

HRLN 12 - Evidence from: RTPI Cymru

Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change,
Environment, and Infrastructure Committee**

**Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of
nature by 2030**



RTPI Cymru

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e-mail response sent to: SeneddClimate@senedd.wales

Dear Sir/Madam,

Response to: Halting and reversing the loss of nature by 2030

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 Inquiry. Our planning related comments are set out below.

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

Committee Terms of Reference

The effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030;

The Nature Recovery Action Plan for Wales is the National Biodiversity Strategy and Action Plan for Wales. At a local level, all Local Authorities in Wales should have in place a Biodiversity Action Plan, which recognises local nature diversity and sets priorities.

“Wales has a strong track record in supporting local nature initiatives through the work of Local Nature Partnerships (LNP)”, ([Wales Biodiversity Partnership](#)) which are supported by coordinators, providing advice, funding opportunities and engagement. They play an important role complementing and reinforcing “national nature recovery efforts ... at geographical scales that are meaningful to local communities,” ([Wales Biodiversity Partnership - Local to You \(biodiversitywales.org.uk\)](#)) and creating a vehicle to deliver action plan priorities.

The LNP Cymru project facilitates a nature recovery network in Wales, “helping to reverse nature declines, engage people and communities, businesses and decision-makers in both practical action and strategic planning for a healthy, resilient and nature-rich Wales”. [Local Nature Partnerships Cymru - Home \(lnp.cymru\)](#)

In terms of planning policy, Future Wales: The National Plan 2040, emerging Strategic Development Plans, and Local Development Plans all have a role to play in addressing the decline of biodiversity by supporting nature recovery. These Plans are supported by Planning Policy Wales (PPW), national planning policy, which guides planning decisions. PPW states, that “planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems.” ([Planning Policy Wales - Edition 12 \(gov.wales\)](#))

It is essential that policy initiatives at all levels work together, making the links between net zero, nature recovery, flooding risk adaptation and avoidance and other policy areas, if we are to address adaptation to climate change. The way we manage the natural environment is an important part of the bigger picture, aligning with the ambitions of the Well-being of Future Generations (Wales) Act 2015.

These and other policy and initiatives provide a strong place-based focus for nature recovery on the ground, however, such schemes and initiatives often require collaboration with highways, drainage, ecology, landscape architecture etc. who, along with planning services, are struggling with capacity issues.

Cross sectional working is essential to ensure effective integration into schemes delivered by various services such as active travel. Sharing best practice of positive and effective cross

sectional working would support learning in this area, however, it must also be properly resourced if it is to reach its full potential.

The planning system, if used effectively, can play a significant role in nature recovery. However, resourcing is a key challenge for the sector. It is widely recognised that Local Planning Authorities, along with the wider public sector, are struggling to meet expectations and unlock the value planning has to offer. RTPI analysis of data from the Wales Audit Office report ([The effectiveness of local planning authorities in Wales | Audit Wales](#)) shows that planning services have seen a real term 45.6% reduction in net budgets since 2008-9. It is essential that the strain the public sector is currently under is recognised and addressed so that achieving targets and ambitions is realistic. The RTPI's Big Conversation research (2023) revealed biodiversity / ecology and flooding / drainage as the key specialist areas in need of resourcing [big-conversation.pdf \(rtpi.org.uk\)](#). Sufficient resourcing of public bodies, including organisations such as Natural Resources Wales, and investment in key skills and specialisms for the longer term are all important aspects of meeting targets and ambitions.

The provision of nature recovery schemes needs to be considered in relation to viability. There are a number of schemes in Wales where development has limited viability, and it is therefore difficult to balance critical issues. There is a need for open and transparent discussion around viability, to maximise understanding and get the best out of schemes.

There is equally a role for all stakeholders to work together to maximise outcomes, for example, attenuation basins could enhance both nature and the local environment as well as providing SuDS features. Minerals site restoration is another important area where lessons should be learned from past experience. Stakeholders should work together to ensure restoration of these sites maximise wider benefits, including nature recovery, local community and economic benefits.

The future management of developments is an important consideration at the outset, if we are to ensure delivery and quality on the ground. Local planning authorities can control the maintenance of nature provision/open space etc via a condition or legal agreement i.e. they can require the details of maintenance to be submitted to the local planning authority for approval. From a planning perspective we would stress the importance of the relationship between nature provision/open space and the planning permissions, to ensure that these spaces remain in use and to the standard required by the planning permission.

In terms of effectiveness, S.6 of the Environment Act requires all decisions, including planning decisions, to secure a net benefit for biodiversity. This framework is clear, but it is too soon to tell if the measures taken are working and it is unclear how they will be measured and by whom (and how that will be resourced). However, the intent is supported.

A number of LPAs have detailed and effective Green Infrastructure Supplementary Planning Guidance (for example Monmouthshire Green Infrastructure Strategy) which look at how biodiversity gain aligns with connectivity and green spaces benefiting physical and mental wellbeing and supporting other policy initiatives such as modal shift required by Llwybr Newydd.

Care needs to be taken when introducing new, well-intentioned policy requirements. For example, the recent introduction of a requirement for Green Infrastructure (GI) Statements, while a positive measure, took immediate effect and relates to all planning applications. This meant applications that have been under consideration for a considerable period and are on the cusp of a decision must suddenly be paused for a GI Statement to be written, on a topic that really needs to be integrated into the design and layout from the outset, not applied retrospectively. This approach caused delays and uncertainty to developers and LPAs and gave the perception that a GI Statement can be written at the end as an afterthought, which is not the intention. Moreover, by applying to every application, our members have told us of examples of planning applications for ATMs, new shopfronts and new garden fences that now require a GI Statement. Additional requirements to submit information should be proportionate to the development in question, and not required in cases such as the above proposals. A more pragmatic approach for smaller scale developments would be to specify a required action for a Wales-wide guidance note or policy rather than make applicants provide a Statement on every individual application. Most minor applications are made by householders or small businesses who rarely engage with the planning system and may not have the expertise or financial resources to provide some statements or surveys, and each additional requirement adds bureaucracy. A simple requirement for X trees to be planted or a bat box or bee brick installed etc would be a far better approach for minor development and would provide certainty for applicants and LPAs. Likewise, the tendency to require seasonal and very expensive ecology surveys for minor scale development proposals could be better approached by requiring specific measures on the assumption that protected species are present, such as installation of a bat box, rather than requiring an expensive and seasonal survey and then requiring installation of a bat box. This pragmatic approach would also free up scarce ecologist resources to focus on larger scale developments or proposals in the most ecologically sensitive locations.

The new Net Biodiversity Benefit (NBB) policy is still bedding in, but appears to have a number of positives, including an outcome based, longer term approach. It is different to England's Biodiversity Net Gain policy, which is based on clear metrics that are easily understood by developers and can be factored into a development proposal at the outset. Wales' NBB approach seeks a more qualitative approach but in doing so provides no clarity or certainty to developers about what is needed, and risks inconsistent approaches between developments and between LPAs.

It is worth noting that many activities relating to managing the natural environment, such as agriculture and forestry, fall outside of the scope of the land use planning system, so other agencies will play their part for example via licences, permits and regulatory activity.

Progress towards implementing the Biodiversity Deep Dive recommendations.

No comment on the progress towards implementing the Biodiversity Deep Dive recommendations.

Current arrangements for monitoring biodiversity.

Monitoring and evaluation are a critical part of any development or scheme as it can provide a live evidence base, feeding into future work and learning. The lack of resources, outlined above, and local authority funding makes the implementation and monitoring of planning permissions and Biodiversity Action Plans a challenge.

Careful thought is needed about what data is collected and monitored and by whom. Additional disproportionate demands on LPAs should be avoided.

New approaches needed to halt and reverse the loss of nature by 2030.

Communicating to different audiences including local communities and the wider public is an important element of project development and should be undertaken from the outset, to ensure communities are aware of innovative approaches, longer terms goals and to encourage community buy in. While environmental community groups are aware of nature enhancement and the benefits of initiatives, consideration should be given to how we engage those communities and sectors that aren't already engaged, such as business and the private sector?