



DESIGN
COMMISSION
FOR WALES
COMISIWN
DYLUNIO
CYMRU

31st May 2023
BY EMAIL

Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Neil

Re: Planning Policy Wales: Net Benefit for Biodiversity and Ecosystems' Resilience

Please see below our comments on the proposed changes to Planning Policy Wales.

We support the principle of improving biodiversity and the resilience of ecosystems in Wales. However, we have concerns that the proposed approach may not always result in the best overall outcomes.

In line with the Well-being of Future Generations Act, we must take an integrated approach. Having prescriptive policies or standards on one standalone issue can undermine other objectives. The importance of biodiversity needs to be considered alongside the wider factors that create a sustainable place, including creating walkable, mixed-use neighbourhoods and other requirements such as SuDS.

Our concern is that the proposal may have the unintended consequence of contributing to the creation of low-density and car-dependant developments in the wrong place, which do not meet the wider placemaking objectives in Planning Policy Wales. We have experience in practice of seeing 'standards' for biodiversity driving a particular approach. The use of standards can become inflexible and suggest that there is only one way to achieve the net beneficial impact.

A clear set of principles would perhaps better enable a framework that guides a more holistic approach and avoids potential perverse incentive of more rigid standards. We will be happy to collaborate with the Planning Directorate on this as things evolve.

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The Design Commission encourages the aspiration of this policy to be applied in an integrated way that helps create the best outcome for each development. Placemaking and good design are fundamental to integrating biodiversity along with other important factors that create sustainable places and realise their wider long term public benefits.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'CAD', with a long horizontal stroke extending to the right.

Carole-Anne Davies

Prif Weithredwr Chief Executive

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Ar gyfer ac ar ran y Bwrdd Cyfarwyddwyr - For and on behalf