

Consultation Response Form: SUSTAINABLE DEVELOPMENT FOR WELSH SEAS: OUR APPROACH TO MARINE PLANNING IN WALES

We would welcome your views on the *marine planning in Wales* consultation document. Responses should be provided in writing using the questions set out below. These questions have been taken from the *marine planning in Wales* document, and refer to the text of the strategy. Please expand the comment boxes as necessary.

Responses can be e-mailed to marine@wales.gsi.gov.uk or sent to:

Marine Policy Branch
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ

The closing date for responses is 11 May 2012.

<http://www.wales.gov.uk/consultations>

Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Assembly Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Assembly Government staff to help them plan future consultations.

The Welsh Assembly 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 tell us this in writing when you send your response. 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 Assembly 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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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.

Your Details

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Type (please select one from the following)	Local Authority		
	Government Agency / Other Public Sector		
	Higher Education / Further Education / School		
	Professional Body	x	
	Other Interest Group		
	Individual		
Are you happy for your details to be published in the summary of responses?	Y	x	

Marine features, resources and activities

1	Are there any other key features, resources or activities in Welsh seas that we need to take account of?	Y	N
		X	
Comments			
<p>Although it is noted flood risk management activities are mentioned in the introductory paragraph, we feel the inclusion of 'reducing the risk of flooding in urban areas' under the activity 'Waste Water Treatment & Disposal' (34) belies the complexity and importance of this issue. It justifies a listing as a specific activity, to include managed retreat.</p> <p>The Institute supports your inclusion of land use planning activities. Opportunities should not be missed through this initiative to specifically address the strategic links between the marine and land-use planning system, to address the increasing development pressures and conflicting uses. For example, the critical role of ports and shipping to the delivery of offshore renewable generation to meet Assembly Government low carbon energy targets (and the associated benefits in terms of 'green jobs').</p>			

Integration between marine and terrestrial planning regimes

2 Are there other ways in which integration could be improved?

Comments

We would consider the lead of marine planning (51) and the MLW/MHW overlap as inadequate to achieve integration. In order to meet the UK high level marine objectives for good governance, the challenge to integrate plans and policies across the inshore and offshore area should not be understated. Furthermore, in order for marine, land and water management mechanisms to be responsive and work effectively together, we consider reliance on Integrated Coastal Zone Management Plans (ICZM) to form a link between marine, land use and River Basin Management Plans to be insufficient. Being non-statutory, they do not have to be taken into consideration in development proposals and planning applications. Further emphasis should be placed on the multiple, potentially conflicting, activities and pressures between marine and land use planning and the solutions to these challenges.

As with any new policy and approaches we would recommend comprehensive training and support to relevant officers involved, including land use planners dealing with coastal zone management and marine planning issues. It will also be important to draw together the different parties to ensure a common buy-in to the approach adopted and strategy. RTPI Cymru would be willing to support this work area, as it has done for other new planning policy areas introduced by the Assembly Government.

We would welcome inclusion of the Wales Spatial Plan (WSP) *People, Places, Futures* and Planning Policy Wales within this section and note previous interest (referenced by WWF) in extending the WSP from terrestrial planning to cover the Welsh territorial sea.

Further points:

- An update of the current TAN 14 would provide additional support to the integration of coastal and marine management

- Need to actively engage with industries / users of the marine and terrestrial environments, especially when uses can at first glance be seen as incompatible (i.e. renewables and shipping lanes). Again, integrated with land use plans.

- Also need to engage with English neighbours to ensure that there is consistency, continuity and shared objectives.

- Implementation of the Floods and Water Management Act 2010 and the Flood Risk Regulations 2009 requirements lies with Local Flood Authorities, requires close integration with Welsh Ministers responsible for Marine Planning

- Integration with River Basin Management Plans, if these are divided at the sub regional level in Wales in the future (recognised as key in section 100).

The process for developing marine plans in the Welsh marine areas

3	What sectors do you think need to be included in the governance arrangements?
<p>Comments</p> <p>It is vital that the planning sector and all coastal planning authorities are involved in the governance arrangements. Although the Institute notes that all reasonable steps will be taken to ensure that the marine plan will be compatible with relevant Local Development Plans in Wales (and their equivalent in England) and the Wales Spatial Plan (84) the need for close working arrangements between the Marine Planning Authorities and the land use planning authorities should be emphasised. We advocate joint working and joint decision making process on relevant policies, proposals and environmental assessments that span the overlap between the two planning systems.</p> <p>In addition, all stakeholders (including industry bodies and specific business where appropriate) related to the activities listed in the document pp6-8, in addition to their cross boundary counterparts. We would also recommend the involvement of the scientific / academic community in Wales and cross boundary colleagues, including planning academics.</p>	

Where marine planning fits

4	What other key Welsh documents do you think need to be taken into account and why?	Y	N
<p>Comments</p> <p>We welcome the inclusion of the Wales Spatial Plan and Local Development Plans. We consider the Rural Development Plan for Wales should also be included – concerning water quality in coastal areas (run off).</p>			

Evidence

5	Do you think that there are currently any significant information or data requirements that we need to have in order to plan for the Welsh marine area?
Comments - The INSPIRE directive, which concerns standardisation of spatial information, related to information sharing. We would also suggest using data held by the European Wind Agency Association, OSPAR Quality Status Report 2010 and general related socio economic data. - Results from ES work and post construction monitoring at existing offshore wind farms (e.g. North Hoyle and Rhyl Flats) and work prepared for Round 3 sites in due course.	

6	Could you help fill them, and how?
Comments We have no access to data ourselves.	

Marine planning areas – national and sub national planning in Wales Cross border relationships

7	Do you think we need to plan on a more sub-national level?
Comments Yes; planning at the sub-national level would assist particularly in intensively used areas such as the coastal zone and estuaries.	

8	If you do, what approach would you like us to take to sub-national marine planning and why?
<p>Comments</p> <p>We would promote regional planning for all of the Welsh Marine area. Planning for 'some' or 'activity hotspots' makes the supposition that you have a thorough knowledge of the Welsh marine area. Offering higher protection to one area, could lead to pressures on less regulated areas. We also consider that close liaison with neighbours is essential to ensure shared objectives and consistency as an activity hotspot is unlikely to reflect national boundaries e.g. North Wales / Liverpool Bay.</p> <p>Marine Planning Policy should again make certain that coastal planning authorities are closely involved in any development of sub-regional plans, to ensure compatibility and integration with terrestrial policy and plans. Numerous, potentially conflicting issues will need addressing, particularly within the coastal zone and the means for integrated implementation of policy – through local development plans and ICZM and RBMPs.</p>	

9	Are there different approaches that we could take?
<p>Comments</p> <p>We have no comment to make.</p>	

Cross border relationships

10	Are there other countries or authorities that we need to have close or formal relationships with?	Y	N
<p>Comments</p> <p>We would suggest the following: OSPAR – Celtic sea – France; contracting parties to the Bonn convention – oil spills and pollution incidents; and North Devon and Liverpool Bay authorities – in terms of offshore renewable energy.</p>			

Engagement and consultation

11	Do you agree with this approach?
Comments There is nothing that we would disagree with in this inclusive approach. NB we do not consider it to be appropriate for the Assembly Government to set up new partnership groups, who value their independence. It is important to ensure appropriate industries and investors are involved, e.g. Ports and Renewables industry.	

12	How do you think we can make best use of existing coastal partnerships?
Comments We consider that they should be made statutory consultees	

13	How else can we reach the public?
Comments Through bodies with popular membership – e.g. National Trust, RSPB, Surfers Against Sewerage. Planning Aid Wales could also act as a conduit. The media is also important; it is essential that web resources are accessible and easy to use.	

Any other comments

The Royal Town Planning Institute (RTPI) is a membership organisation representing over 23,000 spatial planners; RTPI Cymru represents the interests of almost 1,100 members in Wales. The RTPI exists to advance the science and art of town planning for the benefit of the public.

RTPI Cymru welcomes the opportunity to input into this consultation. The response has been formed following consideration by RTPI Cymru's Policy and Research Forum, which is comprised of a cross section of members from across the profession in Wales, including the public and private sectors and academia.

Thank you for completing this form.