Lesley Griffiths AC/AM Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig Cabinet Secretary for Energy, Planning and Rural Affairs



Ein cyf/Our ref MA-P-3052-18

Mike Hedges AM
Chair of Climate Change, Rural Affairs and Environment Committee
National Assembly for Wales
Cardiff Bay
Cardiff CF99 1NA

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Dear Mike,

Thank you for your letter of 22nd August, regarding the Climate Change, Environment and Rural Affairs Committee consideration of the National Development Framework. I welcome the Committee's role in helping shape the NDF and look forward to working with you as the preparation of the Framework moves forward.

In response to your questions:-

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

The Draft Preferred Option set out the proposed scope and content of the NDF. The consultation has drawn a range of comments on the relationship between Planning Policy Wales (PPW) and the NDF and the approach to presenting policies and content in the future NDF document. I will reflect on these comments when considering the Draft NDF and I am confident a more simplified approach aligned with PPW can be achieved.

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

The establishment of the NICfW has progressed in recent months. Mr John Lloyd Jones OBE, FRAgS, Hon FLI has recently been appointed to the Chair and I understand the appointment of commissioners is underway. My officials are meeting with Mr Jones in September to brief him on the preparation of the NDF and establish mechanisms to work together.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The NICfW will provide expert and impartial advice to the Welsh Government about Wales' longer-term strategic economic and environmental infrastructure needs over a five to 30-year period. It will also consider the interactions of these needs with social infrastructure, such as schools, hospitals and housing. Future iterations of the NDF can take forward the NICfW's recommendations where appropriate. In the short term, I have requested officials discuss with Mr Jones how the emerging NDF and State of the Nation Report, and in particular the evidence and engagement work which supports the preparation of these, can be shared and wherever appropriate developed together.

Will the PPW Edition 10 be redrafted in light of the NDF process, and vice versa? The revised edition 10 of PPW is scheduled to be published by the end of this year. PPW will be amended to reflect the NDF once it is published in 2020. PPW will also be updated between versions of the NDF to reflect Ministerial priorities. Subsequent NDFs may adopt spatial approaches to new policy developments in PPW as part of an evolving and iterative process.

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

As Cabinet Secretary with responsibility for both the NDF and the Marine Plan, I recognise the importance of ensuring both plans work together to achieve our national goals. To ensure they are both developed and inform each other, I have requested lead officials work together and maintain a focus on the relationship between our national marine and terrestrial planning frameworks. On a formal basis, planning officials sit on the Marine Governance Board and marine officials sit on the NDF Programme Board. There is regular attendance by planning and marine officials in each others engagement events, workshops and similar activities to brief and engage with stakeholders from respective marine/terrestrial environments. Informally, there is a programme of regular liaison meetings between officials to discuss common issues and maintain a focus of the interaction between both plans.

The Integrated Sustainability Appraisal (ISA) for the NDF and the Sustainability Appraisal (SA) of the Marine Plan are tools which help to ensure the integration between the plans. These assessments make sure we have a comprehensive understanding of the positive and negative effects of each plan to ensure they are as sustainable as possible. This includes assessing whether they support integrated decision making and collaboration across marine and terrestrial interfaces and boundaries.

The Draft NDF will include further detail on the relationship between the NDF and the National Marine Plan.

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?

The primary evidence base for revising the approach set out in the Draft Preferred Option will be the responses submitted during the consultation. Both Well-being Plans and the Area Statements are important and will inform the preparation of the Draft NDF.

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

To ensure clarity and consistency of our planning policy, the NDF will use the same definition of placemaking as PPW which is due to be published by the end of this year.

What is the reasoning behind including the three regions described in Prosperity of all: economic action plan?

Prosperity for All: The National Strategy identifies the importance of working on a consistent regional basis and the Welsh Government will introduce a new regionally-focussed model of economic development. The Economic Action Plan (EAP) sets out the three regions which will form the basis of the regional approach – North Wales, Mid and South West Wales and South East Wales – and the rational for them. The EAP will ensure the evolution of the regional model will create networks of stakeholders in regions, linked to government, delivering on our objectives and regional priorities and will support:-

- Joined up economic development planning.
- Stronger local and regional supply chains.
- Better integrated transport.
- Strategic planning on a range of issues from land use to housing to skills.
- Stronger complementary economic and cross border collaboration.

To deliver the joined-up, coordinated approach to government set out in the National Strategy and to maximise opportunities by supporting and working with key strategies such as the EAP, I believe it is appropriate for the NDF to be developed around the same three region footprint.

In considering the merits of the three region footprint, I was of the view there may be different solutions to achieving better regional planning within different regions. For example, in one region it may be appropriate for a single Strategic Development Plan (SDP) to be prepared. In other regions, it may be more appropriate to have more than one SDP or a combination of an SDP and joint LDPs. The key outcome is to ensure strategic planning issues, are identified and planned for whilst nesting within the 3 region model. I will reflect further on the consultation responses on this matter and I recognise, as with any proposed regional approach, there will be a range of views.

Will the number of regions be revisited in future iterations of the NDF? Future iterations of the NDF will be free to revisit the approach to regions.

There was a call for clarity over the role of the regions set out in the NDF. The Draft NDF will set out a much fuller picture of the spatial policies and projects in relation to each region. This will be informed by a thorough evidence gathering exercise which will be tested with stakeholders.

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

During the passage of the Planning Bill, there was widespread support for the introduction of SDPs. It was recognised by many the single tiered development planning model based on LDPs, does not adequately address national and regional issues. The Planning Act introduced the NDF and SDPs as a result. I believe SDPs can help us achieve better outcomes, helping plan for strategic housing, transport, environmental and economic issues which are best understood at a regional level.

My view at this time remains it is preferable for Local Planning Authorities (LPAs) to prepare SDPs on a voluntary basis. A joint, commitment to preparing SDPs provides the best platform to move forward, allowing LPAs to shape their development. I wrote to LPAs last year encouraging them to work together on SDPs and joint LDPs. I received assurance from local authorities they have capacity to produce individual LDPs with improved voluntary collaboration between authorities. I continue to support local authorities in SE Wales to bring forward a SDP and I am hopeful they will submit their proposal to me later this year

It is important for LPAs to plan for and address regional issues. The NDF can play a role in supporting this work and I will work with them to consider this as we prepare the Draft NDF.

Is there any intention to clarify the language which refers to 'the range of housing numbers'? My officials are currently working on this and are developing a new process for assessing housing need and demand to establish housing figures for the NDF. The Draft NDF will set out the context for these figures.

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

The intention of the work currently underway is to develop a methodology which can provide a range of housing figures at a range of levels in a consistent way. This will be in addition to any locally derived housing need figure which may inform the SDP or LDP process.

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?

Consultants with expertise in HRA have been engaged to assist in the preparation of a HRA for the NDF. This work will be undertaken in accordance with the statutory requirements. As we move forward, stakeholders will be able to engage in the production of the HRA at each stage of the NDF process.

Will the Welsh Government be taking the lead on developing the expertise in local authorities on Welsh Language impact assessments and subsequently be publishing guidance and examples of best practise?

As part of the ISA process, the NDF will be subject to Welsh Language Impact Assessment. The assessment will take the form suitable and appropriate to a national plan. It will be developed in conjunction with key stakeholders and subject to consultation. The assessment of LDPs can and should be more detailed and locally focussed. TAN 20 advises on sources of evidence and methodology and we continue to encourage local authorities to work together to refine the approach to reflect local circumstances.

Can the Welsh Government provide international examples which have proved successful? As work on the NDF progresses the Welsh Government will continue to draw upon best practice on the form and content of national spatial plans, including equivalent plans in Scotland and Ireland. This will include how linguistic matters have been addressed by these plans.

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