



Welsh Government

Consultation – summary of response

Draft Planning Policy Wales: Edition 10

December 2018

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

Introduction and Main Issues

The Welsh Government conducted a public consultation on a draft Planning Policy Wales (PPW): Edition 10 over the period 12 February to 18 May 2018.

PPW is the national land-use planning policy document for Wales. It is used by Local Planning Authorities (LPAs) to inform policies and land-use allocations in Local Development Plans (LDPs) and it is a material consideration for decision makers in determining individual planning applications. PPW sets out the land use policies of the Welsh Government and provides the context for land use planning in Wales.

The consultation sought your views on proposed revisions to PPW in light of the Well-being of Future Generations (Wales) Act 2015. The draft PPW was restructured into policy themes which reflect the well-being goals and policy updated where necessary to reflect Welsh Government strategies and policies. A total of 36 questions were asked as part of the consultation; further details on which are provided in the sections which follow.

The comments received were very wide ranging and detailed, highlighting many individual and thematic issues. Due to the nature of the comments received, all detailed comments received to the consultation are not specifically referred to as part of this summary report. Nevertheless, all comments received have been considered during analysis of the responses.

This consultation summary report provides a summary of all responses received to the draft PPW consultation exercise and the Welsh Government's response to those matters raised. The results of this analysis have informed publication of the final Planning Policy Wales Edition 10.

Background

The format of PPW had changed very little since it was first published in 2002 up to Edition 9 of the document published in November 2016, with each chapter dedicated to one or more theme or topic. These chapters outlined the Welsh Government's strategic objectives for these areas; set the policy context and described key issues; identified areas which LDPs should address locally; and outlined matters which should be taken into account when planning applications are decided.

Sustainable development has been at the core of PPW since it was first published. When the Planning (Wales) Act, the Well-Being of Future Generations (Wales) Act (WFG Act) and the Environment (Wales) Act were being developed, a commitment was given to restructure PPW so it more clearly evidenced the legislative requirements of these pieces of legislation.

The legislative requirements set out in the Well-being of Future Generations (Wales) Act (WFG Act) mandate improving the social, economic, environmental and cultural well-being of Wales. It requires public bodies (including the Welsh Government and Local Planning Authorities) to think about the long-term, to work better with people and communities, to look to prevent problems and take a more joined up approach to deliver sustainable development.

To make sure we are all working towards the same vision, the Act puts in place seven well-being goals. The Act also introduces 5 Ways of Working to help achieve the well-being goals.

The planning system is one of the main tools which we have to create sustainable places. It is the main contribution the planning system can contribute to the successful implementation of the WFG Act. Everyone engaged with or operating within the planning system must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of Sustainable Places. Placemaking is a multi-faceted approach to the planning, design and management of public spaces. Placemaking capitalises on a local community's assets, inspiration, and potential, with the intention of creating development that promote people's health, happiness, and well being. It is therefore central to the wider objectives of the WFG Act.

Consultation Proposals

The draft Edition 10 restructured the format of PPW to reflect the new legislative framework and the concept of placemaking to provide an appropriate context within which development plans are prepared and decisions on development proposals are taken. It also updated planning policy in key areas where necessary to reflect new Welsh Government strategies and policies. Consultation on the draft Edition 10 sought views on the new structure of PPW, the placemaking concept and the new or revised policy requirements.

Consultation questions 1 to 34 focused on where changes have been made in order to introduce new policy requirements in a number of the chapters, reflecting Government objectives. The overall aim where possible was to reflect the new legislative framework and introduce the concept of placemaking, whilst reflecting and retaining existing principles of policy and policy statements contained in PPW Edition 9. Question 35 specifically asked whether policy, other than the amended policy statements detailed in Questions 1 to 34, accurately reflected the existing policy. Question 36 asked whether there are any existing policy statements in PPW Edition 9 which have not been included in the draft of PPW Edition 10. Specific detail relating to the consultation questions, consultation responses received to those questions and the Welsh Government's responses are set out in detail under the 'Summary of Responses by Question' section below.

Consultation and Publicity

The draft PPW Edition 10 was published by the Welsh Government for a period of public consultation lasting over 13 weeks from 12 February 2018 to 18 May 2018.

Details of the consultation were published on the Welsh Government's website throughout its duration. Established stakeholders in the planning system were notified about the consultation, including the 25 local planning authorities and other statutory consultees. Details were also disseminated by other means, including through Welsh Government officials hosting presentations on the draft PPW at various planning stakeholder groups across Wales and to specific groups with an interest in the planning system over the consultation period. The Cabinet Secretary for Energy, Planning and Rural Affairs issued a written statement on the consultation and it was further publicised through various forms of social media, including Facebook and Twitter.

Consultation Responses

A total of 2,779 responses were received to the consultation. Of those, 2,562 responses were received on a single issue matter to policy wording on ancient woodland within the draft document.

Notwithstanding these single issue responses, of the other 217 responses received the largest respondent by type was professional bodies and interest groups who represented 28% of respondents.

The group that classified themselves as 'others' made up 19% of respondents and comprised of individuals and organisations with either a personal or professional interest in the planning system. The voluntary sector made up 15% of the respondents. Businesses made up 14%.

Local Planning Authorities and government agencies and other public sector bodies each made up 12% of the respondents. These included 24 out of the 25 local planning authorities in Wales, alongside other individual and shared agency / public-sector services such as the Welsh Local Government Association, Town and Community Councils and the Welsh Language Commissioner.

Table 1: Respondents to draft PPW Edition 10 by type

Respondent Type	Number of Responses	Percentage
Professional Body / Interest Group	61	28%
Other	41	19%
Voluntary Sector	33	15%
Businesses	31	14%
Local Planning Authorities	26	12%
Government Agency / Other Public Sector	25	12%
Total	217	100%

Summary of Responses by Question

A summary analysis of the key findings for each consultation question is set out below, followed by the Welsh Government's response. Some questions have been grouped together due to common issues being raised or common responses.

It should be noted that the summary analysis provided below is not reflective of the overall number of respondents. Instead it is based on the respondents who directly answered 'yes' or 'no' to the questions (as outlined in the tables provided). Many respondents chose not to provide a direct answer but provided comments. Wherever possible, comments and views have been incorporated into the analysis if they directly relate to the subject matter of the question even if they were not explicitly presented as answers to the question. Most of the questions invited respondents to expand on their views; therefore much of the analysis is qualitative in nature.

Question 1-5, relating, to the introductory elements of Chapter 2 of the draft version of PPW or the structure of the document as a whole, are grouped together as the Welsh Government response cross-cuts many of the issues raised during consultation.

Q1 Do you agree planning policy topics be clustered around themes which show their relationships with each other and the 7 well-being goals? If not, please explain why.

Question Context

In order to restructure PPW so that it reflects the new legislative framework provided by the WFG Act and Environment Act whilst continuing to provide an appropriate context within which development plans are prepared and decisions on development proposals are taken, the draft PPW Edition 10 aligned planning policy topic areas to the goals of the WFG Act. This was carried out by drawing together those topic areas which have common relationships to the descriptions of the goals contained in the WFG Act, grouping those together under thematic headings.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	10	4	6
Local Planning Authorities	7	6	8
Government Agency / Other Public Sector	10	2	0
Professional Bodies / Interest Groups	25	8	3
Voluntary Sector	12	2	2
Other	14	5	6
Total	78	27	25
% (figures may not sum due to rounding)	60%	21%	19%

Q2 Do you agree the introduction provides an adequate overview of the planning system in Wales and appropriate context? If not, please explain why.

Question Context

Chapter 1 of the draft PPW Edition 10, the Introduction, provided an overview of what PPW sets out to do and a general context for the planning system in Wales. It highlighted key legislation and provided policy context related to Development Plans and Development Management.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	6	8
Local Planning Authorities	1	7	13
Government Agency / Other Public Sector	5	5	0
Professional Bodies / Interest Groups	22	9	9
Voluntary Sector	3	7	4
Other	6	5	11
Total	41	39	45
% (figures may not sum due to rounding)	33%	31%	36%

Q3 Do you agree with the Planning Principles? If not, please explain why.

Question Context

Chapter 2 of the draft PPW Edition 10, Placemaking, introduced the concepts necessary to ensure PPW reflects the WFG Act.

The Welsh Government set out the concept that everyone engaged with or operating within the planning system in Wales must embrace placemaking in both plan making and development management decisions in order to achieve the creation of Sustainable Places.

The Placemaking Chapter set out the 5 Key Planning Principles the Welsh Government identified for planning which should be the starting point for all those involved in considering what they are trying to achieve. The chapter also set Sustainable Places as the goal of the land use planning system in Wales; identifying them as the output of the planning process. The theme was to ensure all development decisions, either through policy-making in development plans or through individual development management decisions should seek to contribute towards the making of Sustainable Places.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	9	6	5
Local Planning Authorities	7	9	5
Government Agency / Other Public Sector	9	3	0
Professional Bodies / Interest Groups	26	7	6
Voluntary Sector	12	3	0
Other	8	3	12

Total	71	31	28
% (figures may not sum due to rounding)	55%	24%	22%

Q4 Do you agree with the definition of what is a 'Sustainable Place'? If not, please explain why.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	11	4
Local Planning Authorities	5	9	7
Government Agency / Other Public Sector	7	3	0
Professional Bodies / Interest Groups	16	9	10
Voluntary Sector	2	4	5
Other	6	6	10
Total	40	42	36
% (figures may not sum due to rounding)	34%	36%	31%

Q5 Do you agree with high-level planning outcomes highlighted by People and Places: The National Placemaking Outcomes? If not, please explain why.

Question Context

We developed a suite of high level National Sustainable Placemaking Outcomes, to encapsulate the spirit of placemaking in one succinct place and to ensure that all developments, as far as possible, make or contribute towards the creation of Sustainable Places.

The purpose of the placemaking policy was not to replace the detailed considerations that occur during every planning application or site allocation process, but rather it contained the high level outcomes that planning is seeking to achieve and take into account.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	11	6
Local Planning Authorities	4	11	5
Government Agency	4	5	0

/ Other Public Sector			
Professional Bodies / Interest Groups	19	11	6
Voluntary Sector	8	4	1
Other	5	6	10
Total	41	48	28
% (<i>figures may not sum due to rounding</i>)	35%	41%	24%

Question Responses – Summary Analysis

Overall, the principle of structuring PPW around distinct themes was agreed with; however some respondents commented that the whole structure needed to be simplified with too many different aspects being used to explain concepts and the use of the document. Other respondents suggested that more explanation was needed on how to use the document and the diagrams within it. Some respondents commented that more linkages between the themes are needed.

Comments on the introduction chapter mainly related to certain policy areas not having a specific reference. There were also suggestions that the call-in process section needed to be factually updated and the full legislative context that the planning system sits within needs reference as Edition 9 did previously. There were also a significant number of responses seeking clarification on the roles of the different tiers of development plan.

Responses to the key planning principles were largely positive. However there were a significant number of responses that stated there needed to be a principle relating to economic prosperity as it was felt this was missing from the draft version of the document. Many suggestions were made on amending the text accompanying the principles.

The definition of what is a Sustainable Place and the National Sustainable Placemaking Outcomes attracted a number of detailed responses with suggestions for change. Clarification was also requested on the status of the Outcomes and if all of them needed to be achieved in all development proposals. Comments were also made that the outcomes diminished the need for a specific definition.

Welsh Government Response

Chapter 1 and the introductory elements of Chapter 2 have now been revised. The theory of placemaking and the policy content relating to strategic planning have now been separated into their own chapters to ease navigation around the document. A new Annex has been included in the document to outline relevant pieces of primary and secondary legislation. The text on Development Plans has been revised to improve clarity.

The Welsh Government appreciates that the way that policy topics have allocated to themes could have occurred in a number of ways; however it is considered that these groups are the most effective way to encourage placemaking in practice. PPW has been amended to include more explicit information on how the document should be used in practice.

The Key Planning Principles have been amended with a new principle covering economic prosperity. The wording accompanying the principles has been revised where appropriate to more accurately reflect the aspirations of the principle following consultation. The principles are a key element of the theoretical aspect of the new approach in PPW and the new Annex

B of the document highlights how they relate to the National Sustainable Placemaking Outcomes.

The National Sustainable Placemaking Outcomes have been revised to make them more succinct and self explanatory and match the diagram included in Chapter 2 of PPW. These then relate to each of the themes with a similar diagram explaining which outcomes are more relevant. The use of the outcomes has also been amplified to clarify their use. The definition of a Sustainable Place has also been incorporated into the text of the document rather than being an explicit outcome in itself. Rather it is now the intention that a Sustainable Place is achieved by maximising the outcomes.

Q6 Do you agree with the search sequence outlined for the formulation of development plan strategies? If not, please explain why.

Question Context

PPW acknowledges that land is finite resource and, in line with the principles of the sustainability and the Well-being of Future Generations Act its development should be undertaken in an efficient way. We therefore sought to make our preferred approach to the formulation of development plan strategies more explicit by outlining a search sequence for new development.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	10	5
Local Planning Authorities	7	7	6
Government Agency / Other Public Sector	6	3	1
Professional Bodies / Interest Groups	16	15	3
Voluntary Sector	4	7	0
Other	9	5	8
Total	46	47	23
% (<i>figures may not sum due to rounding</i>)	40%	41%	20%

Question Responses – Summary Analysis

In principle, respondents agreed with the overall search sequence approach to identify suitable sites for development and the preference to consider previously developed land (PDL) (also known as brownfield sites) before greenfield sites. However, many respondents felt the search sequence was not prominent enough within the chapter and could be viewed as overly simplistic given the lack of recognition in respect of the other issues associated with site selection e.g. environmental constraints, sustainability credentials and site viability.

Respondents consider it is important to emphasise that the reuse of previously developed land may not be the most suitable and sustainable options for development and sites can often have significant challenges in terms of delivery and viability. Comments outlined that a

full appraisal of sites is required rather than a simplistic process of automatically assuming that all previously developed land will be more appropriate for future development.

Detailed comments were provided outlining the possible inconsistencies between other policy areas such as the Previously Developed Land (PDL) and Housing.

Welsh Government Response

The Spatial Strategy and site search sequence section provides additional clarity on the issues that need to be considered when developing their spatial strategy. The section now acknowledges that in developing their spatial strategy Planning Authorities must prioritise the use of suitable and sustainable previously developed land and / or underutilised sites for all types of development. However, it is recognised that not all sites of this nature are suitable for all types of development.

The section now emphasises that the search process and identification of development land must be undertaken in a manner that fully complies with the requirements of all relevant national planning policy. Locational and site choices will also need to be made within the context of an understanding of both economic and market conditions. Consideration should be given to whether specific interventions from the public and/or private sector, such as regeneration strategies or funding, are required to help deliver the strategy and specific development proposals.

Q7	Do you agree with our revised policy approach for the promotion of new settlements and urban extensions? If not, please explain why.
-----------	--

Question Context

The draft version of PPW suggested a new policy regarding the promotion of new settlements or major urban extensions, of 1,000 or more dwellings. Due to their strategic nature and significance, which goes beyond a single local authority boundary, they were only proposed to be included as part of a joint LDP, SDP or the NDF.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	10	6
Local Planning Authorities	1	4	16
Government Agency / Other Public Sector	4	4	0
Professional Bodies / Interest Groups	15	13	5
Voluntary Sector	5	5	0
Other	8	5	8
Total	35	41	35
% (figures may not sum due to rounding)	32%	37%	32%

Question Responses – Summary Analysis

Overall, the positive policy position regarding new settlements was welcomed; however the majority of respondents either did not agree with aspects of the policy or considered more explanation was necessary.

Many respondents understood the principle of restricting the allocation of new settlements / urban extensions above a certain size to Joint LDPs or higher tier plans, however a number of respondents considered the policy to be too prescriptive and premature given the uncertainty regarding Joint LDPs and SDPs.

A number of respondents felt the approach was too rigid and would undermine local democracy and the ability local authorities to plan for their own area. Respondents did recognise that new settlements can have significance beyond a single local authority area but they outlined that collaborative working with neighbouring authorities is necessary when progressing an LDP. Consequently it was felt that the policy was unduly restrictive and should be amended to recognise that new settlements can also come forward through individual LDPs.

The vast majority of comments also related to the 1000 dwelling threshold with many respondents stating there did not appear to be any evidence or rationale to justify this arbitrary figure.

Concern was also expressed by respondents regarding the significant difference between new settlements and urban extensions with many considering these two types of development should be dealt with separately. Comments were also raised regarding how the proposal for a new settlement would fit with the search sequence for identifying development sites.

Welsh Government Response

Welsh Government has maintained the position whereby new settlements should only be proposed as part of a joint LDP, an SDP or the NDF due to their strategic nature and significance beyond a single local authority. However, the section on New Settlements no longer applies to “urban extensions” and the 1000 dwelling threshold has been removed acknowledging a new settlement should be self contained but may vary in size depending on specific issues and location.

The section now outlines that new settlements need to be self contained and not dormitory towns for overspill from larger urban areas and, before occupation, should be linked to high frequency public transport and include essential social infrastructure including primary and secondary schools, health care provision, retail and employment opportunities. This is necessary to ensure new settlements are not housing estates which require car based travel to access every day facilities.

New Settlements are now included in the site search sequence, but must only be considered in exceptional circumstances.

Q8	Do you agree with our revised policy approach to the preference for the re-use of previously developed land? If not, please explain why.
-----------	--

Question Context

We examined our policy on the use of brownfield land and strengthened it to seek to ensure that all options to re-use previously developed land are considered before greenfield sites are utilised. The over-riding imperative set out was to examine previously developed land first. In line with advice later on in PPW, the draft PPW Edition 10 advised planning authorities to continue to take a de-risk approach to sites to enable them to come forward, being mindful of the deliverability in economic terms.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	10	8
Local Planning Authorities	6	8	9
Government Agency / Other Public Sector	10	1	0
Professional Bodies / Interest Groups	17	14	4
Voluntary Sector	7	5	0
Other	10	6	6
Total	51	44	27
% (figures may not sum due to rounding)	42%	36%	22%

Question Responses – Summary Analysis

The majority of respondents agree that Previously Developed Land (PDL) should be used in preference to greenfield land, in both urban and rural areas, and the approach promotes the efficient use of scarce land resources. However, a number of comments outlined that it cannot be assumed that all PDL is suitable for development and there needs to be flexibility to allow LPAs to make their own decisions on its suitability. There also needs to be a mechanism to allow the relative benefits of PDL and greenfield development to be considered.

The de-risking approach was supported in principle and it was agreed that it may help bring sites forward. However, it was considered the approach is heavily reliant on LPA and specialist inputs at a time of budgetary constraints which may impact on the feasibility and deliverability. It was felt the general approach to PDL and de-risking may be more feasible if specific finance / grants were available for such works.

Respondents considered sections of PPW lacked consistency in terminology with reference to PDL and brownfield land.

Specific comments were received in the definition of PD. These related particularly to nature conservation value, but also to defence buildings, agricultural and forestry, horsiculture, landfill, archaeology and that land should not deliberately be left to deteriorate so as to fall within the definition.

Welsh Government Response

In response to concerns raised, the Welsh Government has stated that PDL land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. However, it is now recognised that not all PDL is suitable for development, this may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated.

The Welsh Government maintains that planning authorities should work with landowners to ensure that suitably located previously developed sites are brought forward for development and to secure a coherent approach to their development. To incentivise the appropriate re-use of previously developed land, planning authorities should take a lead by considering and identifying the specific interventions from the public and/or private sector necessary to assist in its delivery.

Changes have been made to the exclusions from the definition in regard to nature conservation, for purposes of consistency with the way other exclusions are treated.

Q9	Do you agree with our revised policy approach for the designation of Green Belts and Green Wedges? If not, please explain why.
-----------	--

Question Context

We provided clarification on the difference between Green Belts & Green Wedges. Although proposals for both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of forms. The essential stated difference between them was that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process. It was also confirmed that Green Belts are also strategic in nature and should only be proposed as part of either a joint LDP or an SDP.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	11	3
Local Planning Authorities	6	9	6
Government Agency / Other Public Sector	4	3	0
Professional Bodies / Interest Groups	17	14	2
Voluntary Sector	3	8	0
Other	8	3	9
Total	40	48	20
<i>% (figures may not sum due to rounding)</i>	37%	44%	19%

Question Responses – Summary Analysis

The majority of respondents supported the policy approach to Green Belts and Green Wedges and welcomed the clarification regarding the difference between the designations.

A large proportion of respondents agreed, that due to their strategic nature, Green Belts will have significance beyond a single local authority and they should only be proposed as part of a Joint LDP or SDP. A number of respondents went further and thought Green belts should be only promoted through SDPs and / or the NDF. However, some respondents had an alternative view and considered there should be an option for promoting Green Belts through an LDP providing appropriate consultation and evidence for the designation is demonstrated such as collaborative working with neighbouring authorities.

A number of respondents considered that greater clarity was required regarding to what is acceptable within a Green Belt or Green Wedge with a number of examples being given such as mineral extraction and renewable and low carbon energy generation.

Welsh Government Response

Given their strategic and significance beyond a single local authority, the Welsh Government has maintained the position whereby Green Belts should only be designated through a joint LDP or an SDP. However, designations can now also be proposed through the NDF if it is considered appropriate.

Further clarity has been provided regarding the forms of development which may be appropriate in the Green Belt or green wedge provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- mineral extraction;
- renewable and low carbon energy generation;
- engineering operations; and
- local transport infrastructure.

Questions 10, 22 and 29 are addressed together as they relate to the introductory sections of the Active & Social, Productive & Enterprising and Distinctive & Natural Places themes.

Q10	Do you agree with the issues and inter-linkages highlighted in the introduction to the Active and Social Places chapter? What other issues and linkages could be identified to support this theme?
------------	--

Question Context

The Active and Social Places chapter in the draft PPW Edition 10 highlighted the connections which the policy topics in this chapter have with the placemaking outcomes. It also made the linkages with the 7 Well-being Goals and 5 Ways of Working of the WFG Act. The future trends in this area were also identified as well as how the different policy topics in theme can work collectively together to achieve Sustainable Places.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
---------------------	-------	----------------------------	----------

Businesses	2	14	2
Local Planning Authorities	2	12	7
Government Agency / Other Public Sector	4	5	1
Professional Bodies / Interest Groups	15	10	8
Voluntary Sector	8	2	3
Other	5	7	9
Total	36	50	30
% (<i>figures may not sum due to rounding</i>)	31%	43%	26%

Q22 Do you agree with the issues and inter-linkages highlighted in the introduction to the Productive and Enterprising Places chapter? What other issues and linkages could be identified to support this theme?

Question Context

The introduction to the Productive and Enterprising Places chapter in the draft PPW Edition 10 highlighted the connections which the policy topics in this chapter have with the placemaking outcomes. It also made the linkages with the 7 Well-being Goals and 5 Ways of Working of the WFG Act. The future trends in this area were also identified as well as how the different policy topics in theme can work collectively together to achieve Sustainable Places.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	11	3
Local Planning Authorities	7	7	4
Government Agency / Other Public Sector	4	2	1
Professional Bodies / Interest Groups	15	12	5
Voluntary Sector	7	4	0
Other	5	8	6
Total	42	44	19
% (<i>figures may not sum due to rounding</i>)	40%	42%	18%

Q29 Do you agree with the issues and inter-linkages highlighted in the introduction to the Distinctive and Natural Places chapter? What other issues and linkages could be identified to support this theme?

Question Context

The draft PPW Edition 10 set out the Distinctive and Natural Places chapter, the introduction of which highlighted the connections which the policy topics in this chapter have with the placemaking outcomes. It also made the linkages with the 7 Well-being Goals and 5 Ways of Working of the WFG Act. The future trends in this area were also identified as well as how the different policy topics in theme can work collectively together to achieve Sustainable Places.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	8	2
Local Planning Authorities	7	6	8
Government Agency / Other Public Sector	4	5	0
Professional Bodies / Interest Groups	17	11	3
Voluntary Sector	6	5	1
Other	5	6	6
Total	43	41	20
% (figures may not sum due to rounding)	41%	39%	19%

Question Responses – Summary Analysis

Respondents generally considered that the introductory sections of all of the themes needed to be simplified and made clearer. In particular, some respondents were of the view that there was an unnecessary element of repetition between the national place-making outcomes set out in Chapter 2 and the content of the introductory sections, although differently presented. Conversely, other respondents considered that although somewhat repetitive, this text assists in emphasising the ‘Key Planning Principles’ in the context of the themes. Numerous suggestions for additional trends and linkages were usefully identified by respondents.

Welsh Government Response

The Welsh Government considers that the introductory sections of the 3 ‘themes’ help to provide a useful summary of the issues and trends that planners need to be considering when formulating development plans and taking planning decisions. Whilst they are not policy, the introductory sections help to make the links directly between planning and the well-being goals and ways of working. The diagrams are there to help make the links between the theme and the National Sustainable Placemaking Outcomes integrating the document together under the overarching agenda of placemaking.

However, as with the introductory chapters to PPW, the Welsh Government recognises that, in practice, it is important to distinguish between the theory and the policy of placemaking. Therefore the design of PPW has been amended to place this information in a separate box

to mark that distinction. Amendments to the specific linkages and trends have been made where appropriate.

Q11 Do you agree that it is important for viability to be assessed at the outset of the plan preparation process and for this to be supported by an enhanced role for housing trajectories? If not, please explain why.

Question Context

In the draft PPW Edition 10, emphasis was placed on economic viability being central to assessments of the deliverability of development plan housing requirements from the outset of the plan preparation process. This was supported by an enhanced role for housing trajectories, which would provide the basis for housing land supply until a housing land availability study is required to inform an authority's first development plan Annual Monitoring Report.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	13	3
Local Planning Authorities	8	7	7
Government Agency / Other Public Sector	5	5	0
Professional Bodies / Interest Groups	18	12	5
Voluntary Sector	4	7	0
Other	7	6	8
Total	44	50	23
% (figures may not sum due to rounding)	38%	43%	20%

Question Responses – Summary Analysis

Viability assessments – Respondents recognised the importance of viability assessments as part of assessing the deliverability of development plan housing requirements. However, concern was expressed by some respondents about the practicality of carrying out detailed viability assessments before the development plan strategy and policies on issues such as planning obligations and affordable housing have been agreed. Other respondents considered that the approach to viability assessments should be based on a site's importance to the delivery of strategic housing and the overall plan strategy. The view was also expressed that the link between viability and deliverability needs to be more explicit. Some respondents were also concerned that carrying out viability assessments at an earlier stage may cause difficulties for SMEs in fully engaging in the process.

Housing trajectories – Respondents generally considered that housing trajectories are a useful tool. However, some respondents thought they should remain part of the evidence base of a development plan rather than becoming a formal part of an adopted plan as local

planning authorities do not control delivery rates once planning permission has been granted.

The replacement of joint housing land availability studies (JHLAS) by housing trajectories for a period immediately following plan adoption was questioned by some respondents who considered that the JHLAS process was more meaningful.

Welsh Government Response

The final version of PPW provides additional clarity regarding the role of viability assessments during the plan preparation process. PPW proposes a proportionate approach which differentiates both between the type of assessment that is required at different stages of the process and between the importance of sites to the delivery of a plan's strategy. This policy statement also serves to reinforce the link between viability and deliverability.

Housing trajectories demonstrate how sites contained in a development plan will be delivered by providing a summary of site specific phasing information for all sites. Housing trajectories aid the effective monitoring of the plan and therefore it is important that they are a formal part of an adopted plan. Housing trajectories are derived from all the components of housing supply and are therefore closely linked to the maintenance of a five-year housing land supply, making them a suitable mechanism to monitor land supply until a Joint Housing Land Availability Study is required to inform the first Annual Monitoring Report following plan adoption.

Further information on these issues will be provided in the forthcoming Development Plans Manual.

Q12	Do you agree that it is important for a flexibility allowance to be included as a policy requirement in order to facilitate the delivery of planned housing requirements? If not, please explain why.
------------	---

Question Context

When allocating land for housing in their development plans, the draft PPW Edition 10 encouraged local planning authorities to include an additional allowance to allow for flexibility where sites do not come forward as planned to provide a realistic prospect of achieving the planned housing requirement.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	7	11	1
Local Planning Authorities	15	4	3
Government Agency / Other Public Sector	5	4	0
Professional Bodies / Interest Groups	17	13	3
Voluntary Sector	3	7	0
Other	6	5	9
Total	53	44	16

% (figures may not sum due to rounding)	47%	39%	14%
---	-----	-----	-----

Question Responses – Summary Analysis

The majority of respondents agreed that it is important to include a flexibility allowance as a policy requirement to facilitate housing delivery and enable responsiveness to the market. The view was also expressed that this allowance should be locally determined, based on local circumstances. Some respondents called for guidance to be provided about how the allowance should be calculated.

Those respondents opposed to a flexibility allowance becoming a policy requirement were concerned that these additional sites cause uncertainty and confusion for the public, are not necessary given the increased emphasis placed on viability and that instead under-delivery should be addressed through plan review.

Welsh Government Response

The final version of PPW explicitly confirms that the additional flexibility allowance should be locally determined and locally appropriate. Such an allowance is for sites not coming forward for development as planned during the plan period, to ensure that the housing requirements identified by planning authorities in their development plans can be delivered. All sites included as part of the flexibility allowance are required to be in sustainable locations and to meet the relevant policy requirements of the development plan.

Q13 Do you agree that to deliver the new housing Wales needs it is necessary for local planning authorities to allocate a range of site sizes, including small sites, to provide opportunities for all types of house builder to contribute to the delivery of the proposed housing? If not, please explain why.

Question Context

To deliver the new housing it is necessary to diversify the means of delivery by encouraging all types of house builder to contribute, including the self-build and custom build sector. To facilitate this, the draft PPW Edition 10 stated how local planning authorities must provide a range of site sizes when allocating sites in their development plans and must consider the opportunities for custom and self-build options, including the use of Local Development Orders.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	10	8	0
Local Planning Authorities	14	5	2
Government Agency / Other Public Sector	6	3	0
Professional Bodies / Interest Groups	18	13	1
Voluntary Sector	8	3	1
Other	8	4	6

Total	64	36	10
% (figures may not sum due to rounding)	58%	33%	9%

Question Responses – Summary Analysis

Respondents generally agreed that providing opportunities for small-scale house-builders should increase capacity and housing delivery. However, there were some reservations regarding the resource implications for local authority planning departments and the ability to meet planning gain requirements. A register of small sites was proposed by one respondent as an alternative way of encouraging the delivery of housing on small sites.

Welsh Government Response

The Welsh Government considers that in order to deliver the homes the people of Wales need it is important to broaden the delivery options and provide opportunities for all sectors of the housing market to contribute, including small builders, Registered Social Landlords and the custom and self-build sector. PPW therefore requires planning authorities to consider providing a range of sustainable and deliverable sites through their development plans. PPW also states that planning authorities should set a locally determined target for the delivery of housing on small sites and should maintain a register of suitable sites to facilitate this.

Q14 To ensure that small sites are allocated, should there be a requirement for a specific percentage (e.g. 20%) of sites to be small sites? If not, please explain why.

Question Context

See contextual information provided under Question 13.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	9	8
Local Planning Authorities	0	2	19
Government Agency / Other Public Sector	2	6	0
Professional Bodies / Interest Groups	10	20	4
Voluntary Sector	2	7	0
Other	3	7	10
Total	19	51	41
% (figures may not sum due to rounding)	17%	46%	37%

Question Responses – Summary Analysis

The majority of respondents considered that it would be inappropriate for a target for delivery on small sites to be set in national policy; a clear understanding of local markets

was required and such a target should therefore be left to local planning authorities to assess. Advantages in terms of delivery and design innovation were also highlighted.

Those respondents opposed to stipulating a specific percentage of small sites were concerned that this could prejudice the allocation of larger sites which may be better suited to meeting the growth demands of a given settlement or region and could result in sub-optimal sites being allocated.

Welsh Government Response

As referred to above in response to Question 13, the final version of PPW states that planning authorities should set a locally determined target for the delivery of housing on small sites and should maintain a register of suitable sites to facilitate this. In setting this local target planning authorities will need to take account of their overall strategy for delivering the homes their communities need.

Q15 Do you agree that the custom and self-build sector can play an important role in housing delivery, in particular when linked to the use of Local Development Orders and design codes? If not, please explain why.

Question Context

See contextual information provided under Question 13.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	7	9	2
Local Planning Authorities	11	11	1
Government Agency / Other Public Sector	4	3	1
Professional Bodies / Interest Groups	14	14	2
Voluntary Sector	6	4	0
Other	9	5	7
Total	51	46	13
% (figures may not sum due to rounding)	46%	42%	12%

Question Responses – Summary Analysis

Those respondents who agreed that custom and self-build housing can play an important role in housing delivery, considered that the number of homes this sector would provide would be small. For this reason, some respondents questioned whether the use of Local Development Orders (LDOs) and design codes was justified given the costs involved. It was suggested that strong policies on design and accompanying Supplementary Planning Guidance (SPG) or 'place plans' or site specific development briefs may be more appropriate and quicker to implement.

Welsh Government Response

Increasing the contribution of the custom and self-build sector forms part of broadening housing delivery options. Decisions about the most effective way for planning authorities to facilitate the custom and self-build sector will be for planning authorities to consider as part of assessing their local housing delivery options.

Q16 Do you agree that negotiating on an 'open book' basis would help to improve trust between the parties and facilitate the delivery of both market and affordable housing? If not, please explain why.

Question Context

The delivery of affordable housing as part of market housing developments requires local planning authorities and developers to negotiate in an open and transparent manner. Further emphasis was placed on this in the draft PPW Edition 10 by referring to the need for such negotiations to be on an 'open book' basis.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	12	1
Local Planning Authorities	16	7	0
Government Agency / Other Public Sector	4	5	0
Professional Bodies / Interest Groups	12	18	2
Voluntary Sector	1	8	0
Other	7	7	7
Total	44	57	10
% (figures may not sum due to rounding)	40%	51%	9%

Question Responses – Summary Analysis

A number of those respondents who agreed that negotiating on an 'open book' basis would help to improve trust between the parties and facilitate the delivery of housing, queried whether this could be put into practice given the confidentiality surrounding the commercial interests of developers. Respondents also expressed the view that an 'open book' approach could be acceptable at planning application stage subject to a consistent approach being taken across Wales.

Welsh Government Response

PPW promotes the front-loading of assessing the economic viability of sites through the development plan process and states that viability assessments at planning application stage should only be necessary in exceptional circumstances. It will be for either the applicant or the planning authority to demonstrate that such circumstances exist and, where this is the case, it will be important for there to be transparency from all parties as part of the justification.

Q17 Do you agree with the changes to emphasise the need for the appropriate provision of community facilities when considering development proposal? If not, please explain why.

Question Context

The draft PPW Edition 10 made changes to emphasise the need for the appropriate provision of community facilities. It stated how planning authorities should develop a strategic and long-term approach to the provision of community facilities when preparing development plans. Further stated was that when considering development proposals planning authorities should consider the needs of the communities and should ensure that community facilities continue to address the requirements of residents in the area.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	6	12	0
Local Planning Authorities	5	10	5
Government Agency / Other Public Sector	6	3	0
Professional Bodies / Interest Groups	18	12	3
Voluntary Sector	11	2	0
Other	12	5	3
Total	58	44	11
% (<i>figures may not sum due to rounding</i>)	51%	39%	10%

Question Responses – Summary Analysis

Respondents were generally supportive of the emphasis given to appropriate provision of community facilities within the draft PPW, with comments received on local issues surrounding the provision of new facilities. For example, a number of respondents suggested a need for PPW to recognise there could be issues with regards to the provision of such facilities locally, including viability and to account for the evidence base in supporting community facilities provision, including the capacity of existing facilities and needs of the overall community.

Respondents further alluded to delivery and management of community facilities, including how the planning system isn't necessarily responsible for the delivery of certain types of community facilities (such as in respect of health facilities provision) and their ongoing maintenance and funding. Some respondents suggested a need for increased detail, clarity and referencing on 'community facilities' terminology within PPW, including on their location, accessibility, the types of facility they could include and also on the consideration of the loss of existing community facilities as part of new development. Potential benefits with the provision of community facilities were highlighted by a few respondents, particularly in respect of the potential for open space and recreation provision to enhance biodiversity.

Welsh Government Response

PPW Edition 10 has been amended from the draft consultation version to ensure reference to the local evidence base (in terms of capacity of existing facilities and needs of the overall community) is made in terms of planning authorities considering the need for community facilities provision within their areas. Comments received regarding viability of providing

community facilities are noted and the issue of viability is picked up elsewhere within PPW.

The examples of community facilities given in the draft PPW Edition 10 are not intended to be prescriptive and it is considered planning authorities are best placed to determine what is of importance to their local communities in this context. Comments received regarding the delivery and management of community facilities are considered to be matters which are local or wider than what can be prescribed through national planning policy. The potential for open space and recreation facilities to contribute towards biodiversity is stated in PPW.

Q18 Do you agree that giving greater emphasis to the transport hierarchy will improve the location and design of new development? If not, please explain why.

Question Context

The draft PPW Edition 10 updated the transport policy to give greater emphasis to the transport hierarchy, which prioritises walking and cycling, then public transport, and finally private motor vehicles. It stated how new development should be located and designed in accordance with this hierarchy.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	5	13	0
Local Planning Authorities	11	9	1
Government Agency / Other Public Sector	3	5	0
Professional Bodies / Interest Groups	14	13	5
Voluntary Sector	8	4	1
Other	8	5	7
Total	49	49	14
% (figures may not sum due to rounding)	44%	44%	13%

Question Responses – Summary Analysis

The majority of respondents supported the principle of the transport hierarchy and welcomed it being given greater emphasis. It was suggested that the role of Ultra Low Emission Vehicles should be clarified in the transport hierarchy. There were also suggestions that the wording of policy needed to be framed by a stronger narrative, focused on prioritising sustainable transport over other modes of travel.

Some respondents did not support a hierarchical approach to transport choices and there were queries about how useful the transport hierarchy is when considering the location of new development. The transport hierarchy's relevance in rural areas was also queried.

Welsh Government Response

The transport hierarchy has been incorporated into a new section in PPW, which sets out the Welsh Government's commitment to sustainable transport. The hierarchy has also been updated to include Ultra Low Emission Vehicles. Supporting text has been added to address the concerns raised regarding the application of the transport hierarchy, including its application in rural areas.

Q19 Do you agree that the policy will enable the planning system to facilitate active travel and the provisions of the Active Travel (Wales) Act 2013? If not, please explain why.

Question Context

The draft PPW Edition 10 made changes to strengthen the policy objective of reducing travel by private vehicles and increasing walking, cycling and public transport use. The policy on active travel was strengthened and the provisions of the Active Travel (Wales) Act 2013 further integrated with the planning system.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	14	0
Local Planning Authorities	11	10	2
Government Agency / Other Public Sector	5	3	0
Professional Bodies / Interest Groups	15	8	6
Voluntary Sector	7	5	1
Other	4	7	8
Total	44	47	17
<i>% (figures may not sum due to rounding)</i>	41%	44%	16%

Question Responses – Summary Analysis

There was support for the increased prominence given to active travel. However, it was suggested that there needs to be a radical shift in the way our places are designed and developed, away from the car-centric society and culture that has developed over the last 50 years, and to achieve this it was suggested that a more robust and ambitious policy stance should be taken. It was suggested that active travel, as well as public transport, should be a key consideration in the location of new development, and that the provision of active travel should be a central and essential requirement of new developments, rather than something that is regarded as optional.

Welsh Government Response

The Welsh Government is committed to ensuring the planning system promotes and supports active travel, including the implementation of the Active Travel Act. PPW has been updated to further strengthen and make clear that the provision for active travel should be an essential component of development schemes and that the planning system should ensure new developments are designed and integrated with existing settlements in a way which makes active travel a practical and attractive travel choice.

The Cabinet Secretary for Energy, Planning and Rural Affairs has also written to local planning authorities regarding this matter. The letter set out the expectation that development plans identify active travel routes, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their delivery. The letter also states that, as part of the selection of future development sites, priority should be given to sites which can be readily connected to existing active travel routes or future networks.

Q20 Do you agree that the policy will enable the creation of well-designed streets? If not, please explain why.

Question Context

Greater emphasis was placed on creating well-designed, people orientated streets. The revised policy explicitly set out an expectation that the design of new or enhanced streets must reflect the principles in Manual for Streets.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	3	12	1
Local Planning Authorities	10	10	2
Government Agency / Other Public Sector	4	3	1
Professional Bodies / Interest Groups	11	16	5
Voluntary Sector	2	6	3
Other	5	6	7
Total	35	53	19
% (figures may not sum due to rounding)	33%	50%	18%

Question Responses – Summary Analysis

Overall the policy was welcomed, particularly the more explicit reference to Manual for Streets. However, some respondents felt that the policy would benefit from more content on the design of streets.

A number of respondents highlighted that the current standard approach to the design and layout of new development is very often based on standardised, engineered street designs which are principally focused around the private car. In order to create well-designed, people orientated streets as standard, it was suggested there needs to be a step change in the approach to street design by all involved, including highway engineers and developers.

A number of respondents raised concern about the impact of maximum car parking standards on street design. It was suggested that this can result in local parking problems and vehicles dominating the street.

Welsh Government Response

PPW has been updated to further emphasise the expectation for the creation of well-designed, people orientated streets. The policy states that the design of new or enhanced streets should respond to urban design principles, including those in Manual for Streets and the Active Travel Design Guidance, and not adhere to ridged standards as stated, for example, in Design Bulletin 32. A multi-disciplinary approach is required to ensure the design of streets contributes to the creation of high-quality places and planning authorities should challenge development proposals with standardised, prescriptive, engineering-focussed, risk-adverse street designs

PPW recognises that how and where cars are parked can be a major factor in the quality of a place. The policy has been updated to clarify that a design-led approach to the provision of car parking should be taken. Good design is key to achieving lower levels of car parking, whilst not allowing vehicles to dominate the street or inconvenience people walking and cycling.

Q21 Do you agree with the requirement for non-residential development to have a minimum of 10% of car parking spaces with ULEV charging points? If not, please explain why.

Question Context

The draft PPW Edition 10 introduced a new policy to encourage the use of Ultra Low Emission Vehicles (ULEV). The policy required a minimum of 10% of non-residential car parking spaces to have ULEV charging points. The intention for this was to be applied flexibly to ensure the level, location and type of charging provision is appropriate to the scheme and local circumstances.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	3	12	1
Local Planning Authorities	11	4	6
Government Agency / Other Public Sector	4	3	0
Professional Bodies / Interest Groups	11	16	2
Voluntary Sector	2	5	2
Other	5	9	5
Total	36	49	16
% (figures may not sum due to rounding)	36%	49%	16%

Question Responses – Summary Analysis

In general, the introduction of a policy on ULEV was supported. There was recognition of the benefits of ULEVs and that there is currently a lack of charging points. However, there was not universal support and some respondents raised concern that this could give priority to private cars, with the potential to encourage car use, and that it is an unproven technology.

There were a number of comments querying the requirement of a minimum of 10% of non-residential car parking spaces to have ULEV charging points. Some respondents suggested that 10% is an arbitrary requirement, whilst others thought it was a reasonable figure and a good starting point. It was suggested that there should also be a specific requirement for residential development. It was also highlighted that charging points need to be well designed and located.

Welsh Government Response

ULEVs have an increasingly important role to play in the decarbonisation of transport, particularly in areas with limited public transport services, and this is reflected in PPW. The requirement for 10% of car parking spaces to have ULEV charging points relates to non-residential development, but the planning system should encourage and support the provision of ULEV charging infrastructure as part of all new development. PPW has been updated to ensure the provision of ULEV charging points is planned as part of the overall design of a development. It states that charging points must not cause an obstruction to walking or cycling, should be resistant to vandalism, and located where there is good lighting and natural surveillance. This policy does not relate to residential development as this will be addressed through the Building Regulations.

Q23 Do you agree with the changes to Telecommunications section of the draft PPW? If not, what other changes could be made to clarify the situation? If not, please explain why.

Question Context

The draft PPW Edition 10 updated the mobile telecommunications section of PPW to recognise the important economic benefits of having good, reliable and fast communication networks. It encouraged planning authorities and network operators to work collaboratively to identify areas of limited connectivity and ways the planning system can help to address this. It also sought to clarify the situation regarding mobile phone developments and health.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	14	1
Local Planning Authorities	4	12	4
Government Agency / Other Public Sector	3	6	0
Professional Bodies / Interest Groups	13	16	0
Voluntary Sector	1	9	0
Other	4	10	4
Total	26	67	9
% (figures may not sum due to rounding)	25%	66%	9%

Question Responses – Summary Analysis

Many of the respondents to the consultation considered that telecommunications (mobile services / broadband) are essential everyday services alongside other utilities and should be regarded as an important element of the planning system. However, this was caveated that progress in this area should not put Wales' landscape and countryside areas at risk from undue impacts caused by multiple installations.

Particular responses wanted stronger emphasis placed on the need for site sharing to be considered, to reduce the overall need for new sites. It was also suggested that the title of the section be renamed "Electronic Communications" to reflect the legislative context within which this policy area sits.

Welsh Government Response

In response to representations received the title of the section has been renamed as 'Electronic Communications'. We have also strengthened the wording of the section to require more proactive action by planning authorities in areas where mobile signal is weak or non-existent. The section on mast sharing has been strengthened to state that approaches to sharing should be justified in applications. New text also states that developers should engage with planning authorities and the community to scope possible locations for new infrastructure that bring additional benefits.

Changes to the fixed line broadband section state that, as an essential service, new development proposals should include the provision of broadband services from the outset.

Q24	Do you agree with the location of the transport infrastructure section in the Productive and Enterprising Places chapter? If not, please explain why.
------------	---

Question Context

The draft PPW Edition 10 grouped transport infrastructure with other forms of infrastructure in the Productive and Enterprising Places chapter. This section included planning policy on public transport infrastructure, the strategic road network, ports, airports and freight. The policy sought to ensure the planning system facilitates the delivery, decarbonisation and improvement of transport infrastructure, in a way which reduces the need to travel, particularly by private vehicles, and promotes sustainable transport. The policy was designed to be read in conjunction with the overarching transport planning policy, which is located in the Active and Social Places chapter.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	11	1
Local Planning Authorities	8	3	9
Government Agency / Other Public Sector	3	5	0
Professional Bodies / Interest Groups	13	13	5
Voluntary Sector	1	6	4
Other	6	7	6

Total	35	45	25
% (figures may not sum due to rounding)	33%	43%	24%

Question Responses – Summary Analysis

There were mixed views on the inclusion of transport infrastructure in the Productive and Enterprising Places chapter. Some respondents thought this was the correct location and acknowledgement that the revised PPW will require a different way of working. However, a number of respondents felt that it would be better if all transportation issues were dealt with in one chapter.

There was concern that the separation of transport policy could free major projects, like new road schemes, from the sustainability considerations covered by the wider transport policy. It was suggested that a new section be added relating to transport sustainability.

Welsh Government Response

Transport infrastructure, which relates to the strategic movement of people and goods, will remain in the Productive and Enterprising Places chapter. The overarching transport policy has been moved to the start of the Active and Social Places chapter and a new section on sustainable transport added, which applies to transport infrastructure.

Q25 Do you agree with the new requirements for local renewable energy planning as set out in the draft PPW? If not, please explain why.

Question Context

Following the establishment of renewable energy targets for Wales, the draft PPW Edition 10 introduced the requirement in policy for local authorities to establish targets for renewable energy generation in their development plans. The draft policy also explicitly required planning authorities to identify spatial areas in their development plans where renewable energy developments will be permitted.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	8	7	3
Local Planning Authorities	4	7	11
Government Agency / Other Public Sector	5	4	0
Professional Bodies / Interest Groups	13	17	2
Voluntary Sector	4	5	3
Other	7	7	5
Total	41	47	24
% (figures may not sum due to rounding)	37%	42%	21%

Question Responses – Summary Analysis

There was generally support for the introduction of a policy on local authorities identifying renewable energy targets in development plans. However, respondents stated that targets would need to be meaningful and capable of facilitating deliverable projects. In relation to the policy on planning authorities establishing spatial policies in their development plans, respondents highlighted that this should be dependent on the conclusions drawn from the supporting Renewable Energy Assessment. For both, respondents raised concern that these policy tools could be used to constrain renewable energy potential, rather than the intention to maximise potential.

It was highlighted that there could be benefits of planning authorities taking a regional approach to developing evidence and an energy strategy, and using this to set targets and identifying renewable energy search areas.

A number of respondents commented on the Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, which provides guidance on how an evidence base can be developed. There were calls for it to be updated, as well as concerns raised about it being used too rigidly and not reflecting local circumstances.

Welsh Government Response

Targets and spatial policies are intended to be used by planning authorities to support, guide and maximise renewable and low carbon energy development potential. These policies should be informed by an evidence base, which identifies the opportunities for renewable and low carbon energy in a planning authority's area. The Toolkit for Planners provides a suggested approach to developing an evidence base, but should be adapted to local circumstances to enable renewable energy opportunities to be maximised and methodological assumptions should not be used to constrain the identified resource. This has been clarified in PPW, along with encouraging innovation and for planning authorities to develop an evidence base and policies appropriate to their area. PPW has also been updated to identify that there may also be benefits to planning authorities working together on a regional basis.

Q26	Do you agree with the use of the energy hierarchy for planning as contained in the draft PPW? If not, please explain why.
------------	---

Question Context

The draft PPW Edition 10 included all energy and sustainable buildings policies in the same section to highlight the integrated nature of these issues. This is exemplified by the use of an energy hierarchy for planning which sets out a preferred approach to energy planning to guide energy related choices in the planning system.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	8	9	1

Local Planning Authorities	9	6	5
Government Agency / Other Public Sector	7	2	0
Professional Bodies / Interest Groups	15	14	1
Voluntary Sector	7	8	0
Other	6	8	5
Total	52	47	12
% (<i>figures may not sum due to rounding</i>)	47%	42%	11%

Question Responses – Summary Analysis

There was significant support for the principle of the energy hierarchy. However, some respondents raised questions about the role of the planning system and planning authorities in implementing the policy.

Welsh Government Response

The Welsh Government expects all new development to mitigate the causes of climate change, in accordance with the energy hierarchy for planning. The policies in the energy section of PPW set out how the planning system and planning authorities should support this objective and implement the energy hierarchy. As well as supporting renewable and low carbon energy development, the planning system also has an important role in reducing energy demand and increasing energy efficiency, through the location and design of new development. All aspects of the energy hierarchy have their part to play, simultaneously, in helping meet decarbonisation and renewable energy targets.

Q27 Do you agree with the approach taken to coal and onshore oil and gas as contained in the draft PPW? If not, please explain why. Please consider each source separately.

Question Context

The draft PPW Edition 10 placed energy minerals in the energy section and removed it from the minerals section, compared to PPW Edition 9. The extraction of coal and onshore oil and gas for the purposes of energy generation were placed at the bottom of the planning energy hierarchy reflecting their position as the least preferred source of fuel for power generation.

The policy content was amended to fit with the UK wide plans to phase out coal powered generation and Welsh Government's progressive aspirations to address climate change and to avoid being 'locked in' to future fossil fuel extraction. Planning policy was amended to limit coal extraction and state that planning permission should not be granted. Policy relating to onshore oil and gas placed higher thresholds for consideration of planning applications.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	10	4
Local Planning	10	7	4

Authorities			
Government Agency / Other Public Sector	4	4	0
Professional Bodies / Interest Groups	10	17	2
Voluntary Sector	5	5	0
Other	4	10	3
Total	34	53	13
<i>% (figures may not sum due to rounding)</i>	34%	53%	13%

Question Responses – Summary Analysis

There was strong feeling that it is not in the public's interest to pursue energy mineral exploitation; that coal and gas need to be left in the ground and that while oil and gas exploration may assist in a reduced carbon economy, it is still antithetical to a decarbonising economy.

There was however some support, albeit small, for continued extraction of fossil fuels.

Some felt PPW should include a presumption against further exploration of all fossil fuels and support development of environmentally sound alternatives in order to achieve Wales' carbon reduction targets and that policy to restrict opencast coal mining should apply to exploratory drilling and unconventional oil and gas proposals.

While others felt alternative solutions such as district heating can help reduce gas usage.

Respondents commented that coal is used not just in energy generation but for other means such as in the steel industry and domestic use and that there could be some benefit in coal extraction in areas where historic coal mining has left areas of instability.

Some queried why the extraction of coal should not be permitted, yet it should be safeguarded whilst others saw some long term benefit to do so.

Some responses indicated that the stages of oil and gas in this chapter are confusing.

There was strong support of the restoration of mineral workings back to nature, with also a recommendation that establishes a strong presumption in favour of biodiversity as the afteruse.

Welsh Government Response

It is accepted that coal is used for other means and not just energy generation. This was already reflected in the draft but some changes have been made to reflect this and to address some public safety benefits in coal extraction in areas of land instability from former worked areas. It has also been made clear in the text that both chapter 6 of PPW and MTAN 2 contains more information on land instability.

In terms of safeguarding of coal resources, it is recognised that the policy written as proposed in the consultation paper appears contradictory. The policy has been updated to provide a flexible approach. Whilst this may not be ideal there may be a need for the question to remain open at a time of change in the energy sector.

An additional paragraph has been included under the stages of oil and gas to better explain the process and stages a planning authority would typically go through when receiving a planning application for onshore oil and gas development.

In terms of the points made regarding restoration and afteruse, PPW states that one of the key principles, in relation to mineral extraction, is to achieve, without compromise, a high standard of restoration and aftercare so as to avoid dereliction and to bring discernible benefits to communities, heritage and/or wildlife, including beneficial after uses or opportunities for enhancement of biodiversity and the historic environment.

Reference to the transportation of minerals by waterway has been added to reflect feedback from respondents.

Q28 Do you agree with the approach taken to promoting the circular economy and its relationship to traditional waste and minerals planning as contained in the draft PPW? If not, please explain why.

Question Context

Promoting the circular economy was introduced into the draft PPW Edition 10 to encourage and promote positive action and early consideration of materials choices and resource use in the planning process and to provide a greater driver for action further up the waste hierarchy. It was considered that making best use of resources can result in better location, site treatment and design choices. Also, it was considered at a strategic level there is a need to support the infrastructure necessary to move towards a circular economy.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	3	10	2
Local Planning Authorities	6	9	5
Government Agency / Other Public Sector	6	4	0
Professional Bodies / Interest Groups	18	14	1
Voluntary Sector	7	6	1
Other	6	8	4
Total	46	51	13
% (figures may not sum due to rounding)	42%	46%	12%

Question Responses – Summary Analysis

It was clear from the responses that there were various levels of understanding of the concept of the circular economy. Some respondents felt the concept needs more prominence, needing better marketing and that the importance of the circular economy should not be underplayed. One response noted that the circular economy is something that the planning system already does but can do better

Nevertheless, many responses were positive about its inclusion citing the significance that “waste” is eradicated as far as possible and that its presence will encourage and promote early consideration of materials choices in the planning process.

There were however some responses which were concerned the proposals go beyond the remit and expertise of the planning system and that it is perhaps too aspirational. Alongside this, some felt there would be practical difficulties with implementation.

There were a number of helpful comments on the minerals section with suggestions including safeguarding and extensions.

Welsh Government Response

The wording in this chapter has been amended and clarified and where possible simplified..

A full description of the circular economy has been provided and references have been provided in PPW to research which has been undertaken by Constructing Excellence Wales. The research highlights the positives the circular economy brings and also how achievable it is through best practice examples.

A suggestion was made to referencing the creation of locally uncontaminated soils bank where local communities could access and re-use resources. While specific mention of a soils bank has not been referred to, PPW does advocate the use of “urban quarries” and re-processing facilities to avoid the creation of waste which cannot be effectively re-used due to a lack of available facilities.

The paragraph referenced 4.167 in draft edition 10 (now paragraph 5.11.21) has been re-written so that it reads less like a list of materials preferences and more about promoting the most appropriate material available to help prevent the depletion of non-renewable resources and prevent waste arising.

Paragraph 14.3.6 from PPW edition 9 has been reinstated into edition 10 following respondent’s comments.

A number of suggestions have been reflected such as issues of availability of waste materials and supply, reference of transport of minerals by waterway and lack of evidence to the approach.

In terms of extending a minerals operation, it is noted that there may be additional benefits to this as opposed to a new development. A new paragraph has been put into edition 10 which recognises, for instance, the benefits of shared infrastructure to an extension as opposed to working a new Greenfield site

Q30	Do you agree with the approach taken to landscape, biodiversity and green infrastructure? If not, please explain why.
------------	---

Question Context

The draft PPW Edition 10 retained a similar thrust to the policy contained in PPW Edition 9 with the focus remaining on the protection and enhancement of the natural environment. The legislative requirements (WGFG Act and Environment Act) were strengthened, elaborated and re-presented. The draft included reference to the resilience of ecosystems

and the wider benefits to be derived from embracing such an approach and green infrastructure.

Key specific changes included additional detail on local landscapes, geodiversity and landscape information, outlining a planning approach to Section 6 duty requirements of the Environment Act to conserve and enhance biodiversity and increase the resilience of ecosystems, including elevating 'net benefit' and no significant loss of biodiversity from TAN 5, and explicit recognition of green infrastructure and the requirement to prepare assessments.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	9	5
Local Planning Authorities	7	4	9
Government Agency / Other Public Sector	4	5	0
Professional Bodies / Interest Groups	16	14	3
Voluntary Sector	5	6	4
Other	6	5	11
Total	40	43	32
% (figures may not sum due to rounding)	35%	37%	28%

Question Responses – Summary Analysis

Responses to this question were generally positive, but caveated; calls were made for clarity on specifics and for more guidance on details. The structure and presentation of these policy topics was questioned, as drafted, weighting was felt to be disproportionate. For instance, the Green Infrastructure section was felt to be of such critical importance to drive the placemaking approach that it should be placed upfront in the document. The net benefit for biodiversity policy was generally supported, but concerns were raised about the conflict of this approach with established development principles and practicalities in implementation and monitoring of 'no significant loss'. Criticism was levelled at the lack of guidance on Habitats Regulations Assessment. The structure of the landscape policy section was queried and the lack of consideration of the impacts on the setting of a designated landscape was questioned. Particular concern was raised regarding the 'all landscapes matter' policy. Green Infrastructure Assessments were supported; however, local planning authorities raised concerns about the resource implications of this new policy. Finally, particular concern (2,000 plus individual representations) was voiced over wording choices to support ancient woodland protection.

Welsh Government Response

Welsh Government has reflected on the specifics of the concerns raised and in the final version of PPW, policies will be tighter and clarity given where it was felt to be lacking. For example, in considering the aspects of ecosystem resilience as laid out in the Environment

(Wales) Act 2016, more detail has been given on how planning responses can help to deliver against these attributes. The step wise approach to maintaining and enhancing biodiversity has been re-ordered, tightened up and strengthened in places. An additional paragraph has been added to address the lack of guidance on Habitats Regulations Assessment. The assertion that the ‘all landscapes matter’ policy is flawed and unnecessary is rejected. This policy underpins the placemaking approach in PPW; all landscapes have an intrinsic contribution to understanding a sense of place. Finally, the paragraph on protecting ancient woodland has been redrafted; responding to concerns about loose wording choices. The policy reflects Welsh Government’s commitment to protecting ancient woodland.

Q31 Do you agree with the approach taken to distinctive coastal? If not, please explain why.

Question Context

The general premises of the policy contained in draft PPW Edition 10 from PPW Edition 9 were largely unchanged. There were some additional elements including separating out and more fully explaining the unique characteristics of coastal areas, a greater emphasis on the role of the Shoreline Management Plan and appropriate planning responses and consideration of the role of the coast and its management in combination with recognition of wider benefits and well-being.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	3	9	2
Local Planning Authorities	6	11	2
Government Agency / Other Public Sector	5	4	0
Professional Bodies / Interest Groups	14	14	1
Voluntary Sector	1	7	1
Other	8	8	2
Total	37	53	8
% (figures may not sum due to rounding)	38%	54%	8%

Question Responses – Summary Analysis

Respondents generally welcomed the updated policy on coastal characteristics. Comments largely related to proposed additions or requesting clarifications to improve the policy.

In particular there were calls to give further guidance on the relationship between PPW and the Marine Plan, seascape and seascape assessments, further detail on the nature of Shoreline Management Plans and the weight to be attached to them. Others felt that resistance to change through too much emphasis on preservation/protection would not deliver on rebuilding the vitality of coastal communities.

Various detailed suggestions included the need to reference the risks and benefits of incremental change, that irreplaceable habitats should be protected, that an explicit geodiverse approach should be employed and there should be a fuller acknowledgement of the historic environment. In particular, lack of reference to intervisibility between land and sea was considered to be an important omission.

Welsh Government Response

Based on the comments received additional text and clarifications have been incorporated into the final policy. These changes improve the policy and particularly relate to referencing the Marine Plan, the provision of further detail on Shoreline Management Plans, reference to seascape and intervisibility and additional policy in relation to incremental changes to development and risk.

Q32	Do you agree with the approach taken to air quality and soundscape? If not, please explain why.
------------	---

Question Context

The draft PPW Edition 10 retained the key principles of the policy from PPW Edition 9, but they were developed and elaborated as part of a more robust framework for addressing air quality and noise based on long term, prevention and integrated ways of working and contribution to well-being goals. The concept of soundscape was introduced to recognise the positive contribution of sound as part of the experience of place rather than just recognising noise as a source of pollution.

The draft PPW Edition 10 recognised there are no safe limits of airborne pollution, that the planning system can be a positive way of reducing average levels of pollution, that long term approaches should be taken, that noise and air pollution often arise from the same sources and can be addressed together and the agent of change principle had been explicitly introduced, particularly as far as this principle is an integral part of addressing compatibility of uses and activities.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	2	12	1
Local Planning Authorities	8	10	3
Government Agency / Other Public Sector	8	2	0
Professional Bodies / Interest Groups	11	18	1
Voluntary Sector	8	3	0
Other	5	9	5
Total	42	54	10
% (figures may not sum due to rounding)	40%	51%	9%

Question Responses – Summary Analysis

In general terms the policy was welcomed as a substantial improvement and a step forward when compared to current policy. This extended to support for the greater recognition of the preventative role of planning, the concept of soundscape, the acknowledgement that national air quality objectives are not safe levels, the references to well-being and public health as key components of the policy and the references to green infrastructure and its role in mitigation. As a counter point to general support more guidance was requested to aid implementation, including better cross referencing to other policies such as active travel and assessing soundscape.

A small number of respondents felt that whilst there was logic to bringing air and noise pollution together it would be helpful for them to be treated separately. Alongside this there was a feeling that the policy was too focused on road transport impacts. Air quality was felt to be particularly difficult topic to address and it was questioned whether the policy actually gave any practical solutions, although it was noted that it at least offered the opportunity for conversations to take place. There was felt to be a need for guidance at both plan and individual proposal level, particularly to enable conflicts to be resolved. Some detailed suggestions were made which require further consideration.

There were differing views regarding technical matters, particularly in terms of whether circumstances for requiring detailed assessments should be identified and specified. Some felt prescription was necessary, whereas others felt that flexibility was needed. All agreed that where technical assessments were needed they should be done as early as possible in the process.

It was felt there should be explicit reference to intensive agricultural units in this section covering their location relative to sensitive areas and the lack of a mechanism to address cumulative effects (outside of the EIA process). Suggestions included a zoning and traffic light system for development plans and ecological air quality management areas. Allied to this, there was a feeling amongst some respondents that novel types of development should be addressed, citing the precautionary principle.

Welsh Government Response

A number of helpful and detailed suggestions were made as part of the consultation exercise and these have been taken on board as far as appropriate. Some comments warrant further consideration and given that Welsh Government is committed to undertaking work to prepare a technical advice note on planning for air quality and soundscape these comments will be addressed as part of this process.

In particular, amendments which provide a more coherent recognition of the role of plans in addressing air quality and soundscape issues, the importance of design and early involvement of key stakeholders and the effects of cumulative development on sensitive receptors have been made. References to potential agricultural pollution and novel developments have been incorporated in response to comments, with the caveat that any substantial amendments would need to be subject to further consultation.

A number of comments questioned the practicalities of implementing the policy approach and the challenges associated with this are acknowledged. Where possible, changes have been made to the draft but these matters will primarily be dealt with through the provision of further guidance.

Q33 Do you agree with the approach taken to water services as contained in the draft PPW? If not, please explain why.

Question Context

The draft PPW Edition 10 more fully explains the complex interactions between development and water services than PPW Edition 9 by including stronger attention on the fact that discharge of surface water to combined sewers should not take place, greater emphasis on the role of water and its management and links to wider benefits and well-being and greater emphasis on Suds.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	11	3
Local Planning Authorities	7	10	2
Government Agency / Other Public Sector	5	4	0
Professional Bodies / Interest Groups	8	21	1
Voluntary Sector	8	6	1
Other	7	9	2
Total	36	61	9
% (figures may not sum due to rounding)	34%	58%	8%

Question Responses – Summary Analysis

Respondents expressed the need for more information in relation to SuDs and the new legislative requirements of the Flood and Water Management Act 2010, particularly to provide clarity about the interface between planning and the SAB process. Some detailed comments were made in relation to design and close working with the SAB body, the benefits of collaborative/strategic/community types of approaches for SuDs over wide areas. Others, however, felt SuDs requirements were disproportionate, unrealistic and would result in developments being cancelled. Generally there were calls for more guidance.

A wide ranging spread of respondents felt the mechanisms for water infrastructure planning did not work effectively. The plan system does not influence the AMP (Asset Management Process) process employed for water infrastructure planning and there is no statutory duty for water companies to work with planning authorities to support emerging plans. It was felt that the uncoordinated nature of the system would continue so long as developers were willing to pay but this dilutes the certainty of the plan led system, whereas others wanted more prescription through policy to achieve better coordination. In this context, some respondents felt there was a need for greater clarity over roles and responsibilities. Detailed suggestions were put forward on all of these points.

Detailed comments were put forward in relation to intensive agricultural units, particularly in relation to cumulative effects on the water environment, with requests for policy direction (and the connection with air quality).

Some respondents questioned how water services formed part of place making and others stated the role of planning should not be to provide for cumulative benefits, rather it should merely ensure there are no detrimental effects over wider areas. Others disagreed with this and supported the focus on opportunities to secure various benefits through integrated approaches to SuDs and various on and off site nature based measures.

Welsh Government Response

Based on the comments changes have been made to the policy, primarily through referencing the requirements of the Flood and Water Management Act 2010 and emphasising the importance of considering SuDs at an early stage in the planning process, including as part of design choices. The need for close collaboration with the SAB has been added.

The effectiveness of the relationship between water infrastructure provision and the planning process is noted. The need for effective co-ordination is recognised in the policy so far as this is within the remit of PPW, whilst it is acknowledged that these amendments are minor and do not change the position which persists. Fuller cross referencing and clarifications have been made, which are intended to make roles and responsibilities and the context in which infrastructure is considered clearer.

Wider comments relating to the water environment as part of placemaking have been considered and in the context of maximising the contribution of the planning system to the well-being goals and the ways of working contained within the Well-being of Future Generations (Wales) Act it was not considered appropriate to dilute draft policy which seeks to take a proactive and positive approach towards achieving sustainable outcomes.

Q34	Do you agree with the approach taken to addressing environmental risks and a de-risking approach? If not, please explain why.
------------	---

Question Context

The draft PPW Edition 10 places environmental risks, such as land contamination and instability, in the context of 'de-risking'. De-risking can be understood as unlocking the potential of places through managing risk and identifying opportunities. It depends on obtaining greater transparency about risk and opportunity, promoting approaches where collaboration between agencies occurs and information, evidence and assessments could be re-used, recycled and shared.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	4	10	2
Local Planning Authorities	5	12	3
Government Agency / Other Public Sector	6	4	0
Professional Bodies /	14	15	1

Interest Groups			
Voluntary Sector	3	6	1
Other	5	8	7
Total	37	55	14
% (figures may not sum due to rounding)	35%	52%	13%

Question Responses – Summary Analysis

There were a number of positive responses to this question. It was felt that the policy is entirely coherent with the Well-being of Future Generations Act, while enhanced transparency and sharing of data with an understanding of the impact on the environment has to be a positive outcome. Some felt more information is needed to understand the potential requirements of de-risking or that they did not disagree with the principle but felt more clarity was needed, particularly in terms of practical requirements and the term De-risking” was deemed to be jargonistic. Others felt it was part of the normal planning process and should be embraced. However, there was a general feeling that it would lead to further burdens and have financial implications for planning authorities.

There were comments to support the sharing of information with developers and a suggestion of a central risk register and national land reclamation fund.

Welsh Government Response

A number of valid points were made as part of the consultation and text has been added which should help. This includes alleviating confusion over whether the onus is on the developer or the planning authority when proposing a site or sites.

Points were raised regarding land stability and a perception that the policy read as if it were only an issue for ex-mining areas and not general stability matters. This has been noted and as such, new text has been put in under the heading Physical Ground Conditions and Land Instability.

Other minor changes have been incorporated in response to calls for greater clarity.

Q35 Do you agree that other than those policy statements referred to in Questions 1 to 33 above, the remainder accurately reflect the existing policy? If not, please explain why.

Question Context

In restructuring PPW for Edition 10 the aim was to retain the majority of policy contained in PPW Edition 9.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	1	11	3
Local Planning Authorities	2	8	10

Government Agency / Other Public Sector	4	4	0
Professional Bodies / Interest Groups	9	16	5
Voluntary Sector	0	6	1
Other	3	8	6
Total	19	53	25
% (<i>figures may not sum due to rounding</i>)	20%	55%	26%

Q36 Are there any existing policy statements in PPW Edition 9 which you think have not been included in the draft of PPW Edition 10 and you consider should be retained? If so, please specify.

Question Context

In restructuring PPW for Edition 10 the aim was to retain the majority of policy contained in PPW Edition 9.

Question Responses – Statistical Overview

Respondents by type	Agree	Neither Agree nor Disagree	Disagree
Businesses	0	12	2
Local Planning Authorities	4	11	2
Government Agency / Other Public Sector	1	4	0
Professional Bodies / Interest Groups	3	17	4
Voluntary Sector	1	4	0
Other	5	8	3
Total	14	56	11
% (<i>figures may not sum due to rounding</i>)	17%	69%	14%

Question Responses – Summary Analysis

In response to the final two questions there were many different comments received on a wide variety of issues, from specific text changes; to greater clarification requested on certain policy areas; and the structure of the document as a whole.

A number of responses from planning authorities suggested that PPW reinstate the old format of PPW whereby development management and development plan considerations were highlighted in the text and where a specific box was included pinpointing statements of national policy. Other responses commented on the lack of the legal framework which was in the introductory section of the previous version of the document. In addition many questioned the lack of references in the draft document.

A notable number of responses also commented on the retailing and historic environment sections of document and the fact that they had recently been updated and now the sections were significantly shorter than previous versions.

Welsh Government Response

In redrafting PPW, the Welsh Government wanted to ensure that placemaking is embedded into the heart of the planning system. This cannot be achieved if the national planning policy document is seen as a 'tick box', instructional document that does not give planning authorities the freedom to develop their own policies and practices to make better, distinctive places which reflect the character and needs of their areas.

Where specific guidance is needed, this will be provided in the Development Plans Manual and the Development Management Manual. A revised legal context section has now been included in Annex A. References have also been added with hyperlinks where available.

With regards to the retailing and historic environment chapters, while these sections are shorter, the Welsh Government has been careful not to delete any of the core policy statements from the previous version. Additional guidance is available in the associated Technical Advice Notes.

Planning Policy Wales will continue to be kept under review with regular updates being consulted on and published where the need arises. Edition 10 of the document is the first iteration of PPW in its new form focussing on placemaking; however this is only the start of process. The Welsh Government will now be examining ways in which it can help implement placemaking in practice.

Appendix – List of Respondents by Category

Businesses

Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Arup
Associated British Ports
Barratt David Wilson Homes South Wales
Blackstone South Wales Limited
Castleoak Group
Celtic Energy Ltd
Dulas Ltd
EDF Energy
Environmental Dimension Partnership Ltd (EDP)
Environmental Dimension Partnership Ltd (EDP) – Cardiff Office
Horizon Nuclear Power Ltd
Huw Evans Planning
Innogy Renewables UK Ltd
Lichfields
Llandow Newydd c/o Lichfields
LRM Planning
National Grid
Owen Davies Consulting Ltd
RWE Generation UK plc
Savills
Sirius Renewable Energy

SP Energy Networks
Taylor Wimpey Strategic Land - Wales and West
Taylor Wimpey UK Ltd
Tidal Lagoon Power
Vattenfall
Total = 31

Local Planning Authorities

Anglesey and Gwynedd Joint Planning Policy Unit
Blaenau Gwent County Borough Council
Bridgend County Borough Council
Caerphilly County Borough Council
Cardiff County Council
Carmarthenshire County Council
Carmarthenshire County Council – Pollution and Wellbeing Team
Ceredigion County Council
Denbighshire County Council
Flintshire County Council
Gwynedd Council
Merthyr Tydfil County Borough Council
Monmouthshire County Council
National Parks Wales
Neath Port Talbot County Borough Council
Newport City Council
North Wales Minerals and Waste Shared Service
Pembrokeshire County Council
Powys County Council

Rhondda Cynon Taf County Borough Council
Swansea Council
Swansea Council, Natural Environment Section
Torfaen County Borough Council
Vale of Glamorgan Council
Welsh Local Government Association
Wrexham County Borough Council
Total = 26

Government Agency / Other Public Sector

Aberystwyth Town Council
All Wales Pollution Expert Panel on behalf of Wales Heads of Environmental Health Group
Anonymous
Anonymous
Barry Town Council
Betsi Cadwaladr University Health Board
Buckley Town Council
Cardiff and Vale Local Public Health Team
Children's Commissioner for Wales
Clwydian Range and Dee Valley AONB Joint Committee
Coal Authority
Design Commission for Wales
Future Generations Commissioner
Health and Safety Executive
Marloes & St Brides Community Council
Ministry of Defence
Natural Resources Wales
Network Rail
NHS Wales Shared Services Partnership – Specialist Estate Services
Penyffordd Community Council
Sport Wales
St Fagans Community Council
Wales Health Impact Assessment Support Unit, the Environmental
Public Health Service and Public Health Wales (combined response)
Welsh Language Commissioner
Welsh National Land Contamination Working Group
Total = 25

Professional Body / Interest Group

Anonymous
Association of Convenience Stores
Association of Local Environmental Records Centres CIC
Association of Local Government Archaeological Officers: Wales
Association Local Government Ecologists Wales
Bywyd Cymru
Carmarthenshire Cycling Forum
CBI Minerals Group
Chartered Institute for Archaeologists, the Council for British Archaeology and the Federation of Archaeological Managers and Employers (combined response)
Chartered Institution of Wastes Management (CIWM) Cymru Wales
Chartered Institute of Ecology and Environmental Management
Cofnod - North Wales Environmental Information Ltd
Community Housing Cymru
Country Land and Business Association Cymru
Cycling UK
Cylch yr Iaith
Cymdeithas yr Iaith Gymraeg
Cytûn – Churches Together in Wales
Dyfed Archaeological Trust
Dyfodol i'r Iaith (e-mail response)
Dyfodol i'r Iaith (online response)
Energy UK
Farmers' Union of Wales
Fields In Trust
Friends of the Earth Cymru
Geoconservation Cymru - Wales
Guide Dogs Cymru
Home Builders Federation
Inland Waterways Association
Institute of Acoustics (Welsh Branch)
Institution of Civil Engineers Wales Cymru
Landscape Institute
Mineral Products Association
Mobile UK
Music Venue Trust
National Assembly for Wales Cross Party Group on the Active Travel Act
National Custom and Self Build Association
National Farmers' Union Cymru
National Police Chiefs Council

Noise Abatement Society
North West Wales Rural Housing Enabler Service and Community Housing Cymru (combined response)
One Voice Wales
Pembrokeshire Branch of CPRW
Plantlife Cymru
POSW Minerals & Waste Topic Group
Ramblers Cymru
Road Haulage Association Ltd
Royal Institution of Chartered Surveyors (RICS) Wales
Royal Society for the Protection of Birds (RSPB)
Royal Society of Architects in Wales
Royal Society for the Prevention of Cruelty to Animals (RSPCA) Cymru
Royal Town Planning Institute (RTPI) Cymru
South Wales Landscape Liaison Group (SWLLG)
The British Horse Society
The Geological Society
The Law Society
Theatres Trust
Wales Environment Link
Welsh Environmental Services Association
Welsh Cycling
Welsh Sports Association
Total = 61

Voluntary Sector

Abergavenny and District Civic Society
Age Cymru
Alliance for Welsh Designated Landscapes
Ancient Tree Forum
Anonymous
Beicio Bangor
British Heart Foundation Cymru
British Lung Foundation (Wales)
Calon Cymru Network
Campaign for National Parks
Campaign for the Protection of Rural Wales - Brecon and Radnor Branch
Campaign for the Protection of Rural Wales Montgomeryshire Branch
Cardiff Cycling Campaign
Cardiff Cycle City

Care & Repair Cymru
Carnegie UK Trust
Cilgwyn Community Group
Coed Cadw – the Woodland Trust
Coed Lleol - Small Woods Association (online response)
Community Energy Wales
Glandŵr Cymru – the Canal & River Trust in Wales
One Planet Living Foundation
Planning Aid Wales
Play Wales
Social Farms and Gardens
South East Wales Biodiversity Records Centre
Small Woods (e-mail response)
Snowdonia Society
Sustain
Sustrans Cymru
Trees and Design Action Group
Wildfowl and Wetlands Trust
Wildlife Trusts Wales
Total = 33

Other

Alister Scott
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anthony O'Leary
Arqiva
Campaign for Real Ale
Chris Jones
Christopher Moorman
Cycling UK – Right to Ride representative for the Vale of Glamorgan
Dr. Dai Lloyd AM - South Wales West
Dr. David Brancher
Gary Wyatt-Williams
Glamorgan Gwent Archaeological Trust
Historic Houses
Jenny Rathbone AM
John Griffiths AM
John Mather
Julie Morgan AM
Just Food Group

Kenneth J Richards
Les Hayward
Leyton Williams
Living Streets Cymru
Marie Morgan
Mick Antoniw AM
Mike Bird
Mike Hedges AM
Mr R W Ebley
Owain Lewis
Patricia Martin

Promoters of the St Brides new settlement opportunity.
Richard Brunstrom
Roy Spilsbury – Cycling North Wales
Susan Baron
Trivallis
Wheelrights – Cycling Campaign Group for Swansea Bay
Total = 41

- ***In addition to the above, 2,562 responses were received via co-ordinated activity around the ancient woodland policy.***