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CNP response to Planning for Sustainability consultation

The Campaign for National Parks (CNP) is the charity that campaigns to protect and promote National Parks in England and Wales as beautiful and inspirational places enjoyed and valued by all. It has been in existence for over 75 years. CNP's work in Wales is informed by a Welsh Advisory Committee, which includes representatives from each of the National Park Societies and other bodies such as CPRW and the National Association of AONBs. The National Park Authorities in Wales and National Parks Wales have observer status.

Question 1 – Do you agree with our approach to strengthening national planning policy by introducing a clear statement on the presumption in favour of sustainable development?

CNP welcomes the opportunity to respond to this consultation on amendments to national planning policy which are aimed at strengthening and clarifying the presumption in favour of sustainable development.

We are broadly supportive of the aims of the consultation. The planning system has a key role to play in the protection and enhancement of Wales' landscapes and natural resources and would be able to do this more effectively by taking a more integrated approach to sustainable development. However, we have some concerns about how the changes will work in practice, particularly in the absence of a clear definition of sustainable development, which we have discussed further in our response to question 3 below.

We also support the revisions to Chapter 4 of Planning Policy Wales (PPW) proposed by the Wales Environment Link (WEL) in their response to this consultation.

Question 2 – Do you agree that where development plan policies are out dated or superseded local planning authorities should give them decreasing weight in favour of other material considerations such as national planning policy?

CNP agrees with the proposal that outdated development plan policies should be given less weight than current national planning policy.

Question 3 – We have asked two specific questions. If you have any related issues which we have not specifically addressed, please use the consultation response form to express your views.

CNP recognises the key role that the planning system plays in supporting economic development and growth in Wales as well as protecting and enhancing the country's landscapes and natural resources. We also acknowledge and welcome the Welsh Government's commitment to sustainable development. However, we are concerned that there is neither a clear definition nor a consistent understanding of the exact meaning of the term 'sustainable development'. This issue needs to be addressed as a matter of urgency as part of the forthcoming Sustainable Development Bill. This is particularly disappointing given that One Wales One Planet published in 2009 provides a very good vision for sustainable development that should have provided the framework for this consultation and the definition of sustainable development. There is also good recognition in One Wales One Planet of the important role that landscapes including protected ones, play in achieving sustainable development.

CNP believes that the agreed definition of sustainable development must recognise that the economic and social aspects of sustainable development are inextricably dependent on the environment. It should be an integrated approach which operates within the accepted boundaries of defined environmental capacities and standards. 'Environmental capacity' should include full recognition of the special qualities and particular vulnerability of protected landscapes and the national sustainability exemplars and signposts these areas represent. It is for these and other reasons that our protected landscapes are already major deliverers of the Living Wales approach and represent significant economic assets in their own rights as a result of their current tourism context and role. This is not only because of the high quality environment in these areas but because they are also major suppliers of "feel good factors, social well-being and healthy living" providing inspiration and a sense of refreshment for those who choose to use and enjoy them.

The approach to planning policy and decision making should be an integrated one which seeks to benefit all three elements in the definition, rather than a balance-based approach where the three elements are weighed against each other, producing a "winner takes all" outcome. This means that development which exceeds the 'environmental capacity' of an area or resource should be avoided. At a minimum, development proposals in National Parks should not cause adverse impact on the environmental and social elements of sustainable development, and ideally, they should benefit all three elements.

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