



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

NATIONAL ASSEMBLY FOR WALES SUSTAINABILITY COMMITTEE INQUIRY INTO PLANNING IN WALES WRITTEN EVIDENCE OF THE COUNTRYSIDE COUNCIL FOR WALES

The Countryside Council for Wales welcomes the opportunity to participate in the Sustainability Committee's inquiry into Planning in Wales. Our evidence sets out recommendations and reflections in relation to immediate opportunities to improve the efficiency and effectiveness of the planning system together with longer term perspectives on how the planning system can contribute to addressing future challenges such as climate change.

INTRODUCTION

1. The natural environment of Wales is a strategic national asset for Wales. Important for its own sake, it contributes £9 billion to the GDP of Wales and is central to our quality of life, wellbeing and economy.

1.2 The land use planning system has a key role to play in helping ensure the environment is enhanced and safeguarded whilst supporting economic and social objectives.

1.3 CCW has numerous roles in relation to the land use planning system. We are a statutory consultee in relation to the development plan process and in relation to a wide range of development proposals. We are a consultant body in relation to the Strategic Environmental Assessment Directive (SEA), a relevant body in relation to Habitat Regulation Assessments and a consultee in relation to a range of related consenting and permitting processes.

1.4 We give high priority to advising on the development plan process and on encouraging early and pre-application discussion with developers and local planning authorities, thereby helping achieve the right development in the right place. Our key role is to provide the decision maker with evidence based and objective advice on environmental opportunities and on the avoidance, mitigation and compensation of impact. It is the decision makers' role to seek to integrate economic, social and environmental objectives.

1.5 CCW welcomes the opportunity to submit our views to the Sustainability Committee inquiry into planning. Our submission will focus both on how the system can be enhanced in the short-term whilst also considering the role of the planning system in helping Wales meet the land use implications of future challenges.

Committee Question 1: How are key Welsh government policy objectives reflected in national and local planning policies/ guidance and local planning decisions? Do you think this approach is successful?

2. The Sustainable Development Scheme of the Welsh Assembly Government makes sustainable development the central organising principle for decision making in Wales. This principle is firmly embedded in key government plans and strategies such as the Wales Spatial Plan, Economic Renewal: a New Direction; a Low Carbon Revolution, the Welsh Assembly Government Energy Policy Statement, Wise about Waste: the National Waste Strategy for Wales and the Wales Rural Development Plan.

2.1. Wales has a strong and rational planning framework to deliver and implement policy underpinned by the principles of sustainable development.

2.2 At national (Wales) level policy is set out in Planning Policy Wales¹, Mineral Planning Policy Wales and Local Development Plans, Wales. National policy is supplemented by topic based Technical Advice Notes.

2.3 The system is acknowledged to have played a key role in implementing wider government policy whilst helping guide development away from protected sites and areas and other sensitive areas and servicing improved sites, designs and environmental enhancements from other developments. However as indicated in the current WAG consultation document 'A living Wales - a new framework for our environment, our countryside and our seas'², consideration is required on the future role of the planning system in helping secure the future sustainable and integrated management of land and water by making the long term health of ecosystems and the services they provide central to decision making.

2.4 A key component of a new approach will be to adopt an ecosystem approach underpinned by a spatial approach to identifying our green infrastructure, ecosystem goods and services, and their integration with social and economic infrastructure recognising the multifunctional use of land.

2.5 Key issues for the planning systems to address are:

(i) How best to accommodate and respond to new pressures on land over the next 50 years for example climate change, energy, demographic change, settlements and development, food security, telecommunications and new technology, and pressures on critical public goods such as water supply, biodiversity and carbon sinks. A Living Wales - a new framework for our environment, our countryside

¹ Planning Policy Wales, Edition 3, July 2010:
<http://wales.gov.uk/topics/planning/policy/ppw2010/?lang=en>

² A living Wales - a new framework for our environment, our countryside and our seas:
<http://wales.gov.uk/consultations/environmentandcountryside/eshlivingwalescons/?lang=en>

and our seas (Natural Environment Framework) consultation touches on, and reflects on these issues. This will entail adopting:

- A long-term perspective
- Integration, not balancing economic, social and environmental objectives
- A move from a sectoral approach towards a spatial approach reflecting a multifunctional approach to land use and its management within a framework of national consistency
- Flexibility of solutions to reflect local circumstances/distinctiveness

Such a strategic approach should help iron out conflict at a high level/early stage introducing greater clarity and certainty to decision makers.

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(ii) How best to incorporate new policy objectives and to reconcile implementation of sectoral policy objectives at a local level.

The refresh of the Wales Spatial Plan as a statutory document and the new approach to Marine Spatial Planning provides a framework for such an approach.

- A strategic spatial approach to policy integration at national level would also provide greater clarity and certainty to the process of planning for the provision of strategic infrastructure such as the deployment of renewable energy generation and transmission whilst minimising environmental impact
- A strategic spatial approach at national level will also help avoid potential policy conflict at the local development plan level.

Committee Question 2: How successful are current planning policies/guidance in helping planners to reconcile competing demands.

2.6 In addition to the adoption of a strategic, spatial approach underpinned by the ecosystems approach the following amendments to the planning and decision making process would help reconcile competing demands:

- Early and pre-application discussion between applicants, the statutory consultees and local planning authorities, particularly in relation to major development proposals.
- A project team approach to managing major projects including round table scoping of issues involving statutory consultees the LPA and the developer.
- A Team Wales approach to the development of a training and awareness programme to help ensure a common understanding of policy, legislation and process thereby helping avoid unnecessary confusion and delay in the decision making process .For example CCW have organised SEA training and worked with the Welsh Assembly Government to provide training workshops in relation to Technical Advice Note 5 (Nature Conservation and Planning) .
- Better streamlining and integration of the wide range of regulatory and consenting regimes which may be required in addition to planning permission, particularly in relation to timing and sequencing.

2.7 A number of these issues are addressed in the GVA Grimley review of the Planning Application process in Wales³. The Regulatory and Management Work-stream of the Living Wales Consultation also provides an opportunity to consider these issues within the context of the integrated approach to management and decision making required to deliver an ecosystem approach.

CONCLUSION

3. CCW welcomes the opportunity to participate in the NAW Inquiry into Planning Consultation in Wales. The inquiry overlaps with the commencement of a major consultation by the Government in Wales in relation to developing a new framework to developing a sustainable approach to managing our environment. The Committee's inquiry provides an opportunity to focus on immediate changes to the planning system whilst the 'Living Wales' consultation provides an opportunity to focus on longer term issues.

CCW

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³ GVA Grimley public consultation website for the research study to examine the planning application process in Wales.: <http://dataroom.gvagrimley.co.uk/welshconsultation/index.htm>