



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

Ein cyf/Our ref: WG35350

Eich cyf/Your ref:WG35350

Ty Cambria / Cambria House
29 Heol Casnewydd / 29 Newport Road
Caerdydd / Cardiff
CF24 0TP / CF24 0TP

Ebost/Email

EPP.Planning@cyfoethnaturiolcymru.gov.uk:
EPP.Planning@naturalresourceswales.gov.uk

Ffôn/Phone: 03000 65 4354

Call for Evidence on Housing Delivery
Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

planconsultations-j@gov.wales

10 October 2018

Dear Sir/Madam

Welsh Government Consultation (35350):

Call for Evidence on Housing Delivery through the planning system

The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. This requires that in the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all its work in Wales and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development.

Thank you for the opportunity to respond to the above consultation. Please find attached our response to your consultation on housing delivery through the planning system.

While it is recognised that there have been lower than expected delivery rates for sites allocated in an adopted LDP (or UDP) in Wales and the viability of these sites has been cited as a key reason for the delay in sites coming forward for development, the planning system remains one of the key policy, decision-making and delivery mechanisms for place-making by creating sustainable homes and places. However, we believe that further clarity is required in national planning guidance on how uncertainty, viability and deliverability are to be considered within the planning system and having regard to housing provision.

There have also been recent changes in legislation and policy, including the Planning Wales Act, the Environment (Wales) Act and the Well Being of Generations (Wales) Act, which seek to achieve the delivery of well-being goals, new ways of working, resilient ecosystems and the sustainable management of natural resources to create sustainable

places. In creating sustainable places, the inter-relationship of these factors should be fully understood in the context of development plans and its housing provision, and at different spatial scales.

In meeting housing requirements and in delivering suitable housing provision, we believe that clarity should be provided on how the evidence base of the National Development Framework, the Statement of Natural Resources Report and Area Statements can help to inform a development plan, including its evidence base, strategy, policies and allocations. We believe that this evidence will help public authorities to understand ecosystem benefits and their delivery by making informed planning decisions, for example, by directing the right development to the right location and in the consideration of nature-based solutions, which would help them to ensure the resilience of ecosystems in new development.

We trust you'll find our response useful and clear. If you have any questions relevant to this year's Report then please do not hesitate to contact Adrian James, Team Leader, Energy and Planning, in the first instance by email:

adrian.james@cyfoethnaturiolcymru.gov.uk or on 03000 654354.

Yours Faithfully



Keith Davies

[Rheolwr Cynllunio, Tirwedd, Ynni a Newid Hinsawdd](#)/Planning Landscape, Energy and Climate Change Manager

[Cyfoeth Naturiol Cymru](#)/Natural Resources Wales

Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.