

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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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

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

Date		
Name	Peter Seaman MBE, Chair	
Organisation	Campaign for the Protection of Rural Wales (Brecon & Radnor)	
Address	Brynhafryd, Scethrog, Brecon, Powys	
E-mail address	peter.seaman@btinternet.com	
Telephone	01874 676225	
Type <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input 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)	X
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Do you agree with the NDF preparation timetable?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	X
Further comments		
<p>CPRW Brecon & Radnor Branch was distinctly unimpressed by the environmental assessments (SEA, HRA) as part of the Local Development Plan process and consultation for Powys. The assessments gave a distinct perception that they were a ‘box ticking’ exercise and lacked meaningful and objective evidence of assessments. CPRW (Brecon & Radnor) wishes to see commitment to exploration of environmental impacts, including landscape impacts throughout the NDF process based on objective, informed and validated evidence. The NDF will have a profound impact on the future of Wales including our landscapes, biodiversity, watercourses, sustainability of farm land, human health and well-being etc.</p> <p>Environmental reports and assessments are included at Stage 5. Consultation on issues, options and preferred options.</p> <p>CPRW Brecon & Radnor is concerned that environmental impacts may not be considered at Stage 8 on the grounds that they have already been considered. We would prefer to see “if required” removed from items 7, 8 & 9 of the SEA stages to ensure maximal exploration of environmental impacts throughout.</p>		

Q2	Do you agree that 3 periods of public consultation are sufficient?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Further comments		

A process with too many consultations will not operate smoothly.

The important thing is that responses are taken into account and the impacts of the NDF thoroughly investigated and considered before implementation

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	
	Neither Agree nor Disagree	X
	Disagree	
Further comments		
<p>The periods are reasonable but it is a great pity Stage 5 is over the summer holiday period.</p> <p>Under SA/SEA 4.3 table, it says <u>consultation</u> on SEA Scoping Report will be at NDF Stage 3. It would be useful to know who is to be consulted.</p>		

Q4	Do you agree with the methods to support continuous engagement? Are there additional methods that should be used?	X
	Agree	
	Neither Agree nor Disagree	X
	Disagree	
Further comments		
<p>We are concerned that there will be opportunities for lobbying by financially interested parties which will not be available to voluntary environmental groups and would like to know that the Welsh Government has robust measures for controlling undue influence.</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	X
	Disagree	
Further comments		
<p>Communication/engagement with all Community and Town Councils.</p>		

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

We do not understand the status of NRW in this consultation. NRW is “sponsored” by WAG and works closely with WAG to “enable” development of natural resources.

The Welsh Government Stakeholder Group includes **“Natural Resources”**

The Core Stakeholder Groups include **“Forestry Commission Wales”** and **“Natural Resources Wales”** but the other two NRW divisions:- Environment Agency Wales or Countryside Council for Wales are not mentioned individually.

The General Stakeholder Group includes **“Natural Resources Wales”**

We believe that much, if not all, of the HRA/SEA parts of the consultation will be completed by NRW.

There is public and legal concern about the conflicting roles of NRW in maintaining and enhancing the natural environment and, at the same time, assisting the Welsh Assembly Government to achieve development with severe negative impact on the natural environment. (See Kerry Lewis *The framework for environmental regulation in Wales: NRW speaks with ‘One Voice’ - Has the statutory voice for Nature been silenced?* In Environmental Law Review 2015 vol 17.)

Given the inherent conflict in NRW’s role, CPRW and the public in general need reassurance that responses to the NDF consultations by independent Environmental Groups such as Wildlife Trust Wales and others listed below are given proper consideration.

We also find some inclusions and omissions in the WG, Core and General lists bizarre. These are just examples:

Why is Health not mentioned by name in the WG Group?

Why is the Theatres Trust a Core Stakeholder?

Why isn’t Cadw a Core Stakeholder?

Please add the Alliance for National Parks (Cymru) as a General Stakeholder

Please add the Cambrian Mountain Society as a General Stakeholder

Please add the Campaign for National Parks as a General Stakeholder

Please add Conservation of Upland Powys as a General Stakeholder

Please add The Gower Society as a General Stakeholder

Please add Open Spaces Society as a General Stakeholder

Please add Plant Life Cymru as a General Stakeholder

Please add Wales Environment Link as a General Stakeholder

Please add the 4 Wales Biodiversity Information Services as General Stakeholders

Please add all the Welsh Archaeological Trusts as General Stakeholders

Please add Wildlife and Wetlands Trust as a General Stakeholder

Please add Woodlands Trust as a General Stakeholder

Please add the Wye and Usk Foundation as a General Stakeholder

Please add The Welsh Historic Gardens Trust as a General Stakeholder
Please add The Georgian Society as a General Stakeholder
Please add the Society For the Protection of Ancient Buildings as a General Stakeholder
Please add The Water Conservation Trust as a General Stakeholder
Please add The Royal Commission on the Ancient and Historical Monuments of Wales [RCAHMW] as a General Stakeholder
Please add the Council for British Archaeology Wales as a General Stakeholder
Please add The Marine Conservation Society as a General Stakeholder
Please add The Royal Society for the Protection of Birds Cymru as a General Stakeholder
Please add The British Trust for Ornithology as a General Stakeholder
Please add The Wales Ornithological Society as a General Stakeholder
Please add National Trust Wales as a General Stakeholder
Please add Butterfly Conservation Wales as a General Stakeholder
Please add Buglife Wales - Invertebrate Conservation Trust as a General Stakeholder

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

see answers to Q6.

We believe that much, if not all, of the HRA/SEA parts of the consultation will be completed by NRW.

There is widespread public and legal concern about the conflicting roles of NRW in maintaining and enhancing the natural environment and, at the same time, assisting the Welsh Government to achieve development, with a potential negative impact on the natural environment. (See Kerry Lewis *The framewok for environmental regulation in Wales: NRW speaks with 'One Voice' - Has the statutory voice for Nature been silenced?* In Environmental Law Review 2015 vol 17.)

Given the inherent conflict in NRW's role, CPRW and the public in general need reassurance that responses to the NDF consultations by independent Environmental Groups such as Wildlife Trust Wales and those others listed at Q6 , are given proper consideration.

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>Planconsultations-a@wales.gsi.gov.uk</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

If you have any queries about this consultation, please

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