

Evidence from: Kieran Thomas, Policy Officer, Chartered Institute of Ecology and Environmental Management (CIEEM).

Senedd Cymru | Welsh Parliament

Y Pwyllgor Llywodraeth Leol, Tai a Chynllunio | Local Government, Housing and Planning Committee

Blaenoriaethau ar gyfer y Pwyllgor Llywodraeth Leol, Tai a Chynllunio | Priorities for the Local Government, Housing and Planning Committee

You do not need to answer every question, only those on which you wish to share information or have a view.

What do you consider to be the three most important issues the Committee should prioritise during the Seventh Senedd?

Please ensure that your response relates to matters within the Committee's remit (Local Government, Housing, Planning, Communities and Regeneration).

(<https://senedd.wales/SeneddHousing>)

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

Our priorities for this Senedd term were set out in our [pre-election manifesto](#).

What is your highest priority (Priority 1)

Ensuring that planning policy is 'future-proof' by preparing for a changing climate and with strategies to improve the sector's resilience to climate change.

Please explain why this should be a priority for the Committee (Priority 1)

(We would be grateful if you could keep your answer to around 500 words).

Issues

The planning sector in Wales must prepare for a significantly different climate over the coming decades and beyond, characterised by a higher frequency and intensity of extreme weather events including heatwaves and floods¹ affecting tens of thousands more homes in Wales by the end of the century². This includes the occurrence of, until now, relatively novel weather events for Wales, such as wildfires. The Government, Local Authorities and other planning bodies must adapt accordingly, through both spatial planning and built design, to ensure people, communities and businesses are resilient to climate change.

Asks

More demands are being made of Wales' land, including nature-based solutions to climate impacts, improving food security, and creating viable habitats for nature (and end in and of itself considering our statutory nature targets, as well as a means to improve climate resilience and food security). Of course, these demands sit alongside the need to increase housing supply and develop infrastructure. Strategic spatial planning will be key to balancing these demands in a sustainable manner.

The Committee has an early opportunity in this regard through scrutiny of the National Development Framework. We ask that the Committee push the Government to make sustainable, future-proof development the central focus of their response by developing a national policy to this end, similar to the Land-use Framework in England. However, the economic short-termism increasingly inherent in English planning policy³ must be avoided; instead, sustainable development must be the central pillar of Welsh planning policy: planning for climate resilience is the most viable and responsible long-term economic option⁴.

Over this Senedd term, we ask the Committee to ensure that all planning policy is developed with our changing climate and ecosystems as foundational reference points. This includes both sustainable building practices, building design for new and retrofit developments (especially building to cope with extreme heat), and considering the net cumulative environmental impact of planning decisions (e.g. by requesting regional or national spatial planning strategies). This should include a review of Strategic Development Plans to ensure climate change is a central factor in their development.

As part of ensuring planning policy in Wales is future-proof, we ask the Committee to push the Government to review the Technical Advice Notes (TANs) to ensure they are fit for current and future contexts. Some TANs have not been updated for over ten years (TAN 5, for example, still

refers to the Assembly Government and CCW). This work should include revisiting the functional tests in TAN 6 following the conclusion of the Rural Proofing duty consultation.

What is your second highest priority (Priority 2)

Improving the implementation and communication of net benefits for biodiversity (NBB) across Wales.

Please explain why this should be a priority for the Committee (Priority 2)

(We would be grateful if you could keep your answer to around 500 words).

Issue

Planning Policy Wales stipulates that developments deliver NBB, locally or nationally, taking into account the resilience of ecosystems. Currently there exists a degree of confusion among planning bodies about the requirements and implementation of NBB, partly caused by divergences in planning policy from other parts of the UK, particularly England's Biodiversity Net Gain approach. Additionally, there is often a lack of early engagement with the NBB approach in Wales and further divergence in the application of NBB between different Local Authorities. Together, these issues are constraining the potential of NBB, leading to inconsistencies across the country, and resulting in unnecessary costs for Local Authorities and developers⁵.

For example, there have been cases of Welsh Local Authorities receiving a completed metric calculation (relevant to English planning policy) as part of planning applications – this approach is not designed to meet Welsh legislative requirements (e.g. it does not necessarily address ecosystem resilience), resulting in wasted time and money for applicants and Local Authorities.

Asks

New NBB guidance is currently being developed by CIEEM members and others in conjunction with the Welsh Government. We ask that the Committee scrutinise the Government's ongoing work in this area to ensure that the new guidance is properly communicated to all relevant parties and that it is implemented correctly. This should include reviewing any barriers to implementation or understanding the guidance.

In particular, we ask that the Committee scrutinise Government action in the following areas:

- Emphasising the importance of engaging with the NBB process at the earliest possible planning stage and reviewing how the Government are working with Local Authorities to communicate this to planning departments and developers.
- Ensuring Local Authorities understand NBB as laid out in PPW and that this approach is different from England's. This must reiterate the ecological resilience aspect of NBB as specified by the Environment Act (2016) and DECCA framework. This could be partly addressed through a NBB checklist for Local Authorities.

We also ask that the Committee press Welsh Government to improve relevant guidance for phased developments, which may include separate teams of ecologists working on plans with significant time gaps. For example, where habitats develop (as part of NBB work or separately within a relevant geographic area), ecological baselines may shift if there are gaps of years between development phases, which may impact NBB outcomes. Guidance must be available on when and how to make additional NBB assessments, and overall strategy on delivering NBB on a phase-by-phase basis.

What is your third priority (Priority 3)

Ensuring local planning authorities and other planning bodies have sufficient resources, ecological expertise, and access to data.

Please explain why this should be a priority for the Committee (Priority 3)

(We would be grateful if you could keep your answer to around 500 words).

Issues

An adequately resourced and informed workforce is foundational to the delivery and enforcement of existing and evolving planning policy, including our above priorities. This includes Local Authorities with enough staff with relevant skills and ecological expertise (or access to these skills and expertise) to assess, implement and evaluate planning policy.

Resourcing also encompasses adequate data and evidence for decision making and evaluation, including cross-boundary information sharing for consistent, strategic planning, which is particularly pertinent with regards to our first priority above. Of particular concern for CIEEM, given this priority and our response to the equivalent CCESRA Committee consultation, is the enforcement of planning policies that support nature recovery and climate mitigation, including statutory targets such as 30by30.

Currently, many LPAs are under-staffed, under-resourced and under-supported, unable to deal with the volume of applications they receive. This causes development delays, rushed decision making and spiralling costs, as well as poor or illegal practices going unpunished due to insufficient resources for enforcement, undermining well-intentioned government policy and the hard work of planning departments. Amongst the staff that LPAs do have, there are gaps in ecological expertise.

Research commissioned by Welsh Government published earlier this year highlights the scale of these challenges⁶. For example:

- Three quarters of LPAs currently have vacant posts, and face particular difficulties filling specialist posts.
- Ecology skills gaps are particularly pronounced, with nearly 60% of LPAs reporting shortfalls in this area.
- Net expenditure on LPA planning services has fallen in real terms by 43% over the past fifteen years.

Capacity is stalling progress of Local and Strategic Development Plans (LDPs and SDPs), which is of particular concern given our previously highlighted need for better spatial planning for climate resilience and nature recovery.

Asks

We ask that the Committee press the Government over progress in reviewing or implementing the recommendations of the above report. Of particular relevance to environmental concerns within the planning sector are the recommendations to establish a Planning Improvement Service for Wales, develop a recruitment and retention strategy, and work on improving shared services (recommendations 2, 5 and 6 respectively). The Committee should also press the Government on the review and implementation of recommendation 4 to collect and publish quality planning data. This will help monitor ongoing capacity concerns addressed above and evaluate progress in addressing these concerns.

The Committee should also work with relevant ministers, especially the Deputy Minister for Skills and Tertiary Education, to review and address underlying causes of skills gaps and plan for an economy that will require more ecologists and people with 'green' skills in the future. We were very pleased to see the Nature Service referenced in the new Government's pre-election manifesto and ask the Committee to help the Government progress their support for this service.

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1. Netherwood, A. (2021) *Evidence for the third UK Climate Change Risk Assessment (CCRA3): Summary for Wales*. UK Climate Risk. Available at: <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA-Evidence-Report-Wales-Summary-Final.pdf>
 2. Natural Resources Wales (2025). *Flood risk management annual report 2024 to 2025*. NRW. Available at: <https://naturalresources.wales/evidence-and-data/research-and-reports/flooding-reports-evidence-and-data/flood-risk-management-annual-report-2024-to-2025/?lang=en>
 3. CIEEM (2026). *CIEEM Response to National Planning Policy Framework (NPPF) Consultation (2026)*. CIEEM. Available at: <https://cieem.net/resource/cieem-response-to-national-planning-policy-framework-nppf-consultation-2026/>
 4. Institute of Civil Engineers. (2026) *Making resilience count: the economic value of climate readiness*. Institute of Civil Engineers. Available at: <https://www.ice.org.uk/news-views-insights/policy-and-advocacy/policy-insights/policy-paper-economic-value-of-climate-readiness>
 5. CIEEM (2022) *Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System*. CIEEM. Available at: <https://cieem.net/resource/cieem-briefing-welsh-governments-approach-to-net-benefits-for-biodiversity-and-the-decca-framework/>
 6. RTPI Cymru (2026). *Public Sector Planning Resources in Wales*. Welsh Government. Available at: <https://www.gov.wales/research-public-sector-planning-resources-wales>
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