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Our Ref/Ein Cyf: 30<sup>th</sup> May 2018
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Dr. Dai Lloyd Chair, Health, Social Care and Sport Committee National Assembly for Wales Cardiff Bay Cardiff CF99 1NA

Dear Dai,



Thank-you for your letter of 4<sup>th</sup> May and please accept apologies for the delay in replying. I wanted to canvass views amongst colleagues in local authority planning departments to inform my response.

The revised Planning Policy Wales consultation has just closed and, as part of that process, WLGA also sought views from the 25 Local Planning Authorities. The greater alignment with the Well-Being of Future Generations Act Goals and ways of working was agreed as a positive change although many felt that the structure and presentation was confusing and challenging. The emphasis on place-making was also positively received alongside the drive to consider the holistic impacts and needs of communities. The concern raised was that PPW outlined a great many things that were positive outcomes without recognising the constraints that development has to address and the realities of the industry.

The specific references to recreational spaces set out from para. 3.106 onwards did not elicit any detailed responses other than the more general points made in relation to development activity across Wales. The committee will be fully aware of the recent issues concerning TAN 1 and housing land availability studies. The issue here is a lack of a five-year housing land supply in the majority of Welsh Local Planning Authorities.

Notwithstanding the current Welsh Government consultation on the move to disapply an element of TAN 1, the provision of housing land and viability remains an issue. Indeed, the provision of a large number of affordable dwellings is a major Welsh Government target that local authorities support.

Functioning communities need a range of community facilities, open space, and active travel links to make these places work.

Consequently, there is significant pressure to achieve a range of



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outcomes from any S.106 negotiations and discussions about design standards and density.

There has been an active debate as to where PPW uses language such as 'should' (as in para 3.106) and 'must'. The document itself states that this distinction is drawn from the statutory - or otherwise - basis of the issue. It is clear that there will always be a need for an element of local flexibility to ensure appropriate outcomes. The concern would be that something like recreational spaces could get squeezed in the need to provide community facilities such as housing and especially affordable housing. This pressure is intensified as reduced budget provision impacts across the public sector. Therefore, the language within PPW is critical.

Therefore, the committee may wish to consider if this part of the guidance should be firmer in directing that not only 'should' a framework be required (for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities) that all large-scale development must adhere to this framework unless there are significant reasons for not doing so. This would send a clearer signal to the development industry as to what the expectation is and it can be more fully factored into land acquisition costs.

I hope this response is helpful to you in the committee's work on this issue.

Yours sincerely

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Tim Peppin

Director of Regeneration and Sustainable Development