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25 September 2018

e-mail response sent to: <u>YmatebionYnni-EnergyResponses@gov.wales</u>

Dear Sir/Madam,

## **Response to: Petroleum Extraction Policy in Wales**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above consultation. RTPI Cymru recognises and supports efforts to decarbonize, reduce pollution and tackle climate change. Our comments in relation to this consultation focus around the need for a robust planning policy, with supporting criteria to enable planners to make informed recommendations on any future planning applications. Our comments do not extend to the subject area or provide views on the subject, prior to the further research, and supporting consideration, which we have suggested. We have set out a number of policy focused comments on the consultation below.

We note on the basis of the evidence provided, the proposed policy is not to undertake any new petroleum licencing in Wales or support applications for hydraulic fracking petroleum consents. The impact of this policy for the planning sector will depend upon the weight granted to this policy when determining a planning application or planning appeal for this type of development in Wales.

We do have concerns that the evidence base is not sufficiently robust at this stage to provide a conclusive response in respect of the impacts of this type of development in a particular part of Wales, indeed some of the evidence suggests certain locations may be appropriate for this type of development this seemingly contradicting the policy. Policy, without detailed support is potentially unhelpful and could lead to that policy being superseded by appeal decisions when a full consideration of issues is addressed.

We therefore suggest further research is undertaken to produce a more robust evidence base to allow Planners and Planning Inspectors to make an informed decision when determining an application for this type of development.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at <u>walespolicy@rtpi.org.uk</u>

Yours sincerely,

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Dr Roisin Willmott OBE FRTPI Director RTPI Cymru