



RTPI Cymru

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4 June 2024

e-mail response sent to: MarinePlanning@gov.wales.

Dear Sir/Madam,

Response to: Strategic Resource Areas for Marine Planning

The Royal Town Planning Institute (RTPI) is the largest professional body for town planners in the UK and Europe and represents around 27,000 members in over 80 countries worldwide, with over 1300 members in Wales. The Institute has been shaping planning policy and raising professional standards for over 100 years and is the only body in the UK to confer Chartered status to planners, the highest professional qualification. The RTPI champions the power of planning in creating prosperous places and vibrant communities. Our ambition is to promote healthy, socially inclusive, economically and environmentally sustainable places.

Thank you for the opportunity to respond to the above consultation. Our response focuses on the interface between land and sea and the impacts of marine planning and development on the land and seascapes.

While we support the identification of marine Strategic Resources Areas and raise no objections in principle, we believe the wider land-based implications must be fully integrated into the development of these areas. The coastline of Wales links history, culture and communities, with natural beauty and wildlife, providing jobs and homes while attracting tourists and recreationists. Wales is home to the UK's only fully coastal National Park, with over half of the Welsh coast designated as National Park or National Landscape, along with several non-statutory designations and the coastal path, running the entire coastline of Wales. These are "valued as living landscapes for their interaction between natural and human elements" (Welsh National Marine Plan, pg 34). The sensitive interface between land and sea is recognised in the Welsh National Marine Plan, which states, "marine

developments with land-based elements must ... include consideration of Welsh land use planning policy” (Welsh National Marine Plan, pg 107)

The mapping of Strategic Resource Areas aims to safeguard specific marine areas for particular technologies. In planning for these areas, it is important to recognise the uncertainty and potential impact around emerging and new marine technologies on the land, including seascapes and the land-based infrastructure required to support the technology, such as cables and substations. Some coastal areas are designated Sites of Special Scientific Interest (SSSI) and it is therefore worth noting that Chapter 6 of Planning Policy Wales 12 applies, which potentially restricts development to that required for the management of the SSSI and therefore impacting on land based infrastructure.

Both Eryri and Pembrokeshire Coast National Park have Supplementary Planning Guidance on seascape assessment.

- [Anglesey-Seascape-Character-Assessment.pdf](#)
- [Anglesey and Snowdonia Seascape Character Assessment – Fiona Fyfe Associates](#)
- [Seascape PCNP \(pembrokeshirecoast.wales\)](#)

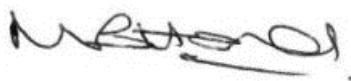
Marine assessments and licensing should be developed in consultation with local planning authorities and consider these and other relevant land use planning policies and guidance, to encourage the stronger integration of the marine and land use planning frameworks. Collaborative working across the marine and land use planning frameworks, needs to be supported and resourced, with clear expectations and common goals.

Many public sector agencies are currently under-resourced and under-funded. It is therefore important that adaptive marine monitoring for new technologies is adequately resourced, to avoid future risk and ensure evidence-based marine development in the future. This is particularly important given current capacity issues in the wider public sectors including Natural Resources Wales.

There is an opportunity for marine planning to learn lessons from land-based planning in areas such as minerals safeguarding and restoration bonds etc. Equally lessons must be learnt from developments such as the Ramsey Sound and Morlais tidal energy schemes to ensure evidence-based decision making in the future.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Mark Hand at walespolicy@rtpi.org.uk

Yours faithfully,



Mark Hand MRTPI
Director