

10 April 2015

e-mail response sent to: SeneddEnv@assembly.wales

Dear Sir/Madam,

Response to: Natural Resources Wales - Annual Scrutiny 2015

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 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 views and evidence to this scrutiny session. Members of the RTPI Cymru Planning Policy and Research Forum have provided information about their experience of working with and/or accessing services from Natural Resources Wales (NRW) and how it is delivering its statutory functions, including the resources available to deliver these functions.

On the whole members have noted some difficulties in the transition from separate authorities to NRW and in general they view the organisation to be struggling to deliver in some key areas.

RTPI Cymru's main cause for concern is around resources and whether NRW are adequately resourced, particularly in taking forward the changes set out in the Planning (Wales) Bill.

Comments in relation to development management and planning applications

We have been made aware that some Local Planning Authorities (LPAs) have been receiving poorer responses to consultations on planning applications from NRW in comparison with responses from the past separate organisations. Our members have raised a number of issues including delays/lack of responses to planning applications, inconsistent advice between officers and applications, a lack of communication (officers not responding to requests for pre-application and informal discussions) and officers not reviewing ecological information before providing responses.

Inconsistency also appears to be a problem area, in particular the amount of detail received in responses, which can range from being considered 'over the top' in some simpler applications, but not detailed enough in other cases. This alongside slow responses can be a real problem for development management teams, and in turn the applicants.

Comments in relation to Planning Policy

One member commented that the regional contacts in the separate organisations generally worked well with the LPAs. However, they did experience some difficulties after the merger, particularly with communication e.g. email addresses not working. This resulted in delays in responses, at the time when the LPA was preparing their Local Development Plan (LDP) and going into the LDP examination. The LPA was fortunate to have flood risk representation at the examination, but unfortunately were unable to secure attendance by landscape / environmental representation; they instead had to revert to previous representations and consultee comments.

In relation to planning policy our members have raised timeliness in relation to responses as being a key issue. They also feel that coordination on issues within the NRW remit is important in particular to ensure they are adequately resourced as an organisation to deliver not only the existing requirements but also looking forward to future planning reforms.

Funding bids for partnership grants

Members have also highlighted problems in funding bids for partnership grants. A lack of clarity has made the funding process for 2015/2016 challenging. Issues have included conflicting information in the guidance notes and from NRW officers, late changes to the funding available which in turn raised problems with match funding, and uncertainties over timescales.

General comments

We note that although NRW anticipates playing a major role in future minerals planning in Wales, it is disappointing that there has been no representation at recent meetings of the South Wales Regional Aggregates Working Party.

The NRW website is still linking in some cases to predecessor organisations, which may cause confusion to members of the public (for example LANDMAP layers are still shown on the CCW website).

There is a lack of a consistent point of contact. It would be useful to have a consistent contact point for planning authorities to chase up any particular problems. NRW may consider undertaking some sort of customer survey or focus group sessions with LPAs. This may lead to a better understanding between organisations. We understand that the North Wales Planning Officers Group will be seeking to agree a Memorandum of Understanding between the North Wales LPAs and NRW.

Comments in relation to specific project work

One member has been dealing with NRW primarily on a single project. They felt after the different authorities merged, there was some confusion around identities, but now feels this has been largely overcome and has a more positive experience to share.

From the experience of this project, they felt that NRW are now accepting of their revised remit. They believe that the *“change in remit to foster economic well being etc. from the narrow previous focus has now however enabled us to have positive and pragmatic discussions to allow NRW to secure betterment / improved enhancement works which are over and above that are required through the planning process. We have frequent meetings with the officer team and work closely on the discharge of planning conditions..”*

If you require further assistance, have any queries or require clarification of any points made, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott MRTPI

**Director
RTPI Cymru**