



24th April 2008

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

Dear Sir / Madam

Wales Spatial Plan Update Consultation: RTPI Cymru Response

RTPI Cymru's Policy and Research Forum has considered the Wales Spatial Plan Update (WSPU) and welcomes the opportunity to submit comments on the Update. The Forum's response has been informed by the discussion groups at the two consultation events in Cardiff and Bangor for planners. The Forum would like to formally thank the WSP Unit for supporting these events, which provided a valuable and worthwhile consultation event for the planning community in Wales.

The Forum's comments focus on the inevitable issues resulting in the development of the WSPU, particularly with the inclusion of the more detailed Area work, and its relationship with the land use planning system. The Forum's response has mainly focused on the national level and does not consider the individual Areas in any detail, except where they are useful to illustrate a comment.

The Forum welcomes and supports the WSPU and the opportunity it offers to add value to the application of Assembly Government policy at a spatial level and also its support to sub-regional partnership working.

1. Land Use Planning Policy and Links to Land Use Plans

There is obviously a close relationship between the WSPU and national and local planning policy. Specifically, the WSPU refers to the needs for Local Development Plans (LDPs) to integrate with the WSP to ensure its delivery. The WSPU also makes some reference to Technical Advice Notes (TANs). However, there is no reference to Planning Policy Wales (PPW), and is most notably omitted from the diagram on page 3. Given the relationship, it would be beneficial to have a cross reference to PPW and the TANs at the appropriate places. This would help to set out the relationship with PPW, and to ensure that these important policies and guidance affecting land use are not overlooked or the relationship misinterpreted by WSPU users.

The Forum accepts and supports that the WSPU has a specific role in providing a spatial framework for all Assembly Government policy to operate within and be directed. However, it has a close relationship with LDPs and influences the content of LDPs; whilst this is an obvious way of knitting together national, sub-regional and local policy to guide implementation on the ground, it may pose difficulties for local planning authorities (LPAs) in trying to assemble the evidence to support the WSPU at the local level, which is able to stand up to the scrutiny process of examinations in public.



It remains a weakness of the spatial planning system in Wales that the soundness of individual LDPs will be ruled upon by Planning Inspectors when the soundness of the WSP, as a parent document, has not been subjected to any form of soundness test. In this situation, incrementally through their reports on each of the LDPs, Inspectors will effectively be filling the regional planning void left by the absence of opportunities for effective challenge from the WSP and particularly its Area Strategies.

However, given the current position with no LDPs having been through the process completely, the Forum recognises that the developing sub-regional collaborative work by LPAs may address this weakness. This situation will need to be closely monitored across all areas, and support provided to assist LPAs to work collaboratively.

The Forum would like to see improved central documentation of the evidence base for WSP national and Area work which provides support to the work of the LPAs on a sub regional basis. If the Assembly Government objects to an LDP because it does not align with the WSP, it will be incumbent upon them to defend the WSP at any Examination. If third parties object to the LDP because of suggested flaws in the WSP, it may fall to LPAs to defend. Theoretically, LPAs should have done their own research to substantiate the WSP elements as part of their strategy; however, it would be helpful if some protocol be discussed and agreed on this.

2. The Planning Bill

As you will be aware proposals in the Planning Bill include the development of National Policy Statements (NPSs) to cover a variety of spatial issues on a UK basis. Looking to the future, the Forum considers it essential that the WSPU considers how it will evolve to play a role in the proposed NPSs. The Forum would be pleased to provide support on this matter.

3. National Strategy

The WSPU rightly draws on the current Assembly Government policies and the specific commitments set out in 'One Wales'; however specifically referring to figures e.g. the affordable homes target of 6,500 by 2011, may lead to the document being out of date relatively quickly.

A particular area of policy weakness in the WSPU is the lack of emphasis on agriculture / rural issues. This sector has an important role to play in terms of the climate change agenda - it covers a significant area of Wales, it is important for food production, energy, leisure and the economy and is also a high contributor to our ecological footprint. It would be helpful if this policy area was strengthened under the appropriate themes.

4. Building Sustainable Communities

The Forum recognises that the role of the WSP is to provide a policy context for the development of housing allocations at the sub regional and LPA level, but that it is not the role of the WSPU to develop the detailed figures. It is for each LPA to co-operate on sub regional figures and to develop its own figures in its LDP, and have them tested at LDP examination, within the reality of different timescales. However, the activities of the LPAs to develop such figures through joint working and LDP work would be assisted if the Assembly Government were to set up a national housing database and support central and local research including Housing Market Strategies and affordable housing targets, updating them regionally at regular intervals. This could include information on implementation / new build and would be particularly helpful for national park authorities (NPAs), particularly if the strategies and targets contain disaggregated figures for the NPAs.

As already inferred, in reality the housing figures for each LPA will be agreed at individual LDP examinations and will depend on the timetable of LDPs. This does not provide a strategic process for the apportionment. However, building this into the current WSPU would not be the answer; this would change the WSPU completely and severely lengthen the process. The Forum believes this would undermine the current purpose of the WSPU in providing a strategic spatial approach to the implementation of Assembly Government policy.



5. Achieving Sustainable Accessibility

Transport policy is obviously a significant factor in any spatial strategy. The Forum considers that transport should be more integral to the WSPU. There should be reference to and a closer integration with the Regional Transport Plans (RTPs) and the national transport strategy. Generally the transport policies should look to promote low carbon policies, particularly in terms of the location of development. It would be helpful if the WSPU could provide a lead in informing the development of low carbon policies in the RTPs and national transport strategy.

A key concern in relation to the national vision is the absence of a recognition of the importance of improving communications particularly between North and South Wales, as well as developing East – West links. The Marches railway line, notwithstanding the location of much of its length within England, provides the primary public transport link. The need for investment in upgrading the line should represent a top priority for the WSPU, as should consideration of the key road links.

6. Promoting a Sustainable Economy

In terms of the Area strategies, there appears to be an emphasis on the former WDA initiatives and a lead by economic interests. However, the Forum accepts that it is inevitable that policy interventions managing growth and change are based on new development and economic / market interests and that these proposals will take time to filter out of the system.

7. Valuing Our Environment

The reference to low carbon regions would be strengthened with a definition of this term. Does it refer to eco towns, or is it an area where actions are more curtailed in terms of their carbon emissions than other areas? This would need enshrining in LDPs, although the timing is not helpful. The Forum understands that the Sustainable Development Commission (SDC) is taking forward some work on your behalf on low carbon regions; the Forum welcomes this.

Whilst the WSPU acknowledges the importance of climate change, it is not evident that this is fully carried through into the strategy. The role of economic growth as a generator of growing energy use and road traffic growth needs to be fully acknowledged. Unless more radical approaches are applied to this issue, new development will simply replicate past trends where economic growth and rising affluence increase energy use and generate more road traffic. The WSPU must grasp this issue, if it is to provide an effective response to climate change.

8. Working with our Neighbours

The sub regional strategy for North East Wales addresses cross border links, including a role for North East Wales in contributing to the well being of the Liverpool City Region. However, it does not address the important east west dimension on the North Wales coast. The Forum supports the work done to look at links with neighbouring English regions. However, it recommends that there also needs to be stronger recognition of the relationship to the remainder of North Wales.

9. Distinctiveness

In terms of ‘distinctiveness’, there needs to be a greater clarification of what is meant by this term: is it design, culture, language, landscape, population characteristics or others? This needs to be considered from a top-down perspective as well as importantly, considered as a bottom-up issue. The WSPU needs to make a strong statement about its importance and refer to the Design Commission for Wales (DCfW), but not be prescriptive about its definition locally.



10. Linkages between the National and Area Strategies

The Forum has concerns that the individual Areas do not build up into the national strategy. There appears to be a lack of connectivity through the policies and actions. For example, the connection between the

outline RTPs and the transport elements of the WSPU. This may be an issue to do with the timing of the Area work and the update of the national sections.

The Forum appreciates that the maps are not intended to be precise. However, it is inevitable that they will be used to support particular perspectives. The Forum considers there to be a lack of consistency between the maps used; particularly between national and Area maps. The national vision map appears to be more of an aggregation of regional visions than providing a genuine national vision. A specific example of the inconsistencies is that the Valleys Regional Park is not shown on the Swansea Bay map, when the overlap is shown on the South East map, there is also no reference to the Park in the Swansea Bay text. There are also inconsistencies between the text and the maps, and between the main document and the summary. The national maps would benefit from an overview to ensure consistency and joined-up thinking.

The Forum considers that more depth needs to be added to the social and environmental issues and actions at the sub-regional level. For example, new health and educational facilities should be targeted towards areas of multiple deprivation. This could be action for the next stage of work.

11. Consistency between Terminology and Area / Sub-regional Approaches

In terms of the settlements and hubs which are shown, an explanation of how these were selected would be beneficial. Was it the same process across all of the sub-regions? In terms of consistency between areas, for example the South East, define hubs as employment and service hubs, and not as locations for housing, as there may be more appropriate alternative locations for housing. However, in Swansea Bay the hubs are referred to as the main locations for housing.

Areas outside the South East have also identified a further layer of Key Settlements below the Primary Key Settlements, so that the Area with the highest concentration of urban population has by far the smallest number of identified settlements. It would be helpful if there is consistency in the terminology used by the Areas.

This leads back to the issue regarding the LDPs needing to provide the evidence in support of the WSPU. There is concern that the selection of Settlements may limit local opportunities. It is important to ensure that any process of selection is supported by evidence, rather than political choices. It should be acknowledged that local choices will not be curtailed with regard to lower order settlements, which do not figure in the WSPU.

The South East – Capital Network includes Strategic Areas of Opportunity (SOAs). The Forum considers this term to be ambiguous: should this mean that these areas must be included as areas for development in LDPs? Or merely investigated as opportunities as part of an LDP strategy? Perhaps it would be better to do as in English Regional Spatial Strategies (RSSs) and identify both St Asaph and Llantrisant / North Cardiff as part of a sub region that needs more detailed cross boundary investigation and planning. Again, the evidence to support these will be needed for the LDPs and RTPs.

This also highlights an inconsistency with other Areas; SOAs should be identified in the other sub-regions, but only if they are of national significance.

12. Concluding Points

The Forum appreciates that the WSPU is an evolving document and process and supports this position and the continued development of the WSP. The Forum would like to emphasise the need to adapt, to be able to inform the development of the proposed NPSs from a Wales' perspective.



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The Forum particularly supports the role which the WSPU offers in improving the integration and transfer from national to spatial policy.

Building on the joint consultation events for planners, the Forum would welcome the opportunity to continue to work with the Spatial Plan Unit.

I trust you find the Forum's comments helpful, but please do not hesitate to contact me should you require any further clarification. The Forum has no objection to their comments being made publicly available.

Yours faithfully

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