



RTPI Cymru

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e-mail response sent to: marineplanning@wales.gsi.gov.uk

Dear Sir/Madam,

Response to: Draft Welsh National Marine Plan

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above consultation.

Our response to the consultation questions are set out below.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

Q1: Do you agree with the WNMP vision and objectives? If not how can these be improved?

RTPI Cymru welcomes the Welsh National Marine Plan's (WNMP) ambitious vision and accompanying objectives in their aspiration to achieve the UK's shared vision and the sustainable management of natural resources.

We consider that the plan successfully seeks to translate the UK's shared vision and High Level Marine Objectives (HLMOs) into a Welsh context, and will help to provide clarity to marine users, developers and regulators of what seas around Wales will look like in 20 years' time and how to achieve this. The longer-term vision for the marine environment can be combined with the vision of Local Development Plans (LDPs) to produce a comprehensive and integrated approach to development at the Welsh coast.

We consider that further work could be undertaken to better balance the three pillars of sustainable development (social, economic and environmental), particularly in the context of the Well-being of Future Generations Act 2015, to make the Vision more consistent with the High Level Marine Objectives (HLMOs) and UK Sustainable Development Strategy, and in particular greater clarification of the ecosystems approach in marine plan development.

We welcome objective 11 which recognizes the need for the plan to take a "plan-led, precautionary, risk based and adaptive approach" to managing Welsh seas.

We welcome the opportunity provided to establish greater links with decision making on the land and in the marine environment. The 2017 RTPI Planning Awards for Excellence, was awarded to Marine Scotland for their Pilot Pentland Firth and Orkney Waters Marine Spatial Plan for Excellence in Plan Making Practice. This provides a useful case study for the integration of marine planning with land use planning.

http://www.rtpi.org.uk/media/2500499/FINAL%20RTPI_Awards_for_Planning_Excellence_2017_Digital_Brochure_Darya.compressed.pdf – see page 4 for details.

Q2. Do you agree that the draft plan, its objectives and policies provide a framework for sustainable development of the Welsh marine plan area? If not, how can they be amended or improved?

We welcome the Plan's recognition of Wales' new statutory duty in relation to sustainable development, and that it supports the intentions of the Well-being of Future Generations Act, namely to improve the long term social, economic, environmental, and cultural well-being of Wales.

Q3. Do you agree that the WNMP provides clear information and guidance to support decision making? If not, how can it be improved?

Overall the Plan is too long and could be slimmed down considerably to make the policies clear and make it a more accessible document. Much of the text could be moved to technical annexes.

There are several terms within the Plan which appear to be interchangeable, namely: "precautionary" and "proportionate" and "sustainable development" and "sustainable growth". The terms should be used consistently.

The Wales Marine Planning Portal is an essential part of the Plan which should considerably aid decision making in the marine environment and also potentially help land based decision making. Wider awareness and input to the Portal will be needed amongst land use planners to ensure its full potential is realised, and has a greater role in integrated coastal zone decision making. The expansion of economy and society data for example could be complemented by existing datasets held by local planning authorities (LPAs) around the Welsh coast. <http://lle.gov.wales/apps/marineportal/#lat=52.9212&lon=-4.2967&z=12&layers=231>

Q4. Do you agree that we have identified all relevant general policy areas and these are fit for purpose to deliver the plan Vision and Objectives? If not, please give details why below.

No comment.

Q5. Do you agree that the WNMP provides clear approaches to ensuring policies are applied to proposals on a proportionate basis? If not, please give details why below.

No comment.

Q6. Do you agree that the WNMP can support integration between land and sea management and contribute to the principles of Integrated Coastal Zone Management? If not, how can this be improved?

The WNMP supports the integration between land and sea and a longer consultation period on the Plan gives sufficient opportunity for LPAs to consider the integration issues for marine plan policies and proposals and associated LDP content.

The Plan will make a very significant contribution to ICZM in Wales and it sets the framework for joined up thinking between the LDP, the Marine Plan, Shoreline Management Plans and the associated organisations. It is surprising that SO9 (Effects on Coastal Change and Flooding) does not make greater links with the emerging Area Statements around the Welsh Coast, although early engagement with NRW (paragraph 220) is included as a key principle within the document and should bring forward this integrated approach at the coastal zone.

Greater links with the land use planning system are supported, although the existence of the Marine Plan does illustrate the real need for updated and more relevant Welsh Government National Planning Policy in Planning Policy Wales (which is currently the subject of a separate consultation) and specifically updated technical advice within TAN 14 (Coastal Planning) and TAN 15 (Development and Flood Risk).

There is now a better framework in Wales for Intergrated Coastal Zone Management (ICZM) with joint interest in the intertidal zone between high water and low water mark (which is now covered by both land use and marine planning systems - paragraph 284). It is again surprising that this section does not explicitly identify Area Statements, amongst the listed statutory and non-statutory plans in the coastal environment; although support is provided in the commentary in paragraph 287: "Area Statements that include the coastal zone should take account of this plans policies for managing the land sea interface. In doing so, Area Statements recognise that activities on land can have direct effect on the sea and vice versa".

Support is given to the links made to the Natural Resources Policy (paragraph 286); Local Well Being Plans (paragraph 289) and links with the National Development Framework (paragraph 285), all positive in bringing forward ICZM. It is recommended that further work is taken forward on the Strategic Resource Areas in relation to aquaculture and tidal lagoons in order to demonstrate consistency of ICZM policy within the plan.

The Marine Management Organisation (MMO) has produced helpful guidance for local authority planners getting to grips with marine planning. The guide compares land-use and marine planning and is intended to assist land use planners in their understanding of marine planning and the links across the land and sea interface. Welsh Government may wish to consider producing similar guidance for planners and other end users that are directly affected by marine planning in Wales. RTPI Cymru would be interested in helping to move this piece of work forward.

Q7. Do you agree that the WNMP sufficiently considers cross-border marine planning challenges and opportunities, particularly in areas where Wales adjoins England? If not, please give details below.

We have concern that the Dee and Severn Estuaries are not integrated, as the plans for these parts of England have not yet been developed. However, we accept there will always be a problem of plan timescale alignment and one plan cannot be held up to wait for another.

Q8. Do you agree that the general policy implementation guidance is fit for purpose? If not, how can it be improved?

We have concerns of the resourcing of the Plan's implementation, particularly for LPAs and the integration with LDPs.

Q9. Do you have any comments or concerns about the sector supporting and safeguarding policies and implementation guidance? If you have concerns please explain.

In relation to tidal lagoon policy, it would be useful to make reference to the Hendry Review in its recommendations to provide a 'pause for learning' prior to the construction of further lagoons after the first test case in Swansea Bay. RTPI Cymru would note the implications for aggregate demand in both north and south Wales should the tidal lagoon proposals move forward.

Q10. Have we identified Strategic Resource Areas (SRA) for the right sectors and the appropriate areas? If not please specify which SRAs need amendment and provide clear evidence below.

No comment

Q11. Do you think the plan adequately identifies opportunities and priorities for blue growth? If not, please give details below.

No comment

Q12. Do you have any comments on Welsh Governments revised marine aggregates dredging policy and the proposed withdrawal of IMADP? If so please give these below.

No comment

Q13. Do you have any comments on the findings of the Sustainability Appraisal for the WNMP? If so please give these below.

No comment

Q14. Do you have any comments on the Habitat Regulatory Assessment (HRA)? If so please give these below.

No comment

Q15. Do have any comments on the effects (whether positive or adverse) the introduction of the WNMP would have on opportunities for persons to use the Welsh language and on treating the Welsh language no less favourably than the English language?

No comment

Q16. Do have any comments on whether the proposals could be formulated or revised to have positive effects, or decreased adverse effects, on opportunities for persons to use the Welsh language and on treating the Welsh language no less favourably than the English language?

Integration with LDPs will be important for the Welsh language and the impact any proposals may have on communities.

Q17. We have asked a number of general questions, but are there any other comments you would like to make about the WNMP? If yes please explain below.

No comment