

Lesley Griffiths AM  
Cabinet Secretary for Energy, Planning and Rural Affairs  
Welsh Government

22 August 2018

Dear Lesley

### **Welsh Government consultation on the National Development Framework**

The Climate Change, Environment and Rural Affairs Committee held a stakeholder workshop to discuss the National Development Framework (NDF) for Wales on 28 June 2018.

We also heard from John Davies, former Chair of the Independent Advisory Group on Reform of the Planning System in Wales and Neil Harris from the School of Geography and Planning, Cardiff University at our meeting on 14 June. I am grateful to the officials from your department who also attended that meeting on 14 June to give us a briefing on the NDF. It was extremely informative and I would ask that you pass on our thanks to them.

Those we heard from during our work praised the amount and nature of engagement the Welsh Government has carried out during the NDF process to date. The Committee hopes that this level of engagement will continue as further iterations are produced.

The Committee recognises that drafting the NDF is a process which will continue until 2020 and that the NDF preferred option which was discussed is a high level document. The Committee will return to this topic to scrutinise the draft NDF in more detail when it is published next year.



The discussions we had with stakeholders raised a number of issues which the Committee wanted to address.

### 1. The structure of the NDF preferred option

Stakeholders told us that the document, as drafted, is overly complicated and has too many layers. They commented that the document should be more focussed rather than having a vision, objectives and themes and that it would be difficult to navigate and understand for those who are not involved in the planning system but who will be affected by the proposals.

For instance, there are four main strands to the vision of the NDF: distinctive and natural places; productive and enterprising places; active and social places and prosperous, distinctive and diversified regions. The NDF also has 27 objectives set out under headings which are slightly different, but obviously related to, the four strands in the vision. Finally, the Preferred Option: Sustainable Places is presented under five 'areas' which are similar to the four 'thematic headings' in PPW – Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; and Wales's Regions.

*Is there any intention to simplify the presentation of the document?*

### 2. The synergy between the NDF preferred option and other policies

**Planning Policy Wales(PPW)** – Some stakeholders were unclear how PPW and the NDF would integrate and align with one another. They asked for clarity on how the two documents are expected to work together.

Stakeholders asked for more details on how the consultation on the new PPW Edition 10 will affect the drafting of the NDF. We understand that the new PPW is due to be published before the end of the year. Stakeholders questioned whether any significant issues from the consultation on the NDF will mean redrafting PPW and vice versa.

**National Infrastructure Commission** – Our stakeholders questioned whether those drafting the NDF have worked with officials taking forward the National



Infrastructure Commission for Wales (NICfW). The NICfW is responsible for advice to the Welsh Ministers on the economic and environmental infrastructure needs of Wales for the next 30 years. The Committee understands that the detailed working arrangements of the NICfW have yet to be agreed between the Welsh Government and the appointed Commissioners through a constitution document.

**Draft Welsh National Marine Plan** – our stakeholders would like to see more detail on how the NDF will be integrated with the Marine Plan and how each will be revised as they are updated.

**Area statements** – our stakeholders would like to know how the Area Statements produced under the Environment (Wales) Act 2016 will feed into the drafting of the NDF?

**Well-being Plans** – our stakeholders questioned whether the evidence from the Well-being Assessments was used in the drafting of the NDF preferred option. They also questioned whether the draft NDF will draw on this evidence base in future.

*How will the Welsh Government ensure that the work of the NICfW and the principles of the NDF are informed by each other?*

*Will the PPW Edition 10 be redrafted in light of the NDF process, and vice versa?*

*What are the mechanisms for ensuring the NDF and the Welsh National Marine Plan inform and develop each other?*

*What is the evidence base for the detailed revisions of the NDF preferred option, and will it draw on the Well-being Plans and Area Statements?*

### 3. Placemaking

The concept of placemaking was well received by stakeholders.

However, it was felt by some that there should be more emphasis on people and communities within the definition, including a focus on the importance of homes and jobs for creating successful places.



It was suggested that Place Plans would be a useful mechanism for involving communities in placemaking and informing local housing needs.

*Is there any intention to revise the scope of the definition of placemaking in future iterations?*

#### **4. Regional planning**

The NDF preferred option provides direction for the three regions of Wales – North Wales; Mid & South West Wales and South East Wales.

However the research undertaken by the School of Planning and Geography, Cardiff University recommended four regions in the NDF.

The Committee understands that the three regions in the NDF preferred option are aligned to those in ‘Prosperity for all: economic action plan’, however, our stakeholders recommended dividing the Mid and South West Wales region to create a total of four regions.

*What is the reasoning behind including the three regions described in Prosperity of all: economic action plan? Will the number of regions be revisited in future iterations of the NDF?*

We recognise the need for planning at the regional level to deal with issues that cross local planning authority boundaries and we are concerned that Strategic Development Plans (SDPs) are not coming forward. Stakeholders were concerned that this could result in the NDF addressing issues that would be better addressed via SDPs.

*There was a call for clarity over the role of the regions set out in the NDF.*

*What steps will the Welsh Government take to ensure the delivery of Strategic Development Plans from local authorities?*



## Housing

The NDF 'will identify a national policy based population and housing projection, which will include an all Wales range of housing numbers for the plan period.'

There was concern that the 'range of housing numbers' could be interpreted as a target Stakeholders were also concerned that the language used in the document suggested an approach that is 'top down and not bottom up'. They wish to see housing figures that are based on local need and then aggregated upwards to create the regional and national figures

. Stakeholders also commented that the housing numbers included in the NDF should reflect different housing types to reflect local housing needs, such as for social and affordable housing.

*Is there any intention to clarify the language which refers to 'the range of housing numbers'?*

*To what extent will local housing needs determine the national housing figure in the final document?*

### 5. Integrated Sustainability Appraisal

The NDF includes an Integrated Sustainability Appraisal which covers statutory and non-statutory assessments.

It was recognised that this method should provide a more integrated appraisal and save time on numerous assessments. However, there was concern that the statutory assessments may be 'watered down' due to this combined approach which may leave the process open to legal challenge.

The Committee notes the comments from RSPB Cymru that 'the 'Strategic Environmental Assessment' has been integrated within the Sustainability Appraisal. We would like to see more rigour applied to the SEA Regulations and feel this would provide an opportunity for you to demonstrate the plan's application of the sustainable management of natural resources (SMNR).'



*What consideration has been given to the recommendation from the RSPB that an 'Environmental Report' be appended to each future iteration of the ISA.*

It was recognised that it was difficult to carry out a meaningful detailed Habits Regulation Assessment (HRA) given the high-level nature of the NDF preferred option. However, stakeholders felt there was a lack of engagement with the HRA because it was drawn up by consultants.

*Is it the intention to use consultants to produce the next iteration of the HRA? If so, what mechanisms are there for stakeholders to engage in this process?*

## **6. Language Impact Assessments**

Our stakeholders recognised that undertaking Welsh language impact assessments is a new discipline within our planning system.

It was noted that expertise in this area is not as well developed as in other areas, such as environmental impact assessments. Given that the planning profession will have less experience of these assessments – both in terms of undertaking them and in interpreting their conclusions – it was recommended that the Welsh Government should take the lead in developing expertise in this area.

*Will the Welsh Government be taking the lead on developing the expertise in local authorities on these assessments and subsequently be publishing guidance and examples of best practise? Can the Welsh Government provide international examples which have proved successful?*



As planning falls within the remit of the Committee, we will continue to scrutinise the NDF as it develops. I would be grateful if you could respond the questions raised in this letter by 17 September 2018 in order to inform our work.

Yours sincerely,

A handwritten signature in black ink that reads "Mike Hedges". The signature is written in a cursive style with a large initial 'M'.

**Mike Hedges AM**

**Chair of Climate Change, Rural Affairs and Environment Committee**

