



**RTPI Cymru**

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27 February 2019

e-mail response sent to: [PublicTransport.Engagement2019@gov.wales](mailto:PublicTransport.Engagement2019@gov.wales)

Dear Sir/Madam,

**Response to: Improving Public Transport**

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.

We welcome the opportunity to provide a submission in response to the above consultation.

While many of the issues discussed in this consultation are outside the remit of planning, our response focuses on those issues that are relevant to planning, emphasising the close links between land use and transport provision.

However, we understand that there are some issues that sit beyond planning, yet have a direct impact on some of the factors linked to planning, for example, the current legislative regime represents a major barrier to achieving the integrated public transport network that Welsh Government aspires to. While the detail of this is beyond planning, it does appear to impact on the bigger picture, of which planning is a major part - Local authorities have no ability to influence either the fare pricing or the network and routes which commercial operators use. These factors combined with reductions in subsidy available to support non-commercial services to meet social need mean that local authorities have very little influence over the coverage and quality of local bus networks and services. Based on figures provided in the consultation document, WG currently subsidises every rail journey within the all Wales rail franchise by over £11. This is in contrast to bus passenger journeys which attract funding of only £2.20 per journey. This is in spite of there being more than three times as many bus journeys in Wales as journeys made by rail. If bus transport is to become a truly practical alternative to the car, we believe this situation needs addressing. The

consultation document recognises the need to ensure bus services meet the needs of passengers and are integrated with rail and other transport services. We welcome this position. There are important links between the development and viability of bus services and the present and future patterns of land use. We would also wish to see better integration with active travel proposals.

It is disappointing that there is not a clear recognition of the relationship to land use in this consultation. These links are already recognised in planning guidance and the Technical Advice Notes used by planners. Planning Policy Wales (PPW) also clearly sets out the links between land use and active travel. PPW, paragraph 4.1.29 states “provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice.”

Local Development Plans, which are an important part of the planning system in Wales, can give detailed consideration to such links. It is important that they are also recognised in relevant guidance and policy in relation to the provision of public transport including bus services.

All sectors and stakeholders involved must recognise that the early provision of public transport to serve new developments, together with longer term support mechanisms is essential to establish sustainable travel patterns. Delaying such provision until developments are at an advanced stage is more likely to result in car based travel patterns becoming established. A key issue to address in this respect is to ensure, where new developments are proposed, that negotiations with the developer about the appropriate level of transport provision to be made by the developer, include sufficient funding to support the provision of public transport services as soon as developments start to become occupied.

We support the continued preparation of Local Transport Plans (LTPs) by local authorities. These are a useful mechanism to achieve co-ordination with the development of local land use development, and need to be well-integrated with the preparation of Local Development Plans. Any changes to guidance on LTPs should continue to recognise that role. In regions where journey to work areas typically cross local authority boundaries, there is a strong case for LTPs to be prepared on a regional basis, and to be integrated with regionally based city deals and Strategic Development Plans where these are brought forward.

Any guidance in relation to transport services must recognise the important links to land use. The implications for existing and planned land use development must be considered.

The additional powers given to the Welsh Government by the Wales Act 2017 will enable it to take a more proactive role in relation to bus services and that is welcomed. This would need to involve a closer relationship with the Traffic Commissioner for Wales. If that new role and the relationship with the Welsh Government is to achieve the intended benefits, it is important that adequate resources are provided, in particular staff resources at the recently announced new office for the Commissioner. Measures to more effectively integrate bus services with Metro programmes and with rail services also need to be given greater priority.

It should be recognised that the planning system has a number of mechanisms such as planning conditions, travel plans related to larger schemes, Section 106 agreements / Community Infrastructure Levy, which can enable improvements to bus facilities (bus lanes, stops etc) as well as local service benefits. Ensuring that all relevant guidance and regulation recognise the links between transport planning and land use planning will ensure such benefits are able to be achieved. Bus priority measures are particularly important in seeking to steer modal change towards more sustainable forms of transport.

The planning profession have recently been called upon to be bolder in embracing digital technology and we would call upon public transport providers to do the same, keeping abreast of new technologies such as more efficient electric buses, real time service information, and ensuring that any supporting infrastructure such as charging points and information panels and apps are provided.

And finally we must ensure that bus stations, bus stops and taxi ranks are well designed and well maintained, with good vandal proof materials, weather protection, high quality lighting, seating where possible, good quality information, good links to pedestrian routes and facilities to deal with litter. These measures will all enhance the experience of using them, the quality of the built environment and thus will encourage public transport use.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



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**Director**  
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