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Welsh Government

Consultation Document

Planning for Sustainability The presumption in favour of sustainable development

Date of issue: 2 March 2012 Responses by: 25 May 2012

Overview

This consultation paper seeks views on our proposals to amend national planning policy in Planning Policy Wales to strengthen and clarify the presumption in favour of sustainable development within the planning system.

How to respond

The closing date for replies is 25 May 2012.

Responses should be provided in writing or electronically using the consultation form set out in Annex C.

You can reply in any of the following ways:

Email:

Please complete the consultation response form at Annex C and send it to: planconsultations-C@wales.gsi.gov.uk

Please include "Presumption statement" in the email subject line.

Post:

Please complete the consultation form at Annex C and send it to the address provided on this page.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Insert any references to the internet, documents or information which might to useful to consultees, e.g. consultation web address, detailed appendix to consultation

Contact Details. For further information:

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http://wales.gov.uk/consultations/planning

Data Protection: How the views and information you give us will be used

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.

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 tell us this in writing when you send your response. We will then blank them out.

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.

Introduction

Sustainability lies at the heart of the Welsh Government's agenda for Wales. Sustainability means healthy, productive people; vibrant, inclusive communities; a diverse and resilient environment and an advanced and innovative low carbon economy.

We are looking at how we strengthen our approach to delivering a better future for Wales through a proposed Sustainable Development Bill, alongside how the planning system should operate in the future through a proposed Planning Bill. To complement this work we are looking at how we strengthen sustainable development within our planning system now.

Our planning system is fundamental for delivering sustainable development in Wales. It exists to manage the development and use of land in the public interest. Its purpose is to reconcile the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. It does this to deliver sustainable development.

Since devolution we have introduced secondary legislation, national planning policy and guidance and worked with stakeholders to further this aim. We want to continue this commitment by amending national planning policy to strengthen and clarify the presumption in favour of sustainable development.

The way in which our planning system currently favours sustainable development is two-fold.

Firstly, it can promote and guide development to the most sustainable location – by preparing and adopting a development plan for an area over a set period of time. Legislation requires that these plans are prepared with the objective of contributing to the achievement of sustainable development and authorities are required to carry out a sustainability appraisal of their development plans.

Secondly, it can encourage sustainability within individual projects by granting permission for development proposals of good sustainable design, mitigating adverse sustainability impacts or preventing unsustainable development proposals by refusing permission.

In strengthening our approach to planning for sustainable development we need to make sure that planning decisions at all

levels within Wales contribute to sustainable development. The best way to do this is for local communities, working with their local planning authority, to plan ahead and manage this change effectively and sustainably by adopting and implementing a Development Plan and then to determine planning applications in accordance with the adopted plan with the objective of delivering sustainable development.

In some areas of Wales there is no adopted Development Plan in place and in other areas policies within adopted plans may be outdated or superseded. In these areas there is a lesser degree of certainty in facilitating sustainable development through the planning system at the local level. Until there is full Development Plan coverage across Wales, the framework for local authorities to make planning decisions which deliver a positive sustainability outcome may be less clear and robust.

What do we want to change?

We want to strengthen our national planning policy (*Planning Policy Wales*) to reinforce the need to prepare, adopt and implement the plan-led approach through Development Plans and strengthen the framework within which individual applications are determined in order to further facilitate sustainable development.

We want to hear your views on our proposed changes to *Planning Policy Wales*.

Contents

Introduction	1
What are the main issues?	4
What is the current position?	6
What are the main changes we are proposing?	8
What will happen next?	12
Consultation Questions	12
Annex A – Development Plan Coverage	14
Annex B – List of bodies/organisations invited to respond to this consultation	15
Annex C - Consultation Response Form [Separate document]	

What are the main issues?

Sustainable Development

- We have a legal obligation to have a scheme setting out how we will promote Sustainable Development and we have embarked on an ambitious and long-term programme of policy initiatives to help us achieve our vision of a sustainable Wales, which we set out in our Scheme, One Wales: One Planet. This commitment is based upon our sustainable development duty under Section 79 of the Government of Wales Act 2006.
- We have already published a discussion document on our proposal to legislate through a Sustainable Development Bill to strengthen our approach to sustainable development as the central organising principle in all of our actions across Government and all devolved public bodies. We will be consulting further on our proposals during 2012. Further information can be found here: http://wales.gov.uk/topics/sustainabledevelopment/sdbill.
- 3. Sustainable development is the process by which we reach the goal of sustainability. Our approach to sustainable development is set out in our *Sustainable Development Scheme* (2009). It is aimed at improving the economic, social and environmental well-being of people and communities in Wales over the long term. This is done in ways that promote social justice and equality for all and which reduce our use of the earth's resources and move us to living within our resource limits. It is an approach firmly focused on improving and sustaining people's quality of life and well-being, now and in the future. Our Scheme sets out a vision of what a sustainable Wales would look like.
- 4. Our definition of sustainable development is contained in our *Sustainable Development Scheme*:
 - "...enhancing the economic, social and environmental wellbeing of people and communities, achieving a better quality of life for our own and future generations, in ways which:
 - a. Promote social justice and equality of opportunity, and
 - b. Enhance the natural and cultural; environment and respect its limits using only our fair share of the earth's resources and sustaining our cultural legacy".
- 5. The global goal for sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. It is an internationally adopted principle where social, economic and environmental issues should be considered at the same time when plans are being drawn up and decisions are being taken for

the future. When we talk about sustainable development, we mean an approach to decision making that:

- Embraces the long-term, in particular by avoiding long-term costs that will have to be picked up by future generations.
- Demands integration between economic, social and environmental outcomes.
- Reduces complexity, allowing more resources to be directed to front-line service delivery.
- Encourages joined-up thinking within and between organisations.
- Encourages active participation by those who will be affected by decisions.¹
- 6. Our Sustainable Development Scheme identifies the planning system as one of four key themes that underpin the approach to reducing our ecological footprint and delivering sustainable development. The Scheme identifies the overall aim of the planning system as providing land for homes, infrastructure, investment and jobs in a way that helps reduce our ecological footprint. Our Sustainable Development Scheme: One Wales: One Planet (2009) can be found here: http://wales.gov.uk/topics/sustainabledevelopment/publications/onewalesoneplanet.
- 7. In January 2011 the National Assembly for Wales Sustainability Committee reported on its *Inquiry into Planning in Wales*². It recommended (Recommendation 8) that the Welsh Government should "...consider the introduction in planning policy of a presumption in favour of sustainable development". This recommendation was accepted by the Welsh Government.
- 8. In June 2011 the Minister for Environment and Sustainable Development stated that we would amend national planning policy to introduce a presumption in favour of sustainable development. The Minister reiterated that the best way to ensure that sustainable planning decisions are taken is to ensure that an up-to-date development plan is in place.
- 9. This consultation paper details our proposals to strengthen *Planning Policy Wales* and introduce a clear statement on the presumption in favour of sustainable development.

5/16

One Wales: One Planet – A Welsh Government Discussion Paper – Sustainable Development Bill, Welsh Government (2011)

² Inquiry into Planning in Wales – January 2011, National Assembly for Wales, Sustainability Committee (2011) See here <a href="http://www.assemblywales.org/bus-home/bus-third-assembly/bus-committees/bus-assembly-publications-committee-inquiries/research-completed_inquiries.htm#sustainabilitycompleted

What is the current position?

- 10. The purpose of the land-use planning system is to set the framework and manage the development and use of land in the public interest, taking full account of economic, social and environmental issues. It should contribute to the strategies and priorities of the Welsh Government which relate to the sustainable use and development of land.
- 11. Our national objectives and principles on planning for sustainability are set out in *Planning Policy Wales (PPW)* and *Minerals Planning Policy Wales (MPPW)*. PPW sets out the overarching framework for the land use planning system in Wales. It is supplemented by a series of Technical Advice Notes (TANs), while procedural advice is given in circulars and policy clarification letters. *Planning Policy Wales* was first published in 2002 providing national planning policy and guidance for consideration in the preparation of development plans and in the determination of planning applications. PPW is kept under constant review and is updated frequently. Sustainable development has been embedded within national planning policy since the first edition of PPW and subsequent updates continue to be made with a view to promoting sustainable development.
- 12. The Town and Country Planning Act 1990 ('1990 Act') and the Planning and Compulsory Purchase Act 2004 ('2004 Act') set the legislative context for how land use change is managed and controlled in Wales. This relies on a **plan-led** approach underpinned by the publication of a Development Plan which sets out the Local Planning Authority's objectives in relation to the development and use of land in their area and their general policies for the implementation of those objectives³. The main types of development plans in existence are:

Structure Plans⁴ prepared by former County Councils;

Local Plans⁵ prepared by former District Councils;

Unitary Development Plans (UDP)⁶ prepared by Unitary Authorities and National Park Authorities; and

Local Development Plans⁷ prepared by Unitary Authorities and National Park Authorities.

13. Under the current legislative framework (the 2004 Act) every local planning authority in Wales must prepare a Local Development Plan (LDP) for its area. Existing legislation requires that plans must contribute to the achievement of sustainable development and have regard to

³ Section 62(2) of the Planning and Compulsory Purchase Act 2004

⁴ Town and Country Planning Act 1968

⁵ Town and Country Planning Act 1968

⁶ Transitional arrangements exist to enable LPAs to take forward their Unitary Development Plans (UDPs) to adoption, before starting to prepare LDPs

⁷ Introduced by the Planning and Compulsory Purchase Act 2004.

- national policies, the Wales Spatial Plan and the local community strategy⁸.
- 14. A Development Plan provides the basis for rational and consistent sustainable decisions about the use and development of land. LDPs are required to be prepared with the objective of contributing to the achievement of sustainable development and are subject to Sustainability Appraisal⁹, Strategic Environmental Assessment (SEA)¹⁰ and Appropriate Assessment (AA)¹¹.
- 15. Once a plan is adopted, the local authority is required to determine planning applications in accordance with the relevant adopted development plan, unless material considerations lead them to decide otherwise¹².
- 16. PPW, the TANs, circulars and policy clarification letters comprise national planning policy and should be taken into account in the preparation of development plans. They may be material to decisions on individual planning applications. They provide a policy, rather than legal, framework for guiding local policy formulation and development control decisions on the basis that local planning authorities, through the adoption and approval of Development Plans, are best placed to determine the local implications of planning applications. Amendments to national planning policy will strengthen how sustainable development is delivered within the planning system in Wales. National planning policy therefore provides a robust basis for determining individual planning applications where there is no adopted development plan or where policies within an adopted development plan are superseded or outdated within the context of national planning policy.
- 17. The **plan-led** approach is designed to create greater certainty within the planning system about what forms of development will and will not be acceptable in sustainability terms, in any given location. As of January 2012 five LDPs (20%) and fourteen UDPs (one joint) (56%) have been adopted. A full list can be found in Annex A.
- 18. Structure and Local Plans have not been prepared in light of the Welsh Government's commitment to sustainable development. Therefore they offer a lesser degree of certainty in facilitating sustainable development through the planning system.
- 19. We have concerns in light of our commitment to promote sustainable development in Wales that in areas where there is no development plan in place, or where policies in adopted plans are outdated, or have been

7 / 16

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⁸ Section 39 of the Planning and Compulsory Purchase Act 2004

⁹ Section 39 and Section 62(6) of the Planning & Compulsory Purchase Act 2004

¹⁰ EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

¹¹ The Conservation (Natural Habitats, &c.) Regulations 1994 (SI No. 1994/2716) (as amended) Council Directive 92/43/EEC

Section 54A of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004

superseded by other material considerations, there is a lesser degree of certainty in facilitating sustainable development through the planning system at the local level.

What are the main changes we are proposing?

- 20. We want to strengthen our national planning policy (*Planning Policy Wales*) to introduce a clear statement on the presumption in favour of sustainable development. We also want to make it clear that local planning authorities should give decreasing weight to development plan policies where they are outdated or superseded in favour of other material considerations such as national policy.
- 21. Our proposed changes to national planning policy cover amendments within Chapters 2-4 of *Planning Policy Wales*. The main proposed changes to PPW are included below in order to prompt specific consultation responses. These changes should be read alongside the policy and guidance already contained in PPW.
 - (A) Introducing a clear statement on the presumption in favour of sustainable development
- 22. We propose to include a new section in Chapter 4 *Planning for Sustainability* to strengthen and clarify the presumption in favour of sustainable development. This statement reiterates the need to have an adopted development plan in place; the need to make decisions in accordance with the development plan and with the objective of contributing to sustainable development. The proposed new Section 4.2 is detailed below. This should be read alongside the existing text in PPW.

Planning Policy Wales

Chapter 4 Planning for Sustainability

Section 4.2 The role of the planning system in delivering sustainable development

Presumption in favour of sustainable development

- 4.2.1 **Sustainable development in the planning system** means that social, economic and environmental issues are considered at the same time when plans are being drawn up and decisions are being taken for the future.
- 4.2.2 The planning system has a fundamental role in delivering sustainable development. It must provide for homes, infrastructure, investment and jobs in a way which is consistent with our sustainability principles (see section 4.3) and our key policy objectives (see section4.4).

- 4.2.3 Local planning authorities should exercise their planning functions with the objective of contributing to the achievement of sustainable development. There should be a presumption in favour of developments that enhance the economic, social and environmental well-being of people and communities now and over the long term (sustainable development) (see Section 4.1).
- 4.2.4 The presumption in favour of sustainable development is expressed through the key policy objectives set out at section 4.4 below. It will be for the decision-maker to balance and reconcile these key policy objectives when planning for their area (see Chapter 2) and in taking decisions on individual applications (see Chapter 3).
- 4.2.5 A plan-led approach is the most effective way to secure the presumption in favour of sustainable development at the local level. Development Plans, when adopted (or approved by the Welsh Ministers), provide the basis for this presumption to be exercised when determining individual applications (see para 2.7[new]).

Consequential changes

- Paragraph 4.1.6 is replaced by new section 4.2 (above)
- Section 4.2 *Planning for Climate Change* moves to Section 4.5, with consequential changes for the remainder of the chapter.

Question 1 (new section 4.2)

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

- (B) Giving weight to national planning policy in determining individual applications where policy in adopted or approved development plans is outdated or superseded.
- 23. The proposed presumption statement reinforces the need for an approved or adopted development plan to be in place, prepared with the objective of contributing to sustainable development. There are currently four different types of development plan in existence in Wales as set out in paragraph 12 above. These have been prepared within the context of varying requirements and national planning policy.
- 24. While planning has always been about balancing competing demands, UDPs and LDPs have both been prepared with the objective of delivering sustainable development. LDPs must, by statute, contribute to the achievement of sustainable development¹³, have regard to national policies and are required to carry out an appraisal of the sustainability of

¹³ Section 39 of the Planning and Compulsory Purchase Act 2004

the plan¹⁴. Similarly, where authorities prepared UDPs they were required to have regard to environmental, social and economic considerations and were expected to carry out a full sustainability appraisal of their development plans¹⁵. Both UDPs and LDPs have also been prepared against the context of the Welsh Government's Sustainable Duty (1998)¹⁶ and *Planning Policy Wales* (since 2002) which embeds sustainable development into the planning system. Adopted and approved UDPs and LDPs therefore provide a robust basis for planning decisions for sustainable development to be made at the local level.

25. Earlier plans which have not been prepared in light of the Welsh Government's commitment to sustainable development may offer a lesser degree of certainty in facilitating sustainable development through the planning system.

'Adopted and approved'

- 26. The terms 'adopted' and 'approved' are those terms set out in the relevant legislation. In summary a plan is the development plan only in so far as it is **adopted** by resolution of the local planning authority or is **approved** by the Welsh Ministers. This does not include plans that did not proceed to full adoption, but have been 'adopted' by the local planning authority for development management purposes.
- 27. Plans, once adopted, will remain as the adopted development plan until altered or replaced. However, over time current *national planning policies* may provide a more robust and relevant policy basis for the determination of individual applications, in particular where development plan policies become outdated or are superseded. The proposed amendments in Chapter 2 *Development Plans* seek to reinforce this. The new section should be read alongside the existing text in PPW.

Planning Policy Wales

Chapter 2 Development Plans

2.6 What happens when a development plan has not yet been adopted?
(existing)

2.6.2 [new text at end of paragraph]

National planning policy can also be a material consideration in these circumstances.

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¹⁴ Section 62(6) of the Planning and Compulsory Purchase Act 2004

¹⁵ Paragraph 2.18 of 'Unitary Development Plans Wales (2001) and 'Planning for Sustainable Development: Towards Better Practice' (DETR, 1998).

¹⁶ Government of Wales Act 1998

2.7 What happens when development plan policies are outdated or superseded? (new)

2.7.1 Where development plan policies are outdated or superseded local planning authorities should give them decreasing weight in favour of other material considerations such as *national planning policy* in the determination of individual applications. This will ensure that decisions are based on policies which have been written with the objective of contributing to the achievement of sustainable development (see paragraph 1.1.4 and [new] section 4.2).

2.8 PPW Policy Statements

(currently 2.7)

2.8.4 National development control policies set out here should, where appropriate, be considered in the determination of individual applications, particularly where national planning policy provides for a more up-to-date policy on a certain topic (see [new] paragraph 2.7 and [new] section 4.2).

Consequential changes:-

- Section 2.7 PPW Policy Statements now becomes Section 2.8.

Question 2 (new section at 2.7)

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

(C) Summary of proposed amendments

28. A summary of the proposed amendments is contained in the table below. This includes sections of PPW where cross references and minor text amendments are proposed (but not detailed) to support the changes proposed in this consultation.

Summary of proposed changes to Planning Policy Wales					
Chapter 2 Development Plans					
2.1.2 (cross reference)	A new cross-reference to new section 4.2 Presumption in favour of sustainable development.				
2.7 (new section)	Please refer to paragraphs 23-27 (p12-13) of this consultation document for details of the proposed changes.				

2.8.4 (new paragraph)	Please refer to paragraph 27 (p13) of this consultation document for details of the proposed changes.			
Chapter 3 Making and Enforcing Decisions				
3.1.2 (cross reference)	New cross-reference at the end of the paragraph to the proposed presumption statement at new sections 4.2 and 2.7.			
3.1.3 (cross reference)	New cross-reference at the end of the paragraph to new section 4.2.			
Chapter 4 Planning for Sustainability				
4.2 (new section)	Please refer to paragraph 22 (p.11) of this consultation document for details of the proposed changes. This new section replaces paragraph 4.1.6, with consequential changes.			
4.5 (move)	We propose to move existing section 4.2 <i>Planning</i> for <i>Climate Change</i> to section 4.5, with consequential changes to existing sections 4.5 to 4.12.			
4.4.2 (new text underlined)	4.4.2 Planning policies, proposals <u>and decisions</u> should:			

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.

What will happen next?

- 29. Following the consultation we will review and analyse all consultation responses received. We may publish all responses on our website and publish a consultation summary report. We may consult directly with stakeholders and use our current mechanisms for engagement with stakeholders to discuss any further issues.
- 30. We will aim to publish the final changes to PPW in a new edition by summer 2012.

Consultation Questions

31. Throughout the document we have set out above a number of specific consultation questions that relate to the proposed changes to PPW.

These are repeated below and contained on the **Consultation Response Form** at Annex C.

32. If you wish to make any comments please complete the consultation form. Full details of the consultation can be found on the inside cover of this document.

Question 1 (new section 4.2)

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

Question 2 (new section 2.7)

Do you agree that where development plan policies are outdated or superseded local planning authorities should give them decreasing weight in favour of other material considerations such as 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.

Annex A – Development Plan Coverage

Development Plan Coverage				
	Adoption date	Plan period		
Local Development Plans				
Caerphilly	Dec 2010	2006-2021		
Merthyr Tydfil	May 2011	2006 - 2021		
Pembrokeshire Coast National Park	Sept 2010	2010 ⁺ - 2021		
Rhondda Cynon Taff	Mar 2011	2006- 2021		
Snowdonia National Park	Jul 2011	2007 - 2022		
Unitary Development Plan				
Blaenau Gwent	Jul 2006	1996 - 2011		
Bridgend	May 2005	2001 - 2016		
Carmarthenshire	Jul 2006	2001- 2016		
Denbighshire	Jul 2002	1996 - 2011		
Flintshire	Nov 2011	2000 - 2015		
Gwynedd	July 2009	2001 - 2016		
Monmouthshire	Jun 2006	1996 - 2011		
Neath Port Talbot	Mar 2008	2001 - 2016		
Newport	May 2006	1996 - 2011		
Pembrokeshire & Pembrokeshire Coast National Park (Joint)	July 2006	2000 - 2016		
Powys	Mar 2010	2001 - 2016		
Swansea	Nov 2008	2008 ⁺ - 2016		
Vale of Glamorgan	Apr 2005	1996 - 2011		
Wrexham	Feb 2005	1996 - 2011		
Other (Structure Plan / Local Plan) or r	no plan			
Brecon Beacons National Park	1999	+		
Cardiff	1996	+		
Ceredigion	No Plan			
Conwy	No Plan*			
Isle of Anglesey	1996	+		
Torfaen	2000	+		
No start dates given only adoption dateLocal Plan - Colwyn 1999, Llandudno &				

Annex B – List of bodies/organisations invited to respond to this consultation

All Local Planning Authorities (25)

All Wales Ethnic Minority Association (AWEMA)

Architecture Verte Ltd.

Arup

Association of National Park

Authorities

Bartlett School of Planning

BRE Global Ltd

British Waterways

Bwrdd yr laith - Welsh

Language Board

Cadw

Campaign for National Parks

Campaign for the Protection of

Rural Wales

Capita Symonds

CBI Wales

Chartered Institute of Housing

Cheshire West and Chester

Council

Children's Commissioner for

Wales

Citizens Advice Bureaux

Civic Trust for Wales

Coal Authority

Community Enterprise Wales

Community Housing Cymru

Commissioner for Sustainable

Futures

Country Land & Business

Association

Countryside Council for Wales

Crown Estate Commissioners

Cynnal Cymru

Department of City and Regional Planning Cardiff

University

Department of Energy and

Climate Change

Department of Law Cardiff

University

Design Commission for Wales

Development Planning

Partnership

Disability Wales

Disabled Persons Transport

Advisory Committee

DTZ

Energy Savings Trust

Entec UK Ltd.

Environment Agency Wales

Federation of Small Businesses

Farmers Union of Wales

Federation of Master Buildings

Friends of the Earth Cymru Forestry Commission Wales

Geldards

GMB

Greenpeace UK

Gwent Association of Voluntary

Organisations (GAVO)

Health and Safety Executive

Herefordshire Voluntary Action

Home Builders Federation

IoD Wales

Land Registry Wales Office

Land Use Consultants Landscape Institute Wales

Law Society Wales Ministry of Defence

National Air Traffic Services

National House Building Council

National Trust Network Rail NFU Cymru

Older People's Commissioner

for Wales

One Voice Wales

Operator of Cardiff Airport Planning Consultancy Forum

Planning & Environment Bar

Association

Planning Aid Wales

Planning Inspectorate Wales

Planning Officers' Society

Wales

Police Liaison Officer

Public Services Ombudsman for

Wales

Race Equality First

RNIB Cymru RNID Cymru

Royal Institution of Chartered

Surveyors Wales

Royal Society of Architects in

Wales

Royal Town Planning Institute

Cymru

RPS Planning and Development

RSPB Welsh Headquarters

Sports Council for Wales

Stroma Accreditation Sustainable Wales

TGWU

The Centre for Sustainable Planning and Environments

The Equality and Human Rights

Commission

The Guide Dogs for the Blind

Association

The Outdoor Media Centre Ltd

The Outdoor Advertising

Council

Theatres Trust

Town and Country Planning

Association

Town and Country Planning

Services (Conwy)

Turley Associates

Unite

Wales Council for the Blind Wales Council for the Deaf Wales Council for Voluntary

Action

Wales Disability Rights

Commission

Wales Environment Link

Wales Tourist Board (Visit

Wales)

Wales TUC

Wales YFC

Wales Zero Carbon Hub

Welsh Local Government

Association

Welsh School of Architecture

Cardiff University

WWF Cymru

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