

The Committee Clerk
Environment and Sustainability Committee
National Assembly For Wales
Cardiff Bay
CF99 1NA

Dear Sir/Madam

Inquiry into the General Principles of the Planning (Wales) Bill: The Evidence of the Natural Resources Body for Wales

This is the Natural Resource Body for Wales' (NRW) formal response to the Environment and Sustainability Committee's inquiry into the general principles of the Planning (Wales) Bill.

The purpose of the Natural Resources Body for Wales (NRW) is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainably means with a view to benefitting and in a manner designed to benefit the people, environment and economy of Wales now and in the future. Our functions are set out in the Natural Resources Body for Wales (Functions) Order 2012. Our comments are therefore provided in the context of this remit.

We welcome the opportunity to contribute to the Inquiry, as we consider the Planning (Wales) Bill, together with the Environment and Wellbeing of Future Generations Bills, represent a once in a generation opportunity to significantly improve the statutory framework for the integrated management and planning of environmental and natural resources in Wales to meet the challenges facing Wales. These challenges include the effects of climate change, the need for energy security and efficiency, the depletion and deterioration of natural resources including the continuing decline in biodiversity, the need to create and maintain jobs, and the inequality in the access that the people of Wales have to the benefits that the environment provides.

We consider that the Environment Bill, the Wellbeing of Future Generations Bill, the Wales National Marine Plan, the Review of Designated Landscapes and the Planning (Wales) Bill are complementary and mutually supportive. To ensure a joined up approach to addressing the environmental, social and economic challenges we now face, it is important that these linkages are recognised and clearly articulated within the context of the wider process of public service reform and delivery in Wales.

Within this framework of policy the Planning system is designed to manage the development and use of land in the public interest and is an important mechanism for delivering sustainable development and shared outcomes within a spatial context. As well as providing land for development and infrastructure, the planning system also provides protection and opportunities to enhance the environment. We welcome the aim of the Bill to deliver a planning system which is positive in outlook and enables development that helps to deliver sustainable places whilst providing the protection and enhancement opportunities that Wales' environment requires. NRW has a key role to play in supporting the proposals in the Planning (Wales) Bill through providing evidence and guidance, and in our role as a statutory consultee. In this statutory consultee role, the Bill proposes that we will provide statutory advice through substantive responses at a number of stages in the planning application process. This will involve advice on the environmental impact of development, and potential solutions, to inform developers and decision makers to ensure the right development is located in the right place, and implemented within the impact parameters assessed for developments.

NRW has developed a set of Strategic Objectives for our Planning Advice, which was endorsed by our Board on 18 December 2013. These align with the overall approach set out in the Planning (Wales) Bill. They emphasise the need to move towards an enabling, solutions based approach, working strategically and through early engagement with developers and decision makers to enable the right development in the right location whilst respecting environmental limits in accordance with the ecosystem approach. A copy of our Strategic Objectives is attached at Annex 2 for your information.

Our response to the Planning (Wales) Bill highlights the importance of:

- The integration of legislation, policies and plans;
- Parallel tracking of planning and connected environmental consents and permits;
- Integration of outcomes to optimise the benefits from development;
- The opportunity to develop a common evidence base to inform the National Natural Resources Policy, the National Development Framework and the Wales National Marine Plan.
- Strategic engagement with the National Development Framework and other strategic plans to provide evidence and advice to direct nationally important development and infrastructure to the most suitable locations;
- Early engagement in the development management process – at the site selection phase;
- Clarity over the proposed future role of statutory consultees and others in the planning process.

We note that the Bill sets out a number of provisions which rely upon subordinate legislation for their implementation. Whilst much of this detail is not currently available, we view that this secondary legislation will be of considerable importance. Natural Resources Wales looks forward to continued discussion with regard to the scope and detail of the provisions of secondary legislation.


We note that the Regulatory Impact Assessment has considered the options, costs and benefits of proposals on Statutory Consultees, including the desirability of statutory consultation and the requirement for substantive responses at additional stages of the Planning process. We look forward to working with Welsh Government to establish the full extent of these new responsibilities, our respective roles, particularly in relation to the connected consents process, and how best to resource them so as to maximise our effectiveness in delivering the Welsh Government policy objectives in relation to the Planning, Environment and Wellbeing of Future Generations Bills, and the emerging Wales National Marine Plan.

We will continue to work with the Welsh Government and other stakeholders to develop further the details of this important piece of legislation and associated secondary legislation, policy and technical guidance.

Our detailed response to the terms of the Committee's inquiry are set out in Annex 1.

Finally, NRW has this week been invited to attend to give oral evidence to the Committee, which we will be pleased to do.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Iwan Jones', with a horizontal line underneath.

**Head of Sustainable Communities
Pennaeth Cymunedau Cynaliadwy**

Inquiry into the General Principles of the Planning (Wales) Bill

Evidence of the Natural Resources Body for Wales

1. The General Principles of the Planning (Wales) Bill and the need for legislation in specified areas.

We welcome the opportunity to contribute to the Inquiry, as we consider the Planning (Wales) Bill, together with the Environment and Wellbeing of Future Generations Bills, represent a once in a generation opportunity to integrate the statutory framework for the management and planning of environmental and natural resources in Wales. We consider that the Environment Bill, Wellbeing of Future Generations Bill, the Wales National Marine Plan, the Review of Designated Landscapes and the Planning (Wales) Bill are complementary and mutually supportive. To ensure a joined up approach to addressing the environmental, social and economic challenges we now face, it is important that these linkages and interconnections are recognised and articulated through the various Bills within the context of the wider process of public service reform in Wales.

The challenges we face include tackling the causes and effects of climate change, the need for energy security and efficiency, the depletion and deterioration of natural resources including the continuing decline in biodiversity, the need to create and maintain jobs and the inequality in the access that the people of Wales have to the benefits that the environment provides. Addressing these challenges needs to be delivered within the context of the wider processes affecting the delivery of public services across Wales.

The Planning system is designed to manage the development and use of land in the public interest and is an important mechanism for delivering sustainable development and shared outcomes within a spatial context. As well as providing land for development and infrastructure, the planning system also provides protection and opportunities to enhance the environment. We welcome the aim of the Bill to deliver a planning system which is positive in outlook and enables development that helps to deliver sustainable places whilst providing the protection and enhancement opportunities that Wales' environment requires.

NRW has developed a set of Strategic Objectives for our Planning Advice, which was endorsed by our Board on 18 December 2013. These reflect the overall approach set out in the Planning (Wales) Bill. They emphasise the need to move towards an enabling, solutions based approach, working strategically and through early engagement with developers and decision makers to enable the right development in the right location whilst respecting environmental limits i.e. adopting the ecosystem approach. A copy of our Strategic Objectives is attached at Annex 2 for your information.

The requirement to produce a national land use plan, the National Development Framework

NRW welcomes the proposal to introduce a National Development Framework (NDF) to replace the Wales Spatial Plan. The NDF will be evidence based, and therefore provides an opportunity to direct nationally strategic development and infrastructure to the most appropriate locations based on clear evidence, some of which will be provided in the State of Natural Resources Report and, in due course the National Natural Resources Policy and Area Natural Resources statements. In this context it will be important that green infrastructure is identified in the NDF, and the role that it has in delivering multiple benefits such as managing flood risk and providing health benefits, thereby reducing the social and economic costs associated with flooding and poor health for government, business and communities.

Integration between the NDF, National Natural Resources Policy and the Wales National Marine Plan will be essential to ensuring integrated solutions to the economic, social and environmental challenges facing Wales within the context of the Goals set out in the Well Being of Future Generations Bill.

A significant opportunity exists to develop a common evidence base to inform the Natural Resources Policy, the National Development Framework and the Wales National Marine Plan.

The NDF will need to -

- clearly define the role of the land use planning system in delivering the national outcomes of government and any long term goals arising out of the forthcoming Wellbeing of Future Generations Bill ,the Wales National Marine Plan and future Environment Bill provisions with respect to Natural Resource Management.
- set out a long term vision focussed on the delivery of sustainable development goals and outcomes to ensure a resilient economy and environment
- clearly articulate the relationship between the different tiers of plans and processes
- clearly articulate the relationship between the NDF, the Wales National Marine Plan, the Wales Infrastructure Investment Plan (WIIP), the Wales Climate Change Strategy and its associated Sectoral Adaptation Plans and the Wales Transport Strategy and the spatial expression of major development and infrastructure arising out of non-devolved Plans and programmes e.g. National Policy Statements
- clearly articulate the relationship between the NDF and the Natural Resources Policy proposal for the Environment Bill and between the NDF and the Wales National Marine Plan. Section 60B of the Planning (Wales) Bill should make provisions for the Ministers to have regard to, or consider, natural resources policy and the Wales National Marine Plan in the preparation of the NDF.
- clarify that the NDF will set out a spatial expression of Natural Resources Policy including green infrastructure and strategic recreation and access provision, flood defence and other flood risk management measures, such as upland catchment management measures together with pressured environments and National and Internationally important designations.

- clarify whether Developments of National Significance are to be criteria led or reflected spatially in the NDF, informed by the Wales Inward Investment Plan, Wales Transport Strategy and Natural Resources Policy.
- highlight the key natural resource requirements that target setting and land allocation further down the planning hierarchy will need to take into account e.g. water resource availability when setting housing allocation targets for Strategic Development Plans (SDP) and Local Development Plans (LDP).
- align the review period with that proposed for the Natural Resources Policy and State of Natural Resources Reporting.

We note and welcome the development plan status of the NDF and that the Bill requires a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) to be carried out for it. This will help ensure clarity, certainty and consistency throughout the planning hierarchy in Wales and avoid unnecessary conflict and delay arising from inappropriate development in inappropriate locations. Specifically some environmental issues such as flood risk manifest themselves at regional or national spatial scales, such as large river catchments and coastal process cells. These and other environmental issues should be firstly addressed at the national spatial planning level in order to most effectively influence strategic and local development decisions.

Investment in such development and infrastructure will need to be founded on robust environmental evidence to ensure that proposals are directed to locations that can deliver intended outcomes for the long term, whilst being resilient to current and future challenges such as climate change impact.

The NDF can play an important role in achieving Wales' emissions reduction targets in a way that otherwise uncoordinated local planning decisions will fail to do. It will be important to ensure that SEA/SAs are fit for purpose and demonstrate long term sustainability. In this context, and given the importance of meeting EU, UK and Welsh Government targets on carbon reduction, the Framework and its proposals should be required to demonstrate at least a 3% reduction in carbon emissions per annum, over the lifetime of the Framework. Reducing carbon emissions in line with Welsh Government targets is one key step in assuring long term sustainability.. Similarly, the SEA process should demonstrate how the developments proposed in the NDF and their total impact, reduce the impact on natural resources in line with for example Biodiversity targets.

To deliver SA/SEAs that are fit for purpose it will be important to ensure that the necessary expertise and competencies are available, particularly if it is to deliver the larger than local framework and account for the total impacts of the Plan. A realistic assessment of total impacts will be required at the NDF level. The assessments should not be relegated to the SA/SEAs of the lower tier Strategic (SDP) and Local Development Plans (LDP), so that the bigger picture proposed in the NDF recognises how it is contributing to environmental impacts, as well as delivering any economic, social and environmental benefits.

Whilst welcoming the requirement for SA/SEA, we are concerned however that no reference is made to the need to undertake a Habitat Regulation Assessment of the Plan to ensure that compliance with and full consideration is given, to the requirements of the

Conservation of Habitats and Species Regulations (as amended) (The Habitat Regulations), which transposes the requirements of the EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) into UK law. Consideration should therefore be made to amending Section 60B(1) of the Bill should to include the requirement for a Habitat Regulations assessment to be carried out, either by inserting the reference as part of (c) or by inserting an additional criterion.

The proposals for the scrutiny and review of, the NDF will need careful consideration particularly if the intention is to include the spatial elements of existing TANs, such as TAN 8 and 15, within the NDF. As Strategic Development Plans (SDP) and Local Development Plans (LDP) will be required to be in conformity with the NDF, it also provides the context for both of those plans, and it is therefore of key importance that it is given appropriate scrutiny before being finally published.

The creation of Strategic Development Plans to tackle larger-than-local cross-boundary issues

There are a number of areas in Wales where larger-than-local cross-boundary issues will benefit by greater collaboration between authorities and in being considered at the strategic or regional level. Most notably these include housing allocations particularly for South East Wales and Cardiff, and North East Wales; mineral and waste allocations; and green and blue infrastructure, informed by Area Natural Resources evidence and statements, to complement the delivery of grey infrastructure. Strategic Development Plans (SDPs) therefore seem an appropriate tool to consider such issues.

However, given that consideration is being given to larger local authorities in light of the recommendations set out in the *Report of the Commission on Public Service Governance and Delivery* (The Williams Report), it is anticipated that if such changes are introduced, a number of Local Development Plans will cover a much larger area and therefore become more strategic in nature.

It is not clear from the Bill what the interrelationship between SDPs, the Local Development Plans (LDPs) of larger local authorities and Area Natural Resources evidence and statements will be. This needs to be defined or reference provided to the provisions for it to be clarified in secondary legislation.

Similarly, in areas where no SDPs are proposed, the NDF will need to provide an adequate framework for the LDP for the area, to ensure that the LDP is able to demonstrate the necessary conformity with the NDF.

As stated for the NDF, we similarly welcome the requirement for the Strategic Planning Panel to carry out a Sustainability Assessment and Strategic Environmental Assessment of the SDP. However, as for the NDF, we have concerns that there is no reference to the requirement to carry out a Habitats Regulations Assessment of the SPD. We consider this an omission in the Bill and suggest that it is included.

Similarly there is no legislative requirement for the SDP to be informed by the National Natural Resources Policy or Area Natural Resources Statements, although Paragraph 5.26 of the Positive Planning Consultation stated that SDPs would be informed by it and the area based approach for natural resources management. To ensure that the Bill and the emerging Environment Bill are integrated and mutually supportive, we recommend that the proposed Section 60I (6) of the 1990 Act referred to in the Bill is amended by adding reference requiring SDPs to have regard to or to consider National Natural Resources Policy and the area based approach for Natural Resources Management.

We also consider that the Committee should emphasise the importance of the SDP having to have regard to the coordinating processes and timetables between the plans referred to above and the SDP, as well as the coordinating processes and timetables of other National regional plans including:

- National Natural Resources Policy
- The Wales National Marine Plan
- The Wales Infrastructure Investment Plan
- Climate Change Strategy
- Area Natural Resource Management statements
- The Local Development Plan
- Well Being Plans
- National Park and Area of Outstanding Natural Beauty Management Plans
- Regional Transport Plans

The Committee should also seek provisions requiring information on the coordinating processes to be set out in secondary legislation.

We reiterate that specifically some environmental issues such as flood risk, climate change mitigation and adaptation manifest themselves at regional or national spatial scales, such as large river catchments and coastal process cells. These and other environmental issues should be firstly addressed at the national spatial planning level, integrating the National Natural Resource Policy, the Wales National Marine Plan and the National Development Framework in order to most effectively influence strategic and local development decisions.

Changes to Local Development Plan Procedures

We generally welcome the proposals to refine the LDP process and for LDPs to be in conformity with the NDF and, where relevant SDPs. However, guidance will be required on how any conflict between the different authorities are to be resolved, particularly if they still remain at the examination stage of the LDP.

We consider that where there is sufficient evidence to support a joint LDP, they can be a useful tool in providing a local/sub-regional framework to resolve conflict between land allocations and the capacity of the environment to accommodate change in relation to for example flood risk, water resources or Natura 2000 sites.

Frontloading the development management process by making provision for pre-application services

We welcome the potential to influence the design and siting of applications at the pre-application stage of a proposal to try and ensure that environmental impacts are minimised, and that any opportunities for enhancement of green and blue infrastructure and access to green space provision are explored.

Our experience of the pre application stages of applications for Nationally Significant Infrastructure Projects (Planning Act 2008), however, has demonstrated how resource intensive this stage can be for consultees. Pre application consultations can frequently involve reviewing a number of iterations of information submitted by applicants before an application is finally submitted to the decision maker. It is therefore important that expectations of what applicants can expect from consultees at this stage, and what consultees can expect from applicants, is clearly established at the outset.

Although we fully recognise the value of pre application consultation, currently it is often above our current statutory obligations and can be resource intensive. Consequently we are not always able to provide a consistent level of pre application service across Wales. NRW is working to develop and standardise this service in recognition of these factors. As part of this our Board has asked us to look at the options, benefits and costs of introducing a charging element for non-statutory advice, learning from the models being used and developed by organisations who already offer this service, including those being adopted in England. NRW is currently seeking views on options to charge for non statutory planning services as part of a consultation on our charging scheme for 2015-16.

The introduction of a statutory requirement at the pre application stages for DNS and major applications for statutory consultees to provide substantive responses will need to be considered as part of our service improvements and options for charging. A statutory element in the pre application stage needs to be tightly defined otherwise we suggest there could be unintended consequences on statutory consultees.

We note that provision is made to expand on the detail of the proposals in secondary legislation, with further detail provided in the current Welsh Government consultation – Frontloading the Development Management system – which identifies that bespoke advice will be required to ensure full consideration of the proposals and site. NRW will be responding to this consultation in January.

We also note that statutory consultees will be required to produce an annual monitoring report detailing compliance with the requirement to provide substantive responses as pre-application advice, and within the specified timescales. We consider that the indicators currently proposed are a good starting point but could be improved by greater emphasis on outcomes as well as outputs, for example by linking this to the indicators emerging from the Wellbeing of Future Generations (Wales) Bill.

Introducing a new category of development to be known as Developments of National Significance to be determined by the Welsh Ministers

NRW supports the proposed Developments of National Significance (DNS) category in principle for developments which are of 'National' significance. The Bill and secondary legislation will need to clarify their links with the NDF and the spatial expression of major development and infrastructure arising out of National Policy Statements and other non-devolved Plans and Programmes. Additionally, it will be important that their thresholds and criteria are clearly set out.

We note the provision for secondary connected consents in respect of certain applications, including DNS, to be dealt with by the Ministers. Whilst this has the potential to speed up the determination of proposals by allowing them to be considered simultaneously, implementation of the proposal, and resource implications need to be carefully discussed between Government, statutory consultees and local planning authorities.

It will also be important to consider the resource implications for NRW of inputting to the Nationally Significant Infrastructure Project (NSIP) and DNS processes when applications are submitted simultaneously, as is likely to occur, and the balance that is to be struck in trying to ensure that both processes are adequately resourced. This is possibly an unintended consequence of the Bill and an area where there is the potential for conflicting priorities.

Streamlining the Development Management system

We support the principle of streamlining the Development Management system to deliver a system that provides greater certainty for all involved, and that is effective, efficient, proportional and transparent. We particularly welcome the proposal to update decision notices as conditions are discharged or varied.

Changes to Enforcement and Appeal procedures

We generally support the principle of changes to improve the planning appeals process. However again, many of the provisions will be referred to in secondary legislation, where the detail of the proposals will be important.

Although we are generally supportive of some changes being provided by an applicant to improve a scheme once the appeal has been registered, they can, depending on the scale and nature of the change, add considerable delay to the appeals process. We therefore support the principle of generally not allowing alterations to a scheme. However, we consider that there should be an exception for amendments to be allowed by applicants where they would overcome consultee/3rd party objections, and avoid a subsequent application having to be submitted, which would add more cost and time requirements to all concerned.

Changes in relation to applications to register town and village greens.

We note the changes proposed to applications to register town and village greens. However it is important to recognise the importance of these areas of green space to both urban and rural communities, many of which will have been enjoyed by communities for a number of years and have recognised health and well being benefits associated with them.

2. Any potential barriers to the implementation of these provisions and whether the Bill takes account of them

Critical to implementation of the Bill will be clarity of the integration and interrelationship between other on- going legislative and policy proposals, notably the Well Being of Future Generations Bill, The Environment Bill, the Review of Designated Landscapes and The Wales National Marine Plan.

Careful consideration needs to be provided to the resource implications in the context of the current review of Public Service Delivery, particularly where bodies are required to provide advice to assist determination of applications by Welsh Ministers or their appointed body. This needs discussion nationally between WG, statutory consultees and Local Government, and solutions considered at a National and Regional Scale to help ensure a resilient planning service locally.

Loss of fees for bodies that would ordinarily determine connected secondary consents, but which will still be required to allocate staff resources to assist in their consideration.

Our experience from Nationally Significant Infrastructure Projects is that considerable resources can be required to assess an application as submitted and to ensure the project has evolved in an iterative way, addressing advice and any concerns provided at the pre application stage. Whilst there may be a time saving at application stage our experience is that substantial resources are still likely to be required at that stage without necessarily benefitting from the savings outlined in the Regulatory Impact Assessment. This will require careful management.

3. The extent to which the Revised Bill takes account of the Committee's recommendations in their scrutiny of the Draft Planning (Wales) Bill

No comment.

4. Any unintended Consequences arising from the Bill?

Please see comments above in relation to implications for charging for non statutory pre application advice, and consultee input into DNS proposals and the relative balance to be given to that when simultaneous input into NSIPs is also required.

5. Financial implications of the Bill, as set out in the Regulatory Impact Assessment

Whilst we welcome opportunities to speed up the planning process, and recognise that secondary connected consents have the potential to speed up the determination of proposals by allowing them to be considered simultaneously, implementation of the

proposal, and resource implications need to be carefully discussed between Government, statutory consultees and local planning authorities.

Careful consideration will need to be provided to the resource implications in the context of the current review of Public Service Delivery, particularly where bodies are required to provide advice to assist the determination of applications by Welsh Ministers or their appointed body.

Further, there will be a loss of fees for bodies that would ordinarily determine connected secondary consents. Those bodies will still be required to allocate staff resources to assist in their consideration by the Welsh Ministers or appointed body, but will not receive the fee income to contribute to the costs of the work involved.

These issues should be part of a discussion nationally between WG, statutory consultees and Local Government, and solutions should be considered at a National and Regional Scale to help ensure a resilient planning service.

6. Appropriateness of the powers for Welsh Ministers to make subordinate legislation

We agree with the principle of Welsh Ministers having the power to make subordinate legislation, subject to that such legislation being developed and informed by:

- a clear evidence base
- engagement with key stakeholders and interest groups – including statutory consultees, and
- a transparent process.

7. The measurability of outcomes from the Bill

The Well Being of Future Generations Bill, State of Natural Resources Report and the move toward a common evidence base for Natural Resources Policy, Area Natural Resources Statements, the Wales National Marine Plan, National Development Framework, SDP/LPD, Well Being Plans and National Park and AONB Management Plans, and the Planning (Wales) Bill all provide the opportunity to deliver an integrated framework to address environmental, social and economic challenges. Such a framework should be viewed as complementary and mutually supportive and ensure a joined up approach to decision making that is based on a sound environmental evidence base and optimises potential benefits to environmental, social and economic interests.

Annex 2

NRW's strategic objectives for engagement with the planning system

The Board adopted in December 2013 our proposal for a new approach, with increased emphasis on working at the strategic level and adopting a solutions-based culture. The recommended strategic objectives are as follows:

(i) Principles

We will:

- Engage proactively with the planning system - this is an important means of delivering sustainable development, natural resource management and positive outcomes for Wales' natural heritage
- Engage proactively with regeneration and economic development initiatives - to ensure that initiatives take account of environmental constraints and natural resource management and that consequential developments are sustainable
- Focus our efforts on providing evidence and advice on strategic and spatial plans – to steer development to appropriate locations and minimise future conflicts at the individual application level
- Use the same natural resource evidence base throughout NRW – to ensure consistency of advice
- Encourage early engagement with developers - to influence and identify any problems and creative solutions at an early stage.
- Ensure our statutory advice is a reasoned opinion reached after due consideration, weighing our full range of relevant purposes, duties and guidance – to ensure we comply with our legal duties. Specific duties must be complied with, where these are engaged
- Provide objective and expert environmental advice, based on good place-based knowledge - to assist decision makers in discharging their duties. We recognise that in balancing their duties, decision-makers may come to a different conclusion to NRW on the acceptability of any residual risk or impact of a particular development.

(ii) Ways of working

We will:

- Ensure our responses are as clear, unambiguous, and consistent as possible
- Ensure that our internal processes in providing statutory planning advice are designed and implemented to prevent conflicts of interest (for example where we are the applicant or landowner as well as the statutory consultee)

- Ensure transparency of decisions by being able to explain the reasoning behind our advice, and by publication of decision documents in contentious cases
- Adopt a positive approach. This means trying to find the right solution for the environment and the developer. It means avoiding objecting if we can. However, if it is not possible to find the right solution for the environment, either because the applicant is unwilling or unable to modify proposals, or because the development is sited in the wrong place, we may need to object. If the impact raises issues of national importance, we would need to object.
- Use a risk-based approach in our reactive work, responding to individual applications. This means directing our resources to developments likely to produce significant effects and affecting important and sensitive sites/areas
- Use standing advice where appropriate as it has value in responding to less complex applications and can reduce workloads; however, this does not replace the need for place-based and bespoke advice, particularly in more complex cases
- Charge for non statutory (eg pre-application) advice - where we can demonstrate that this will deliver improved customer service and better environmental outcomes
- Work in partnership with the LPAs and PINS - to deliver joint outcomes, training initiatives and to manage the consultations which are sent to NRW
- Work with developers and their sector groups to clarify the role of NRW (viz providing advice not making decision); identify common evidence needs and solutions
- Work with other statutory consultees such as Cadw to clarify our respective roles in planning and share evidence

(iii) Outcomes:

- Developers seek and take our advice at an early stage so that the siting and design of new development is influenced, encouraging development which avoids negative impacts, is within environmental limits and sustainable
- Decision-makers are taking natural resources into account as a result of our clear and well-targeted advice, so protecting these resources and achieving sustainable development
- Opportunities for environmental enhancement are identified and delivered through the planning system
- Improved relationships and customer satisfaction due to the quality and clarity of our responses and provision of the right information at the right time.

- NRW's role in the planning system is understood by our customers and stakeholders
- Improved compliance with response deadlines