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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation – summary of responses

National Development Framework
Issues, Options and Preferred Option

June 2019

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

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Introduction

1. A 12 week consultation exercise for the National Development Framework (NDF) 'Issues, Options and Preferred Option' took place between 30 April and 23 July 2018. This report summarises the responses to the consultation exercise, the Welsh Government's response and outlines the next steps.

What was the consultation about?

2. The consultation sought views on the issues, options and the Welsh Government's preferred option for preparing the NDF which will be a 20-year national spatial plan for Wales. The consultation document set out the high level issues for the next 20 years and how the NDF might address them.

Publicity

3. Stakeholders were contacted from a core consultation list held by the Welsh Government's Planning Directorate and also through the NDF newsletter. These stakeholders included all local planning authorities in Wales, together with relevant public bodies, businesses, special interest groups and professional bodies. The consultation documentation was also made available on the Welsh Government's consultation website and public drop-in sessions were held across Wales during May and June 2018. Further details are available at the following links:

Consultation: <https://gov.wales/national-development-framework-issues-options-and-preferred-option>

Getting involved: <https://gweddill.gov.wales/topics/planning/national-development-framework-for-wales/getting-involved/?lang=en>

The responses

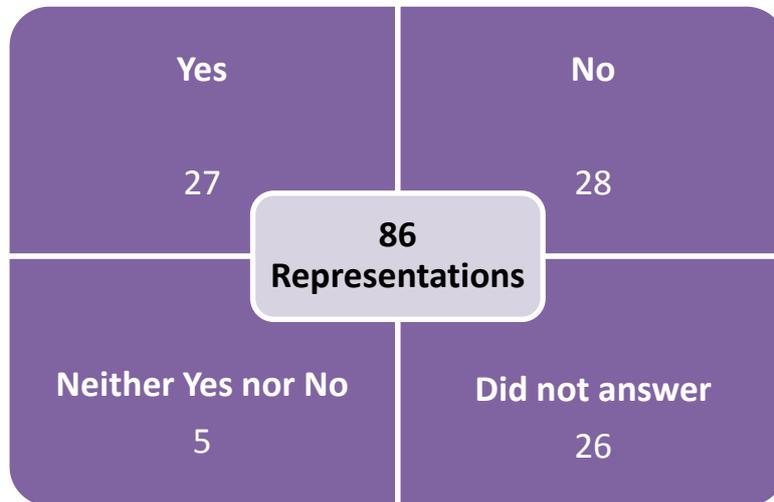
4. In total, 86 consultation responses were received. The respondents were fairly evenly split between the various organisational categories, with only 6% from the 'Private individual' and 'Other' categories. The respondents are listed in Annex 1.
5. All the responses have been considered fully and will inform the next stage of the preparation of the NDF.

Next stage

6. The next stage is the preparation of the draft NDF, with further public consultation scheduled in line with the Statement of Public Participation.

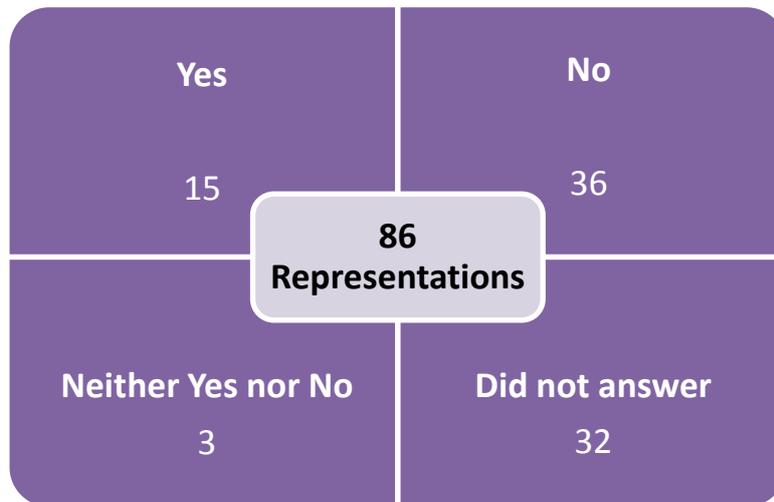
Overview of the responses to each question

Question 1a - Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?



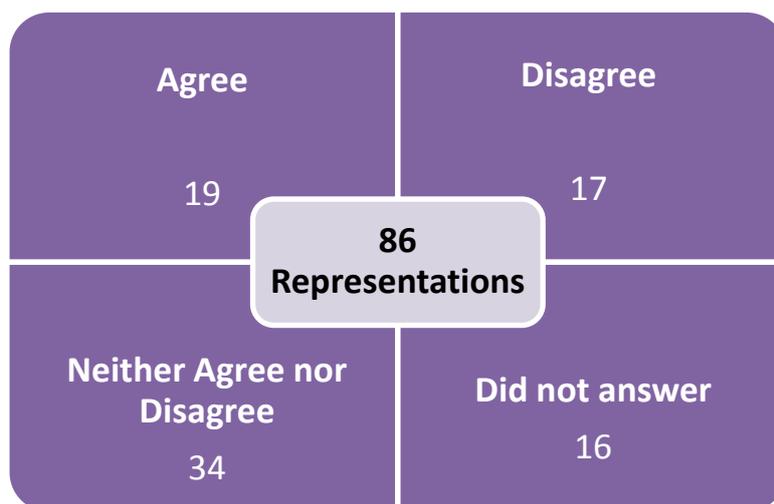
7. Respondents generally supported the findings of the ISA Report. Some respondents considered that there was a lack of spatial information and detail, in particular regarding how the NDF will operate in relation to lower tier development plans. However, it was also recognised that this was a high level document and that the detail would be considered at the next stage of preparing the NDF.
8. However, some respondents considered that the ISA lacked sufficient clarity regarding how some issues had been assessed. This particularly related to environmental issues, with the ISA considered to be more focused on maximising social and economic outcomes.
9. Some respondents commented on the way in which the ISA had been prepared. In general it was considered that this had been a collaborative process and respondents were supportive of the engagement that had been undertaken.

Question 1b - Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?



10. Respondents broadly agreed with the HRA Preliminary Screening Report. Some policy specific comments were made which will inform the next stage of ‘screening’. The view was also expressed that there was a need to set out how decisions are to be made when looking to defer the assessment to lower tier plans. In addition, some respondents considered that the HRA lacked information on matters such as buffer distances, geodiversity, landscapes and the Welsh language.

Question 2a - Do you agree the NDF Vision is clear, ambitious and realistic?

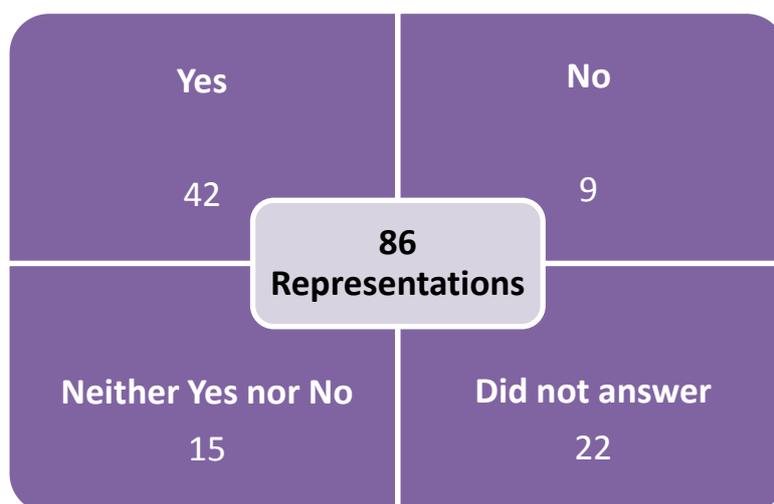


11. Respondents who answered this question were fairly evenly split between those who either agreed (27%) or disagreed (24%) with the proposition that the NDF Vision is clear, ambitious and realistic. The views of other respondents were more mixed, with almost half (49%) of those who

answered indicating that they neither agreed nor disagreed with the NDF Vision.

12. However, through their comments respondents generally supported the NDF Vision and it was considered to present a clear long-term view with links to the Well-being of Future Generations (Wales) Act 2015. Views were also expressed that there needed to be more clarity between the NDF Vision and its objectives. Others sought more clarity on how the Vision would be delivered and how it would influence spatial choices.
13. Other comments were focused more on looking ahead to the substantive NDF itself, raising detailed points about a number of specific subject areas. Issues such as the link with *Planning Policy Wales* and the NDF's role in decision-making were also raised.

Question 2b - Do you believe any changes to the NDF Vision are required? If so, what are they?

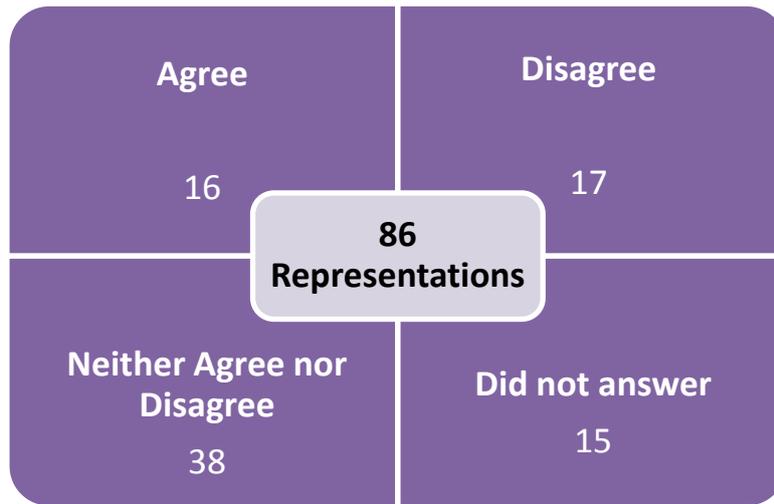


14. A majority (66%) of those who responded to this question considered that changes to the NDF Vision were required. The view expressed by a significant number of respondents was that the NDF Vision needs to be more specific, spatial and deliverable in a 20-year timeframe. Related to this, some respondents also considered that the Vision was too passive in its expression and should instead set out tangible outcomes and what needs to change to deliver them.
15. Some respondents also considered that the NDF Vision should not be looking to repeat the Well-being goals set out in the Well-being of Future Generations Act, but should instead focus on what can realistically be achieved by the planning system. Conversely, other respondents stated that the Vision needed to be more clearly linked to the Well-being goals.
16. Queries were also raised about the choice of the three regions and the relationship of the NDF with the lower tier plans. In this regard, some

respondents expressed concern that the Vision paved the way for regional priorities to be set at the national level rather than being based on work undertaken by the regions.

17. Respondents also suggested changes to include more detail in the NDF Vision on a number of specific subject areas.

Question 3a - Do you agree with the NDF Objectives?



18. Respondents generally expressed the view that there was a need for the objectives to be strengthened in a number of aspects and some respondents proposed additional objectives (see Question 3b below). In particular it was considered that the objectives needed to be framed to include clear outcomes to enable them to be effectively monitored and evaluated. Related to this, it was considered that there was a need for greater consistency in the structure and content of the objectives – some objectives were outcome driven, while others were more generalised and open-ended statements of intent.

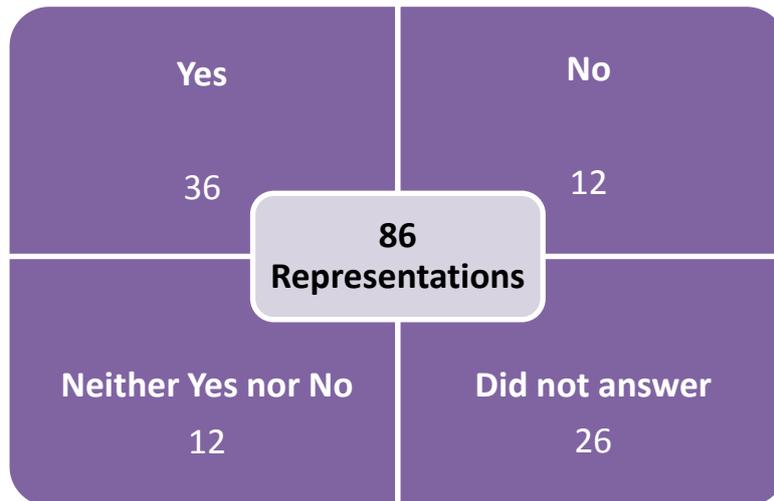
19. Some respondents considered that there was a lack of connection between the NDF Vision, the objectives and the Well-being goals. The view was also expressed that there was a lack of clarity in the alignment of the NDF objectives and the objectives set out in other documents, notably *Planning Policy Wales* and the Well-being of Future Generations Act.

20. Other respondents considered that there was a need to reduce the number of objectives to avoid the risk of conflict between them, while others were of the view that some of the objectives were outside the scope of the planning system to influence and/or deliver.

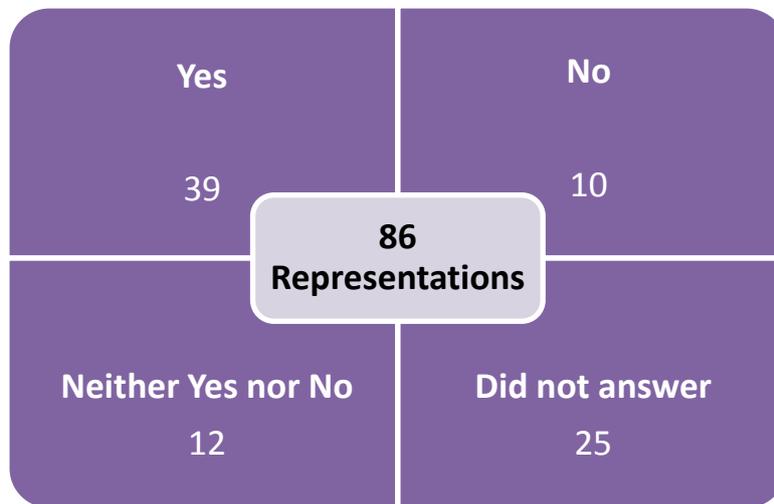
21. The way in which some of the objectives were expressed was queried by some respondents. These respondents considered that the language needed to be more positive to denote more direct action through the NDF.

22. Respondents also raised the need for some of the terminology to be explained and clarified. In particular reference was made to the need for explication about how 'place-making' underpins the NDF preferred option and for criteria for determining that an area is 'rural'.

Question 3b - Do you consider any additional objectives are required? If so, what are they?



Question 3c - Do you consider any of the NDF Objectives should be amended or removed?

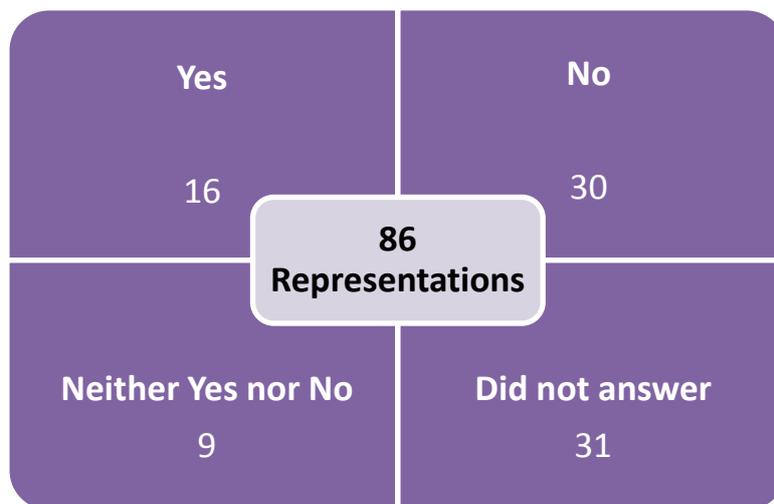


23. Respondents' proposals for both new and amended objectives covered various aspects of a range of subjects. In particular, substantive comments and additions / amendments were made regarding the following subjects:

- green infrastructure
- the Welsh language
- transport
- housing

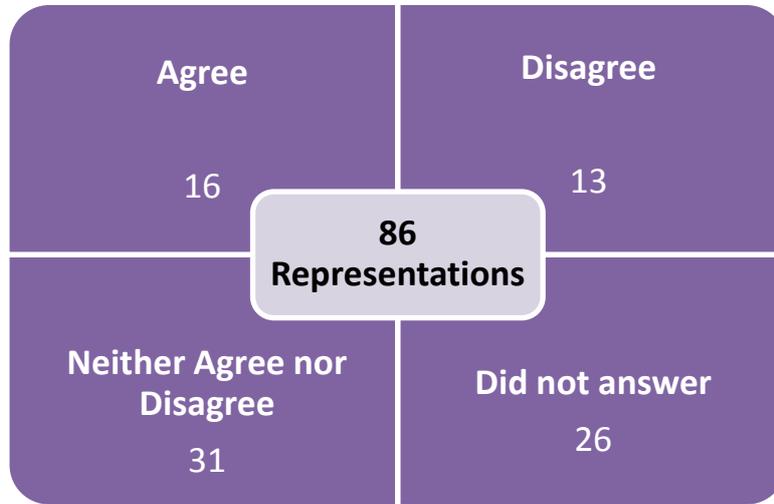
- waste
- tourism
- rural Wales
- cohesive communities
- climate change
- natural resources
- the coast

Question 3d - Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?



24. A large proportion (71%) of respondents either did not answer this question or indicated that they had no comments to make about the assessment of the NDF objectives as set out in the ISA interim report.
25. There were mixed views from those respondents who did answer the question. Some considered that ISA report clearly demonstrated how the NDF objectives had been assessed against the ISA objectives and aligned well with improving well-being, while others considered that this was unclear. Queries were also raised about specific ISA objectives.

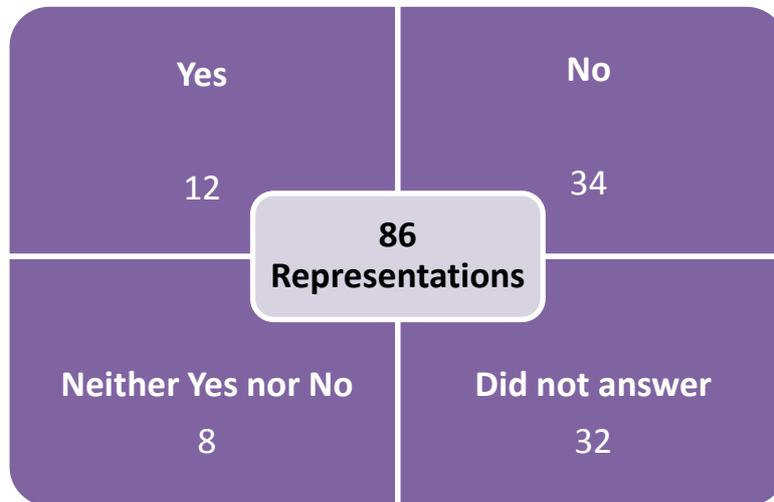
Question 4a - Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the NDF Preferred Option?



26. Respondents had mixed views on the way in which the options were developed and assessed to arrive at the 'Preferred Option'. Respondents who agreed with the approach taken, considered that it was sensible and pragmatic. Others considered that the process did not allow for the strengths and weaknesses of each option to be addressed in sufficient detail, including in relation to the goals of the Well-being of Future Generations Act.

27. Some respondents queried how the issues identified had been translated into the various options, including the 'Preferred Option'. The view was also expressed that it would have been better if all the options had been achievable, leading to the identification of several hybrid options.

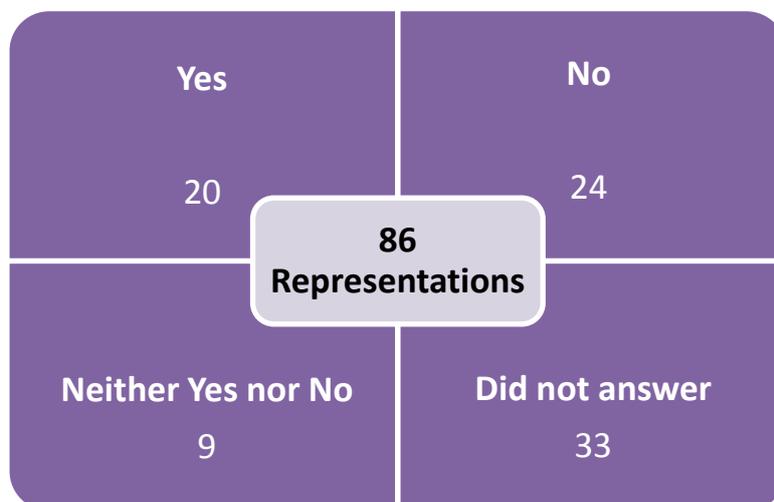
Question 4b - Do you have any comments on the assessment of the NDF Options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?



28. A large majority (77%) of respondents either did not answer this question or stated that they had no comments to make on the assessment of the NDF Options as set out in the ISA interim report and the preliminary HRA screening report.

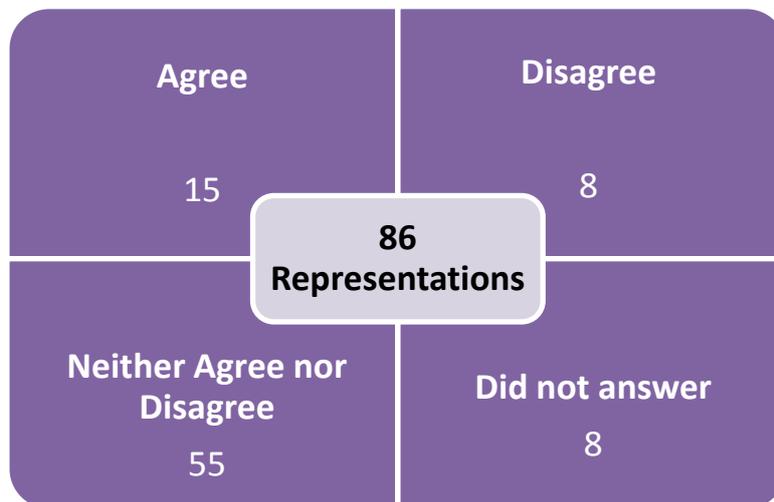
29. Those respondents who commented generally considered that the assessment was sufficiently thorough for the NDF process to proceed, while others made specific comments on the options, often by reference to their responses to previous questions.

Question 4c - Are there further alternatives/options that should be considered for the strategic direction of the NDF?



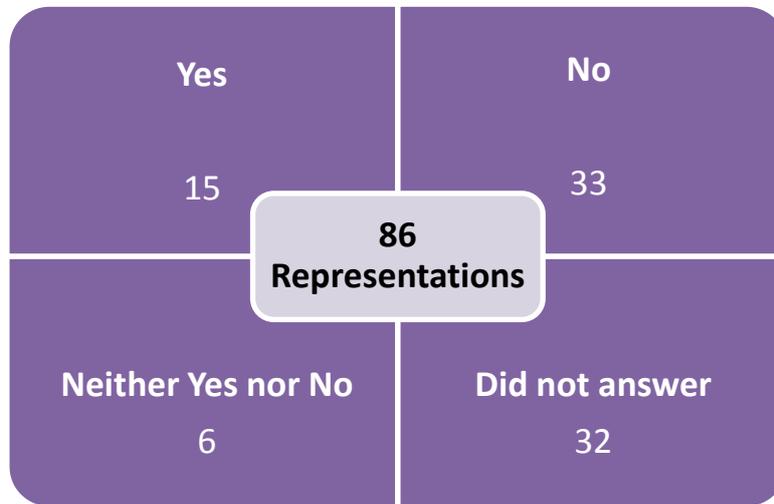
30. There were a variety of responses to this question. Some respondents considered that the options presented covered most approaches to a delivery strategy for Wales and therefore no further options were required, while others considered that the options were too simplistic and needed to take more account of market realities and respond appropriately.
31. Some respondents referred to the modification and/or the amalgamation of the options presented. Other respondents suggested options either based around connectivity and infrastructure (including transport) or based on the 'City Deal Regions'.
32. The need for a critical review of the 'three regions' approach before adoption of the NDF was also raised in this context, particularly in relation to achieving the 'rural' objectives.

Question 5a - Do you agree with the NDF Preferred Option?



33. Although only 19% of those respondents who answered this question explicitly indicated 'agree', there was broad agreement that the NDF Preferred Option represented the most realistic and balanced approach.
34. Respondents raised a number of issues regarding how the Preferred Option would be taken forward, in particular the need for spatial definition in the next stage of the preparation of the NDF. Other issues included:
- the need for more clarity regarding the proposed three regions and their implications for Strategic Development Plans (SDPs);
 - the need to underline the importance of the strategic role of cities in the wider regions;
 - concern that the Preferred Option does not deliver sufficiently for the environment; and
 - concern about the lack of specific reference to market realities.

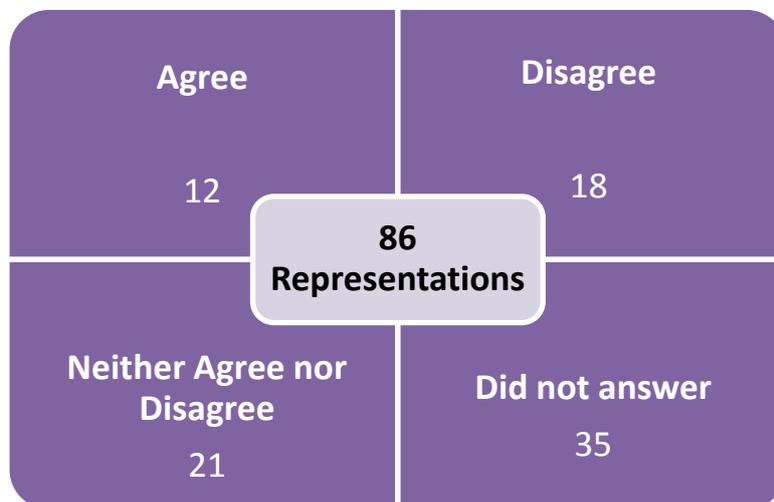
Question 5b - Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?



35. Three-quarters (76%) of respondents either stated that they had no comments on the assessment of the NDF Preferred Option as set out in the ISA interim report and the preliminary HRA screening report or did not answer this question.

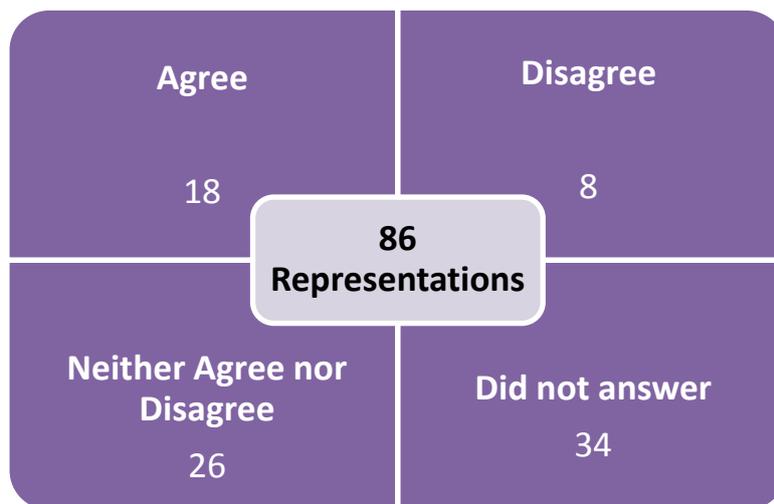
36. The other respondents broadly agreed that a sensible and pragmatic approach appeared to have been taken, with the Preferred Option incorporating the most positive elements of the alternative options. However, some concerns were expressed about the lack of quantitative environmental information and the need for an 'Environmental Report' to address this.

Question 5c - Do you believe all the NDF Objectives are adequately addressed in the NDF Preferred Option?



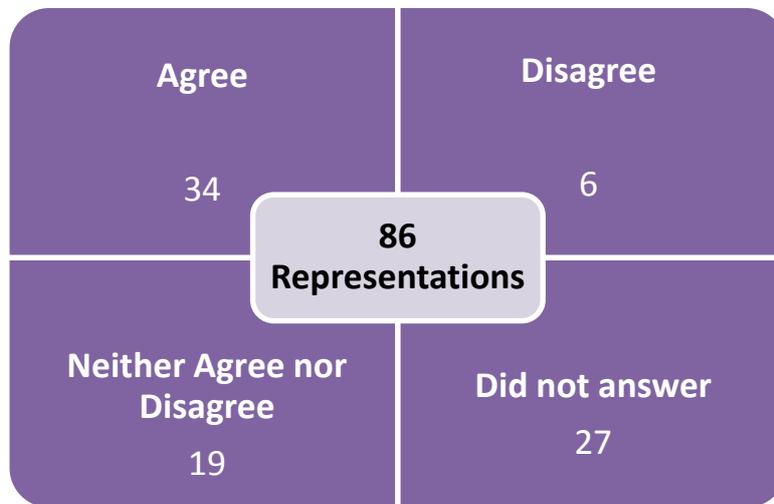
37. Respondents who answered this question generally had mixed views about whether all the NDF objectives are adequately addressed in the Preferred Option.
38. A number of respondents considered that, for the most part, the Preferred Option does adequately address the NDF objectives and translates them into a strategic policy direction. Some respondents raised concerns about specific aspects of the Preferred Option in relation to the objectives, including the need to strengthen the references to rural Wales, tackling climate change, decarbonisation and energy.
39. Other respondents expressed the view that the structure of the Preferred Option is confusing in relation to the objectives and does not lend itself to a clear demonstration that each of the objectives has been satisfactorily addressed.

Question 5d - Do you believe the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?

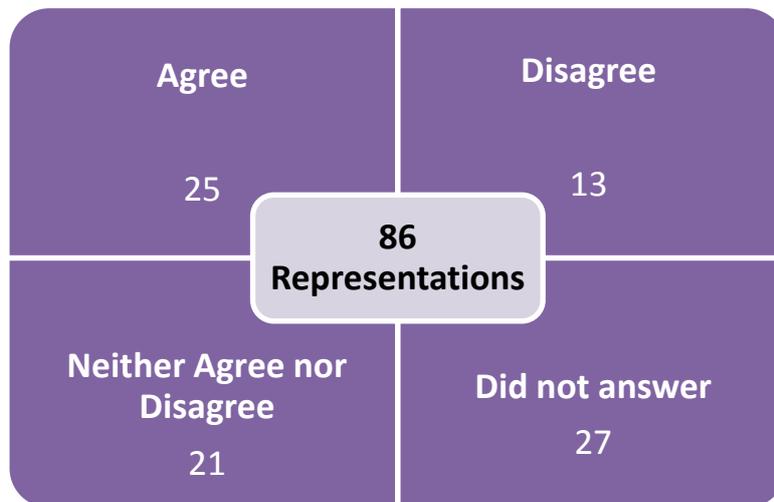


40. Respondents who answered this question were generally of the view that the Preferred Option complements the NDF Vision and has the potential to deliver it. In a number of cases this view was caveated by suggested improvements. In particular, it was considered that the policies would need to be more specific, that it would be necessary to ensure that issues such as the environment, decarbonisation, economic development and housing are addressed equitably.
41. Some respondents considered that both the Vision and the spatial strategy needed to be developed further before a full assessment could be made. In particular, it was suggested a four region approach would be more appropriate to enable delivery of the NDF Vision. The need for more recognition to be given to the importance of market deliverability was also raised by some respondents.

Question 5e - Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?



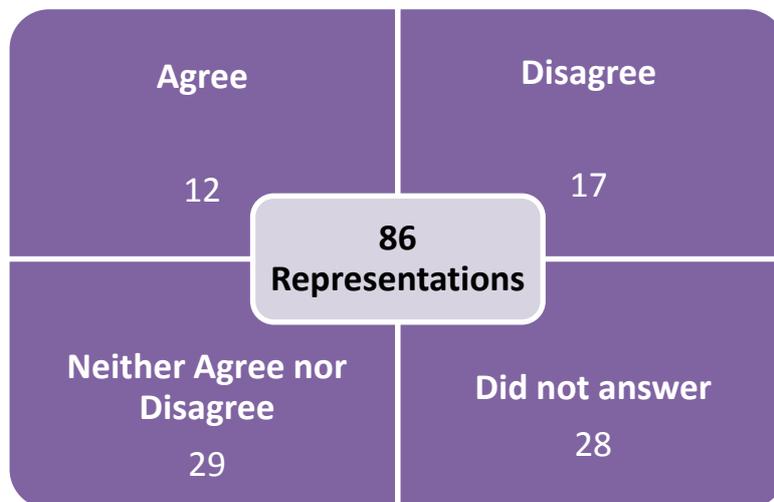
Question 5f - The NDF Preferred Option is developed around the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; and includes an additional theme on Wales' Regions. Do you agree with this approach?



- 42. Respondents who answered questions 5e and 5f made similar points in response to both questions.
- 43. The majority of respondents who answered both questions considered that it was essential for the NDF and PPW to be complementary and for this to be reflected in their structures. Respondents also considered that it was important to avoid duplication and repetition between the two documents.
- 44. Other respondents agreed that PPW and the NDF should be based on a consistent approach, but did not consider that the proposed structure was appropriate.

45. Some respondents expressed the view that although there needed to be clear linkages between the two documents, their structures were of secondary importance. The view was also expressed that the distinctly different functions of the two documents needed to be made clear in both documents and the structure of each document tailored to that purpose.
46. Those respondents who were opposed to the two documents having similar structures considered that the structure of the NDF should be based on addressing spatial issues rather than being “distorted” into the themes adopted for PPW. In general, these respondents were also opposed to the structure of PPW being based around the themes of the National Sustainable Place-making Outcomes.
47. In addition, some respondents considered that the separation into ‘themes’ was unhelpful in achieving sustainable development and place-making. Others were concerned that the proposed structure could lead to a ‘silo’ approach being taken to reading the NDF according to the themes, rather than a ‘whole system’ approach.

Question 5g - Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?



48. There was a mixed response to the spatial issues and the strategic policy direction outlined in the NDF Preferred Option. A number of respondents were generally supportive of the approach taken, while others considered that it was not specific enough and presented a limited analysis of the spatial issues and policy direction. Respondents also raised specific issues on which they either sought clarification or considered need to be amended or addressed differently.
49. **Housing figures** – A number of respondents sought clarification about the nature of the figures that would be included in the NDF and how they would be applied. In particular, it was considered that the regional figures

should not be prescriptive or restrict Strategic Development Plan aspirations. It was also suggested that the methodology for producing the housing figures needed to be transparent and regularly reviewed and updated.

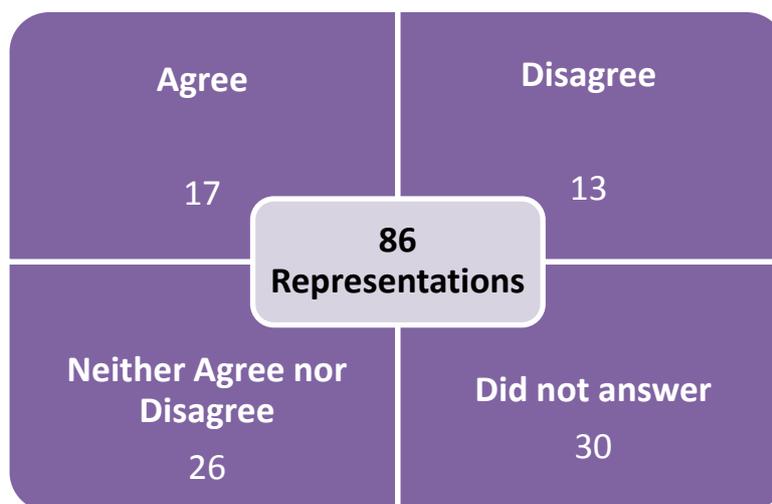
50. **Regions** – Respondents who raised this issue sought further justification for the three regions approach. In particular, concern was expressed about the Mid and South West Wales Region which was considered to be too large and both economically and geographically too diverse for spatial planning purposes. Adopting the City Regions approach was also queried as it was considered that this would reflect the existing settlement pattern and would not provide an effective basis for land use planning.

51. **Rural issues** – Some respondents were concerned about the treatment of rural areas compared with urban areas, with a particular concern being ensuring that rural areas are given the same opportunities for economic development as urban areas. Other respondents considered that there was a need for a comprehensive agenda for rural Wales to address the implications of both Brexit and climate change.

52. Other issues raised by a number of respondents included the need for:

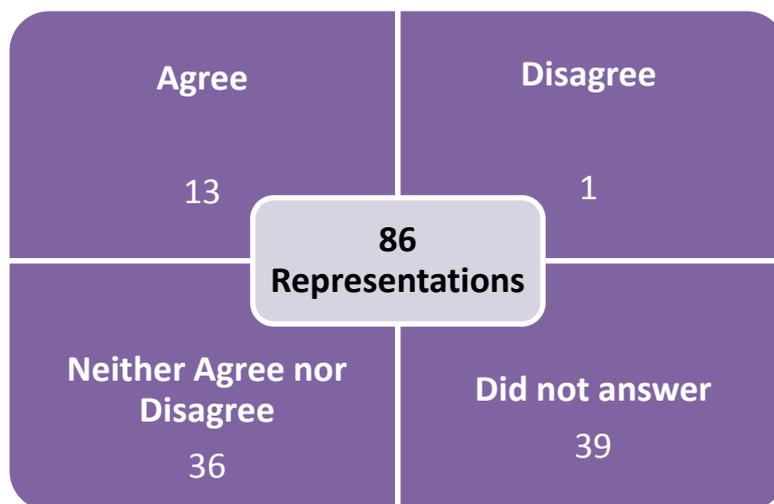
- a specific reference to protecting mineral reserves from sterilisation to ensure a steady supply for the construction industry;
- more emphasis on economic prosperity and associated transport infrastructure; and
- more prominence to be given to green infrastructure.

Question 5h - Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in its national strategy?



53. Respondents were generally supportive of the role that the NDF Preferred Option could play in the co-ordinated delivery of the priorities outlined in the Welsh Government’s national strategy, *Prosperity for All*. However a number of respondents expressed some reservations, in particular that further detail was required to enable this judgement to be made.
54. Some respondents was also considered that there was a need for clarity on the interrelationships between the two documents and with other high-level Welsh Government documents which would underpin future planning in Wales (e.g. *Planning Policy Wales*, the *Welsh National Marine Plan* and national infrastructure planning). Respondents also raised the need for cross-Government working to enable the NDF to make a meaningful contribution.
55. Other respondents were of the view that it was questionable whether the NDF could provide the vehicle for delivering the objectives of the national strategy given that the Welsh Government’s priorities are not restricted to land use based matters. The view was also expressed that to deliver the Welsh Government’s priorities the NDF would need to be more pro-development and contain an explanation of the role of the market in delivering prosperity.

Question 5i - Do you believe the Preferred Option could be formulated or changed so as to have increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?

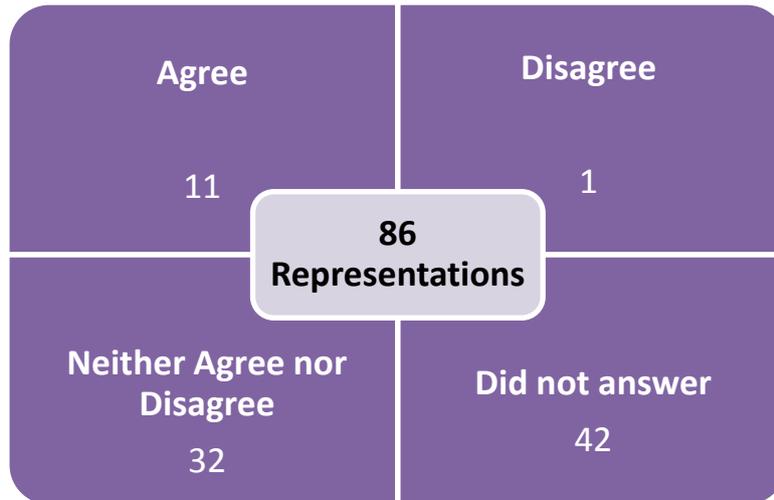


56. The relatively small number of respondents who answered this question put forward a range of views. Some respondents considered that a reference in the NDF Vision to protecting and enhancing the Welsh language would be helpful in clarifying how to treat this issue. Other respondents expressed the view that the Welsh language should be given more consideration in determining the boundaries of the regions and the distribution of growth.

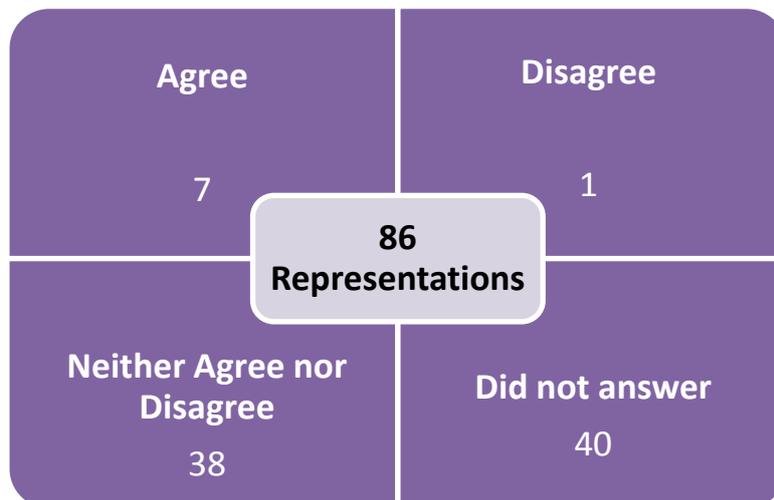
57. The view was also expressed that there is a general lack of clarity about how the planning system can realistically take account of the Welsh language.

58. Other comments were of a general nature rather than being specifically related to proposed changes to the NDF Preferred Option.

Question 6a - Do you agree with the proposed changes to the Statement of Public Participation?



Question 6b - Are there any other changes we should make to the Statement of Public Participation?



59. The small number of respondents who answered these questions strongly welcomed the Statement of Public Participation and the changes that had been made to it. The extensive participation undertaken to date was also considered to be encouraging.

60. Some suggestions for future engagement were made, including that it would be helpful if it was focused in areas that would be specifically impacted by the NDF. The need for events to be well publicised was also raised.
61. Regarding further changes, the need for documents to be written in plain English was raised, in particular the use of simple terminology and the removal of acronyms. The publication of all stakeholder responses was also requested, along with early publication of future engagement plans, including the proposed scrutiny process.
62. It was also suggested that consideration needed to be given to how the NDF preparation process would facilitate bottom-up community-derived proposals. In addition, it was suggested that re-naming the Statement to the 'Statement of Public Involvement' would help to convey that it was about people's concerns and aspirations being directly reflected in the options developed.

The Welsh Government's response

63. Full consideration is being given to all of all the issues raised in response to this consultation on the 'Issues, Options and Preferred Option' in preparing the full draft NDF for public consultation, which is the next stage in its preparation, as set out in paragraph 6 above.
64. In response to the issues raised further consideration is being given to the NDF Vision and objectives and whether they should be replaced by a single statement of planning principles or outcomes. It is recognised that there is a need to link the outcomes to the spatial strategy and to the thematic policies in a coherent way. Such an approach would provide more clarity, reduce complexity and enable the NDF to have a much clearer spatial focus with tangible outcomes. This approach would also maintain the consistency with *Planning Policy Wales*, ensuring that the NDF does not create uncertainty with the key principles and outcomes established for the planning system through *Planning Policy Wales*.
65. The relationship of the NDF with other high-level Welsh Government policies such as the Welsh National Marine Plan and those relating to national infrastructure is important. Work will continue on aligning these plans to ensure they work together to deliver common goals.
66. The full draft NDF will also include a greater level of detail on a range of policy areas and include specific policies. The policy areas will focus on the spatial outcomes to be achieved rather than over-arching policy outcomes which can be better articulated in *Planning Policy Wales*. It is not the intention for the NDF to repeat policy already contained in *Planning Policy Wales*.

67. The aim is for the NDF to support the delivery of the Welsh Government's policy areas which impact on places and help co-ordinate the delivery of these different policies to maximise positive outcomes. This will ensure the NDF supports the delivery of the relevant elements of the Welsh Government's national strategy, *Prosperity for All*.
68. The Preferred Option was developed using the evidence gathered throughout the NDF process, including public engagement, and through the findings of the Integrated Sustainability Appraisal (ISA). The ISA Interim Report sets out how that evidence and findings have shaped the Preferred Option, which has sought to take the best aspects from each of the alternatives, assessed against the ISA objectives and meeting the NDF objectives. The explanation about how the assessment of the options has informed the resulting Preferred Option will be expanded upon in the ISA Report which will accompany the draft NDF.
69. Consideration is also being given to the structure of the NDF in relation to *Planning Policy Wales*. This includes considering the alignment around the issue of 'place-making' and the policy themes in the context of the seven well-being goals under the Well-being of Future Generations Act.
70. A key role for the NDF will be setting the direction for Strategic Development Plans (SDPs) and Local Development Plans (LDPs), which will be required to be in conformity with the NDF. This will ensure that development plans at all levels are consistent and work together to deliver the required outcomes. The NDF will have development plan status and may be used directly in determining Developments of National Significance (DNS). By providing direction for lower tier plans and establishing a framework for DNS, the NDF will set a clear direction for the planning system and influence the delivery of new development.
71. The national strategy, *Prosperity for All*, sets out the Welsh Government's intention to introduce a new regionally focused approach to policy development and implementation. The Economic Action Plan takes this forward and identifies three regions. This regional footprint will be the basis for a range of Welsh Government policies and in order to develop a consistent and joined-up cross-Government approach it is considered important for there to be common spatial areas. There are Chief Regional Officers for each region to support this approach.
72. The three regions in the NDF are not by default the footprint for future regional planning arrangements and therefore do not prescribe the footprints of SDPs. It may be more appropriate in some regions for regional planning to be undertaken in a variety of ways, such as through a combination of SDPs, Joint LDPs and LDPs. This would allow for distinctive characteristics and/or City/Growth Deal issues to shape the approach to regional planning.

73. The future of rural areas and the role of the planning system in supporting these areas is a key issue for the NDF. In this context, in preparing the draft NDF consideration is being given to issues such as:

- urban / rural distinctions;
- economic activity;
- access to services and facilities;
- transport;
- digital connectivity;
- housing and jobs.

74. It is proposed that the NDF will also be accompanied by a number of explanatory notes to provide background details on some of the evidence that is supporting its preparation, for example on the national and regional estimates of housing need.

The next steps

75. The draft NDF is currently being prepared for public consultation. In addition to a formal consultation on the document, this stage in the preparation process is likely to involve further public engagement, including with stakeholders in line with the Statement of Public Participation.

76. Following consideration of the responses to the consultation on the draft plan and any other issues raised during public engagement, the NDF will be re-drafted prior to being subject to scrutiny by the National Assembly for Wales. Publication of the final document will follow the completion of this scrutiny process.

Annex 1 – List of respondents

- Abergavenny and District Civic Society
- Alliance for Welsh Designated Landscapes
- Association of British Ports
- Barratt David Wilson Homes (South Wales) Ltd
- Bay of Colwyn Town Council
- British Holiday & Home Parks Association;
- Cadw
- Caerphilly County Borough Council
- Calon Cymru Network
- Campaign for National Parks
- Campaign for the Protection of Rural Wales
- Campaign for Real Ale
- Cardiff City Council
- Cardiff Civic Society
- Care and Repair Cymru
- Carmarthenshire County Council
- Clwydian Range and Dee Valley AONB
- Community Housing Cymru
- Coriolis Energy
- Country Landowners Association Cymru
- Cylch yr Iaith
- Cymdeithas yr Iaith
- David Thorpe
- Denbighshire County Council
- Dwr Cymru, Welsh Water
- Dyfodol i'r Iaith
- EDF Energy
- Flintshire County Council
- Future Generations Commissioner
- Friends of the Earth
- Geoconservation Cymru
- Glandwr Cymru, the Canal and Rivers Trust in Wales
- Growing Mid Wales Partnership (Ceredigion and Powys County Councils)
- Gwynedd County Council;
- Hereford Council
- Home Builders Federation
- HM Prison and Probation Service in Wales
- Inland Waterways Association
- Innogy Renewables UK Ltd
- Isle of Anglesey County Council
- Lichfields
- Minerals Products Association
- Monmouthshire County Council
- National Grid

- National Museum for Wales
- National Parks Wales
- Natural Resources Wales
- Neath Town Council
- Neath Port Talbot County Borough Council
- Newport City Council – Officer Response
- North West Cardiff Group
- Nuclear Decommissioning Authority, c/o GVA
- Older People’s Commissioner for Wales
- One Voice Wales
- Pembrokeshire County Council
- Penarth Town Council
- Planning Aid Wales
- Promoters of St Brides New Settlement Opportunity
- Prospect
- R W Ebley
- Redrow homes (South Wales) Ltd
- Renewable UK Cymru
- Royal Society for the Protection of Birds
- Royal Town Planning Institute
- South East Wales Strategic Planning Group
- Snowdonia Enterprise Zone Advisory Board
- SP Energy Networks
- St Fagans Community Council
- Stephen Edwards
- Sustrans Cymru
- Swansea Council
- Taylor Wimpey South Wales
- Theatres Trust
- The Coal Authority
- Trees and Design Action Group
- Vanttenfall Wind Power Ltd
- Wales Tourism Alliance
- Welsh Language Commissioner
- Welsh Local Government Association
- Westinghouse UK
- WHIASU Public Health Wales
- Wildfowl and Wetlands Trust
- Woodland Trust
- World Wildlife Fund Cymru
- Wrexham County Council.

1 respondent requested to remain anonymous.

Copies of responses are available on request from the Planning Directorate, Welsh Government.