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18<sup>th</sup> May 2018

Dear Sir/ Madam,

### **Consultation on Draft Planning Policy Wales: Edition 10**

We welcome the opportunity to respond to the above consultation.

The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. This requires that in the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development.

We welcome and support the intention to refresh Planning Policy Wales (PPW) to reflect the requirements of the Well-being of Future Generations (Wales) Act. This is an important step to help ensure that the planning system adopts the ways of working promoted in the Act to help deliver the wellbeing goals.

We also welcome the general direction given in the Draft PPW on the role of the Planning system in delivering the Sustainable Development of Natural Resources as introduced by the Environment (Wales) Act 2016 together with the need for planning authorities to consider their duty under Section 6 of the Environment (Wales) Act.

Whilst we are generally supportive of the approach put forward in the draft PPW, we consider there are certain gaps within the current draft which need to be addressed to ensure a consistent understanding of policy and roles:

### **Sustainable Management of Natural Resources**

We believe that further clarity is required on the aspiration of the Environment (Wales) Act to consider the long-term resilience of ecosystems, and how the sustainable management of natural resources should be applied in the planning system. We also believe that an early section of PPW should clarify the need to consider the evidence from Area Statements and SoNaRR which are statutory requirements of the Environment (Wales) Act. This will help understanding of the existing ecosystem benefits delivered by, and within, a place to inform decisions on directing the right development to the right locations, and how nature-based solutions should be considered to help ensure the resilience of ecosystems and new development.

### **Integrated Decision-Making**

We welcome the recognised need to deliver integrated decision-making to ensure social, environmental, economic and cultural matters are considered together with a view to maximise the delivery of all well-being goals. We believe that the need for integrated decision-making is an important concept to clarify and we consider more guidance is required on how 'integrated decision-making' is reflected in practice both in plan-making and in the planning application process to deliver on wellbeing goals.

### **Green Infrastructure, and Green Infrastructure Assessments**

We welcome the recognition of the need to make provision for Green Infrastructure. This is an important consideration to help ensure development maximises all wellbeing goals. However, we are aware that the term 'green infrastructure' can be defined differently by different actors within the planning system. We believe that PPW should provide a definition of the term, or at least refer to a definition to ensure consistent understanding by actors within the planning system. We advise that the definition used in [The EU Strategy on Green Infrastructure](#) should be recognised in PPW given its whole territory approach and the integration of urban, peri urban and rural green infrastructure.

We welcome the introduction of Green Infrastructure Assessments. These should be framed, and informed, by a national assessment of strategic green infrastructure within the National Development Framework.

We believe these assessments should be developed to understand the current local provision and deficiency of green infrastructure to inform the strategic planning for protecting, connecting and enhancing green infrastructure to support ecosystem resilience, and the delivery of ecosystem services to help support the resilience of development.

To facilitate the delivery of effective and useful Green Infrastructure Assessments, we consider that additional guidance is required to provide plan-making authorities with greater certainty and direction on the scope of those assessments, and how they should be informed by SoNaRR, Area Statements and other information sources to identify and address deficiencies.

### **Parallel tracking**

We welcome the clarity provided in the draft PPW on the relationship between planning application process and other consenting regimes. Whilst the timetable for determining consents varies between different consenting regimes, in many cases it would be advantageous if the various applications are submitted to a shared timetable to allow issues to be considered in parallel e.g. applications for planning permission, and environmental permits. We believe it would be advantageous to take this opportunity to review how this can be delivered. We have many examples where parallel tracking of planning permission applications and applications for environmental permits would have resulted in better outcomes and greater confidence by the public in the determination processes. This view is also shared by other consultees to the planning and environmental permitting processes who often feel unsighted on the potential impacts of the proposed development at the planning stage.

We would welcome the opportunity of further discussion with you on this matter, in the context of the work commenced recently between WG Planning Division, NRW and Planning Officers Society Wales.

This will also need to be framed in the context of the whole-system approach recommended by the Future Generations Commissioner for Wales in her letter to NRW dated 14<sup>th</sup> May 2018.

### **Section 6 of the Environment (Wales) Act**

We are conscious that the need to promote the resilience of ecosystems through development plans, and through individual development proposals represents a new consideration for all parties in the planning system. Consequently, it is reasonable to expect some uncertainty and potentially conflicting views on how to give appropriate consideration to ecosystem resilience. For example, there may be a difference of opinion between different parties on how the content of SoNaRR and/ or Area Statements should be demonstrably and adequately reflected in information prepared in support of a development plan/ planning application. There may also be cases where views on the effect on ecosystem resilience and its significance is contested. This could potentially lead to costly delays both in plan-making and in determining planning applications.

Whilst we recognise that PPW is primarily a policy document, the early provision of further national planning guidance that address these potential areas of uncertainty and conflict will help to minimise the potential for delays to decision-making.

### **Welsh National Marine Plan**

We welcome the reference to the Welsh National Marine Plan and to the recognition of the interface between land, coast and marine. Following the recent completion of the consultation in relation to the WNMP and the imminent completion of the PPW consultation there is an opportunity to develop detailed guidance on operationalising the new ways of working, with a particular focus on the land/sea interface at the coast.

### **EU Transition**

Planning Policy Wales Edition 10, when finalised, will provide the context for how land use planning in Wales will support delivery of the Welsh Government's land use strategy and priorities post EU transition. It would be helpful to indicate how PPW will provide a framework to inform post EU transition decisions, particularly in relation to the diversification of the rural economy.

### **New Ways of Working**

We recognise that the effective delivery by the Planning system of the new ways of working required by new legislation in Wales will take time as individuals and bodies within the planning system gain a greater understanding of how to fulfil new requirements.

It will be important, especially during the 'transition period' between the end of the consultation period and the publication of the final version of PPW Edition 10, for Welsh Government, NRW, the Office of the Future Generations Commissioner for Wales and the Planning Officers Society Wales to work closely together to develop a common understanding of the application of the new ways of working together with any supporting guidance and training events for both officers and elected members

Our detailed response to your consultation questions are included in the accompanying consultation form.

We trust that our advice will be useful to you. If you have any queries in relation to our detailed response, please contact Keith Davies, Planning, Landscape, Energy and Climate Change Manager in the first instance at: [keith.davies@cyfoethnaturiolcymru.gov.uk](mailto:keith.davies@cyfoethnaturiolcymru.gov.uk).

Yours faithfully,



**Ceri Davies**

**Executive Director of Evidence, Policy and Permitting**