagement in the planning process in Wales.

Meaningful community engagement can:

- Give people a voice and build their skills, confidence and capacity to influence decisions affecting their local area.
- Improve the quality, appropriateness and relevance of new development.
- Increase pride in and sense of ownership of the built environment.
- Foster collaboration between developers, planners and communities, resulting in better schemes.
- Improve the quality and relevance of planning policy by taking local knowledge into account.
- Reduce conflict, speed up and reduce costs in the development management process.

Planning Aid Wales a registered charity and company limited by guarantee. We are core funded by Welsh Government but retain a high degree of freedom to act independently on behalf of communities.



## OUR VISION

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*“For all the people of Wales to be able to fully and effectively participate in a fair, transparent and responsive planning system”*

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## OUR VALUES

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**Innovation.** We seek out, develop and share creative engagement approaches and strive to deliver best value for money in our work.

**Inclusion.** We value diversity and seek to ensure that all people in Wales can participate in planning.

**Collaboration.** We value each other, promote collaboration and work with others to make planning more accessible.

**Independence.** We operate independently of politics and the development industry. We are impartial and are concerned with the process rather than the outcome of planning decisions.

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## Our core activities help individuals and communities understand and engage with the planning process and encourage collaboration between communities and planning authorities.

Planning Aid Wales undertakes the following core activities, funded by Welsh Government:

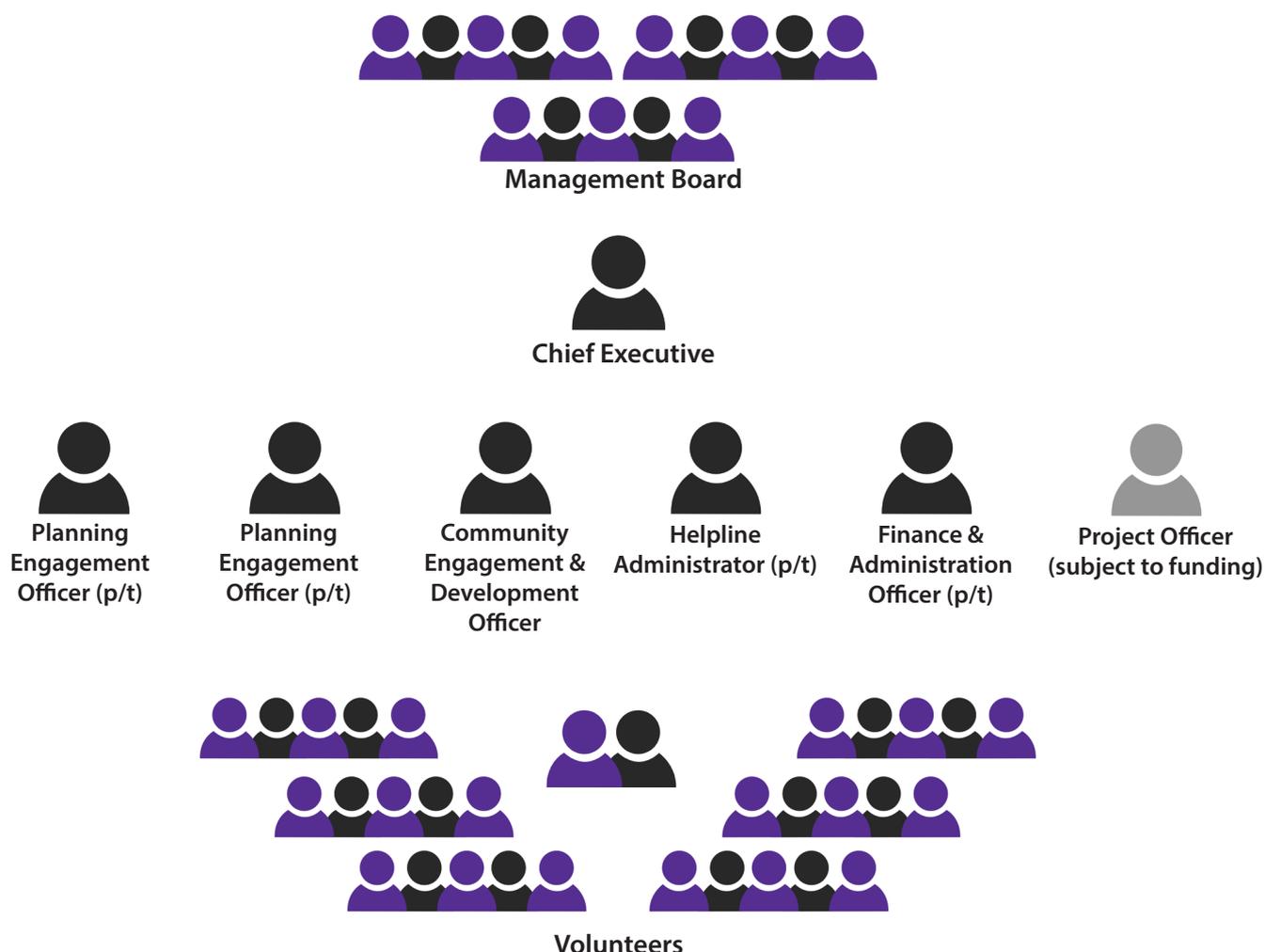
- **Training.** We deliver an annual programme of training courses for Community and Town Councils in Wales.
- **Network events.** We deliver an annual programme of network events, which seek to bring together planners, developers and communities to discuss relevant planning topics.
- **Planning4communities.** With over 1,400 subscribers, our bi-monthly newsletter shares best practice on community engagement in planning from across Wales and beyond.
- **Helpline.** The Helpline service currently receives around 200 enquiries each year. A small group of qualified casework volunteers helps to answer questions, resolve issues and build understanding. Eligibility criteria are used to identify those who most need help.
- **Information and guidance.** The Planning Aid Wales website is an accessible portal to the array of planning information online. Our range of easy-read guidance publications and leaflets give information about the Welsh planning system and on how to get involved.
- **Policy responses.** We contribute to a range of reviews, studies and Government inquiries into planning. We also respond to Welsh Government policy consultations, aiming to make it easier for local communities to engage productively with planning. In doing this, we act on behalf of members of the public, our beneficiaries.

## Commissioned projects and services help us take our work further and explore innovative engagement approaches.

As an innovative community engagement organisation, Planning Aid Wales develops and seeks funding for new engagement projects and offers a range of additional planning engagement services to Welsh Government, Planning Authorities and Community and Town Councils in Wales. We undertake a small number of commissions per year, which include:

- Preparation of easy-read planning guidance.
- Bespoke training / facilitated courses and programmes.
- Advising on community engagement strategy development and delivering engagement workshops e.g. supporting community engagement in LDP preparation.
- Support in engaging hard to reach groups.
- Place Plan development support.

Our dedicated team of trustees, staff and volunteers support all aspects of our work:



Planning Aid Wales is governed by a **Management Board** which sets strategy, ensures that activities align with charitable objectives and resources are used effectively. The Board is made up of a maximum of fifteen volunteer trustee directors. Directors represent a broad cross-section of planning and related interests and are drawn from different sectors and geographical areas.

The Management Board subscribes to the Nolan principles and to WCVA guidance on good governance. The Board meets at least four times each year and reports on our progress and financial position at our Annual General meeting. Directors also contribute to working groups on staffing, policy & research, communications and fundraising matters. For more information about the Management Board, see: [www.planningaidwales.org.uk/about-us/directors](http://www.planningaidwales.org.uk/about-us/directors)

Planning Aid Wales' origins lie in the desire of planning professionals to give their voluntary time and efforts to supporting communities in Wales who want to engage with the planning system. The core of the **membership** is still derived from the planning profession but membership of the charity is open to all who share the vision and values of the organisation.

The **staff team** is made up of our Chief Executive, who is responsible to the Management Board for effectively managing the organisation and its staff. Our Planning Engagement Officers develop support and knowledge networks for planning officers in planning authorities and for co-ordinate delivery of our annual events programme. Our Community Engagement & Development Officer is

responsible for developing support and knowledge networks for community and town councils and community groups and for co-ordinating delivery of our planning training programmes for community and town councillors and clerks. Our Finance and Administration Officer (p/t) looks after day-to-day finances and provides general office support and our Helpline Administrator (p/t) administers the Helpline and supports volunteers. A fixed term Project Support Officer (p/t) is appointed to support delivery of projects when required.

The staff team is assisted by a Wales-wide network of planning **volunteers**. Volunteers can provide advice to Helpline callers, deliver training and contribute to developing guidance materials. We currently have around thirty volunteers who give their time and expertise to helping people engage more effectively with planning.

There is more information about Planning Aid Wales volunteers at:

[www.planningaidwales.org.uk/volunteering](http://www.planningaidwales.org.uk/volunteering)

Planning Aid Wales is committed to equal opportunities through the recruitment of staff, trustees and volunteers. We operate a Welsh Language policy and offer our services in English and Welsh.

**Planning Aid Wales offers exceptional value for money in delivering our activities and services. In 2017/18, with a core grant of £121,500 and additional project funding of £51,000, we:**

- Delivered **4** network events to over **150** planning professionals, community councils and other parties interested in planning.
- Delivered **8** core-funded training courses to representatives of **61** community and town councils.
- Circulated **6** Planning4Communities newsletters to over **1,400** subscribers.
- Responded to policy consultations on the New Planning Code for Wales, Local Government Reform, Enabling Gypsies, Roma and Travellers and the revised Gypsy and Traveller Circular consultation.
- Answered over **200** calls to our helpline.
- Delivered our first bi-annual conference on community engagement to over **50** delegates in Cardiff.
- Delivered a planning law update to over **40** participants on the New Planning Code for Wales.
- Completed Welsh Government funded project commissions to produce Place Plans guidance and completed a programme of 25 development management training events for over **450** community councillors and **60** planning officers in Wales.

# OPERATING ENVIRONMENT

The planning system in Wales is undergoing significant reform and continuing budgetary pressures on the Welsh Government, Planning Authorities and the third sector make for challenging times.

A clear understanding of our operating environment is essential:

## *Political / Legal*

- Continuing support from Welsh Government Planning Division for PAW and the role of communities in the planning process.
- Positive Planning reform, whilst presenting opportunities for better collaboration & simplification, creates a need to raise awareness and educate communities on new process. Some of our past guidance will be out of date.
- More layers of planning policy (e.g. NDF & SDPs) has potential to move policy planning further away from communities.
- Place Plans present opportunities for communities to help shape local environments, but funding and capacity to deliver them at a standard capable of standing up to legal challenge may introduce difficulties.
- Good recognition of role of CTCs in planning, but local government review of CTCs anticipated.
- General Data Protection Regulations comes into force in May 2018.

## *Economic*

- Support for PAW from Welsh Government Planning Division, but likely limited opportunities for funding increases / top up funding in future.
- Ongoing budget pressures on planning authorities may limit their own capacity to engage or to commission PAW to deliver engagement activity.

## *Social*

- Misperceptions of and disillusionment with planning persist.
- Those with ability to find own answers (i.e. least in need) most likely to find and use PAW services.

## *Technological*

- Internet access almost ubiquitous – 8/10 households in Wales have access to the internet & 65% of adults in Wales use smartphones. (<https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2016/cmr-wales-2016>)
- Use of social media common place – e.g. more than 50% of UK population have a Facebook account.

# PLANNING AID WALES' ROLE

As *the* community engagement organisation in planning, our role is to build understanding of the planning system, support better engagement in local planning and encourage collaboration between communities, planning authorities and developers. By giving people a voice in the planning system, we help create a more equal Wales with more cohesive communities.

This role is built on a clear understanding of our own organisation:

## STRENGTHS

- Unique organisation that seeks to give a voice to individuals and communities to engage with the planning system.
- Strong history of quality delivery.
- Distinct role as professional planners dedicated to community engagement.
- Committed Board and volunteers.
- Availability of expertise nationally.
- Reference to us in public policy / strong base of Welsh Government support.
- Strong in house IT / digital skills.

## WEAKNESSES

- Growing, but still low awareness of PAW, our charitable status and our services.
- We undersell the outcomes we deliver / difference we make.
- Unforeseen staff turnover can cause delays in delivery.
- Volunteer numbers and capacity limit growth - e.g. helpline.
- Geographic availability of volunteers limits participation / delivery of training.
- Financial dependence on WG and limited supplementary grant funding.

## OPPORTUNITIES

- Greater focus on volunteering.
- Raising profile of PAW, especially online.
- Commissions increase with profile-raising.
- Concurrent development of business plan, fundraising and comms strategies.
- Top-up funding – grants, donations, membership, networks etc.
- Digital inclusion presents significant scope for engagement and income generation.

## THREATS

- Reduction / loss of core funding.
- Failure to deliver commissions.
- Loss of experienced Directors.
- Decrease in volunteer numbers / capacity.
- Competition / conflict with other organisations.
- Limited staff capacity to capture and deliver opportunities.

In order to raise awareness of Planning Aid Wales, the value we bring and the work we do, we will adopt a new communications strategy in 2018. The strategy will develop our key messages and how we will deliver them to our audiences.

The core message underpinning all our communications is:

*“Planning Aid Wales is an independent, charitable organisation that helps individuals and communities across Wales whose voices are not regularly heard. We can help them to participate more effectively in the planning system, thereby having a voice in shaping their communities and local environment.”*

Our fundraising and communications strategies will develop specific messages appropriate to individual audiences.

# STRATEGIC PRIORITIES



In order to achieve our vision for all the people of Wales to be able to fully and effectively participate in a fair, transparent and responsive planning system, over the next three years, Planning Aid Wales will:

1. Improve understanding, collaboration and engagement in the planning system in Wales.
2. Strengthen and grow our organisation.
3. Explore and deliver new opportunities for positive community engagement in planning.

# YEAR 1 OBJECTIVES

Between April 2018 and March 2019, Planning Aid Wales will:

1. *[With core funding from Welsh Government]* Build understanding, collaboration and engagement in the planning system in Wales by:
  - 1.1 Delivering a programme of 8 training events for Community and Town Councils in Wales that build understanding of roles, opportunities for collaboration and planning reform (e.g. Pre-applications / Place Plans).
  - 1.2 Delivering a forward programme of 4 network events for planners, developers and communities to come together, learn from each other and share their experiences and best practice.
  - 1.3 Continuing to deliver a high quality Helpline service whilst identifying opportunities to grow and develop the service into an efficient entryway to PAW's proactive support services.
  - 1.4 Circulating 6 bi-monthly Planning4communities newsletters, sharing best practice in community engagement in planning as well as organisational news.
  - 1.5 Participating in relevant reviews, studies, and provide input into emerging Welsh Government policy and processes as an advocate of communities and community engagement in planning.
  - 1.6 Reinvigorating and re-focussing our website on information, guidance and services Planning Aid Wales provides.
  - 1.7 Introducing a new section of the Planning Aid Wales website focused on community engagement best practice (drawing on Planning4communities content) and maintaining a database of organisations undertaking such practice.
  - 1.8 With the support of volunteers, preparing easy-read website-based factsheets / articles on emerging areas of the planning system and opportunities to engage, e.g. the National Development Framework, Strategic Development Plans and Local Development Plan review.
  - 1.9 Extensively advertising guidance on Place Plans and Pre-applications consultation produced by Planning Aid Wales.

## 2. Strengthen and grow our organisation by:

- 2.1 Supplementing our funding by adopting a new fundraising strategy with a greater focus on pilot projects, traditional grant funding, charitable giving and sponsorship.
- 2.2 Raising the profile of Planning Aid Wales by adopting a new communications strategy, building relationships with like-minded organisations and better utilising social media.
- 2.3 Better demonstrating the value of our work through our website and an impact report.
- 2.4 Strengthening our ability to deliver activities and projects by recruiting and engaging more volunteers and building our pool of associates.
- 2.5 Improving our IT infrastructure and using IT innovatively to reduce administration costs.
- 2.6 Improving management processes by reviewing internal policies and procedures.

## 3. Explore and deliver new opportunities for positive community engagement in planning by:

- 3.1 Securing funding for the development of a new online planning training platform for communities in Wales.
- 3.2 Securing funding for a training project that will raise awareness of national policy changes, LDP review and Place Plans amongst communities in Wales.
- 3.3 Securing funding for a website portal / app to complement our helpline service.
- 3.4 Exploring / developing a new project with a focus on engaging communities in areas where there is no Community and Town Council coverage.
- 3.5 Exploring the potential for a new project to provide a planning network for CTCs in Wales.
- 3.6 Exploring and developing a new 'Community Engagement in Planning Innovation Fund', membership scheme or equivalent to provide a source of pilot funding for new engagement projects.
- 3.7 Delivering commissions and projects that align with our aims.

# YEAR 2&3 OBJECTIVES

## Year 2: April 2019 – March 2020

### 1. Build understanding, collaboration and engagement in the planning system in Wales.

- Deliver further rounds of training and networking events.
- Share best practice in engagement through our newsletters, website and social media.
- Grow our helpline service in line with the growth in our volunteer network.
- Respond to consultations as an advocate of communities within the planning system.
- Preparing factsheets on relevant / emerging elements of planning reform.
- Deliver a national conference on community engagement in planning.

### 2. Strengthen and grow our organisation.

- Introduce new volunteering projects to attract new volunteers.
- Submit a PAW project to Wales Planning Awards or equivalent.
- Deliver a national conference around theme of community engagement in planning.

### 3. Explore and deliver new opportunities for positive community engagement in planning.

- Secure funding to provide support for individual CTCs to develop place plans.
- Secure funding for a national programme of training events for communities.
- Undertake commissions to support Planning Authorities through LDP review.
- Initiate joint working / partnerships with new organisations.
- Utilise the Community Engagement in Planning Innovation Fund to pilot new activities.

## Year 3: April 2020 – March 2021

### 1. Build understanding, collaboration and engagement in the planning system in Wales.

- Review all core activities and identify opportunities for future growth.
- Develop case studies on community planning networks.

### 3. Strengthen and grow our organisation.

- Continue to grow our volunteer network.
- Identify further opportunities for joint working / partnership.

### 2. Explore and deliver new opportunities for positive community engagement in planning.

- Explore opportunities to extend our online learning platform.
- Compile / commission research on comprehensive toolkit for engagement in planning.
- Deliver 2 new grant funded projects to further engagement in positive planning.
- Submit funding bids for larger scale projects, with partners.

# RESOURCES



Planning Aid Wales currently receives £121,500 annual core grant funding support from Welsh Government. Over the past year we generated additional income from project commissions (circa. £51,000). We anticipate a total annual income of around £180,000 in the 2018/19 financial year.

Planning Aid Wales has a policy of maintaining unrestricted reserve funds totalling £50,500. This is in keeping with Charity Commission guidance which advises charities to maintain sufficient reserves to even out variations in funding flows.

This Business Plan seeks clearly to identify those work requirements and outputs which can reasonably be provided within the current level of core grant received from Welsh Government, (Strategic Priorities 1&2) and those which will require additional funding support to undertake (Strategic Priority 3). PAW will ensure that the time its staff and trustees spend on income generation activities will not detriment the delivery of our core activities. This will be monitored via a 'prospect list' which will be reported on at quarterly meetings.

The majority of our funding (~80%) is expended on staffing, whilst the remainder is spend on office and organisational running costs. Planning Aid Wales utilises a Full Cost Recovery model in all project commissions. For medium and larger projects, additional staff resources are required to meet the demands of those projects.

During the next year, we anticipate additional funding streams will include:

- Welsh Government project funding.
- Commissions from Planning Authorities to deliver engagement services as part of LDP review.
- Pilot projects funded by external grant funders, which will allow us to develop evidence for further larger projects.
- Bespoke training commissions from a range of audiences.
- Other trading activity (e.g. training courses)
- Donations.

Further consideration of resources and income generation is considered by the Planning Aid Wales Fundraising Strategy 2018-2021, which has been developed in parallel to this plan.

# RISKS

The Planning Aid Wales Management Board regularly reviews risk and seeks to incorporate appropriate mitigating actions when developing strategy. The Board reviews its risk profile annually and updates its Risk Management Strategy accordingly.

The Management Board has considered this Business Plan and in terms of delivering core activities, has identified continuity of grant funding and staff as the main risks for delivery over the plan period. The key risks to delivering the plan and the mitigations have been identified below. A full consideration of risks to the organisation contained in the Planning Aid Wales Risk Management Framework.

Key Risks	Likelihood / Impact	Mitigations
Loss of core funding.	Low / High	Demonstrate value of PAW's work through project reports and annual impact reports. Regular communication with Planning Division and regular submission of project bids. Maintain reserves at recommended levels.
Reduction in core funding.	Medium / Medium-High	Adopt fundraising strategy and medium term finance plan to augment core funding. Build relationships and reputation of PAW.
Insufficient capacity to deliver business plan objectives & Failure to deliver existing projects on time.	Medium / Medium	Regular monitoring and reporting on capacity in line with business plan objectives and other work generated.
Failure to secure funding for new projects.	Medium / High	Adopt fundraising strategy. Explore a range of fundraising options – trading, grants, donations etc. to minimise risk of failed bids. Explore partnership-working as a way of strengthening future bids.
Loss of volunteers / reduction in volunteer network	High / Medium	Refocus on volunteer recruitment. Define new staff role focussed on volunteer development. Develop new approaches to generating volunteer interest.
Failure to comply with relevant employment, health and safety and equality legislation.	Low / High	Keep PAW policies and procedures under regular review and ensure adherence to current legislative requirements.

**Appendix: Year 1 Action Plan, April 2018 – March 2019**

	<b>Objective</b>	<b>Target(s)</b>	<b>By when</b>	<b>Responsible</b>
<b>1. Build understanding, collaboration and engagement in planning</b>	1.1. Forward programme of 8 training events for Community and Town Councils that build understanding of roles, opportunities for collaboration and planning reform.	Devise programme of events for the year.	Q1	CEDO
		Deliver 2 events per quarter.	Quarterly	CEDO
	1.2. Forward programme of 4 network events for planners, developers and communities to come together, learn from each other and share their experiences and best practice.	Devise programme of events with diverse subjects.	Q1	PEO
		Deliver 1 event per quarter	Quarterly	PEO
	1.3. Continuing to deliver a high quality Helpline service whilst identifying opportunities to grow and develop the service into an efficient entryway to PAW's proactive support services.	Respond to Helpline enquiries	Ongoing	HA / PEO / Volunteers
		Review and prepare improvement plan.	Q2	CEDO / HA / PEO
	1.4. Produce bi-monthly <i>Planning4communities</i> newsletters, sharing best practice in community engagement in planning as well as organisational news.	Produce 6 bi-monthly newsletters	Bi-Monthly	CEDO / PEO / CEx
	1.5. Participate in relevant reviews, studies, and provide input into emerging Welsh Government policy and processes as an advocate of communities and community engagement in planning.	Respond to relevant consultations	As arising / Ongoing	CEx / PRWG
	1.6. Reinvigorate and re-focus website on information, guidance and services Planning Aid Wales can offer.	Rebuild PAW website	Q2	CEx / ALL / CWG
	1.7. Introduce a new section of the Planning Aid Wales website focused on engagement approaches and best practice (drawing on Planning4communities content) and maintaining a database of organisations undertaking such practice.	Design new website section	Q2	PEO / CEDO
		Populate with relevant content	Q3	PEO
	1.8. With the support of volunteers, preparing easy-read website based factsheets / articles on emerging areas of planning and opportunities to be involved.	Prepare NDF / SDP factsheet	Q2	PEO / Volunteers
		Prepare LDP review factsheet	Q3	PEO / volunteers
	1.9. Extensively advertising guidance on Place Plans and Pre-applications consultation produced by Planning Aid Wales.	Launch advertising	Q1	CEDO
Issue bi-monthly reminders via social media and newsletters		Bi-monthly	CEDO / PEO	

	Objective	Target(s)	By when	Responsible
2. Strengthen and Grow PAW	2.1. Supplementing our funding by adopting a new fundraising strategy with a greater focus on pilot projects, traditional grant funding and charitable giving.	Adopt fundraising strategy.	Q1	Board/ FWG
	2.2. Better demonstrating the value of our work through our website and an impact report.	Produce full Impact Report.	Q1	CEx / CEDO
	2.3. Strengthening our ability to deliver activities and projects by recruiting and engaging more volunteers and building our pool of associates.	Recruit 10 new volunteers.	Q4	PEO / CEDO
	2.4. Raising the profile of Planning Aid Wales by adopting a new communications strategy, building relationships with like-minded organisations and better utilising social media.	Adopt communication strategy	Q1	CWG / Board
	2.5. Improving our IT infrastructure and using IT innovatively to reduce administration.	Review IT needs and identify options	Q2	CEx / CEDO
	2.6. Improving management processes by reviewing internal policies and procedures.	Adopt new staff handbook	Q2	Board / SAC / CEx

	Objective	Target(s)	By when	Responsible
3. New opportunities for community engagement	3.1. Secure funding for the development of a new online training platform for communities in Wales.	Develop proposal for WG funding	Q1	CEx
		Explore alternative funding sources or development as commercial platform if unsuccessful	Q2	CEDO
	3.2. Secure funding for a training project that will raise awareness of national policy changes, LDP review and Place Plans to CTCs.	Develop proposal for consideration by WG and other funders.	Q2	CEx / PEO
	3.3. Secure funding for a website portal / app to complement our helpline service.	Identify potential funders	Q2	CEDO
		Develop proposal for project & submit to funders	Q2	CEx / CEDO / PEO / HA
	3.4. Exploring / developing a new project with a focus on engaging communities in areas where there is no CTC coverage.	Develop proposal for WG funding	Q1	CEx
		Explore alternative funding sources and submit (if unsuccessful).	Q3	CEDO
	3.5. Exploring the potential for a new project to provide a planning network for CTCs in Wales.	Develop project into proposal for consideration by WG and other funders	Q3	PEO
	3.6. Exploring and developing a new Community Engagement in Planning Innovation Fund, membership scheme or equivalent to provide a source of pilot funding for new engagement projects.	Review implications of fund with WG	Q1	CEx
		Develop marketing materials and launch fund	Q2	CEDO / PEO
	3.7. Delivering commissions and projects that align with our aims.	Consider capacity issues with each request for commission	Ongoing	CEx
		Raise profile of availability for commissions with LPAs	Quarterly	PEO