

Wales Spatial Plan

Pathway to Sustainable Development

Analysis of Consultation Response

April 2002

**Analysis of Responses to the Assembly's Consultation Document: Wales Spatial Plan -
Pathway to Sustainable Development**

1. Introduction

1.1 This document provides an overview of the consultation responses to the Wales Spatial Plan - Pathway to Sustainable Development. The consultation document charted the background to the Wales Spatial Plan, including its purposes, possible issues and delivery. The official consultation took place over a 12 week period from 28 September to 14 December 2001, although comments were accepted after the deadline to allow as broadly based response as possible.

2. Response profile

2.1 In total 75 responses were received (see annex 1 for details) divided between the following sectors:

Local Authorities 35% (26)

Private Sector 20% (15)

Voluntary Sector 20% (15)

Government 13% (10)

Individuals 7% (5)

Professional bodies 5% (4)

2.2 The majority of respondents completed the consultation questionnaire, with just over half of the respondents submitting their comments electronically. In terms of language preference, 6% of respondents submitted their comments in Welsh.

3. Executive summary

The consultation exercise encouraged wide debate and generated a diverse range of comments. Following the structure of the consultation document the following broad themes can be identified.

3.1 The identified purposes for the WSP were largely supported. The preferred option was a strategic framework with national planning policy status. There were also strong opinions that the plan should be a spatial representation of the aims of the Sustainable Development Scheme and consider and promote Wales within the global, European, and national context. The role of the Plan as an integration tool and resource allocation mechanism was also identified. A common theme was the need for clear links and strong collaborative working between the Plan at an all Wales level and regional and local groups.

3.2. The most significant concern relating to The Way Forward was the makeup of the Management Board and to a

lesser extent the Network. The Board was considered both over represented and under represented as regards development and environmental interests.

3.3. Whilst the Consultation Procedures received cautious support, a number of concerns were expressed particularly with regard to the purpose, and form of consultation on the draft Plan. Several groups raised the limited ability of some interested parties to fully participate and influence the Plan development. There were also several requests that the Assembly's response to the consultation exercise should be published. The use of the Internet was supported, although it should not be at the expense of traditional methods which are more widely accessible.

3.4. The suggested 20 year duration and national planning guidance status of the Plan was largely supported. Clarification was sought on the Plans relationship with existing planning policy guidance and collaborative regional working. There were also concerns about synchronisation of the WSP with the first round of UDP's.

3.5. A thematic approach to the Plans form and content was generally welcomed. The emphasis on strategic issues rather than local detail was strongly endorsed by the majority of respondents, although some contrary views were expressed in support of strategic land use allocations and the provision of strategic development sites. Certainty was proposed as an additional aspect to form and content so that stakeholders can have confidence that the WSP will deliver its objectives. The use of Geographical Information Systems (GIS) technology was welcomed as an analytical tool, although there were concerns that its maps may become 'policy' by default.

3.6. A large number of comments were made in relation to research, which suggested data sources, data sets and other research considerations to inform preparation of the Plan.

3.7. A commonly held opinion was that the timetable is too ambitious. Preparation of the Plan should not be at the expense of proper scrutiny. Some respondents considered that whilst inclusiveness was welcomed, it would not necessarily result in consensus.

3.8. The appraisal, monitoring and review process was supported in principle with a slightly stronger preference for a 5-year review interval. Sustainability appraisal of the Plan was welcomed but the choice and method of monitoring indicators required clarification. The Plan needs to integrate with preparation of other major strategies otherwise the Plan may be led rather than lead.

3.9. Concerns were voiced about scrutiny, two common themes were the lack of opportunity to challenge the Plan and the limited makeup of Plan scrutinisers. An Examination in Public or Public Inquiry was recommended by many to add legitimacy and ownership of the Plan.

Analysis of response

4. Plan purpose

Plan Purpose covered a number of subject areas. Whilst there were a number of reoccurring themes, including the relationship to existing regional and collaborative work and national planning policy, other comments were diverse

in nature.

4.1. The proposition that the WSP should be a strategic framework was widely supported. It was also generally agreed that the Plan should provide a context for Wales within the UK, Europe and internationally. In this regard, a key role would be the examination of strategic communications, linkages, and inter-regional and cross border issues. Many respondents also considered that the WSP should provide a spatial expression of relevant strategies, policies and programmes. The possibility of a link between the WSP and resource allocation was also welcomed, in particular with regard to structural and related European funds and programme and wider Assembly spending.

4.2. A number of concerns were raised regarding the relationship between the WSP and the planning system. With regard to the relationship to existing regional and collaborative work undertaken by local planning authorities, the main concerns included, whether the WSP would supersede this work and how existing work could be incorporated. The appropriate balance between a top down and bottom up approach, including the identification of issues to be addressed at the national, or, local level through the WSP, regional collaborative work or Unitary Development Plans, was also raised by several respondents. Other concerns centred on the need for the plan to be a framework within which development proposals can be assessed, providing certainty for developers and the community. The need for the WSP to examine the relationship with existing planning policy, and other policies and strategies was also raised.

4.3. Some respondents expressed the view that the WSP should go beyond traditional land use planning matters to become an integrated spatial strategy covering land use, transport, economic development, community regeneration and environmental issues. Several detailed representations were also made on the use of terminology in particular the use of the term 'environmental constraint' and the concept of 'balanced development'. Several commentators suggested that the environment should also be viewed as a resource that provided opportunities for appropriate forms of development.

5. The way forward

Many comments were made regarding the role, effectiveness and makeup of the Management Board and to a lesser extent the Network, and the relationship to local government

5.1. Respondents agreed that the existing management structure and plan process should assist Plan production although strong political support and significant resources were necessary to achieve success. A minority of respondents considered that a small Management Board and lack of scrutiny would not foster a sense of ownership.

5.2. The make up of the Management Board was widely commented upon. Different respondents considered that it both underrepresented and over represented in certain interests. Suggestions for inclusion on the Management Board included, voluntary or community representatives; planning and economic regional groupings; housing and transport sectors; wildlife trusts; locally accountable bodies; energy; and biodiversity interests. The Spatial Planning Network was considered by some to be too large to be effective in allowing for proper consultation and discussion of key issues of concern. There were suggestions that alternative mechanisms may be required to ensure full involvement, for example, focus groups and workshops.

5.3. Local authorities raised the relationship between the WSP and local government as an issue. They considered that local authorities have a key role, which should be recognised explicitly. The Network should not be a substitute for formal consultation with local government. There was a divergence of opinion as to whether the WSP should essentially be 'top down', or, 'bottom up' reflecting local priorities contained in unitary development plans and economic development strategies. Several representations were also received concerning the need for regional perspectives to be fed in into WSP by the regional planning, economic and transport groups. The need to learn from the experience of other nations and regions and to consider policy intentions and linkages was also identified.

6. Consultation procedures

Whilst the proposed Consultation Procedures received cautious support a number of concerns were expressed including the purpose of the consultation, the need for wider consultation and publication of the Assembly's response.

6.1. Several respondents considered that the proposed consultation procedures needed to be better focussed in terms of the purpose of the consultation, who is being consulted, what is being consulted upon and how the consultation will be undertaken. The perceived limited opportunity for interested parties to participate and influence Plan development was also a matter of concern. It was considered that the Assembly should be more rigorous in seeking the views of all key partner organisations. The reliance on 'umbrella' organisations should be reduced, with individual consultees being given more opportunity to comment, particularly given the absence of a formal opportunity for scrutiny through an Examination in Public (EIP).

6.2. Various mechanisms were suggested to improve engagement including greater use of the Network, informal seminars and focus groups. It was recognised that wide ownership will have cost and time implications and that whilst formal consultation is important to allow excluded groups a chance to comment, no process can be fully inclusive and that consensus can lead to ineffective solutions. Use of the Internet to impart information and encourage discussion was welcomed. However, there was concern that an over reliance on disseminating information via the Internet will preclude participation by a large number of people. There were several requests for publication of the consultation responses and the Assembly's response to them.

7. Framework issues

There were divergent views about the suggested Plan issues. Some respondents felt that there were too many issues, leading to a document which is long and complex, whilst others indicated the issues were suitably comprehensive.

7.1. A majority of respondents considered that the WSP should concentrate on key national and regional issues, in particular, those issues necessary to achieve sustainable development at the national level. A number of respondents considered that the WSP should address the range of issues included in individual UDP's. The need for the Plan not to preclude investment in transport infrastructure was also identified as an issue. A more detailed description of the issues identified by respondents for inclusion or removal is attached at Annex 2 and Annex 3.

7.2. To improve clarity of the Plan issues several respondents suggested grouping the issues under headings such as distinctive features and characteristics of Wales, strategic areas of economic opportunity, protection of the

countryside (and the social fabric of rural Wales). There were also suggestions that the Plan should be based on themes such as urban/rural relationships, economic opportunity, strategic accessibility and infrastructure and balanced and polycentric development. Some bodies considered that the Plan's vision should be based on the European Spatial Development Perspective in particular balanced and polycentric development in order to build consensus, whilst others were concerned that the term 'balance' suggests equal allocations across Wales regardless of an area's individual circumstances. There were also concerns that the plan should be realistic, taking into account commercial realities of property values and development potential.

7.3. A number of respondents expressed concern that the timetable for plan preparation will not allow issues to be considered in sufficient depth, or, allow potential conflicts to be resolved.

8. Duration and status

The proposed 20 year duration and status of the Wales Spatial Plan was generally supported. There was limited support for statutory status.

8.1. There was general consensus amongst respondents that the proposed 20 year duration of the plan was correct. However, it was felt by some that the ability of the WSP to influence short term investment and spatial development in Wales over the next 5 years would be largely influenced by the existing and proposed Local Plans and UDP's. The need to consider how the Plan dovetails with other strategies and plans, both internal and external, in terms of duration and status was also identified.

8.2. A minority of respondents suggested that the Plan be elevated to a statutory basis. One reason given for this was to ensure that local authorities do not submit non-conforming and unsustainable planning proposals. Several respondents considered that if the WSP were to be given statutory status the links to the existing planning system would need to be more explicitly defined.

9. Form and content

The form and content of the Plan was supported in principle although respondents disagreed on the level of detail to include.

9.1 The thematic approach proposed for the Plan was generally supported as it provided an opportunity to examine the interrelationships between land uses and other factors. There was some divergence of opinion on the level of detail to be included in the plan. The majority of respondents felt the plan should provide a practical framework by concentrating on key issues of strategic importance, avoiding central control over matters of agreed local responsibility. However, some respondents considered that if the Plan were too strategic, the linkage with the planning system would be unclear. To highlight this linkage several respondents suggested that the plan should establish the broad location of housing need and translate this into allocations between Unitary Authority areas. The need for the Plan to be objective so that it can inform Assembly policy rather than be driven by it, including the need to be consistent with the market realities, was highlighted by a number of respondents.

9.2. Use of information technology and Geographic Information Systems (GIS) techniques was supported. A web

based Plan would enable the general public and business sectors to see the spatial impact of the Plan on their area. However, there were concerns that GIS data and maps may become national policy by default. In terms of Plan accessibility, papers or documents should be distributed at draft stage to those who have already provided input to the plan preparation process. A simplified version of the Plan could also be produced for public consumption.

10. Research

A large number of comments were received. In addition to comments about the research process respondents suggested data sources, data sets and research requirements to assist Plan preparation.

10.1. There was general support for an evidence-based approach to Plan preparation. Respondents considered that the Plan warrants extensive analytical work, which may not be achievable given the time and resources available. There was also concern that economic research should be based on a sufficiently wide range of information, including the use of analytical frameworks that can model the impact of different economic policies and predict their outcome. Several respondents referred to the need for the Plan to recognise the dichotomy in Wales, with its west-east economic axis and its south-north cultural and political flows. The influence of the external economic drivers, English regions and Ireland was also highlighted. The possibility of identifying spatial divisions, other than the four existing economic regions, including functional city regions, for collaboration on issues such as waste planning, tourism or transport was also raised.

10.2. The need for spatial options or scenarios to be tested was identified by a number of respondents. The implications of alternative spatial options should be analysed to assess the impact on the social, economic and environmental interests. The preferred scenario should be rigorously tested against real world trends and not be an unrealistic wish list.

10.3. Respondents also identified a wide range of additional data sets and sources and research requirements details of which are attached in Annex 4.

11. Timetable

The overriding view was that the timetable is too ambitious and this may impact on the Plans delivery date and ability to influence land use issues in the short term.

11.1. The majority of respondents considered that the timetable was unrealistic given the number of issues and purposes being considered. Whilst there is support to have a spatial plan in place as soon as possible, this should not be at the expense of proper scrutiny to give legitimacy to the Plan.

11.2. The minority of respondents considered that the timetable whilst being ambitious should be adhered to. Various suggestions were made on how the timetable could be met, including the allocation of appropriate priority and resources to the project, and effective and targeted consultation with partner organisations and wider interests.

Several respondents were concerned that the Plan was too late to influence various strategies, including the Objective 1 programme but could help to inform their review.

12. Appraisal monitoring and review

Various opinions were expressed. The sustainability appraisal of the Plan was welcomed. Further clarification was requested on the use of indicators. There were mixed views on the Plan review period

12.1. There was some concern that the consultation document provided insufficient detail to comment on the adequacy of the proposals. It was considered that implementation of the Plan through UDPs would be the key test. Appraisal of the Plan and its processes were supported. Some respondents sought details of the criteria on which the appraisal would be based on and how these would be obtained? There were several suggestions that a Strategic Environmental Assessment should be carried out.

12.2. Development of monitoring and performance indicators was welcomed, but a consultation or participation process to assess the generation of indicators should be considered. There were suggestions that the WSP indicators should be based on Assembly sustainable development indicators and those being developed by the individual statutory bodies such as British Waterways, Environment Agency Wales, and Countryside Council for Wales.

12.3. Respondents considered that monitoring and review should be closely defined, otherwise it will be unclear whether the Plan is "working" or whether the outcomes would have happened anyway. Various review periods were suggested within the range 2 - 5 years. There was some support for review being linked to the review of other Assembly strategies, although several respondents felt that the Plan's potential to lead, co-ordinate and influence the development of other strategies was limited. Some respondents sought details on who would carry out the review? There were requests that local government should have a specific mechanism to comment on the Plan's progress.

13. Scrutiny

Comments were wide ranging with contradictory views being expressed. Two common themes were the lack of opportunity to challenge the Plan and the limited makeup of Plan scrutinisers.

13.1 There was general agreement that the level of detail in the Plan should determine the level of scrutiny and that whilst the inclusive process of plan preparation will minimise areas of disagreement it is unlikely to remove them altogether. A number of respondents commented that additional scrutiny would make the process unwieldy and unmanageable given the tight time scale, whilst the view that speedier plan preparation should not be at the expense of proper scrutiny was also expressed. Respondents identified two main options for scrutiny of the Plan, Examination in Public (EIP) or the establishment of a scrutiny committee. The respondents in favour of EIP considered that this type of scrutiny process would be required if the Plan was intended to be a material consideration in UDP preparation and planning decisions. In such circumstances the Plan process should incorporate a method of formal challenge other than through legal avenues.

13.2. As an alternative method of scrutiny several respondents suggested that a scrutiny committee should be established. Various suggestions were made on the composition of any committee including a committee comprising the interests of several National Assembly Committees affected by the plan, or, an independent non political committee.

13.3. A significant number of respondents requested that comments on the draft Plan and the Assembly's response to them should be published, and the final document debated at committee before being presented to a Plenary session.

14. Next steps

14.1. The results of the consultation exercise have been considered by the Minister for Environment and the Spatial Planning Unit. They will also be reported to the Assembly Environment Planning and Transport Committee. All comments will be taken into account during the preparation of the Draft Wales Spatial Plan.

Annexe 1

Wales Spatial Plan

List of respondents

Brecon Beacons National Park Authority

Bridgend County Borough Council

British Retail Consortium

British Waterways

British Wind Energy Association

Bwrdd-yr-Iath Cymraeg

Caerphilly County Borough Council

Campaign for the Protection of Rural Wales

Campaign for the Protection of Rural Wales

Cardiff County Council

Ceredigion County Council

City and County of Swansea

Civic Trust for Wales

Clive James

Confederation of British Industry Wales

Construction Industries Council Wales

Conwy County Borough Council

Council for National Parks

Council of Mortgage Lenders

Countryside Council for Wales

David J Tudor

David Wilson Estates

Denbighshire County Council

Environment Agency Wales

Environmental Planning Consultancy

Farmers Union of Wales

Flintshire County Council

Forestry Commission in Wales

Government Office for the North West

Gwynedd County Council

House Builders Federation

Isle of Anglesey County Council

Jas Chanay

Lattice Property

Marks and Spencer

Merthyr Tydfil CBC

National Grid

National Trust Wales

Newport and Valleys CPRW

Newport County Borough Council

North Wales Economic Forum

North Wales Police

North West Regional Assembly

Ogmore Centre Trust

Pembrokeshire Coast National Park Authority

Rail Passengers Committee Wales

Railtrack PLC

Rhondda Cynon Taff County Borough Council

Royal Institute of Chartered Surveyors Wales

Royal Town Planning Institute Wales

RSPB Cymru

Scottish and Southern Energy plc

Snowdonia National Park Authority

South East Wales Economic Forum

South East Wales Strategic Planning Group

South West Wales Economic Forum

South West Wales Strategic Planning Group

Strategic Rail Authority

Sustainable Gwynedd

Sustrans Cymru

SWITCH

Thalia Nunis

The Institution of Civil Engineers

The Sports Council for Wales

Torfaen County Borough Council

Torfaen Friends of the Earth

Vale of Glamorgan Council

Wales Wildlife and Countryside Link

Walters Group

Welsh Development Agency

Welsh Local Government Association

Woodland Trust

Wrexham County Borough Council

Wrexham County Borough Council

WWF Cymru

Annex 2 - Suggested Issues for inclusion

- Sport/ leisure/ recreation provision
- Minerals
- Waste
- Health
- Education
- Water Framework Directive and its consequences
- Green house gas emissions
- Contaminated land
- Integration of land and marine planning issues
- The importance of the retail sector to the future development of Wales
- The role of retail investment in sustaining and regenerating deprived towns and rural communities in Wales
- Renewable energy policy
- Flooding

- Second homes
- Social exclusion
- Accessibility to social, economic and environmental services and opportunities, both in rural and urban communities
- Integrated management of the coastal zone
- Mixed use communities
- Woodland creation and conservation work
- Safeguarding natural systems - clean air, clean water, healthy soils etc.
- Utilisation of coastal and inland waters.
- Identify areas of opportunity, growth and restraint
- Migration to and from Wales and between its regions
- Integrated transport
- The Plan should be more explicit in supporting public transport
- The transportation issue should indicate that some new infrastructure may be required if it is to be realistic.

Annex 3 - Suggested issues for removal

- securing sustainable growth while protecting and enhancing the environment;
- identifying factors which support balanced development; regeneration;
- diversifying rural economies; securing viable market towns;
- Green Belt designation;
- protection of statutorily designated areas;
- safeguarding non-renewable resources;
- making the best use of settlements to accommodate growth, and protection of statutory designated areas.

Annex 4 - Research and data sources

Possible data sources	Possible data sets	Further research considerations
Wales Woodland Strategy	Quality of life	EU policies
University of Glamorgan's Welsh Transport Research Centre	Health	Risk assessment
The Welsh Economic Review (Cardiff Business School)	Education	Cost implications of spatial change
Coastal Forum data	Income Levels	Transport including waterborne and airborne
Environment Agency LEAPS	Housing needs	Emergency planning
Labour market	Land values	Provision and location of services
Regional Transport Strategies	Landmap findings	Cultural distinctiveness
Strategic Planning Guidance	Ecological Footprinting	Climate change
Language	Waste	Cross-border issues
Tourism	Movement of school leavers	Rural issues
Register of Landscapes of Historic Interest in Wales	Labour market intelligence data published by the TECS and ELWa.	Impact of key sectors of the economy on each scenario
Bio diversity incl. action plans	Woodlands	
Shoreline Management Plans	Current market demands	
Welsh and Regional Economies' Environmental Performance/ Resource Productivity	Employment	.
SRA research in to station car parking	Migration	
South East Wales Strategic Planning Group spatial plan key issues paper	Social and community data	
All Wales Steel Task Force Strategy for South East Wales	Population	
EAW CAMs Plans		
City of the Valleys study		

Local authority Housing Strategy and Operational Plans		
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