



RTPI Cymru
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27 February 2019

e-mail response sent to: decarbonisationmailbox@gov.wales

Dear Sir/Madam,

Response to: Draft Climate Change Adaption Plan for 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.

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

The RTPI's Better Planning programme provides practical advice and intelligence to demonstrate how planning is part of the solution to major social, economic and environmental challenges. The programme focuses on key policy and practice topics, one of these being [responding to climate change](#). "Climate change is one of the most crucial issues facing our communities today, and the increasing occurrence of severe climate-change related weather events is just a reminder of the urgency of this issue. Climate change, like planning, requires us to take a long-term and spatial view." (RTPI)

The planning system in Wales is in a period of change. We are guided by important legislation such as the Well-being of Future Generations Act 2015 and the Environment Act 2016. We are awaiting the Welsh Government's National Development Framework, to be published later this year, and there is a renewed emphasis on regional working and we await the Government's response to the recent Law Commission review of Planning Law in Wales.

The following comments focus on the detail of the consultation document and those issues impacting on planning.

Page 34 identifies, under the heading "the gaps", the need to improve land use planning - "We need to improve land use planning to be more dynamic and consider future implications of climate change", however this does not appear to be followed up or explored any further.

We expect planning to have a growing role in the future, as increasing pressure is put on our land and buildings. This will require the need for well-developed policies in Local Development Plans (LDPs) and well-resourced Local Planning Authorities in guiding change and use.

We believe there is a significant omission from the proposed actions in relation to agricultural resilience and to the land use planning system. This is the failure to reference and to encourage support for the established planning policy that the best agricultural land be protected, with development preferred on brownfield sites and undeveloped land of lower agricultural quality. Much recent development in Wales especially around the major urban centres has been located on top quality farmland. In order to safeguard food security in the face of any expected climate changes it is essential that remaining high quality farmland should be retained for the future.

We note the reference to Planning Policy Wales on page 67, and welcome this along with the recognition that the planning system has a significant role to play in managing climate change.

The vast majority of planning decisions are taken by local planning authorities, and they need to be properly resourced. Local resourcing and capacity are core concerns of the RTPI. Indeed, under-resourcing in local planning departments is a key barrier to effective planning for climate change. You may be interested in recent work by the RTPI and TCPA titled "Planning for the Climate Challenge? Understanding the performance of English local plans" <https://www.tcpa.org.uk/planning-for-the-climate-challenge> The RTPI have long called for the proper resourcing of planning services. This is particularly timely in light of the developing responsibilities of the Welsh Government on planning issues, and the chronic underfunding of local authority planning services. RTPI Cymru would support moves to Local Planning Authorities achieving full cost recovery from development management services to improve planning service delivery. However it is essential that any proposals to increase planning fees are accompanied by rules to ring fence this income to the planning service and that Authorities effectively resource their planning services, so that they are in a position to tackle whatever we may face in the future. The resourcing of LPAs should be considered against the ambitions set out in policy HP1 in relation to the planning system.

Page 51, policy MC3 ought to include a recognition of the role of the planning system and of LDPs in ensuring that new development proposals are consistent with coastal adaptation proposals contained within Shoreline Management Plans. Despite Technical Advice Note 14, Coastal Planning (1998), being in desperate need of updating, it should also be referred to in this policy.

Page 69, policy HP1, Technical Advice Note 14 should also be mentioned alongside TAN 15. We would also suggest noting the importance of regularly updated LDPs and the resources to do so in this policy.

Page 70, policy HP2 includes LPAs as delivery agents, yet the policy focuses on Building Regulations, which planning authorities do not deliver on.

Page 71, policy HP4, Community and town councils should be recognised as stakeholders here.

Place Plans offer an opportunity in helping to put community level activity on climate change into a broader context and could be considered.

We note the reference to the possible preparation of a companion guide to TAN 15 on adapting buildings for climate change on page 72. We would be interested to learn more on this and would support in principle the investigation of such work.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Willmott', with a stylized flourish at the end.

Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru