



RTPI Cymru

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4 October 2018

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

Dear Sir/Madam,

Response to: A Low Carbon Pathway 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.

Thank you for the opportunity to contribute our views to the above consultation.

We welcome the recognition set out in the consultation document that “the planning system has an important role in facilitating decarbonisation, and the role in particular of the National Development Framework and Local Development Plans (LDPs) in doing so” (p20). However, given this recognition, it is surprising that the report lacks proposals for using the planning system more effectively. It is important to recognise the potential role of planning in tackling climate change and reducing emissions.

Planning needs to balance a number of different issues when granting consent for a wide range of developments. This means that planning is unable to solely focus on one specific issue. However, as planning policy evolves the importance of all development being ‘sustainable’ is increasing, as part of a more holistic approach, and is balanced against other relevant considerations.

RTPI Cymru believes that sustainable development must balance economic, social and environmental objectives to address the challenges of climate change. We are aware that higher standards do not always sit comfortably alongside economic impact and therefore consideration needs to be given to how best to build wider stakeholder support particularly in the development industry, taking into account impacts on development costs, viability,

delivery etc. A step change is needed in understanding how good design can integrate low carbon housing and other development.

It is important that the process of designing a building takes on sustainable building standards as a central principle, rather than relying on potentially expensive renewable energy bolt-ons to meet energy savings. Building Regulations is the route for sustainable building standards but issues such as siting and orientation etc. are best dealt with through the planning system. Both systems need to work closely together, ensuring roles are clearly defined to avoid uncertainty and duplication.

Planning has an important role in encouraging and facilitating buildings and urban design that meet high sustainability standards. The role of planning should be emphasised in expecting new development to contribute to energy efficiency, filling in any gaps left by building regulations to ensure higher environmental standards in new build, layout and site design etc., albeit the planning process usually considers developments in advance of building regulations.

We also recognise that there will be a need for requirements to be regularly reviewed in order that they keep pace with technology. Clearly 'green technology' is something which is currently changing very rapidly and is likely to continue to.

Planning should actively support the retro-fitting of energy efficiency improvements to existing stock, for example through playing a proactive role in urban regeneration schemes. Planning also plays an important role in guiding sensitive change to improve the energy efficiency of homes whilst also protecting the local distinctiveness and heritage of the area. To enable green growth, planning should be highlighted in promoting the infrastructure that is required for the development of a low carbon economy.

In relation to sustainable transport and active travel, by influencing the location and density of new development, planning can reduce car travel and influence the level of demand on transport and journey distances to encourage walking and cycling.

It is disappointing that the section on transport (p36-42) fails to recognise the importance of planning decisions in facilitating development that could encourage use of active travel and public transport, while discouraging use of the private car. After all, all journeys involve getting from one building or site to another, and the location of development of all of these can be influenced through the planning system.

The Active Travel (Wales) Act 2014 is a laudable piece of legislation, but the narrow scope of the duty it confers upon local authorities represents a major flaw. Due to the way that the Act and supporting guidance have been framed, in reality the burden of meeting the duty has tended to fall mainly upon local authority transport and highway functions. Whilst these functions would always be expected to play a central role in meeting the requirements set out in the Act, a 'whole local authority' approach integrating the actions of key service areas (e.g. education) is arguably essential in order for the Act to have its intended impact. In this regard, it is significant that the Act makes no reference to the planning system in Wales and requires no specific contribution to the delivery of the Act by local authority planning functions. This is in spite of the considerable influence the planning system has in shaping the design and use of the built environment and local movement networks, and in creating many of the problems which the Active Travel Act sets out to remedy, mainly, by the retrofitting infrastructure.

This lack of a clear linkage with the planning system represents a major weakness in the Active Travel Act which arguably jeopardises its future success. The best means of filling this gap (and of avoiding any revision to the Act) is via a revision of planning policy, planning guidance and the delivery and design guidance for the Act. The comprehensive revision of Planning Policy Wales (PPW) currently being undertaken by Welsh Government represents an ideal opportunity to begin this process. In addition to a strengthening of PPW there

should also be appropriate references included in Technical Advice Notes relating to development plans, transport and design. Policy must also ensure these provisions are reflected within LDPs.

The requirements relating to development management also need to be strengthened. In determining planning applications local planning authorities must ensure that development proposals maximise their contribution to the objectives of the Active Travel Act through their design and supporting infrastructure. This is necessary as, too often, the provision of active travel facilities within new developments is prevented or compromised due to other considerations taking precedence. Where developments do manage to include provision, it is frequently the case that facilities are poorly-designed and do not adequately meet users' needs. This highlights the need for clearer guidance on design and professional training across all professions.

The Active Travel Design Guidance published to support the delivery of the Act provides advice on the design of good quality active travel routes. Embracing many aspects of good practice in infrastructure design, it is a useful and comprehensive document. However, its weakness is that it relates mainly to the retro-fitting of facilities within the existing highway network. This makes it of limited interest and value to the designers of new developments and planning decision-makers.


You may be interested in the recent Foundation for Integrated Transport study: <http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf> This found that most of the new housing being built in England is poorly located and designed to be accessible by sustainable transport. We have no reason to believe that the situation in Wales is any different. There needs to be a fundamental review of the integration of land use and transport planning in the context of decarbonisation.

Through legislation such as the Active Travel (Wales) Act 2014, and decisions on transport investment, Welsh Government is in a position to have a significant influence upon the use of sustainable and less energy-intensive modes of transport. You may be interested in our RTPi Blog on Active Travel – “Time for Travel to get Active” - <http://www.rtpi.org.uk/briefing-room/rtpi-blog/time-for-travel-to-get-active/>

Both planning and sustainable transport can make an important contribution towards the energy efficiency agenda. The connection between these and other policy areas is especially important in light of the Well-being of Future Generations (Wales) Act 2015.

It is also important, on energy planning, that the proposal to “Support the development of regional and local energy planning” (p28) recognises the importance of integrating this with the development planning system. There are opportunities for higher standards to be delivered on strategic sites identified as part of the LDP, such as district energy schemes and integrated transport. However these can require cross-border/cross-LDP considerations, and there are timing issues due to the current position with regard to timescales associated with the adoption of these plans. Supplementary Planning Guidance could provide an opportunity to address major development issues to ensure connectivity, avoiding the above mentioned LDP timescale issues. Strategic Development Plans are a further tool available which could help address these issues.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail
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Yours sincerely,



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