

People, Places, Futures

The Wales Spatial Plan

2008 Update Report on Consultation

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Llywodraeth Cynulliad Cymru
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1.0 Introduction

- 1.1 *People, Places, Futures* – the Wales Spatial Plan was adopted by the National Assembly for Wales in 2004. It sets out an agenda for the sustainable development of Wales over the next 20 years. Since publication, considerable partnership and cross-sector working throughout Wales and with border regions has helped progress the principles of the Plan and identify how the places where we live should develop in the future. The results of this continuing work were published for consultation in the Wales Spatial Plan–2008 Update (WSPU). The consultation period ended on 24th April 2008.
- 1.2 This report has been prepared by DTZ on behalf of the Welsh Assembly Government and presents a summary of the responses received, together with guidance on the key issues arising out of the consultation process for further consideration.
- 1.3 A structured questionnaire was provided with the WSPU (see Appendix 1). Whilst many respondents referred to the questionnaire, the majority of responses were more wide ranging bringing out a variety of issues and observations. It is not, therefore, feasible to present a statistical representation of responses to questions. Rather, and to do justice to the quality of responses received, this report follows the core themes of the WSPU highlighting the key messages, observations and issues identified from the consultation responses.
- 1.4 Throughout the consultation period a programme of regional workshops were facilitated by the Welsh Assembly Government to further the debate on local implications. The outcome of each workshop has been reported on separately and the key issues arising are combined within this current analysis.
- 1.5 This document does not attempt to provide a verbatim report on the consultation responses nor is it feasible to respond to each and every point made in consultation. The full set of detailed suggestions relating to content, direction, drafting, factual corrections or presentational points will, however, feed into the re-drafting of the Wales Spatial Plan Update for consideration by Ministers. A full alphabetical list of all respondents is provided in Appendix 2.
- 1.6 The rest of this document is structured as follows:

PART ONE

Sections 2-5 present an overview of who responded, the key issues arising and suggested way forward.

PART TWO

Sections 6–11 follow the core themes of the WSPU document, drawing out the observations made by consultation respondents.

PART THREE

Sections 12-17 provide details on each of the six Spatial Plan Areas.

PART FOUR

Section 18 provides feedback on responses to the Strategic Environmental Assessment.

PART FIVE

Finally, Section 19 presents the conclusions and reiterates suggestions for the way forward.

PART ONE : OVERVIEW

2.0 The Respondents

- 2.1 A total of 117 formal responses were received on the Wales Spatial Plan Update (WSPU). These came from a wide range of organisations, institutions and included a small number of individual responses. A breakdown by sector of respondent is given in the table below.

Table 2.1 WSPU Respondents by Sector Group

Sector	Number	Percentage
Public	42	36%
Voluntary	27	23%
Business	25	21%
Professional Bodies	6	5%
Umbrella Organisations	12	10%
Individuals	5	4%
TOTALS	117	100%

- 2.2 The “Public Sector” category includes local authorities, government departments and sponsored bodies in Wales, such as the Environment Agency. Not all Welsh Unitary authorities submitted formal responses although those that did not formally respond are known to have indicated support for the WSPU having been directly involved in the preparation through regional partnership working. Over a third of all responses were from this group.
- 2.3 “Umbrella Organisations” embraces a wide array of bodies and groups including local economic partnerships and organisations like the RSPB. Some 12% of responses were received from organisations in this category.
- 2.4 The “Business Sector” was represented by a wide range of interests from planning and property, investment and land holdings, infrastructure and utilities. Over 20% of all responses were from the business community demonstrating a significant increase in business engagement since the original consultation on the Wales Spatial Plan in 2004
- 2.5 Nearly a quarter of all responses were from voluntary sector organisations representing environmental, social, community and transport interests from across Wales.
- 2.6 Responses were also received from the professional organisations in Wales representing planning and property as well as accounting and logistics. There were no representations received from academic institutions.

Area Responses

- 2.7 The majority of respondents commented on the principles contained within the WSPU making reference to Area strategies to illustrate points where necessary. The breakdown of respondents making particular comments on each spatial plan Area is shown in the table below.

Table 2.2 WSPU Area Responses

Area	Percentage
Multiple Region	41%
North West Wales	4%
North East Wales	9%
Central Wales	9%
South East Wales	23%
Swansea Bay	4%
Pembrokeshire	10%

- 2.8 South East Wales – The Capital Network – received the bulk of area specific responses, including the majority of business sector views. North East and Central Wales received a cross section of comments from neighbouring areas, providing evidence of cross-border engagement.
- 2.9 Swansea Bay and North West Wales received the least area specific responses. Whilst Swansea is often included in reference to south Wales within responses covering multiple regions, there appears to be more limited engagement in respect of North Wales from the submitted consultation responses.

3.0 General Points

Headline Points – Overview

- *Support & encouragement for the principles of the WSP.*
- *Increased engagement in the consultation process by the private/business sector.*
- *Submitted responses strong on physical development issues with some strong views and concerns being expressed*
- *Workshop discussions covered wider “people” issues.*
- *General support for the broad direction of Area strategies*
- *Serious concerns raised over lack of delivery and action*

- 3.1 The vast majority of responses have been largely supportive of the approach and broad strategic direction of the Wales Spatial Plan Update – both nationally and at the Area level. In the most part, the challenges that have been raised are to do with seeking greater detail and clarification of the inter-relationships between the WSP and other policy directions.
- 3.2 The strongest representations relate to South East Wales with some conflicting views over the need for a greater emphasis on Cardiff and questions about the ability to manage a ripple effect of growth and economic prosperity.
- 3.3 Many respondents are concerned about delivery and the lack of specific action plans detailing how the visions will be achieved.
- 3.4 A number of specific drafting points have also been raised through the consultation process which will be considered in detail in the redrafting process. Many respondents have raised the need for greater clarity around the use of particular terms and references so that there is no ambiguity in interpretation (e.g. eco-settlement, zero carbon definition and the various usage of the term “affordable” housing – both formal and informal). Others, however, have welcomed some degree of flexibility in the way the WSP is able to establish the high level strategic direction and guide local delivery rather than be overly prescriptive. This also allows for greater stakeholder involvement in the detailed implementation.
- 3.5 Some of the comments raised in this consultation process will, more properly, need to be considered by the originating policy divisions of the Welsh Assembly Government (e.g the Zero Carbon initiative and delivering affordable housing). Many of these new policy areas are, of course, developing in tandem with work on the WSPU and will need to further inform future rewrites as the policies develop.

4.0 Key Issues

Headline Points – Key Issues

- *Concerns over apparent lack of evidence base with the Plan*
- *Challenges to the implied Housing/Job Balance distribution*
- *More consideration need to be given the Climate Change challenge.*
- *Concerns over a lack of a clear rural dimension and an over-emphasis on urban issues and solutions.*
- *Positive support for more specific environmental issues and the promotion of “Green Infrastructure” concept*
- *More attention to be given to Tourism across Areas*
- *Clarification sought on role, function and approach to determining Key & Hub Settlements*
- *Particular concerns around the relationship and status of WSP*

- 4.1 These are the consistent and most frequent general topics raised by the majority of respondents across all sectors. Given the strength of representations, these are considered to be the most important issues to be resolved in the re-draft and clarification of the Wales Spatial Plan Update (WSPU).
- 4.2 Many respondents have been critical about the apparent lack of evidence base contained within the WSPU document to support the strategy and over-arching vision for the spatial plan Areas. There are concerns about whether the document uses the most up to date population projections (2006 as opposed to 2003) to assess the implications for growth throughout Wales.
- 4.3 The lack of specific housing and employment forecasts leave many respondents at a loss as to how the scale of economic growth and development expected has actually (if at all) been measured and assessed to determine infrastructure and transport needs and environmental capacity to accommodate implied growth.
- 4.4 The omission of specific reference to housing projections and the apportionment of housing numbers to Local Planning Authority areas comes in for extensive criticism. Public sector respondents are seeking inclusion in the WSPU to help formalise the analysis undertaken by regional partnerships in order to underpin their ongoing work on Local Development Plans. Most business and professional respondents, however, raise deep concerns over the lack of transparency and scrutiny to the process of apportionment – whether or not this is included in the WSPU. This is shown to be in sharp contrast with the approach taken with the Regional Spatial Strategies in England which are subject to detailed formal public examination overseen by independent inspectors.
- 4.5 There are particular concerns that the WSPU does not adequately deal with rural issues – especially in the context of housing, access to services and rural deprivation being poorly represented in the national statistics. Rural solutions too are less well developed and implications about rural mobility, private transport costs and the importance of east-west movements needing to be more accurately reflected.

- 4.6 Some commentators acknowledge that the English approach is more expressly about regional land use planning whilst the WSPU aims to be much broader than this. However, it is this relationship between the WSPU and land use planning and delivery that is raised most strongly by respondents in the development industry. With the WSPU being identified of “material consideration” for the preparation of Local Development Plans in Wales, the lack of evidence base and absence of public scrutiny is considered to lead to conclusions of “unsoundness” being applied.
- 4.7 Many respondents raise concerns that the drafting comes across mostly as rhetoric aspiration and ambition with no clear direction or precision to actions needed to deliver the strategy.
- 4.8 There is considerable strength of support for a more positive approach to environmental issues and encouragement for a more active “Green Infrastructure” approach. This is posing a new paradigm that sees the environment as an economic tool and responding to the implications for management, food production, leisure and enjoyment, protection and the important inter-relationships between urban and rural areas.
- 4.9 Further clarification is sought on the role and function of proposed key settlements and hubs. Many respondents raise the question about the apparent lack of consistency in approach (and definitions) between the spatial plan Areas. Concerns have also been expressed about attempts to name every settlement as “key” or risk being omitted from WAG funding and investment decisions. A number of public sector respondents seek further clarification of the funding delivery intentions and some have made further representation for inclusion of specific settlements (see the Spatial Plan Area Sections later in this report).
- 4.10 Questions have also been raised about transport links between proposed key settlements, what happens outside these areas and whether consideration has been given to the capacity of nominated settlements to accommodate implied (although not specified) growth. The timing of the Regional Transport Plan (RTPs) and the WSPU and funding delivery is also raised by many respondents.
- 4.11 An over-riding concern emerges about the lack of clarity over the role and purpose of the WSPU document and whether sufficient direction is provided for delivery and implementation.

5.0 Suggested Way Forward

Headline Points – Key Actions

- *The role and purpose WSPU to be more explicit*
- *Section on relationships with other policies to be expanded*
- *Clarity to be given on mechanisms to resolve detailed issues*
- *Further guidance needed to resolve “test of soundness” implications for LDPs.*
- *Further work needed on infrastructure needs – driven by more detailed demand projections.*

- 5.1 Reflecting on the consultation responses, DTZ has provided initial advice on the possible way forward for the WSPU for further consideration by the Welsh Assembly Government and its partners.
- 5.2 Given the broad support for the strategic direction, a way forward would be to fine-tune the current strategies based on the consultation comments. The fundamental challenges about the lack of detailed evidence may well be resolved by greater prominence of the various working papers, research and analysis prepared as an integral part of the regional partnership working groups. This material will also assist preparation of the delivery action plans and support future rewrites of the Wales Spatial Plan as a whole. Whilst some of these have been available through regional web-sites they are not specifically referenced in the WSPU document.
- 5.3 Whilst improved referencing will help point respondents in the direction of the evidence that has been utilised in preparing the update it is also recognised that this may still not answer all the concerns being raised. It is suggested, therefore, that greater clarity may also be required to explain further the intended processes and mechanisms through which additional research, evidence and detailed examination will be resolved in future.
- 5.4 Particular attention is needed to resolve the continued uncertainty over the relationship between the WSP and the land use planning process. The original reference to the “material” consideration role of the WSP was made in Planning Policy Wales (PPW) in 2002 – two years before the WSP was first adopted by the National Assembly for Wales. It may well be, therefore, that the intentions of policy relationships have evolved but the planning and legal framework within which they sit has not been updated to reflect this. A refresh of PPW is currently in hand and consideration should be given to clarifying the legal relationship between the stated policy objectives.
- 5.4 Concerns about the rural dimension and the scope for greater reference to Green Infrastructure can be initially resolved through re-drafting and the commissioning for further research if necessary. Further policy guidance will also be forthcoming from the current review by Welsh Assembly Government into a new 2020 Vision for Farming in the future expected to report in the Autumn.

5.5 Further work is also needed to give direction for infrastructure requirements to meet the needs of sustainable economic growth as envisaged for each spatial plan Area.

PART TWO :
CORE THEMES

6.0 Building Sustainable Communities

Headline Points –

- *Focus on affordable housing without the context of general housing delivery*
- *More clarity on rural communities needed*
- *Health, wellbeing and social justice issues poorly developed*

- 6.1 The high level focus on “affordable” housing is largely welcomed, in principle, but does not appear balanced with similar consideration of general housing provision and the working of regional housing markets. There are major concerns about delivery.
- 6.2 The priority appears to be to focus housing and economic development in nominated key settlements and hence the rush to be identified but there is no clarity about environmental or infrastructure capacity to accommodate envisaged growth and no detail about the scale of growth expected.
- 6.3 Furthermore, such urban solutions appear to miss out smaller settlements and the need for more dispersed rural communities to be supported.
- 6.4 Indeed, rural community issues generally are not well covered. There are very different challenges in terms of access to services, cost efficiency in delivery due to dispersed nature of population and the need for greater mobility not reflected in transport policies.
- 6.5 Health investment is paramount to reducing inequalities within communities. Changes in health delivery not wholly captured or reflected within the WSPU.
- 6.6 There is an absence of community safety in general and opportunities to design out crime and disorder are essential.
- 6.7 The need to empower local communities to resolve local problems is encouraged by a number of respondents. Community leadership and capacity building (skills and expertise) are essential. Community enterprise and sustainable funding solutions (eg Development Trusts, Community Land, Co-operatives) need to be supported more widely.

7.0 Promoting A Sustainable Economy

Headline Points –

- *Tourism & Agriculture hardly considered*
- *Future of manufacturing in Wales ignored*
- *More emphasis needed on role of universities*
- *Scale of development & transport demands not determined*
- *Climate change impacts/effects not determined*

- 7.1 There is general support for the broad economic direction although more detail is sought in determining the scale and location of new development in order to understand delivery options and ability to manage environmental effects.
- 7.2 Very little attention given to the future of agriculture as an economic driver in rural parts of Wales as well as environmental stewardship.
- 7.3 More consideration needed on how to raise skills across the board from basic employability to advanced technical and specialist skills/knowledge.
- 7.4 Overcoming socio-economic barriers essential to improving economic activity and wider remit for social capital and community businesses to contribute to economic well being.
- 7.5 More substantial role needed for Universities in nurturing local talent and exploiting ideas locally. What support mechanisms are needed to enable them to do more and what infrastructure needs to be in place to facilitate this.
- 7.6 Much emphasis given to k-economy without necessarily considering it in the local/regional context. What is or should be the future of manufacturing in Wales and how can the sector respond to meet global competition?

8.0 Valuing Our Environment

Headline Points –

- *More consideration needed to delivering “Green Infrastructure”*
- *More focus on climate change issues / minimise impacts*
- *Ability to deliver of zero carbon development by 2011 questioned*

- 8.1 Whilst the ambition of early achievement of zero carbon development in Wales is widely welcomed there remain major concerns about the practical delivery in such a short timescale by 2011. The development industry is seeking clarification of the assessment criteria and clearer definition of the standards to be adopted.
- 8.2 Respondents are also seeking greater attention to a raft of climate change issues from flooding, water resource management, environment capacity assessments and implications following “Peak Oil” scenario. More evidence is needed of specific actions to be taken that will reduce the ecological footprint of spatial plan Areas.
- 8.3 There is considerable strength of support for a more positive approach to environmental issues and encouragement for a more active “Green Infrastructure” approach. This is posing a new paradigm that sees the environment as an economic tool and responding to the implications for management, food production, leisure and enjoyment, protection and the important inter-relationships between urban and rural areas.

9.0 Achieving Sustainable Access

Headline Points –

- *Regional Transport Plans clearly vital and urgent*
- *Funding must support transport solutions*
- *International connections not especially covered*
- *Effective Wales-wide ICT delivery to be resolved.*

- 9.1 Publication of the Regional Transport Plans (RTPs) is urgent across Wales to ensure comprehensive integration with the objectives of the WSPU. The lack of specific development targets in the WSPU, however, makes it difficult to see how transport capacity and workable solutions can be easily resolved. Funding commitment to improve transport connections, reliability and effectiveness is also critical.
- 9.2 There is very little attention in the WSPU on international connections and further consideration should be given to the role of the ports and the airport and improvements to their regional connectivity.
- 9.3 Cross-border transport connections are important and joint funding solutions may need to be developed to tackle particular problems. East-West links are as important as North South improvements and connections to Birmingham, Manchester and Liverpool as vital as to London.
- 9.4 The array of key settlements and hubs and desire for all to be inter-connected could lead to a complex pattern of transport routes. More attention is needed to encourage and enable alternative transport solutions from road and private car use.

10.0 Respecting Distinctiveness

Headline Points –

- *Little reference to Rural Distinctiveness*
- *Culture, language and heritage should feature more*
- *Further work needed to determine niche tourism markets*

- 10.1 Greater awareness and respect is needed for the underlying value of places in Wales. These demand more sensitive treatment in terms of development proposals, urban design and form of building to ensure they contribute to distinctiveness in the future. More evidence is needed on the scale and nature of expected development to ensure steps can be taken to manage delivery effectively through the local planning process and with community involvement.
- 10.2 There appears very little reference to rural distinctiveness and the merits of the landscape, geology and physical environment. Active management, however, is essential to maintain the rural character and charm requiring greater support for Agriculture and farming communities.
- 10.3 The culture, language and heritage of Wales should be more widely promoted and care needed to sustain these values for the future. Further work is needed to identify and support niche tourism markets that can be exploited in a sustainable way and stimulate value-added activities for rural areas.

11.0 Working with Our Immediate Neighbours

Headline Points –

- *Cross border health delivery needs more attention*
- *Further consideration needed of cross-border housing markets*
- *Service delivery agreements needed – backed up by funding*

- 11.1 It is recognised and supported that there are good working relationships emerging in some areas (North East / Deeside and Central / West Midlands) but respondents are seeking more detailed cross-border action and commitment to funding and investment for joint solutions.
- 11.2 The scale of development proposed and the transport implications need to be fully evaluated in context with neighbouring development strategies.
- 11.3 Further attention needed to Irish links and inter-relationships.
- 11.4 More work needed on south west regional links – and more detail needed on the Severn Barrage proposals.
- 11.5 Further work also needed on wider marine spatial planning and maritime issues taking account of the Marine Bill and opportunities to take a lead in integrated marine and coastal resource management.

PART THREE :
AREA STRATEGIES

12.0 N W Wales – Eyri A Mon

Headline Points – Key Issues

- *Greater reference needed to landscape value and role of agriculture in environmental management*
- *Accessibility and rural transport solutions critical*
- *Indigenous growth and support for SMEs vital for future*

- 12.1 Particular concerns have been expressed about the need for greater emphasis on the importance of the value of the landscape as a distinctive offer in N W Wales. Critical need to reconnect communities with the environment and develop distinctive strategy to retain/attract young and skilled people back to the area.
- 12.2 The important role of the agriculture sector as environmental managers and curators of the distinctive landscape should also be given more prominence.
- 12.3 Considerable weight attached to the need to increase the value of economic activity and tackle economic inactivity. Local supply chain development needs to be prioritised to reduce leakage and increase local multipliers and value of indigenous activity.
- 12.4 Skills development is also crucial but should not be focussed too narrowly but generate transferable skills providing greater flexibility within the workforce. Emphasis suggested on vocational training in all sectors and at all levels. More attention needed to business support for 3rd and 4th sector enterprises (voluntary and community sectors) to achieve long term viability.
- 12.5 Seen as important to value the traditional assets in N W Wales as well as present a positive outward looking and ambition region and people. High value and value added tourism essential as well as “global competitiveness” across all sectors.
- 12.6 The principle and location of key socio-economic hubs is supported but further clarity needed on the linkages and transport implications between hubs and the rural hinterlands. The provision and exploitation of ICT and especially broad band connectivity in non hub areas also needs attention.
- 12.7 Reference is made to the inclusion of Blaenau Ffestiniog as a key town and not to be overlooked between two spatial plan areas. Opportunities for outdoor / high value recreation and tourism should be exploited aligned with physical regeneration.
- 12.8 Concerns have also been raised about the narrow description of Bangor as being centred around the University with equal emphasis needed to the towns role as a regional transport hub and regional shopping centre. The comment is also made that Bangor should be promoted as one of the cultural, drama and literary centre in Wales rather than Caernarfon.

13.0 N E WALES – Borders & Coast

Headline Points – Key Issues

- *Good recognition of linkages with neighbouring regions in England*
- *More consideration needed of skills imbalance and the ageing population*
- *Tourism potential of the Dee Valley should be exploited*

- 13.1 More detail needed about activities necessary to diversify the regional economy. Particular challenges being faced in N E Wales include demographic changes, an ageing workforce and substantial in and out migration pressures.
- 13.2 Whilst supporting the intentions behind promoting a sustainable economy, comments have also been raised about the need for balancing economic growth and the ecological interests of the Dee Estuary.
- 13.3 The opportunity was raised in the workshop meeting of considering measures other than just economic growth e.g. quality of life.
- 13.4 More attention should be given to the tourism potential of the Dee Valley.
- 13.5 Cross border relationships are critical and there is a good basis for improved working and delivery.

14.0 Central Wales

Headline Points – Key Issues

- *Particular concerns that vision less ambitious than others*
- *Rurality issues not adequately addressed*
- *More focus needed on east-west links and cross border delivery*
- *More detail needed on delivery actions*

- 14.1 There remain some concerns over the definition of the Central Wales area. Comments made to the effect that this is simply the bit in the middle of Wales. In practice there are considerable differences between the eastern and western parts of Central Wales – with the Cambrian Mountains in between.
- 14.2 There appear concerns that these differences are not fully addressed in the strategy and the vision appears less ambitious than other Areas. Generally, however, there is broad support for the overall strategy subject to the issues highlighted.
- 14.3 East-West links are important and greater consideration of the inter-dependence on cross border relationships for service provision is required. There is a “rural premium” cost to service delivery including skills and training and rural deprivation is not adequately addressed by the current measures.
- 14.4 The workshop discussions raised the need for “appropriate and relevant growth” rather than growth at all costs and much more attention is needed to protecting the valuable environment that sets Central Wales apart.
- 14.5 The role of ICT, delivery of reliable and extensive broad band services and the need for cross border investment in road transport are all highlighted as needing more detailed consideration and examination.
- 14.6 Changing demographic structures within rural areas and the implications of recent migration patterns and possible future changes needs particular consideration and solutions to the demand for skilled labour. Prospects to retain young skilled people need to be explored further.
- 14.7 The role of the Cambrian Mountains in achieving a number of priority themes should be made more explicit. There is also a call for Aberystwyth to be identified for strategic investment.
- 14.8 Diversity and the distinctiveness of Central Wales to be recognised more fully and not attempt to introduce cloned solutions. The area must avoid a narrow focus on the Knowledge Economy – however that is defined – and embrace the variety of economic activity (including agriculture) that is prevalent through the area.
- 14.9 More consideration needs be given to the impacts of climate change across all themes and priorities and the importance of reducing the local ecological footprint whilst recognising the different pressures on transport and travel in rural areas.

14.10 Skills development, education and training seen as critical elements of protecting future economy and need to prepare for future demands in environmental sectors.

15.0 South East Wales – Capital Network

Headline Points – Key Issues

- *Extensive and detailed representations submitted*
- *Many of the “Hot Topics” particularly affect S E Wales*
- *Concerns over housing/job balance and implied distribution*
- *Role and relationship between Cardiff and the Valleys*

- 15.1 There is general support for the strategic vision and the distinction between the Valleys, Coast and Connections Corridor is broadly welcomed.
- 15.2 There remains mostly private sector concern, however, over the proposed approach to manage growth of Cardiff and encourage/divert development to other areas. Many respondents are concerned that a housing/job balance is not achieved and that Cardiff may struggle to realise its economic potential without integrated/balanced housing delivery.
- 15.3 Concerns are also expressed as to whether 1.4 million people can properly support a functioning “City Region” as suggested and, therefore, whether the aims of dispersed activity from Cardiff will realise economic success. Other City Regions appear to need more critical mass to function effectively (3 million plus people). Respondents therefore question whether more growth should be directed to Cardiff.
- 15.4 The strategy is seen to be wholly dependent on the success and delivery of the Transport Strategy. There remain major concerns over delivery of the RTP and funding capacity to make the connected region truly work in a sustainable way.
- 15.5 More should be made of the region’s “international” dimension and greater attention needed to the role of Ports and the airport in supporting this economic driver. Further consideration should also be given to tourism in the Capital Network.
- 15.6 Many respondents raise fundamental concerns over the lack of consistency across the spatial plan areas in determining and defining Key Settlements. Only 14 centres are identified in S E Wales but 118 centres are identified across the rest of Wales and yet SE Wales contains over half the country’s population. Greater clarity is needed on the role, function and purpose of key settlements. Different approaches also appear to be emerging in LDPs and more distinction is needed between “Regionally” key and Locally “Key” settlements. Some additional centres are suggested for consideration.
- 15.7 More evidence is needed on the role, purpose and selection process in identifying “Strategic Opportunity Areas”. Greater attention to be given to cross-border relationships and a strategic connection corridor should be highlighted along A465/A40/M50 to Midlands.
- 15.8 A range of interests comment that there is a need for an International Business Park in SE Wales and some question why no location is identified. Several competing locations are suggested in responses.

16.0 Swansea Bay – Waterfront & Western Valleys

Headline Points – Key Issues

- *Swansea's role as regional capital perhaps underplayed*
- *Transport and local connections must improve*
- *Strong distinctive features should be promoted widely*
- *Balance needed between key settlements and building sustainable valley communities*

- 16.1 From the workshop discussions there appeared to be general consensus that the broad approach for Swansea Bay is about right although more attention needs to be given to social issues. Some respondents questioned whether the vision was achievable and also how it should be measured – especially given that there are no explicit targets set.
- 16.2 The written submissions have raised concerns about the possible dilution of the original emphasis given to Swansea and the City Centre. There appears no explanation of how the original vision for the Swansea city region will be prioritised by WAG. In contrast, however, the workshop debates raised the question about whether the valley areas were being neglected in favour of Swansea. Others did, however, raise the issue about whether there were too many key settlements and whether there was danger of “spreading the jam too thinly”.
- 16.3 More clarity is therefore sought on the different role and functions of the proposed key settlements in order to give more strategic direction for priorities and delivery. More baseline data is required to measure future change and to evaluate whether or not the ripple effect from the key settlements is actually working.
- 16.4 Continued improvement in skills and knowledge exploitation of Swansea University as a key driver for economic improvement should be highlighted. The development and location of a Science/Innovation Park has not been addressed in the Area strategy and more focus should be given to the important role of the University.
- 16.5 Further consideration should be given to the long term future of heavy industry in the area and the strategic effects of any radical change.
- 16.6 Concerns have been raised as whether there is enough information on housing – is it to be provided in the right location. There appears to be scant consideration of housing needs in rural settlements.
- 16.7 Transport infrastructure and connectivity is not considered to be good at present between the valleys and the coast/key settlements. Indeed a lot of concern about poor services in the valley areas in danger of isolating them further in the future.
- 16.8 More engagement needed with community groups if bottom-up delivery is to be achieved and many respondents raise the concern about lack of detail on delivery.

17.0 Pembrokeshire – The Haven

Headline Points – Key Issues

- *Vision is not radical enough*
- *Greater emphasis needed on rural/agriculture issues*
- *Role of communities outside key settlements to be integrated*
- *The distinct north/south differences do not come across*

- 17.1 Some conflicting views appear to have been made about the future direction for Pembrokeshire. Some express concern about taking a traditional linear economic growth model and suggest an alternative quality of life/social well being future could well be better suited for Pembrokeshire. Others see the challenges are to do with a tradition of low value/low pay activities and more emphasis needed on skills and training and action needed to diversify the local economy.
- 17.2 Many respondents have expressed strong concerns about the apparent “urban bias” in the WSPU Area strategy and the vision does not adequately reflect the rural dimension of much of the County. The distinction between North & South Pembrokeshire especially is not addressed and actions/solutions will need to be different in each location.
- 17.3 There appears considerable support for much more emphasis to be given to the future role of agriculture. Prioritising responses to climate change also feature strongly in the responses and suggestions that the vision should reflect a need to reduce the Areas carbon ecological footprint. More should be done to exploit and promote opportunities around renewable energy.
- 17.4 Greater attention is needed to solutions to infrastructure constraints to improve local capacity and reduce the feeling of peripherality. Dualling of the A40 is highlighted as well as the crucial need for better and more extensive broad band coverage.
- 17.5 Affordable housing is seen as a particular priority for Pembrokeshire but the document does little justice to the scale of the problem nor the solutions that may need particular attention in rural / low development locations such as Pembrokeshire.
- 17.6 Training and local skill development is seen as a priority to build local confidence and capacity to attract, grown and retain employment. The lack of HE presence is or particular concern with inevitable loss of young people from the county to take up education.
- 17.7 There is support for town centre regeneration and the Key Settlement/Hub concepts. But a clearer vision is needed on the complimentary roles of towns recognising that they are often in competition with each other. Over centralisation has worried a number of respondents and the inter-relationships between settlements and the dispersed population that is characteristic of Pembrokeshire also needs to be addressed.
- 17.8 The role and importance of individual communities and the vital need to empower local people to solve problems themselves comes across most strongly from the consultation workshop discussions. A range of community delivery options have been expressed but appear to have faced local setbacks. Issues around funding, local leadership and communication all need to be tackled but the WSPU does little to give direction for delivery.

**PART FOUR :
STRATEGIC ENVIRONMENTAL
ASSESSMENT**

18.0 SEA Responses

- 18.1 There have been relatively few responses to the SA/SEA paper. This probably reflects the more technical approach of this process, greater interest of respondents on the 'big' issues and the natural bias of respondents to direct the plan toward their way of thinking and their ambitions.
- 18.2 Respondents referring to the SA/SEA include, amongst others, The Town and Country Planning Association, the Environment Agency, Countryside Council for Wales Cynnal Cymru, Wales Environmental Link, Welsh Local Government Association, Merthyr Tydfil CBC and Cadw. Some are very detailed and will need to be considered further.
- 18.3 A key concern that a number of respondents have questioned is the validity and implications of the statement that the 43,000 new homes proposed for Swansea Bay will "not have significant environmental effects".
- 18.4 There are also concerns that individual projects will gain legitimacy without scrutiny and transparency as developers will seek to argue that proposals have been tested via the SA/SEA. This fear is exacerbated because there is concern that the SA/SEA has not been rigorous due to the lack of detailed information to test it against. For example, objectives to 'improve air quality' and to 'build vibrant, safe and cohesive communities' comprise generalised aspirations making it hard to judge potential conflicts.
- 18.5 It has been suggested that cultural heritage is made more explicit and reference to it strengthened in terms of quality of life and maintaining sustainable communities.
- 18.6 In relation to the South East, it is pointed out by one respondent that the Preferred Strategy would bring significant adverse effects on climate factors. It is questioned whether employing this strategy would make it difficult to achieve wider targets for a reduction in Co2 emissions and voices significant concern that the WSPU is proceeding on the basis of a plan that will cause adverse effects on the climate.

PART FIVE :
CONCLUSIONS

19.0 Conclusions

- 19.1 There has been widespread support for the public consultation exercise undertaken which involved both invitation to submit written responses and discussion workshops. This has resulted in a good level of response with respondents representing a varied and diverse spread of interests.
- 19.2 Other notable features include a concentration of business/private sector responses in the South East demonstrating the interest and particular challenges in this region. It is also clear that joint working and a 'bottom up approach' has been successfully realised, as demonstrated by responses from English Local Authorities, utility companies and local community/environmental groups.
- 19.3 There is considerable support for the continued development of the Wales Spatial Plan and a number of respondents welcome the integration of land use planning with wider aspirations and policies.
- 19.4 An uneasy relationship exists between the WSPU and current town planning legislation, to which private sector respondents have been strong in voicing their objections about the lack of detail and transparency. However, Local Authorities have also raised concerns in this vein, that the WSPU does not provide a robust basis or commitment against which they can be sure their LDP's will be robust. Perhaps alternative mechanisms may be needed to resolve these issues rather than embroil the WSPU in such detailed debate.
- 19.5 Broadly, however, the strategic vision and overall direction contained within the WSPU and the Area Strategies have gained general support. For consistency, there is merit in the WSPU remaining a strategic document, backed up by the supporting technical work which should also be published and expanded over time by related policy development work. This will ensure the WSPU builds on the good work undertaken by the various regional partnerships which have begun to foster more joined-up sub-regional thinking and action.

APPENDIX 1: CONSULTATION QUESTIONNAIRE

People, Places, Futures: The Wales Spatial Plan 2008 Update Consultation



Response Form

(This form is to be read in conjunction with the consultation document)

Title	<input type="text"/>	First Name	<input type="text"/>	Surname	<input type="text"/>
Organisation	<input type="text"/>				
Job Title	<input type="text"/>				
Address	<input type="text"/>				
Postcode	<input type="text"/>	Tel.	<input type="text"/>		
E-mail	<input type="text"/>				

Your completed responses should be returned by 24 April 2008 to:

**Wales Spatial Plan Team
Room 3.08 CP1
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ**

NATIONAL

Building Sustainable Communities

1. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Building Sustainable Communities' forward?
2. Are there any other strategic spatial challenges for 'Building Sustainable Communities', which the Wales Spatial Plan should address? (Please offer supporting evidence)

Promoting A Sustainable Economy

3. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Promoting a Sustainable Economy' forward?
4. Are there any other strategic spatial challenges for Promoting a Sustainable Economy, which the Wales Spatial Plan should address? (Please offer supporting evidence)

Valuing Our Environment

5. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Valuing Our Environment' forward?
6. Are there any other strategic spatial challenges for 'Valuing Our Environment', which the Wales Spatial Plan should address? (Please offer supporting evidence)

Achieving Sustainable Accessibility

7. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Achieving Sustainable Accessibility' forward?
8. Are there any other strategic spatial challenges for 'Achieving Sustainable Accessibility', which the Wales Spatial Plan should address? (Please offer supporting evidence)

Respecting Distinctiveness

9. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Respecting Distinctiveness' forward?
10. Are there any other strategic spatial challenges for 'Respecting Distinctiveness', which the Wales Spatial Plan should address? (Please offer supporting evidence)

Working With Our Immediate Neighbours

11. Do you think the proposed Outcomes and Actions in the National sections are the right ones to take 'Working With Our Immediate Neighbours' forward?
12. Are there any other strategic spatial challenges for 'Working With Our Immediate Neighbours', which the Wales Spatial Plan should address? (Please offer supporting evidence)

REGIONAL

North West Wales – Eryri a Môn

13. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
14. Does the strategy address all of the key future challenges for the region?

North East Wales – Border and Coast

15. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
16. Does the strategy address all of the key future challenges for the region?

Central Wales

17. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
18. Does the strategy address all of the key future challenges for the region?

South East – The Capital Network

19. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
20. Does the strategy address all of the key future challenges for the region?

Swansea Bay – Waterfront and Western Valleys

21. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
22. Does the strategy address all of the key future challenges for the region?

Pembrokeshire – The Haven

23. Does the document paint a clear picture of the 20 year vision for the region? (Please offer supporting evidence).
24. Does the strategy address all of the key future challenges for the region?

APPENDIX 2: LIST OF RESPONDENTS

A

Abergele Town Council

Associated British Ports South Wales Ports

B

Barton Willmore

Blaenau Gwent

Blaenau Ymlaen

Bourne Leisure Ltd

Boyer Planning

Brecon Beacons National Park Authority

Bridgend County Borough Council

Bridgend Local Service Board

British Waterways

C

Caerphilly County Borough Council

Campaign for the Protection of Rural Wales

Capital Region Tourism/Visit Wales

Cardiff Council

Carmarthenshire County Council

Ceredigion County Council

Ceredigion Economic Regeneration Partnership

Ceredigion Local Health Board

Ceredigion Local Public Health Team - National Health Service For Wales

Ceredigion Local Service Board (LSB)

Cheshire County Council

City and County of Swansea

City of Bangor Council

Clwydian Range AONB

Composite Energy Ltd

Conwy County Borough Council

Country Land & Business Association

Countryside Council For Wales

Crickhowell Estates

Cushman & Wakefield

Cynnal Cymru's

D

Defence Estates

Denbigshire County Council/Denbigshire LSB

Department of the Environmental & Transport

Department of the Environmental & Transport

Disability Wales

E

Equality and Human Rights Commission

Environment Agency Wales

Environmental Planning

F

Felinfach Community Council

Friends of the Earth Cymru

G

Gwent Wildlife Trust

Gwynedd Council

H

Harmers Limited

Harmers Limited

Haverfordwest Improvement Project

Haverfordwest Town Centre Manager

I

Innovation Network Partnership Mid-Wales

Isle of Anglesey County Council

Isle of Anglesey County Council's Biodiversity Officer

M

Merthyr Tydfil County Borough Council

Micropower Council

Monmouthshire County Council

Mr C Croft MBE

Mr J Chanay

Mr R Jarvis

N

National Grid

Natural England

Neath Port Talbot Council

Network Rail

Newport & Valleys Branch of the Campaign for the Protection of Rural Wales

Newport Area Environmental Group

Newport Area Environmental Group

Newport City Council

NFU

North West Regional Assembly

P

Pembroke 21C Community Association

Pembrokeshire Coast National Park Authority

Pembrokeshire County Council

Pembrokeshire County Health Council

Pembrokeshire Local Health Board

Pembrokeshire Town Council

Pembrokeshire: The Haven Business Panel

Plymouth Estates

Powys County Council

Powys County Council

R

Redrow Homes

RPS Planning & Development Ltd

RPS Planning & Development Ltd

RSPB

RTPI Cymru

S

Savills

Scottish Power Energy Networks

Sewta

Snowdonia National Park Authority

South East Wales Economic Forum

South East Wales Strategic Planning Group

Spawforths

SWWITCH

T

The Alliance Wales

The Chartered Institute of Logistics and Transport (UK)

The Holyhead Forward Board

The Home Builders Federation

The Institute of Chartered Accountants

The Mersey Dee Alliance

The Ramblers Association North Wales

The Royal Institution of Chartered Surveyors Wales

Torfaen County Borough Council

Tourism Partnership North Wales

Town and Country Planning Association

Transition Bro Gwaun

V

Vale of Glamorgan

W

Wales Environment Link

Wales TUC Cymru

WCVA

Welsh Assembly Government

Welsh Assembly Government

Welsh Association of Chief Police Officers

Welsh Language Board

Welsh Local Government Association

West Midlands Regional Assembly

Westgate Park Cardiff Limited

Wirral

Wildlife Trusts Wales

WWF Cymru

Wye Valley AONB Unit