

## Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales



Llywydd            President    Glyn Davies  
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Mr Mike German AM  
Chair  
Sustainability Committee  
National Assembly for Wales  
CARDIFF  
June 11<sup>th</sup> 2010

Dear Mr German,  
**Sustainability Committee's Inquiry into "Planning in Wales"**  
**Submission by the Campaign for the Protection of Rural Wales (CPRW)**

As Wales' foremost countryside charity, CPRW welcomes the opportunity to submit its observations on this important issue, given that the scope and manner in which the Planning system in Wales is delivered, has a fundamental influence upon my organisation's interests and those of rural Wales and the communities which live and work in these areas.

We strongly support the principle that new and imaginative planning approaches continue to be needed and should be promoted by the Assembly Government in conjunction with Local Planning Authorities to overcome the acute economic, social and problems which often go unrecognised in the deeper rural areas of Wales. We believe however that these new approaches must be introduced in a manner which is both environmentally sensitive and responsible, in ways which are not subject to abuse.

We therefore welcome your scrutiny of the principles and synergy that underlie the Planning system in Wales and trust that your recommendations improve the future well being of Wales' people and places in ways which deliver sustainability and the responsible stewardship of the landscapes, natural resources and community life.

CPRW trusts that its submission and suggestions in this respect and we likewise look forward to your recommendations being applied enthusiastically and equitably across the country.

Should there be any matters which require further clarification, then I will gladly do so upon your request.

Yours Sincerely,

Peter Ogden  
Director

**National Assembly for Wales  
Sustainability Committee Inquiry**

**“Planning in Wales”**



**Submission by  
the Campaign for the Protection of Rural Wales (CPRW)**

June 2010

## 1. Context

- 1.1 As Wales' foremost countryside charities, CPRW is pleased to contribute to the National Assembly for Wales' Sustainability Committee's scrutiny of the issue of Planning in Wales. We believe that this system is one of the powerful, influential and effective means by which the Welsh Assembly Government is able to deliver its Sustainability obligations and ambitions. We also believe that the planning system is one of the most relevant ways of safeguarding the crucial environmental assets which Wales possesses and for encouraging greater public awareness of the value, sense of place and importance that well cared for landscapes and local environments offer to the well being of Welsh people. We trust that the principles which the planning system has championed over the last 60 years will be uppermost in your minds in judging how well the present system performs.
- 1.2 Engaging with the Planning processes in Wales is one of CPRW's core activities and we regularly and throughout Wales, monitor and respond to planning policy consultations and planning applications which in our opinion affect the landscape, environment and the well being of the communities of rural areas. Being able to engage with the planning process effectively and in a meaningful way therefore provides a fundamental opportunity for CPRW to achieve its Charitable aims.
- 1.3 We suggest that the guiding principle upon which members of the Committee should reflect during your deliberations, is whether the current planning system is effective in delivering the right things in the right places and in a correct and timely manner.
- 1.4 In essence CPRW believes the planning system in Wales and the processes which have evolved for its delivery, are essentially sound and have stood the test of time well over the past 60 years We believe that the system in Wales has adapted to change and been refined to reflect the prevailing circumstances albeit that in certain circumstances the quickening pace of strategic policy change has made it difficult to cascade some of these changes down through the tiers of the Development Plan and Development Management system. We applaud the ambition of the Assembly Government in particular in seeking to make the planning system fit for a new and future Sustainable purpose.
- 1.5 We suggest however from an environmental point of view, that greater clarification is required in reconciling the legitimacy to achieve some elements of this Sustainability agenda with the long term environmental interest of the rural areas of Wales and the quality and diversity of the landscapes which are such a fundamental part of the Welsh heritage.
- 1.6 We are particular concerned from this point of view that the Planning system has not adequately embraced the principles of the European Landscape Convention. WE believe that that this has not been helped by present planning approaches

which only recognise areas which have a designations as being those which are of value. We would hope that your review highlights the fact that the interface between land use/ development planning and the stewardship of Wales natural assets (and the essential public services they provide), should be more deeply rooted in the fundamental principles which lie at the heart of the Convention and should in our view drive forward the principles of our future planning approaches in Wales

- 1.7 We also believe that much has yet to be done to fully and properly engage the public with the role and full relevance of the Planning system. Whilst Wales is no different to many other parts of the UK in this respect, we suggest that the systems which are now emerging to involve the public in the early stages of local policy development should be developed further and strengthened.
- 1.8 Regrettably we do not believe that the Assembly has yet been able to achieve a comparable degree of engagement nor openness in the manner in which its own policy development is undertaken. When responding to various consultations we have repeatedly committed a considerable amount of time and effort to providing comments and suggestions in respect of various planning policy issues but rarely receive any indications as to the reasons why our proposals have proved unacceptable. We believe it inequitable and inappropriate that such double standards should exist whereby local planning policy is subject to detailed and rigorous scrutiny through open and accountable process of the Public Inquiry process whilst crucial Assembly policy is not subject to the same independent proofing and evaluation.
- 1.9 We would argue that the Assembly's ambitions for sustainability should include processes which are themselves democratically equitable and challengeable. CPRW has long advocated that a Third party right of appeal is the means of achieving this and should exist. We believe that this procedure is just as applicable in the context of Assembly policy formulation and development as it is in the case of Local Development Plans and individual planning proposals. Such a provision would enable any individual or organisation which believes that a decision made by a relevant Planning Authority including WAG to be unjustified, to be able to apply to an independent arbitrator for an impartial judgement on the validity of the decision in terms of its soundness. (We draw a parallel to the process involved in testing the completeness and appropriateness of the new form of LDPs).
- 1.10 We contend that if the planning application process is to be the mechanism to deter development proposals which are tested against the democratically adopted architecture of a "Plan lead" system, then there should be a means by which decisions which do not robustly conform to this approach can be challenged without recourse to Judicial review, as exists at present. CPRW therefore advocates that a "Third party right of appeal to potentially unsound decisions" should be a

recommendation which emerges from this Committee deliberations and in the future forms part of a fundamental component of all planning procedures.

- 1.11 We would therefore respectfully suggest that this Committee also reflects on how well its own scrutiny of Assembly policy is informed by the widest range of public opinion. We note that in many instances the views of smaller interest groups or the members of the public rarely features in the evidence considered. Wales and the Assembly Government in particular faces a number of major challenges in implementing its Sustainability and Planning agendas and we suggest that much could be achieved if a the focussed programme of scrutiny is extended to include a element of public and in particular regional outreach.
- 1.12 We trust however that the conclusions of this scrutiny will confirm in principle the role, direction and legitimacy of the current process which guides Planning in Wales but seek to highlight and make recommendations on those elements of it which lack robustness, are confusing or fail to meet the standards expected of such an important public service.
- 1.8 We note in this context, how in recent years the planning system and in particular the planning process particular the planning application procedures have become increasingly more complex and technical both in terms of the requirements expected of the public or individual applicants and the task of respondents in evaluating all the relevant information required to consider the acceptability of emerging individual proposals. The increasing complexity of the process is both a potential strength of the scrutiny process which we support but can also be a weakness. Whilst the information required to support a representation we agree should be relevant and evidence based and in theory is therefore more comprehensive and allows proposals to be properly evaluated, the wealth of information now required to support any representation means that the process can become bewildering complicated for Third parties to engage with and also more time consuming for comprehensive appraisals of the legitimacy of policies and applications, to be undertaken thoroughly and objectively. Clearly a balance needs to be struck between objective and thorough appraisal and decision making and the marginalisation of individuals or interest groups without the skills or inclination to commit themselves to participate or rise to such demands. We highlight for instance the recent introduction of the requirements to produce Design and Access statements to accompany planning applications and cite our own experience of being required to produce a full DES statement for the erection of a commemorative public Interpretation Panel ! The inflexible application of such Regulations inevitably reflects poorly on the credibility of the planning process.
- 1.9 We therefore trust that your considerations will evaluate and your recommendations embrace, the issue of how the public and interested parties can be encouraged to participate more effectively in all elements of the Planning

process thereby ensuring that the decision making process at all levels is more inclusive and representative of the range of public opinion. We have suggested to the Assembly Government previously and repeat our request to this Committee that it would be helpful if some form of statement outlining the “key factors of critical relevance” associated with either a policy consultation, LDP or in particular a planning application could be devised, which would point potential respondents/ applicants and also the public to those issues which the relevant Authority considers to be paramount in evaluating the legitimacy of the policy issue or the planning application it is considering.

- 1.10 In suggesting this approach, whilst we recognise that such a list can never be definitive, we believe that such a statement would be helpful in guiding everyone towards those key issues which are considered to be of specific relevance in determining the acceptability of a particular proposal. We believe that such an approach would also help avoid the frustration that many individuals experience when responding in particular to a planning application only to find that their views have either not been taken into account or indeed dismissed for no apparent reason by the relevant Planning Authority.
- 1.11 We further suggest that the Committee endorse the need for special consideration should be given to the manner in which higher standards of planning are applied in certain areas of Wales in particular the range of Protected Landscapes across Wales where the sensitivity of inappropriate policy or development in the countryside are likely to be more acute than in many other rural areas. We believe that the existing independent planning arrangements in these areas should be retained and where necessary in the cases of Areas of Outstanding Natural Beauty made more fit for purpose.
- 1.12 We likewise trust that the Committee supports the basic principle that the Planning system should not seek to support unsustainable development, rural enterprise or land use/management practices anywhere where such change would undermine the value of the Wales’ storehouse of important “environmental capital”.
- 1.13 We therefore contend that an important focus for the Committee’s should be the manner in which the planning system is integrated and implemented rather than its basic architecture. In this respect we would question some of the democratic dimensions of the process as much as its basic scope or detail. Whilst we support a system which provides increased certainty and reliability in respect of the acceptability of development, we do not believe that the process which drives the system or the values and standards which underpin it, should either be so rigorous or forfeited so as to result in a “laissez fair” mentality towards inappropriate forms of development.

## 2. Policy standards

- 2.1. So far as our approach to the completeness and hence determining whether planning policies be they national or local are fit for purpose, CPRW applies a set of criteria and standards to our evaluation of any such statements.

We would expect all planning /policy statements to reflect all of the following

- Consistency of purpose in seeking to ensure positive change and that the right things are provided in the right places and in the right way.
- A clear perspective on the value of safeguarding the environment and the quality and diversity of local landscapes and the guiding principles which will achieve these aims.
- Clear approaches and policies aimed at supporting the well being of local people and which foster the relationships these individuals have with their local landscapes and seascapes so that they become more diverse, distinctive, welcoming and valued.
- A policy perspective which recognises that when change occurs, it should be guided in a positive way which is sympathetic, sustainable and meets the highest possible environmental standards thereby promoting environmental, social and economic improvement.
- A recognition that the environment has an intrinsic value in its own right and that this must be safeguarded because of the basic value and function it provides for the critical life support services upon which society depends.
- A clear evaluation statement explaining how the preferred planning approach or decision has been derived
- A clear statement of the assessment methods and evaluation criteria to be used to decide the acceptability of the location, scale, form and sustainable credentials of any development proposals within its local setting.
- That planning policies or approaches are clear and do not conflict or contradict each other or with national policy
- That the planning ambition of any statement or Plan articulates clearly how local policy will help achieve national ambitions and vice versa how national ambitions are expected to be delivered locally in a spatial context
- That planning approaches recognise, reflect and celebrate the quality and diversity of the heritage of our landscapes, culture and rural life.

Equally we would expect any policy statements or plans to clearly challenge and outlaw

- Any form of development and activity which is either imposed or significantly blights the character of valued rural assets.

- Unnecessary building in the open countryside or the inappropriate use of important amenity spaces
- Poor quality design and the use of inappropriate materials in developments
- The promotion of land use practices that destroy traditional landscapes and the features within them
- Countryside clutter or pollution which reduces the quality of the living environment
- Proposals which reflect undemocratic decision making processes because the rights of individuals and communities have been by passed.

The remainder of our response, offers more detailed and specific comments about the questions under consideration and our comments follow the sequence of issues as set out in the submission invitation.

### **3 Q1. The ease or difficulty of higher-level policies and guidance being interpreted into policies at the local level?**

- 3.1 Of specific relevance in this context is the issue of the repetition of national policy in LDP's. Whilst CPRW understands the reason for this approach, its application can result in the potential for a policy vacuum to exist in relevant Development Plans and the likelihood of important and sometime guiding considerations being overlooked. If the national policy remains generic or does not embrace a specific matter, considered to be of relevance locally, then the connectivity of national policy being expressed locally can often be difficult to justify.
- 3.2 We would cite in this respect the principles of the European Landscape Conventions. The Convention was ratified by Westminster Government and adopted by the Assembly Government and provides guiding principles as to how the character and value of landscapes should be considered. The principles which underpin this Convention namely that "**All landscapes matter**" rarely features in any national Planning policy and as such are therefore difficult to use as the basis for any all embracing planning approach to be pursued in LDPs relating to landscape protection or stewardship. This weakness has been exposed in various Inquiry circumstances because the weight needed locally to justify the legitimacy of a particular planning approach is not provided by virtue of it being omitted in a higher level national policy.
- 3.3 We would further note that where that where Planning Policy Wales or TANs exist , these are likewise not set out in the form which can be easily transposed into Development plan policies, with clear criteria by which development proposals can be judged. Many national Planning policies are generic, supported by open ended narrative for instance that "*regard should be given to...*". This form of imprecise wording leads to a lack of clarity of intent and hence uncertainty amongst those



who have to use the guidance to prepare policy, as well as those who seek to use it, be they local planning authorities, developers or the public. The generalised nature of national policy guidance can therefore lead to all manner of interpretation, tensions and challenge.

### **Recommendation 1**

**That all Welsh Assembly Government national policy is composed in a form which is less ambiguous and more conducive for transfer into Local Development plan policy.**

3.4 At a more practical level, we are likewise concerned that the new system of preparing LDPs provides no obligation to produce comprehensive Proposals maps. We believe that this is unfortunate as it not only provides an immediate and practical means for the user of the Plan to understand its spatial implications, but more importantly enables the user to understand how the different policy components of the Plan integrate with each other in an effective and justifiable manner. The re introduction of this approach we believe would undoubtedly help encourage the public to engage more directly and effectively with the plan making process.

### **Recommendation 2**

**The Welsh Assembly Government reintroduces a requirement to prepare and publish a comprehensive Proposals Map covering the entire area of any relevant Development Plan showing in a complete and comprehensible manner the implications of all the relevant constraints ( in particular those with conservation or amenity implications) and policy proposals.**

## **4. Question 2. How reactive is the LDP processes to new policies and guidance?**

4.1 Because of the comprehensive nature of the Development Plan preparation process, it is inevitably complex and long winded. That being so and given the degree to which guidance both in Draft form and as adopted Assembly Policy is changing; it is inevitable that there are mismatches, sometimes significant between the approaches underpinning an LDP and current Assembly policy. This naturally compounds itself when development proposals have to be judged against dated and prevailing national Planning policy, in so far as it can often be unclear to the public or those with an interest in a particular development proposal as to which is the prevailing policies upon which decisions should be made. The problem deepens further in circumstances where a Local Planning Authority does not have an adopted UDP. In these circumstances current planning policy may be 10 or more years out of date. Clearly this mismatch problem can only be overcome when all areas of Wales have LDP coverage and the process for their revision matches more closely the programme of revised advice to reduce "policy lag". We are however concerned that because the soundness and integrity of prevailing Plans has been tested

through the SEA process which require them to conform with current Assembly guidance, changes in Assembly policy can create a dislocation or imbalance which would undermine the integrity of the Plan and thereby compound the problems referred to previous of Plans of internal policy inconsistency.

4.2 We would therefore suggest that the Assembly has a more predictable and integrated timetable for the revision of guidance rather than the piecemeal approach which currently exists.

4.3 We would also note that in our view the range of TAN advice is not complete. We referred to the significance of the European Landscape Convention previously and the obligations on the Assembly to embed its principles into national and local planning policies. At present there is no guidance which enables Local Planning Authorities to understand how to do this. We contend that this is a significant deficiency and will become even more important as the relationships between planning and the protection of our terrestrial and marine eco systems goods and services (Wales' Green and Blue Infrastructure) becomes more important.

### **Recommendation 3**

**That the Committee requests the Assembly to develop a less piecemeal approach to the issuing of Planning Policy guidance and TANs**

### **Recommendation 4**

**That an overarching TAN relating to landscape and ecosystems stewardship is produced to assist in the strategic planning of Wales Green and Blue Infrastructure**

## **5. Question 3. What guidance/policy gives on reconciling competing land-uses such as renewable energy and casework quality, affordable housing and design criteria/social concerns, climate change and economic growth?**

5.1 One of the major weaknesses of the existing policy approach adopted by the Assembly Government is that its policy guidance is produced on an independent basis. This provides the potential for conflict between different elements of this guidance. At present the preferred approach is for these differences to be reconciled at a local level and not through scrutiny nationally. We believe this is inappropriate and that a process of proofing all national policy should exist. We suggest that if the Assembly policy was more open to thorough and independent scrutiny these conflicts may not be as evident

### **Recommendation 5**

**All Assembly planning policy is subject to independent scrutiny so as to reduce and hopefully avoid the potential for conflict of intent .**

5.2 We also believe that the problems of conflicting policy would be further reduced if all relevant Welsh Assembly Government which has a spatial dimension, was expressed

in this way through the TAN system. Whilst not supporting the conclusions and advice provided in TAN 8 per se, we recognise the legitimacy of what its spatial policy approach seeks to achieve. We believe that the principle of using spatial advice to deploy nationally important development to the appropriate locations, be they on land or sea is legitimate. We do not however accept that this should be done to further a specific aim without taking all the relevant factors fully and properly into account. We therefore believe that any TAN guidance which can be expressed spatially should be subject to through scrutiny through the same Strategic Environmental Assessment procedures which apply to all other planning policy arising from the Development Plan process.

### **Recommendation 6**

**That all relevant Assembly Planning policy and supporting TAN advice is spatially expressed and subject to comprehensive scrutiny to ensure the legitimacy of its conclusions**

5.3 In addition to the above, CPRW is particularly concerned that there is still no comprehensive independent expression of the Wales Environment Strategy either in its own right or as part of the Wales Spatial Plan. The existence of this is a major deficiency in reconciling contesting and competing agendas for the use of land. There is therefore an urgent need for planning system in Wales to articulate its national environmental priorities. We believe as do others, that the Town and Country planning system is one of the most powerful public policy tools available to the devolved administration to achieve this and one which should be brought to bear on a range of national objectives including the environment.

### **Recommendation 7**

**The Assembly Government expresses its strategic national environmental policies and priorities spatially so that these can be used positively by the planning system to ensure that development is not directed towards the wrong places.**

## **6. Question 4. What weight should be given to competing policies where planning applications are decided?**

6.1 From CPRW's perspective, we believe that the guiding principle which we believe should apply in such circumstances is that there should be not nett or long term loss of environmental quality arising from any development proposal. We believe that a healthy environment is the perquisite for a sustainable society and the nation's economic prosperity.

6.2 That being the case we believe that the potential threat or loss to the environment's integrity or the ability of our natural ecosystems to continue to provide vital public services and benefits, should be given high weighting in the decision making processes.

6.3 We recognise that such judgements may not be straight forward and hence it is important for all planning policy and in particular all LDPs to set out what are considered

to be the critical environment assets within its area and which of these should be protected and effectively considered as being inalienable. All development proposals and change should then be tested to establish the degree to which they would threaten the status of these assets. We refer in particular in this context to the Sandford Principle, Silkin Test and the Section 62(i) obligations on Statutory bodies (to have due regard to the purposes of National Parks when undertaking their activities in those areas) as an exemplar of good practice in this respect

## **Recommendation 8**

### **The environment and the natural assets of Wales should be afforded primacy in circumstances of conflict**

#### **7. Q5. What weighting should be given to public opinion if it is in opposition to national and local policies?**

7.1 The preparation and adoption of Development plans in Wales is based on the principle that they have been prepared by means of an open, transparent and accountable process and are subject to independent scrutiny. We believe that these principles must be maintained and the primacy of the LDP must at the heart of the decision making process so as to ensure that there is consistency in the manner in which consent for development is planned and granted.

7.2 That being the case, engagement with the LDP process represents the most effective way of ensuring that public opinion is gauged, expressed and translated into effective local planning policies. However, we do not believe that most of the public either understand or engage with this process in a meaningful way and hence its credibility remains obscure at best and irrelevant at worst. We therefore feel that further efforts must be made to improve this situation.

7.3 As a minimum we would advocate that

- Comprehensive notification procedures are adopted at all stages of the Development Plan making process, to highlight every proposed allocation and every proposed change to the settlement boundary.
- Local visions are produced for settlements which translate the approaches of the Spatial Plan and Development Plan into a relevant local context
- The process by which individuals can engage and make representation to policies affecting their interests is simplified.
- Individuals are provided with the opportunities to pursue their concerns through the plan making process in an easy and understandable way.

7.4 We also repeat our views with regards to the Third Party Right of appeal and believe that there should be a process through which individuals affected by a proposal or policy have the legitimate right to express and challenge inappropriate decisions.

### **Recommendation 9**

**The Assembly retains the primacy of the Development Plan as the means for directing and determining development and land use change in Wales**

### **Recommendation 10**

**The processes of engaging the public in the Plan making process are reviewed to enable greater and easier engagement**

### **Recommendation 11**

**The Assembly should introduce a Third Party Right of Appeal in respect of all aspects of the planning process and procedures in Wales**

### **Recommendation 12**

**National Policy is subject to the same process and degree of scrutiny as Local Development Plans to ensure its soundness and appropriateness**

## **8. Q6 How Planning officials advise planning Committees**

8.1 As noted previously, monitoring and responding to planning policy and development proposals is a core activity for CPRW. As a result of our direct engagement with the planning system in Wales, CPRW is conscious of the varying and sometime inconsistency of procedures and standards which apply in respect of these relationships. We conclude that this is due to a number of factors and weaknesses including but not exclusively the results of the following:

- The increasing technical complexity of the information required to support planning applications.
- The standards of advice provided by officer varies, according to the degree of experience, confidence and complexity of the issues concerned.
- The difficulties that arise when it is not made clear (to both the members and in particular those making representation about an application) what are the key material planning considerations which require consideration in determining the acceptability of a development proposal
- A tendency for officers to expect members to reconcile policy contradictions associated with controversial applications. We contend that this should be the role of the Planning Officer to reconcile this difference in their consideration of the merits of an application, leaving the members the right to question and challenge these judgements
- Planning Committee members making decisions contrary to their own Council's policies because of the influence, pressure or lobbying from applicants or opponents of the development which are not based on relevant planning considerations. This affects the integrity of the whole

process and results in considerable inconsistency and a public loss of confidence in the system.

- We believe that design standards vary considerably between Officers and members in particular in the context of the quality and design of major developments. Our experience is that design standards are generally low, with bland and uninspiring designs too readily accepted, even where more thoughtful approaches could be adopted within prevailing resource limits. We suggest that the process would be improved if LPAs were required to use specialist advice for this aspect of the appraisal process and a requirement should exist that developers use accredited landscape contractors for the implementation of proposals associated with major developments.

### **Recommendation 13**

**A more robust quality assurance mechanism is put in place to ensure that Planning Authorities:**

- **Are consistent in their reasoning and in the decisions they take, so as to prevent sound recommendations by officers being overruled for inappropriate reasons by Committee members**
- **Take into account relevant representations in a fair and balanced manner**
- **Understand the application and appreciate its likely effect on the environment**
- **Become more discerning and demanding in ensuring that design standards for new development especially those in sensitive location are of the highest standard.**

## **9. Conclusions**

9.1 CPRW believes that the present planning system in Wales is essentially sound and believes that the great majority of approaches and decisions which emerge as a result of its existence, are rational and a reasonable reflection of the regulatory policy framework which underpins it. We do however consider as outlined in our submission, that the system has a number of weaknesses which could be overcome through further review and refinement

9.2 We believe however that public understanding and engagement with the system is at best poor and at worst nonexistent. Clearly this is a result of the system being complex and difficult to engage with. We contend that public confidence in the system will only increase if the decisions which emerge from it are more predictable and consistent.

9.3 We recognise that the new regime for plan making has led to a generalisation of policy approaches and hence provides an inherent and increased possibility for the

inconsistent interpretation of policies. We suggest that these circumstances should as far as possible be eliminated

9.4 In a period of rapid change, the need for national and local policy to remain synchronised remains a major challenge. More effective ways to avoiding the problems of “policy time lag” should be introduced. Similarly the expression of those elements of national policy which can be expressed spatially will help improve the synchronisation of planning outcomes in Wales

9.5 Finally we believe there are still a number of obvious democratic deficits within the existing planning system in Wales, the most obvious one being the lack of a Third Party Right of Appeal for unsound decisions

CPRW trusts that our commentary and Recommendations provide a helpful point of reference for the Committee’s deliberations. Naturally we would happy to elaborate upon any of these matters should the Committee so request

Peter Ogden  
Director  
CPRW

June 11<sup>th</sup> 2010

In conclusion CPRW in principle welcomes the range and nature of most of approaches being suggested in this consultation. We would however repeat our primary concern that adequate safeguards need to be incorporated into any proposed revisions of the existing guidance to ensure that the integrity of the countryside is not compromised in an attempt to promote a more sustainable approach to life in rural areas of Wales.