

CONSULTATION FORM

Draft Planning Policy Wales: Edition 10

This consultation seeks your views on the Welsh Government's proposed revision to Planning Policy Wales in light of the Well-being of Future Generations (Wales) Act 2015.

Fundamentally, PPW has been restructured into policy themes around the well-being goals and policy updated where necessary to reflect new Welsh Government strategies and policies.

If you have any queries on this consultation, please email: planconsultations-c@gov.wales or telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128.

Data Protection

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 tick the box below. 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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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.

Confidentiality

Responses to consultations may be made public on the internet or in a report.
If you do not want your name and address to be shown on any documents we produce please indicate here ☐

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Draft Planning Policy Wales: Edition 10		
Date:		
Name	Ellen Hudspith	
Organisation	The Campaign for Real Ale	
Address	230 Hatfield Road, St Albans, AL1 1SQ	
E-mail address	ellen.hudspith@camra.org.uk	
Telephone	01727 337851	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input checked="" type="checkbox"/>

1. Introduction
2. Thank you for the opportunity to respond to this consultation.
3. CAMRA, the Campaign for Real Ale, is a consumer group which acts as the independent voice for real ale drinkers and pub goers. Our vision is to have quality real ale and thriving pubs in every community. CAMRA has nearly 4,500 members in Wales.
4. Our response to the consultation will discuss the general social and wellbeing benefits of pubs, and then focus on key consultation questions which relate to pubs in the planning system.
5. Societal and personal wellbeing benefits of pub going
6. Pubs have been found to have a beneficial effect on individual wellbeing and are important to fostering community cohesion and combating social isolation and loneliness. These factors mean that the role that pubs play in community life contributes to wider Government objectives and initiatives. CAMRA commissioned the 'Friends on Tap' report from Oxford University, which found that people who identify as having a 'local' pub have more close friends and feel more engaged with their local community. The sense of community which pubs provide is vital in preventing social isolation. Research by the Campaign to End Loneliness found that 52% of over 65s surveyed stated that having someone to sit with helped to ease feelings of loneliness, while 35% said that eating with someone helped.
7. The Well-being of Future Generations Act sets goals for a healthier Wales and cohesive communities. Pubs contribute strongly to these goals of community wellbeing, cohesiveness and sustainability. Pubs, especially in rural areas, have become important community facilities and are often left as the last community space in an area where local people can meet and socialise. CAMRA maintains that pubs are the best place in which to drink, as both the sale and consumption of alcohol is regulated in a social setting. This is in stark contrast to alcohol bought in the off trade which is much more likely to be consumed alone at home. A YouGov survey carried out for CAMRA in July 2017 found that 54% of people agree that drinking alcohol in moderation in the company of others is good for wellbeing.
8. Pubs also raise money for charity, benefiting many local and national causes every year. The World's Biggest Pub Quiz, coordinated by PubAid and run during the week 4-8 March 2018, and saw 2,200 pubs sign up as participants with over £100,000 raised for charity.
9. Taking Wales Forward, as part of its United and Connected cross-cutting strategy, advocates a positive approach to pubs. It undertakes to "work with local communities to protect local facilities that bring people together, including pubs" and "introduce measures to prevent unnecessary closures" while the Strategic Integrated Appraisal acknowledges that "our pubs... can provide focal points for the community to come together and deliver benefits for the whole community".
10. In order to continue to reap the societal benefits of pub going, more must be done to prevent the unnecessary loss of pubs - currently at a rate of one per week in Wales. However the pub has less protection within the planning system in Wales than in any other part of Great Britain.
11. Unless statutorily listed or in a conservation area, pubs can be turned into shops or offices (including betting shops and payday loan shops) or demolished without any requirement for planning permission. This means that important community facilities can be lost without the local authority or community being able to have any say, even if the Local Development Plan contains policies for the retention of pubs. Where a local pub comes under threat, it is reasonable for those affected and their democratically elected representatives to have an opportunity to contribute to the debate, which is lacking in the current system.

12. It is therefore vital that in addition to a strong set of planning policy documents, the Welsh Government also implements changes to the Use Classes and Permitted Development Orders to make sure that any change of use or demolition of a public house requires full planning permission.

13. Draft Planning Policy Wales: Edition 10 - general comment

14. CAMRA welcomes the retention of wording from the Edition 9 at paragraphs 3.93 and 3.94 of the new Draft Edition, which recognises the role that public houses play in community life, their social and economic role, and the detrimental impact that the loss of such facilities can cause.

15. Furthermore, CAMRA welcomes the addition of paragraph 3.97, enshrining the Agent of Change principle into Welsh planning policy. This is an important inclusion which will guard against the loss of community pubs and small music venues due to noise complaints from new developments built alongside them.

16. However, while mention of public houses appears in Chapter 3, "Social and Active Places", which includes a section on community facilities, mention of public houses is currently limited to the section "Retail and Commercial Development". CAMRA would like to see explicit mention of pubs as community facilities within paragraph 3.102, in recognition of the key role that pubs play in community life and cohesion, and their contribution towards to achievement of wider Welsh Government policy goals, as outlined in the above section.

17. Paragraph 3.98 recognises the cultural contribution that retail and commercial centres make to towns. CAMRA considers community pubs to be a vital part of this, providing important diversity to both the night time economy and to everyday community life. In towns, they add vibrancy and vitality to the high street, assist social interaction, provide leisure opportunities and facilities and help to extend the area's footfall. In the suburbs they are focal points for community activity while in more rural areas, they are frequently the sole communal facility left in a village and have increasingly become multi-use, often also serving as shop, post office, formal meeting place and venue for other community services.

18. Furthermore, paragraphs 3.93 and 3.94 suggest that the detrimental effects of a pub closure are greater in rural areas. While it is vital that the loss of the last such facility in a village is resisted, the societal and personal wellbeing benefits of pub going are felt regardless of the physical location of the community pub. CAMRA would like to see this section revised to emphasise the detrimental impact that the loss of any community pub can have, while placing an additional duty on councils to prevent the loss of the last such facility in any area within their Local Development Plans.

19. CAMRA contends that while the adequate provision of community facilities should certainly be a priority for councils, national planning policy should go further and encourage councils to have policies in place which guard against the unnecessary loss of community facilities whenever and wherever one comes under threat.

20. Consultation question responses

21. Q1: Do you agree that planning policy topics be clustered around these themes which show their relationships with each other and the 7 well being goals? If not, please explain why.

22. CAMRA supports the approach taken of aligning the structure of the Draft Edition 10 with the goals of the Wellbeing of Future Generations Act. The inclusion of policy relating to pubs under the "Active and Social Places" section is supported. However, as outlined above, CAMRA would like to see explicit mention of pubs within the 'Community Facilities' subsection, rather than only in the 'Retail and Commercial Centres' section.

23. Q3: Do you agree with the Planning Principles? If not, please explain why.
24. CAMRA supports the five Planning Principles identified in the document. In particular, Principles 3 and 4 - "Facilitating Accessible and Healthy Environments" and "Creating & Sustaining Communities".
25. CAMRA supports any initiative that makes planning law more accessible, comprehensible and collaborative, particularly to individuals and community groups looking to engage with the planning system without previous experience or expertise.
26. Often when a pub is threatened with closure or development, it is the local community that will form a campaign group to try and save the pub. The majority of these groups campaign with little or no access to finance and legal or expert advice, and have to navigate complicated planning legislation to object to planning applications and speak at hearings. Clear and concise national planning policy, accompanied by easy to navigate Local Development Plans are essential to this, and communities should be engaged in planning and encouraged to interact in place-making as much as possible.
27. Due to the societal and personal wellbeing benefits of pub going as outlined in the above section, pubs can play a key role in creating thriving, cohesive communities and therefore should be positively planned for within planning policy. CAMRA fully supports the retention of the wording from Edition 9 at new Draft Edition paragraph 3.94 that provides for proactive re-establishment of pubs in areas that have previously benefited from such facilities but lost them.
28. Q17: Do you agree with the changes to emphasise the need for appropriate provision of community facilities when considering development proposals? If not, please explain why.
29. CAMRA welcomes the changes that emphasise the need for planning authorities to develop long term and strategic approaches to the provision of community facilities in Local Development Plans. However, as stated above, CAMRA contend that pubs should be explicitly referenced as community facilities, and in addition to this that pubs should be included in strategies for the long term provision of community facilities.
30. CAMRA carried out an audit of Local Development Plan policies relating to pubs in Wales in the second half of 2017. While 20 out of 22 Councils had some form of Local Development Plan policy in place concerning community facilities, only 8 of those policies mentioned pubs. To ensure equal protection of pubs as community facilities across Wales, this needs to be enshrined in national planning policies to place a duty on all councils to adopt robust community facility retention strategies, explicitly including public houses.
31. Additional policy consideration - Use Classes Order
32. As stated above, pubs in Wales have the lowest level of protection in the planning system than in any part of the UK. The current Use Classes Order in place in Wales allows conversion from A3 use to A2 or A1 use without planning permission. Furthermore, as the A3 Use Class contains pubs, restaurants and fast food takeaways, therefore pubs can be converted within the Use Class without planning permission. Since the last change to the Use Classes Order, three pertinent changes relating to pubs have been made to the Use Classes Order in England (where Permitted Development Rights have been removed for pubs altogether).
33. While there is of course no requirement for the Welsh Government to make changes reflective of those made in England, it was pointed out by the Law Commission in its consultation document 'Planning Law in Wales', where "Wales-only decoupling [of legislation] has occurred through Westminster Bills applying to England only, this has left complex old UK or England and Wales text in place only for Wales". This situation seems to apply the current Use Classes Order.
34. CAMRA understands that a consultation is planned in the near future on a full review of the Use Classes Order, and will be urging the Welsh Government to take the opportunity to amend the

Order classification in respect of pubs, and to move them into a Use Class of their own with no associated Permitted Development Rights so that planning permission is always required for conversion or demolition.

35. Examples: Pubs lost under current Permitted Development Rights in Wales

Waterloo Arms, Abermule - converted to office use
Three Salmons, Rogerstone - converted to restaurant use
Admiral, Cadoxton - converted to retail use
Bells, Cadoxton - converted to retail use
Grand Slam, Pentwyn - converted to retail use
Ship and Castle, Portmadog - converted to cafe use
White Hart, Cardiff - converted to restaurant use
Wharf, Cardiff - demolished

36. Contact

37. If you wish to discuss any of these points further, please do not hesitate to contact CAMRA

Ellen Hudspith, Policy and Research Manager - ellen.hudspith@camra.org.uk / 01727 337851

How to respond

Please submit your comments by 18 May 2018, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to:</p> <p>planconsultations-c@gov.wales</p> <p>[Please include 'Draft Planning Policy Wales: Edition 10' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Planning Policy Wales Consultation Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information
<p>If you have any queries about this consultation, please:</p> <p>Email: planconsultations-c@gov.wales</p> <p>Telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128</p>