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e-mail response sent to: [martinbuckle@hotmail.com](mailto:martinbuckle@hotmail.com)

Dear Sir/Madam,

**Response to: Wales Flood and Coastal Erosion Committee: Resources for Flood & Coastal Erosion Risk Management in Wales, Draft Final Report of the Resources Sub-Committee**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 27,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to respond to the draft final report from the resources sub-committee of the Wales Flood and Coastal Erosion Committee (FCEC), following the Call for Input in November 2020 ([RTPI Cymru Policy and Research Forum response to the Call for Input](#))

Our planning related comments are set out below.

RTPI Cymru welcomes the report, clearly setting out the various interconnected issues alongside proposals to address them. Due to the interlinked nature of many of the issues and proposals set out in the report, it is vital that the impact of progressing proposals, or otherwise, in isolation, is fully understood as part of the wider picture.

We believe that a key challenge for the future will be to progress sustainable place making within those settlements where the risk of flooding is significant. Links between planning and flood risk management need to extend beyond decisions on land use and Sustainable

Drainage Systems to create resilient places, which can accommodate the natural processes of flooding. The revised Technical Advice Note (TAN)15 (September 2021) will have a key role in this. There will also be a need to focus regional and local strategies, plans and policies on this challenge, as well as ensuring that the content of the relevant Area Statement is taken into account.

Adequately resourced, collaborative working will be the key to involving a wide range of stakeholders. How this collaboration can be properly encouraged, funded and structured is an important discussion.

Future Wales: The National Plan 2040 poses an opportunity to push boundaries in the longer-term planning for Wales. While the Plan recognises flood risk and climate change resilience, we feel it could go further to address the issue of coastal adaptation in future iterations. We acknowledge that this currently might be beyond the term of the Plan, but we believe there is an opportunity to start to set the agenda.

Long-term sustainability goals, including climate change must remain priorities and at the forefront of planning for the future in Wales. Of course, adequate resourcing is vital. Local planning authorities have lost significant capacity in recent years. A well-resourced, plan-led planning service can deliver corporate objectives and outcomes, which, if properly encouraged and effectively organised can bring together objectives across services and help achieve local and national sustainable development and climate action goals.

We have previously called for links to be made with the Wales Infrastructure Investment Plan and we are pleased that the latest Wales Infrastructure Investment Strategy (WIIS) 2021 [Wales infrastructure investment strategy 2021 | GOV.WALES](#) makes progress in this area, including a section on placemaking. We very much hope this sets a standard for further integration, not only in relation to future iterations of the WIIS but across all plans, strategies and levels of Government, including regional and local.

### **1.1 Levels of Capital Funding**

We welcome the proposal to prepare a Capital Funding Action Plan to support the Programme for Government, the five-to-ten-year investment programme pipeline and the Long-Term Investment Requirements report.

We equally support the proposal to include a Communication Plan within the Action Plan, to “strengthen public and stakeholder support for investment in Flood and Coastal Erosion Risk Management (FCERM)”. This is an important element of a clear and transparent process.

We support Action A.1.3 proposing a review of longer-term infrastructure funding mechanisms, which was raised as an issue in RTPI Cymru’s response to the previous Call for Information (November 2020).

## **1.2 Medium to Long Term Funding Mechanisms**

We welcome the 3-year FCERM budget for December 2022. Evidence based, long term planning alongside rolling, flexible multiyear funding is essential. We would support a joined up, rolling budget for the future that brings certainty yet flexibility between financial years.

## **1.3 The Planning System**

The planning system sets the context for development and creates the enabling conditions for a sustainable and healthy built environment. Planning can also address potential negative impacts of development which can be harmful to human health, such as air pollution and flooding.

We welcome the approach of this report that looks beyond the important role of flood defences and recognises the vital role of the planning system in addressing flooding and climate change in the longer term.

We recognise the issues set out in the report, which includes the need for improved integration and capacity within the planning system. These are issues that the RTPI have long called for.

Effective climate action requires a strong evidence base, long term planning and well-designed development in the right place, rather than concentrating efforts and funding on the maintenance and growing need for flood defence.

Future Wales: the National Plan 2040, emerging Strategic Development Plans (SDPs) and Local Development Plans (LDPs) can together facilitate an integrated approach with other areas of policy, linking decisions on economic development with those on housing, climate change, energy generation, transport, and other infrastructure, providing a spatial framework for investment at different scales across Wales. This could support joint working and maximise benefits on the ground.

Emerging SDPs at a regional level will enable us to address the more complex regional spatial issues that cross boundaries and may require different responses across Wales and borders.

Planning offers an established and effective process to facilitate a sustainable future for Wales. However, it needs to be invested in and strengthened to be able to deliver expectations. In 2019 the Auditor General concluded that:

“Planning Authorities are not resilient enough to deliver long-term improvements because of their limited capacity and the challenge of managing a complex system.”

Local Planning Authorities in Wales are under increasing pressure to deliver more services with fewer resources. Authorities have seen their budgets cut by more than 50% in the last

five years. These budget cuts place local authorities under intense pressure and make key health, social and economic services unaffordable. Moreover, these cuts are exacerbating inequalities.

**Proposal 3:** There are a number of elements to proposal 3.

Proposals for flood risk infrastructure should where possible help support wider redevelopment proposals and as a result the whole cost benefits of the infrastructure are recognised.

RTPI Cymru supports the proposal for training for local planning authorities and would support this proposal being extended to Councillors, Lead Local Flood Authorities, Planning Inspectors, statutory consultees and Town and Community Councils etc.

RTPI Cymru has called for a full review of the General Permitted Development Order (GPDO) and Use Classes Order, in our recent response to Welsh Government on amendments to permitted development rights - [RTPI | Amendments to Permitted Development Rights](#) RTPI Cymru welcomed the revised TAN 15 and would support the proposal to review TAN 12.

In relation to the proposals on monitoring and indicators - See the RTPI Measuring Planning Outcomes Research [RTPI | Measuring What Matters: Planning Outcomes Research](#)

**Proposal 4:** RTPI Cymru would support the ring fencing of planning fees, so that they are retained by local planning services, as part of ensuring that the planning service is adequately resourced.

A well resourced, plan-led, positive planning service can deliver corporate objectives, which, if properly encouraged and effectively organised can bring together objectives across services and help achieve local and national sustainable development and climate action goals.

High-quality planning is needed to efficiently meet the needs of people in all areas. Like any good public service, the planning system requires resources and capacity to deliver outcomes efficiently, effectively, and equitably. Financial support to increase the number of public sector planners employed, funding for specialist knowledge and investing in efficiency-saving digital technologies can help support the shift from a largely reactive, regulatory planning system, to a proactive and strategic planning system.

## **2.1 Partnership Funding – Policy / Strategy / Mechanisms**

We are aware that partnership working is taking place across Wales with Natural Resources Wales, local authorities, Welsh Water Dŵr Cymru, Network Rail, Trunk Road Agencies etc, however we understand these to be on an informal basis. While there is clear value in informal partnership arrangements, we would support a properly resourced and more formal partnership group and arrangements, to ensure it can continue in the longer term and there

is no silo working, due to a lack of support. Building a partnership group with other partners could be a requirement of securing funding.

## **2.2 Partnership Funding – Developers**

We support proposal 6 and seeking a better approach to the use of S106 / Community Infrastructure Levy to fund critical infrastructure. There may be an opportunity to co-ordinate resources with initiatives such as City Deal etc.

## **2.3 Co-ordinating Government Programmes and Achieving Wider Benefits**

We support this proposal to link programmes up more effectively. Our understanding is that projects are still being looked at in a degree of isolation, both geographically and with limited linkages between different disciplines.

While we recognise the challenge of this proposal, we equally support the spirit and benefits it could bring. See above our comments on the importance of joint working and the need for support to embed it effectively.

This could provide a good practice example for the wider co-ordination of programmes in the future. Monitoring and review of the process, outcomes and impact would therefore be essential. See RTPI Measuring Planning Outcomes Research [RTPI | Measuring What Matters: Planning Outcomes Research](#)

## **4.1 Levels of staffing resources, knowledge, skills and technical expertise**

We would support the important proposals 10 and 11.

Any new or future legislation and policy needs to be supported by adequate resources. This links to the recent experience with TAN15. The potential impacts of new guidance, policy, legislation needs to be fully considered and understood from the outset with appropriate briefings provided.

## **4.2 Issues around skilled professionals in FCERM in Wales**

We would support proposal 12 to establish a working group with key stakeholders and would be pleased to discuss RTPI Cymru's supporting role in this.

This could provide an interesting format to address the skills shortage across planning and related fields. Therefore, close monitoring and review of the proposal in practice should take place to inform future good practice.

## **5.1 Resourcing of Councils' FCERM services**

As stated above, a well resourced, plan-led planning service can deliver corporate objectives, supporting local and national sustainable development and climate action goals. We would support this proposal.

We note that "only 2 Public Service Boards (PSBs) consider climate change", we would therefore support further engagement with PSBs to ensure they have a sound understanding of the issue within their local authority boundaries and across Wales.

### **6.1 Levels of engagement and awareness raising with communities**


We believe the relationship between Place Plans and Community Flood Plans is yet to be fully explored and we therefore support this proposal.

The capacity of Town and Community Councils and local communities is an important issue in relation to flooding and erosion and we believe with suitable resources and training, they have a greater role to play. This requires Town and Community Councils and the wider communities to be engaged both in the resilience efforts and through the planning system.

Early engagement in the development plan and management processes are vital, incorporating Community Flood Plans in any discussions. Planning Aid Wales would be a good partner in this respect, given their work on Place Plans and planning training of Town and Community Councils.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



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