

RTPI Cymru



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29th October 2009

FAO Paul Lewis
Planning Policy Branch
Planning Division
Welsh Assembly Government
Cathays Park
Cardiff CF10 3NQ

Dear Sir / Madam

Consultation on Changes to Planning Policy Wales to Support the Requirement for Travel Plans for Specific Types of Development

RTPI Cymru is pleased to submit a response to the consultation on Changes to PPW to support the requirement for Travel Assessments for specific types of development. RTPI Cymru's Policy and Research Forum has considered the proposals and its responses are contained in the attached appendix.

I trust you find the Forum's comments helpful but do not hesitate to contact me should you require any further clarification. The Forum has no objection to these comments being made public.

Yours faithfully,

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Guidance Note

When completing the questionnaire please clearly state if you support or oppose the question by marking 'Yes' or 'No' where indicated, or alternatively signal you are 'undecided'. If you wish to express further views please complete the comments box.

Q1. Do you agree that changing Planning Policy Wales will make TAs a more important consideration or should the Assembly Government amend Secondary Legislation to require them as part of the planning application documentation

Yes

Comments

Ensuring that national planning policy is given the required weighting as a material consideration is an important factor in the Welsh planning system. It is RTPI Cymru's view that if the introduction of new policy is given sufficient promotion and Local planning Authority Officers (planning and those that give transport / highways advice) and Members are briefed / trained to establish an awareness and understanding of the policy requirements, then there is no reason why the policy would not be given the weight it requires to achieve the policy.

RTPI Cymru assumes that the Planning Inspectorate will give appropriate weight to such a national policy.

It is our view that in the first instance, an amendment to Planning Policy Wales should be undertaken. The adoption of the policy by Local Planning Authorities should be monitored and if it is not taken forward, then consideration could be given to the introduction of secondary legislation.

Wherever possible, legislation should be a last resort and policy should be used.

Q2. Do you agree that planning policy should identify the types of development where Transport Assessments are expected?

Yes

Comments

This would provide guidance to Local Planning Authorities and would also achieve greater consistency in their use across Wales. Authorities will have the opportunity to require TAs for other developments also; and will therefore not be restricted by the policy to extending their use.

Further guidance / training on the understanding of Travel Assessments for assessing applications for Local Planning Authority officers should be provided.

This guidance should address how Travel Assessments should be interpreted in rural areas. Whilst RTPI Cymru promotes development to be within existing settlements and served by good walking, cycling and public transport routes, there needs to be an acceptance that some developments will be located within rural areas which do not have good access to these routes. Guidance needs to be provided to assess in what cases this is acceptable and potential mitigating factors.

Q3. Do you agree with the proposed thresholds for developments requiring Transport Assessments

No

Comments

These thresholds are already established in TAN 18: Transport, which was adopted in 2007, we believe this is therefore current. However, we would propose the following amendments:

- Reduce Food retail to 800 sqm, as they are a large trip generator.
- Decrease Industry to 4,000 sqm, as there is often an issue with the public due to the associated HGV movements.
- Increase Storage and Distribution, as 2,500 sqm of storage may generate very few trips dependent on the type.

Q4. Do you agree that there is a need to integrate the evidence base between TAs and Design and Access Statements?

Yes

Comments

It is essential that TAs contribute to the Design and Access Statement. The DAS plays a key role in drawing together the evidence for the inclusive design of a development. It makes no sense in using an alternative source for the Access element of the DAS.

There is also the risk of creating conflicting design proposals / information about a development if two sources are used. The principle behind DAS is to establish an inclusive design process, which draws all of the issues together.

Transport Hierarchy

Q5. Do you agree that Planning Policy Wales should promote a hierarchy of transport modes?

Yes

Comments

This should form the basis of the policy which establishes why a TA is required and provides the framework under which it is used to assess an application for development.

The principle of using a hierarchy to explain policy principles has been successful in terms of both waste and energy and there is no reason why it should not be established for modes of transport also.

Q6. Do you think that the proposed hierarchy will have any effect on site allocation and planning permission?

Undecided

Comments

It is anticipated that it will direct development to sites which are able to support the transport hierarchy and thus the environmental, social and economic benefits which will come from this. However, it is likely that this will take some time, as there are already sites in the pipeline (even before an application for planning has been made) which will take time to work out of the system.

The successful promotion of the hierarchy is essential if we are to overcome the plethora of developments in unsustainable locations across Wales, particularly in the light of climate change and also energy security.