



RECORD OF DELEGATED OFFICER DECISION

SUBJECT:

A Welsh Government Consultation On :

Proposals relating to the Statement of Public Participation for the National Development Framework (NDF)

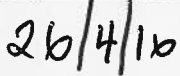
PURPOSE OF REPORT:

The purpose of the report is to outline the contents of a Welsh Government consultation on 'Proposals relating to the Statement of Public Participation for the National Development Framework (NDF) and to seek approval to submit the Consultation Response Form, as attached to this report as APPENDIX A by 25th April 2016.

DELEGATED DECISION (Date): That the Consultation Response Form, as attached to this report as APPENDIX A. in respect of a Welsh Government consultation on 'Proposals relating to the Statement of Public Participation for the National Development Framework' is approved for submission to Welsh Government.


Chief Officer Signature


Print Name


Date

The decision is taken in accordance with Section 15 of the Local Government Act, 2000 (Executive Functions) and in the terms set out in Section 5 of Part 3 of the Council's Constitution



CONSULTEE CABINET MEMBER SIGNATURE

25/4/16

DATE



OFFICER CONSULTEE SIGNATURE

25/4/16

DATE

Directorate:	
Contact Name:	
Designation:	
Tel.No.	

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

**MUNICIPAL YEAR 2014 - 2015
REPORT TO ACCOMPANY DECISION OF
CHIEF EXECUTIVE**

Part 1
(Non Confidential)

A Welsh Government Consultation On :
Proposals relating to the Statement of
Public Participation for the National
Development Framework

1. PURPOSE OF THE REPORT

- 1.1 The purpose of the report is to outline the contents of a Welsh Government consultation on 'Proposals relating to the Statement of Public Participation for the National Development Framework and to seek approval to submit the Consultation Response Form, as attached to this report as APPENDIX A.

2. RECOMMENDATIONS

- 2.1 It is recommended that:

The Consultation Response Form, as attached to this report as APPENDIX A. in respect of a Welsh Government consultation on 'Proposals relating to the Statement of Public Participation for the National Development Framework' is approved for submission to Welsh Government by 25 April 2016.

3. BACKGROUND

- 3.1 The consultation document relates to the production of the National Development Framework (NDF). The National Development Framework (NDF) will be a national land-use development plan and will set out the Welsh Government's social, economic and environmental spatial planning objectives for the next 20 years. This consultation concerns the first stage in the process of preparing the NDF, the preparation of the Statement of Public Participation. The Statement of Public Participation sets out the key stages and timetable for preparing the NDF and the steps the Welsh Government will take to engage stakeholders and the public.
- 3.2 The Planning (Wales) Act 2015 sets a statutory framework for the Welsh Ministers to prepare and keep up to date a national land use plan known as the National Development Framework for Wales (NDF). The Planning Act requires that as part of the process of developing the NDF, Welsh Ministers prepare a Statement of Public Participation. The Statement of Public Participation will set out how the Welsh Government will embed participation across all stages of the preparation of the NDF and ensure stakeholders are aware of how and when to engage in the process.

3.3 The proposed Statement of Public Participation sets out the following aims and methods of public consultation:

- **Facilitating Engagement-** raising awareness of the NDF and its preparation and engaging stakeholders by providing clear guidance on the process of preparing the NDF, its purpose, its role and how stakeholders can influence its preparation.
- **Ensuring stakeholders inform the development participation programme-** providing the opportunity for stakeholders to inform the Statement of Public Participation.
- **Ensuring participation is inclusive, open and transparent-** ensuring that stakeholders are aware of when and how they can engage in the development of the NDF including the provision of a timetable which sets out relevant consultation times.
- **Ensuring information is accessible-** all key documents and evidence to be made available on the Welsh Government website.
- **Ensuring that there is feedback on representations made across the process-** at each stage the Welsh government will report back on the representations made and how they have influenced the development of the NDF.

4. CONTENT OF THE CONSULTATION

4.1 The Consultation Document asks a number of questions on the proposed statement of public participation. The questions are set out below with a recommended response from the Council.

Question 1: Do you agree with the NDF preparation timetable?

The proposed timetable sets out a process of approximately 4 years from start of the process to adoption (which is the recognized timeframe for production of plans such as this); it envisages publishing the NDF in October 2019. It also sets out three specific 12 week stages of public consultation (stages 2, 5 and 8).

RCT Response: Whilst the Council has no objection to the 4 year timetable (this is the standard timescale for production of an LDP also) in the Council's experience it is very difficult to predict the level of public participation and representation. It is not clear whether slippage has been built into the process.

During this time there are other plans such as the Strategic Development Plan and various Local Development Plans being progressed in addition other significantly important matters such as the Cardiff Region City Deal and the work of the City Region Boards. The process seems to illustrate a top down approach i.e. NDF will inform the

SDP then LDP, however all these other items appear to be progressing ahead of the NDF or at least will be progressing alongside. How will all the timetables for the delivery of these plans, programmes and strategies align with each other in the way anticipated by Welsh Government? It is also not clear how the preparation of the SDP for example, will be affected if the target deadlines for the NDF are not met and what will the implications of this be?

This process can be confusing for members of the public. It is also important that the differences between the NDP, SDP and LDPs are set out clearly at the start but also most importantly how they relate to each other.

Question 2: Do you agree that 3 periods of public consultation are sufficient?

RCT Response: The three periods of consultation do reasonably reflect the stages where the public can most appropriately get involved. The method of continuous consultation is a positive approach to take however it is important that the public is informed clearly when they can submit actual representations as this will lead to frustration if people believe they can make representations when they are not able to. However, regardless of how much consultation is undertaken it is important that it is meaningful in order for the people to be engaged.

Question 3: Do you agree that the periods of public consultation are in the right place to ensure stakeholders can participate in the development of the NDF?

The periods of public consultation are proposed as follows:

- **Stage 2** (current consultation): Publish and consult on the Statement of Public Participation (12 weeks)
- **Stage 5**: Publish and consult on main issues, options and preferred option, supported by environmental reports and assessments (12 weeks).
- **Stage 8**: Consult on draft NDF (12 weeks).

RCT Response: Yes the consultation periods reflect the point in the plan process when there is appropriate information to consider.

The Sustainability Appraisal and Strategic Environmental Assessment process is extremely complicated and very confusing; this often leads to people becoming very frustrated and disengaged with the process. It is important to ensure that enough resources are available to engage people in this part of the process also. It is not clear from the main timetable when the SA/SEA would be consulted on integrating the timetables would be very beneficial.

Question 4: Do you agree with the methods to support continuous engagement? Are there additional methods that should be used?

The consultation document suggests that in order to engage the public as fully as possible the method of continuous engagement will be used. This means that stakeholders will have access to information on the emerging document, are kept informed of its progress and can contact staff to learn more about the process at any time throughout its production. They suggest this will be achieved through:

- Website
- Helpline and email
- Social media
- Articles and press
- Newsletter and
- Consultation Database

RCT Response: Providing people with the opportunity for continuous participation is a very positive approach. If the opportunity is available for people to feel involved in the process they are more likely to take ownership of the plan once adopted. However it is also important that it is absolutely clear to the public when they can submit an actual representation to the process.

In the Council's experience it is also important not to overload the process and potential representors, with too much information as this can cause them to disengage with the process.

Question 5: Do you agree with the methods to support engagement at key stages? Are there additional methods that should be used?

The Statement of Public Participation outlines the following methods will be used to support engagement at key stages:

- Publication of key documents and supporting evidence- to be made available on the Welsh Government Website.
- Direct meetings and stakeholder events- one to one and/or group meetings to publicise consultation and attendance at public events such as the Royal Welsh Show.
- Drop in events across Wales to be held at: Cardiff, Swansea, Carmarthen, Newtown, Wrexham and Bangor.
- Awareness raising- press adverts, web adverts, social media, press stories in specialist media, animations.

RCT Response: Disagree. Whilst the Council welcomes the various methods on public engagement and sees this as a positive approach there is concern that only certain areas of Wales are listed to hold public events. The plan will affect the whole of Wales and therefore the Council considers it important that each Local Authority area should be visited during the consultation process. In the Councils experience the public will welcome being able to speak personally to officers regarding the

plan as this often promotes greater understanding of what can be a very complicated process.

The Council welcomes the use of ICT and social media through the process as a method of engaging a wide range of people; however it is also very important to ensure that those communities and individuals who do not have access to or engage with this technology are not disadvantaged. Methods such as depositing the consultation documents in Council offices for example could be an additional method.

The plan should support the socio, economic and environmental well being of Wales and the consultation needs to be delivered in a manner that will promote engagement from the private sector and statutory bodies as traditional methods of consultation can often lead to people disengaging with the process.

There are clear synergies between what the NDF will seek to deliver and the significant infrastructure, etc that is being considered by the City Region and City Deal bodies. There needs to be a programme of regular and detailed engagement with these bodies in order to ensure that the plans for these major programmes are aligned.

In the Council's experience members of the public are very interested in how a plan will affect the area in which they live particularly. The Council considers that it would be very helpful to the public if a synopsis of every Local Authority area was produced which identified how the NDF would affect that particular area. This would likely engage participants as they would then be able to relate the plan to what would happen on the ground rather than being lost in an all Wales context.

Question 6: Are there additional groups/bodies that could be added to those listed in Appendix 1 of the draft Statement of Public Participation?

The consultation list includes a wide range of public bodies that you would expect to see for such a consultation, however, as explained in answering the previous questions there is a lack of reference to City Region and City Deal bodies in the consultation document.

RCT Response: The City Region and City Deal bodies should be represented in the Core Stakeholder Group and whilst there is significant private sector representation on the General Stakeholder Group it is under represented on the Core group.

5. CONCLUSION

- 5.1 The Council's generally agrees with the Statement of Public Participation but would like to ensure that the methods used give everyone the chance to participate in the consultation not only those

with access to the relevant technology. The Council in its response would also like to ensure that every opportunity is used to explain to the public the importance of this document and how it will affect where they live in the future.

CONSULTATION FORM

Proposals relating to the Statement of Public Participation for the National Development Framework

We want to know your views on the proposed Statement of Public Participation for the National Development Framework (NDF) for Wales. The statement sets out how the Welsh Government will embed participation across all stages of the development of the NDF and will ensure stakeholders are aware of how and when to engage in the process. Your views are sought on the proposed approach.

Please submit your comments by 25 April 2016

If you have any queries on this consultation, please email:

Planconsultations-a@wales.gsi.gov.uk or telephone: 029 2082 3744 / 029 2082 6657

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

If you do not want your response to be shown in any document we produce please indicate here

CONSULTATION FORM
Proposals relating to the Statement of Public Participation for the National Development Framework (NDF)

Date	
Name	Simon Gale
Organisation	Rhondda Cynon Taf County Borough Council
Address	Regeneration and Planning Rhondda Cynon Taf County Borough Council Floor 3 Sardis House Sardis Road Pontypridd
E-mail address	Simon.gale@rctcbc.gov.uk
Telephone	01443 494716
Type <i>(please select one from the following)</i>	Businesses <input type="checkbox"/>
	Local Planning Authority <input checked="" type="checkbox"/>
	Government Agency/Other Public Sector <input type="checkbox"/>
	Professional Bodies/Interest Groups <input type="checkbox"/>

	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Do you agree with the NDF preparation timetable?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>Whilst the Council has no objection to the 4 year timetable (this is the standard timescale for production of an LDP also) in the Council's experience it is very difficult to predict the level of public participation and representation. It is not clear whether slippage has been built into the process.</p> <p>During this time there are other plans such as the Strategic Development Plan and various Local Development Plans being progressed in addition other significantly important matters such as the Cardiff region City Deal and the work of the City Region Boards. The process seems to illustrate a top down approach i.e. NDF will inform the SDP then LDP, however all these other items appear to be progressing ahead of the NDF or at least will be progressing alongside. How will all the timetables for the delivery of these plans, programmes and strategies align with each other in the way anticipated by Welsh Government? It is also not clear how the preparation of the SDP for example, will be affected if the target deadlines for the NDF are not met and what will the implications of this be?</p> <p>This process can be confusing for members of the public. It is also important that the differences between the NDP, SDP and LDPs are set out clearly at the start but also most importantly how they relate to each other.</p>		

Q2	Do you agree that 3 periods of public consultation are sufficient?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>The three periods of consultation do reasonably reflect the stages where the public can most appropriately get involved. The method of continuous consultation is a positive approach to take however it is important that the public is informed clearly when they can submit actual representations as this will lead to frustration if people believe they can make representations when they are not able to. However, regardless of how much consultation is undertaken it is important that it is meaningful in order for the people to be engaged.</p>		

Q3	Do you agree that the periods of public consultation are in the right place to ensure stakeholders can participate in the development of the NDF?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>Yes the consultation periods reflect the point in the plan process when there is appropriate information to consider.</p> <p>The Sustainability Appraisal and Strategic Environmental Assessment process is extremely complicated and very confusing; this often leads to people becoming very frustrated and disengaged with the process. It is important to ensure that enough resources are available to engage people in this part of the process also. It is not clear from the main timetable when the SA/SEA would be consulted on integrating the timetables would be very beneficial.</p>		

Q4	Do you agree with the methods to support continuous engagement? Are there additional methods that should be used?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Further comments		
<p>Providing people with the opportunity for continuous participation is a very positive approach. If the opportunity is available for people to feel involved in the process they are more likely to take ownership of the plan once adopted. However it is also important that it is absolutely clear to the public when they can submit an actual representation to the process.</p> <p>In the Council's experience it is also important not to overload the process and potential representors, with too much information as this can cause them to disengage with the process.</p>		

Q5	Do you agree with the methods to support engagement at key stages? Are there additional methods that should be used?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	X

Further comments

Whilst the Council welcomes the various methods on public engagement and sees this as a positive approach there is concern that only certain areas of Wales are listed to hold public events. The plan will affect the whole of Wales and therefore the Council considers it important that each Local Authority area should be visited during the consultation process. In the Councils experience the public will welcome being able to speak personally to officers regarding the plan as this often promotes greater understanding of what can be a very complicated process.

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The plan should support the socio, economic and environmental well being of Wales and the consultation needs to be delivered in a manner that will promote engagement from the private sector and statutory bodies as traditional methods of consultation can often lead to people disengaging with the process.

There are clear synergies between what the NDF will seek to deliver and the significant infrastructure, etc that is being considered by the City Region and City Deal bodies. There needs to be a programme of regular and detailed engagement with these bodies in order to ensure that the plans for these major programmes are aligned.

In the Council's experience members of the public are very interested in how a plan will affect the area in which they live particularly. The Council considers that it would be very helpful to the public if a synopsis of every Local Authority area was produced which identified how the NDF would affect that particular area. This would likely engage participants as they would then be able to relate the plan to what would happen on the ground rather than being lost in an all Wales context.

Q6	Are there additional groups/bodies that could be added to those listed in Appendix 1 of the draft Statement of Public Participation?	X
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Further comments

Yes – the City Region and City Deal bodies should be represented in the Core Stakeholder Group and whilst there is significant private sector representation on the General Stakeholder Group it is under represented on the Core group.

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Q7	Are there any additional comments you wish to make on the draft Statement of Public Participation?	X
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Further comments

How to respond

Please submit your comments by 25 April 2016, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to :</p> <p><u>Planconsultations-a@wales.gsi.gov.uk</u></p> <p>[Please include Statement of Public Participation in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Statement of Public Participation Consultation</p> <p>Plans Branch</p> <p>Planning Directorate</p> <p>Welsh Government</p> <p>Cathays Park</p> <p>Cardiff</p> <p>CF10 3NQ</p>

Additional information
<p>If you have any queries about this consultation, please</p> <p>Email: Planconsultations-a@wales.gsi.gov.uk</p> <p>Telephone: 029 2082 3744 / 029 2082 6657</p>