

**CONSULTATION FORM****Revision of Chapter 7 of Planning Policy Wales – Supporting the Economy**

We want to know your views on the proposed changes to the Welsh Government's planning policy for economic development.

Please submit your comments by **5 March 2012**

If you have any queries on this consultation, please email: [planconsultations-F@wales.gsi.gov.uk](mailto:planconsultations-F@wales.gsi.gov.uk) or telephone: 029 2082 1673

<b>Data Protection</b>
<p>Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.</p> <p>The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.</p> <p>Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.</p>

## CONSULTATION FORM

Planning Policy Wales Chapter 7- Supporting the Economy (Consultation)		
28 November 2011- 5 March 2012		
<b>Name</b>	James Caird	
<b>Organisation</b>	Institute of Historic Building Conservation	
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<b>Type</b> <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input checked="" type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Do you agree with the proposed of the definition of economic development for planning purposes?	
	Strongly Agree	
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
	Strongly Disagree	

Q1(b)	Do you have any further comments?
	The definition treats economic development as if it were a completely discrete activity/land use. In fact economic development is often allied to other activities and delivers developments satisfying more than the economic development objective. Whilst not disagreeing with the simplicity of the definition, we think that it might be accompanied by elucidative commentary.

<b>Q2</b>	Do you agree with the Objectives as specified in paragraph 7.1.2?
	<p>Strongly Agree</p> <p>Agree</p> <p>Neither Agree nor Disagree</p> <p>Disagree <span style="float: right;">X</span></p> <p>Strongly Disagree</p>

<b>Q2(b)</b>	Do you have any further comments?
	<p>There is a trend in the development of planning policy to view other sustainability objectives as the enemy of progress. Ideally social, economic and environmental objectives should be aligned so that developments can conform to them in a complementary way. The draft policy hints at this but by expressly stating the new policy to be a shift towards economic factors, we think that the balance may become weighted too heavily in their favour. We would prefer to see the Objectives refer to making appropriate positive use of environmental capital (including historic buildings and other heritage assets) wherever possible.</p>

<b>Q3</b>	Do you agree that an Employment Land Review is required to provide the evidence base for Local Development Plans?
	<p>Strongly Agree <span style="float: right;">X</span></p> <p>Agree</p> <p>Neither Agree nor Disagree</p> <p>Disagree</p> <p>Strongly Disagree</p>

<b>Q3(b)</b>	Do you have any further comments?
	No

<b>Q4</b>	Do you agree that Employment Land Reviews should be undertaken collaboratively by local planning authorities to reflect economic circumstances?
	<p>Strongly Agree</p> <p>Agree <span style="float: right;">X</span></p> <p>Neither Agree nor Disagree</p> <p>Disagree</p> <p>Strongly Disagree</p>

<b>Q4(b)</b>	Do you have any further comments?
	No

<b>Q5</b>	Do you think that policy on economic development will help in rural areas to promote diversification of the economy?
	<p>Strongly Agree</p> <p>Agree <span style="float: right;">X</span></p> <p>Neither Agree nor Disagree</p> <p>Disagree</p> <p>Strongly Disagree</p>

<b>Q5(b)</b>	Do you have any further comments?
	Rural areas tend to have considerable environmental capital, including heritage, and economic developments that use this capital (re-use of buildings, environmentally and heritage based tourism etc.) should be particularly referred to with encouragement. This is not to imply restraint on other appropriate forms of development in rural areas.

<b>Q6</b>	Do you consider that the draft policy support the development of the green economy?
	<p style="text-align: center;">Strongly Agree</p> <p style="text-align: center;">Agree <span style="float: right;">X</span></p> <p style="text-align: center;">Neither Agree nor Disagree</p> <p style="text-align: center;">Disagree</p> <p style="text-align: center;">Strongly Disagree</p>

<b>Q6(b)</b>	Do you have any further comments?
	No

<b>Q7</b>	Do you agree that the guidance on the content of development plans is sufficiently flexible to allow for local circumstances and changes in the wider economy?
	<p style="text-align: center;">Strongly Agree</p> <p style="text-align: center;">Agree <span style="float: right;">X</span></p> <p style="text-align: center;">Neither Agree nor Disagree</p> <p style="text-align: center;">Disagree</p> <p style="text-align: center;">Strongly Disagree</p>

<b>Q7(b)</b>	Do you have any further comments?
	7.5.1 – 5 <sup>th</sup> bullet “...encourage the regeneration and reuse of sites <b><u>and buildings</u></b> which are suitable...”

<b>Q8</b>	Do you agree that local authorities should work together, and with other stakeholders, to plan strategically for employment land provision?
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Strongly Agree	X
Agree	
Neither Agree nor Disagree	
Disagree	
Strongly Disagree	

**Q8(b)** Do you have any further comments?

It is highly desirable that planning involves all relevant interests and does not become compartmentalized.

**Q9** Do you agree with the view that Development Management decisions need to reflect economic considerations more prominently?

Strongly Agree	
Agree	
Neither Agree nor Disagree	
Disagree	X
Strongly Disagree	

**Q9(b)** Do you have any further comments?

We are uneasy with the starting point for the consultation. All planning decisions should reflect all relevant considerations. The proposed policy is in danger of reaching a "jobs before anything else" conclusion with which we would disagree. Rather than deal with the issue in this way we would prefer to see policy framed around process of achieving appropriate balance rather than pitting social, economic and environmental factors against one another in separate sections of policy.

**Q10** Do you think that draft planning policy, as proposed, will be effective in raising the profile of economic issues as part of the Development Management process?

Strongly Agree	
Agree	
Neither Agree nor Disagree	X
Disagree	
Strongly Disagree	

<b>Q10(b)</b>	Do you have any further comments?
No	

<b>Q11</b>	Do you agree with the list of key factors to be taken into account listed in paragraph 7.6.1 when deciding planning applications?
Strongly Agree	
Agree	
Neither Agree nor Disagree	
Disagree	X
Strongly Disagree	

<b>Q11(b)</b>	Do you have any further comments?
By setting out purely economic factors in this way without reference to other policy, the impression is given of supremacy. We do not think this is appropriate.	

<b>Q12</b>	Do you agree that local planning authorities should look favourably on applications for economic development not in accordance with development plans, if the economic benefits outweigh any adverse impacts?
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Strongly Agree	
Agree	
Neither Agree nor Disagree	
Disagree	X
Strongly Disagree	

**Q12(b)** Do you have any further comments?

This is too simplistic an approach. Development plans have been through significant environmental assessment. Departures, which have not by their nature been assessed as part of the development plan process, need proper assessment against environmental criteria

**Q13** Do you agree with broad headings which the Technical Advice Note should address?

Strongly Agree	
Agree	
Neither Agree nor Disagree	
Disagree	X
Strongly Disagree	

**Q13(b)** Do you have any further comments?

The headings may be appropriate but the text needs to refer LPAs to the process of bringing proper balance to their decisions.

**Q14** What further guidance would you like to see contained in the draft Technical Advice Note?

We have no view on this.

**Q15**

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We have no further views.

### **Confidentiality**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential please indicate here:

### **How to respond**

Please submit your comments by 5 March 2012, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to :</p> <p><a href="mailto:planconsultations-F@wales.gsi.gov.uk">planconsultations-F@wales.gsi.gov.uk</a></p> <p>[Please include 'PPW Chapter 7 – Supporting the Economy (Consultation)' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Planning Policy Wales Chapter 7- Supporting the Economy (Consultation)            Planning Policy Branch Planning Division            Welsh Government            Cathays Park, Cardiff            CF10 3NQ</p>

#### **Additional information**

If you have any queries on this consultation, please

Email: [planconsultations-F@wales.gsi.gov.uk](mailto:planconsultations-F@wales.gsi.gov.uk)

Telephone: Richard Spear on 029 2082 1673