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7th July 2017

**Planning Application 2017/00564/FUL**

Proposal: Construction of a new highway called the Northern Access Road

For the attention of Mr I Robinson

The Welsh Government must be commended for its progressive planning policies, but they must be condemned for not then applying these policies to their own projects. My objection to this planning application is based on its failure to recognise existing planning laws, its aspirational nature and lack of evidence, for example a business case, to support the application. It is also noted that, planned and approved flood protection works in Llanmaes have been delayed, as by some unknown mechanism these works are now linked with the Northern Access Road (NAR) planning application.

It is argued that the paradox of planning as stated above can emerge when the practice of strategic decision-making is carried out without a coherent methodology. A methodology is much more than a process that is followed. In brief, it clearly identifies the concepts that inform the methods in use, it explains the rationale for the task to be undertaken together with any theories, models or principles for any premise on which the task is founded. Justification is given for the choices made in relation to the methods identified. Consideration is also given to the ethical stance of the task, its practices and implications. A rigorous methodology provides a mechanism for both critical thinking and evaluation. Further, it provides assurance to those individuals involved in strategic decision-making to be able to approach the activity with confidence.

Indications are that the Welsh Government has not had the benefit of such a methodology to guide it through strategic planning in relation to the NAR; this absence may also have wider implications. In the context of strategic decision-making the Welsh Government have often attracted criticism, the most recent example being The Circuit of Wales near Ebbw Vale.

Any strategy is inherently about achieving a future, long-term aim. This can range from visionary and aspirational to a more grounded evidence based approach. I was informed during the consultation process, that the purpose of the NAR is ‘aspirational’. This form of strategy is highly speculative and calls into question the financial and ethical validity of such a decision-making process. Saying things with conviction does not make them true. It is easy to use circular arguments to justify actions, but from a practical perspective this approach is flawed and is likely to fail when applied to real-world operations. It is suggested what is needed in this case is an evidence-based methodology with inherent accountabilities.

It is concluded that the non-observance of planning policies, its aspirational status and absence of evidence in the form of a business case, renders this application invalid and potentially *ultra vires*; it should therefore be abandoned.

Yours sincerely Jackie Simpson