**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 The NDF will not be published in draft form until 2019 but the issues it should address, the Vision, the objectives and the Preferred Option for achieving these are set out in this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](mailto: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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone’s name and address, even though they have asked for them not to be published.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](http://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](mailto:Data.ProtectionOfficer@gov.wales) |

**CONSULTATION RESPONSE FORM**

|  |  |  |
| --- | --- | --- |
| **National Development Framework: Issues, Options and Preferred Option** | | |
| **Date:** | | |
| **Name** |  | |
| **Organisation** | Planning Aid Wales | |
| **Preferred contact details**  **(Email address, phone number or address)** | First Floor, 174 Whitchurch Road, Heath, Cardiff CF14 3NB | |
| **Type**  *(please select one from the following)* | Businesses |  |
|  | Local Planning Authority |  |
|  | Government Agency/Other Public Sector |  |
|  | Professional Bodies/Interest Groups |  |
|  | Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations) |  |
|  | Other groups not listed above |  |
|  | Responding in a private capacity |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **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** | | **X** |
| **Neither Agree nor Disagree** | |  |
| **Disagree** | |  |
| **Further comments** | | |
| PAW suggests that, while this may be covered in the ISA, the NDF should include a brief summary of how the Vision and Objectives meet the well-being goals to facilitate easy reference to those not familiar with the ISA process and role. | | |

|  |  |  |
| --- | --- | --- |
| **Q2b** | Do you believe any changes to the NDF Vision are required? If so, what are they? | **X** |
| **Yes** | |  |
| **No** | | **X** |
| **Comments** | | |
|  | | |

|  |  |  |
| --- | --- | --- |
| **Q3a** | Do you agree with the NDF Objectives? | **X** |
| **Agree** | | **X** |
| **Neither Agree nor Disagree** | |  |
| **Disagree** | |  |
| **Comments** | | |
|  | | |

|  |  |  |
| --- | --- | --- |
| **Q3b** | Do you consider any additional objectives are required? If so, what are they? | **X** |
| **Yes** | |  |
| **No** | | **X** |
| **Comments** | | |
|  | | |

|  |  |  |
| --- | --- | --- |
| **Q3c** | Do you consider any of the NDF Objectives should be amended or removed? | **X** |
| **Yes** | | **X** |
| **No** | |  |
| **Comments** | | |
| On the whole the objectives are laudable. However, many will depend upon cooperation and investment, e.g. support to reduce travel by private vehicles. This will not be fully realised without significant investment in public transport and in safe cycling and walking routes.  12. Cohesive Communities  Within this section of the objectives there is an opportunity to:   * encourage community engagement in the planning process; * devise means of overcoming barriers to public participation in the planning process; and, * reduce real or perceived barriers of certain groups within society to certain public spaces.   The barriers may be physical, temporal or result from other communication difficulties. It is vital that any such barriers are reduced so that as large a number communities as possible have an opportunity to engage in the preparation of the NDF which should improve appreciation of its relevance. | | |

|  |  |  |
| --- | --- | --- |
| **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** | | |
| The key test will be whether the NDF encourages people to work together on solutions that meet the policy tests.  See also our comments in relation to Cohesive Communities in the answer to Q3C (above). | | |

|  |  |  |
| --- | --- | --- |
| **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** | | |
| The decision for a hybrid option for the NDF is welcomed.  However, we consider it vital for placemaking to be fully integrated and based on a collaborative approach that embraces multiple views. The current presentation of ‘placemaking’ as a distinct concept from the other identified ‘areas’ (distinctive, natural social, prosperous places etc.) gives the impression that ‘placemaking’ is a framework or concept that is separate and un-related to the other identified ‘areas’. This is compounded by identifying 3 ‘spatial aspects’ of placemaking without explanation of how they have been identified, and how they relate to the other 4 ’areas’.  Placemaking involves understanding place, the issues, trends, opportunities, and constraints within it that is informed by the views of those who live and work in those areas. Within the NDF, placemaking should be clearly defined and it should be made clear where and how it should be applied at all levels within the planning system.  It is not clear how input from people has informed the evidence base that has been selected to inform the NDF Objectives. We realise that at this is not an easy task to perform at national scale, but the use of social media and drop-in sessions at the call for evidence stage would have been useful. This would have ensured that the Preferred Option was soundly based on wellbeing principles e.g. collaboration*.* | | |
| **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** | | **X** |
| **Neither Agree nor Disagree** | |  |
| **Disagree** | |  |
| **Comments** | | |
| Yes, subject to our comments in Q3c. | | |

|  |  |  |
| --- | --- | --- |
| **Q5d** | Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it? | **X** |
| **Agree** | |  |
| **Neither Agree nor Disagree** | | **X** |
| **Disagree** | |  |
| **Comments** | | |
| See our comment at 4a. | | |
| **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** | | |
| Relationship to PPW  It would help if the NDF contained clear policy statements and a proposals map showing national infrastructure projects, major foci for conservation, growth and search (for renewable energy or minerals) so that it is more straightforward for communities across Wales to easily understand the significance of the NDF and relationship its relationship PPW.  See also our comments on Q5a above. | | |

|  |  |  |
| --- | --- | --- |
| **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** | | |
| It is important to recognise that placemaking needs to be derived from a collaborative approach involving local communities if it is to meet wellbeing goals. | | |

|  |  |  |
| --- | --- | --- |
| **Q5g** | Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option? | **X** |
| **Agree** | |  |
| **Neither Agree nor Disagree** | | **X** |
| **Disagree** | |  |
| **Comments** | | |
| The document divides Wales into three regions (North, Mid and South West, and South East Wales).  PAW notes that the proposed regions are very large and may appear remote from people’s lives. In particular Mid and South West Wales covers an area with very diverse characteristics and issues – from urban industrial to deep rural. It would be helpful to have an indication of the cultural/ economic/ social/ environmental indicators used to identify the regions, as well as some evidence of how they were informed by the views of people who live and work there  Regional SDPs  There is a benefit for wider strategic thinking on large scale projects and developments, particularly where there are cross boundary impacts. One note of caution would be a further tier of planning policy, which may cause confusion or lead to communities and residents feeling there is an overload of policy:  NDF - PPW - Regional SDP - LDP - SPG  Housing  Care will be needed to avoid a rigid system based on housing numbers rather than (local) affordability and quality. It is noted that the current proposals suggest the provision of regional as well as national housing numbers. Whilst the identification of appropriate levels of housing provision is important it is vital that the relevant local authorities have a realistic prospect of delivering these numbers. We have recently responded to a consultation on TAN 1 to support the proposed revision. We consider that, if too much emphasis is placed on the housing figures, it could lead to speculative housing applications outside the development plan allocations which could reduce or exclude participation and acceptance by local communities. In addition, the imposition of regional targets can lead to local authority and public resistance to proposed housing figures which are seen to be imposed upon them without their control.  We suggest WG should give careful consideration as to how to consult on proposed housing requirements, and identified areas of growth to ensure that affected communities understand and have faith the evidence base and rationale behind proposals. | | |
| **Q5h** | Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in *Prosperity for All: the national strategy*? | **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** | |  |
| **Neither Agree nor Disagree** | | **X** |
| **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** | | |
| PAW commends Welsh Government for attempting to engage communities at this stage in NDF preparation and would encourage them to run more of these events in libraries and other accessible venues in future. The current public participation plan had 6 drop-in events covering North and South Wales in Cardiff, Swansea, Carmarthen, Newtown, Wrexham, Bangor. If these events proved popular it could be useful to expand the number of places where a similar events are run at Draft NDF stage. If they were not, it would be useful to find other ways of engaging with local communities.  It would be helpful to run events in Pembrokeshire, Ceredigion, South Wales Valleys and Anglesey. These areas may have their own distinct issues. As such a wider spread may be appropriate on future consultation or such venues included in the informal sessions currently being suggested.  Additionally, as indicated in part in our response to Question 5g above, we suggest that WG should consider focused engagement in those areas where the NDF proposes to locate development of national significance, and or major infrastructure so that communities can understand, influence, and have confidence in the decision-making process (e.g. identified areas of growth, amended or new Strategic Search Areas to those published as part of Technical Advice Note 8 (TAN8).  The introduction of informal drop in opportunities is to be welcomed but should be across broader areas. The greater involvement the better the outcome for the NDF. | | |

|  |  |  |
| --- | --- | --- |
| **Q6b** | Are there any other changes we should make to the Statement of Public Participation? | **X** |
| **Agree** | | **X** |
| **Neither Agree nor Disagree** | |  |
| **Disagree** | |  |
| **Comments** | | |
| See Q6a | | |

**How to respond**

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

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

|  |
| --- |
| **Additional information** |
| If you have any queries about this consultation, please:  Email: [ndf@gov.wales](mailto:ndf@gov.wales)  Telephone: 0300 025 3261 |