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e-mail response sent to: WalesTransportStrategy2@gov.wales

Dear Sir/Madam,

Response to: Llwybr Newydd: a New Wales transport strategy

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 1,300 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 the respond to the above consultation. The Wales Transport Strategy (WTS) will have a significant relationship with the development planning system and will be a consideration in the drawing up of local and strategic development plans. These plans are an important means to develop proposals for active travel and transport schemes. The plans and the schemes within them are drawn up with extensive local consultation and are subject to rigorous examination before being approved. The transport elements of approved development plans are often then included in appropriate transport programmes.

The WTS should also recognise the strong relationship with the NDF – Future Wales (NDF), which is due to be published in February 2021. The NDF will provide the framework to strategically guide development in Wales. It has an important role to play in identifying infrastructure projects and other development at a time where there is uncertainty around the future of planned projects, infrastructure finance and now the UK has left the European Union. It is important to recognise the spatial distinctiveness of places in developing policy. At the national level, it will be the NDF which can facilitate an integrated approach, linking decisions on economic development with those on housing, climate change, energy generation, transport, and other infrastructure, providing a spatial framework for investment.

It is therefore vital that we work to better integrate transport and development planning policies, plans, strategies and funding as well as effectively integrating our working practices across these sectors and others, such as health.

We welcome the reference to Future Wales - the National Development Framework (NDF) at pg 61 of the WTS and the collaboration work that has already taken place on these strategies. Future Wales provides a strong framework to meet the economic, social, environmental and cultural ambitions in Wales. It is essential that the WTS and the National Transport Delivery Plan (NTDP) is implemented through the framework provided by Future Wales.

We note the statutory requirement on Welsh Government to keep the WTS under review. We particularly welcome that this review coincides with the preparation of the first NDF. Given the importance of integration between land use and transport planning at all levels, we would ask Welsh Government to commit to always reviewing the NDF and the WTS in conjunction with each other. The consultation document refers to the review of the WTS, at pg 57, but provides little information, stating "We will update the five-year priorities in Llwybr Newydd regularly, to reflect changing circumstances and to respond to major policy challenges". Further clarification and information is required on the plans and process for monitoring impact and outcomes of the WTS and the review process.

Any monitoring process should recognise the importance of measuring outcomes and going beyond standard indicators. Building this into the process from the outset will help monitor impact on the ground in the longer term. The RTPI's Measuring What Matters Planning Outcomes Research provides a toolkit that sets out a three stage process to measuring impact. The levels set out a progression from understanding policy effectiveness in the decision making process (Level 1), to direct physical development outcomes on the ground (Level 2), to wider cumulative direct and indirect impacts (Level 3). The research and toolkit can be viewed here: www.rtpi.org.uk/find-your-rtpi/rtpi-nations/rtpi-cymru/policy-and-research/

In January, the RTPI have published research on Net Zero Carbon Transport, which looks at the role of spatial planning and place-based transport solutions. This research uses data analysis and modelling to enable the potential carbon impact of different interventions to be considered. The research "indicates an urgent need to move away from the traditional 'predict and provide' approach that continues to form the basis for much of the UK's transport planning, and towards a 'vision and validate' approach that sets clear targets for trip reduction, mode share and carbon emissions. These targets, and the wider vision they sit within, need to form the basis of a policy framework that supports the planning, funding and delivery of the necessary interventions. Importantly, many of the interventions needed to achieve these targets are outside the scope of what is traditionally considered as 'transport planning'. Effective implementation is dependent on a much more integrated approach to transport and land use planning". The report can be viewed at: www.rtpi.org.uk/netzerotransport

Our response to the consultation questions is set out below. If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPi

Director

RTPI Cymru

Q1: Do you agree with our long-term vision?

While we support the broad intentions of the vision it could be strengthened by including an explicit commitment to reducing the impact of transport upon climate change and making significant progress towards meeting the Well Being Goals.

Given the influence of the location of development and design upon travel patterns and behaviour, we believe this should be reflected in the Priorities. For example Priority 1 could be amended to include the underlined section below:

Priority 1: reduce greenhouse gas emissions by planning ahead for better physical and digital connectivity, new developments accessible by sustainable travel, more local services, more home and remote working and more active travel, so that fewer people need to use their cars on a daily basis.

It is essential that planning and transport planning work collaboratively to achieve this and it is built in at the very start of any plans for development. Providing a choice of sustainable transport options in advance of occupation is a key influence in the long term transport habits formed by occupants.

Q2: Do you agree with our 20-year ambitions?

Ambitions

2.1: S1 – We welcome the commitment to the removal of barriers and note the variety of different barriers listed in the consultation document. Linked to the second bullet point at S1 is also the barrier created by transport infrastructure itself, roads, railways, rivers etc. which can present insurmountable barriers to people walking and cycling between communities which are otherwise in close physical proximity.

A programme to address these key barriers could contribute to achieving the long term ambition of a transport system which contributes to a more equal and healthier Wales.

2.2: E2 - We welcome the commitment to a transport system which responds to the climate emergency. There is need for resilience in transport infrastructure which extends beyond biodiversity. Significant components of nationally important transport infrastructure play a critical role in mitigating flood risk for communities, particularly around the coast. See also our comments on P3 below.

2.3: P1 – We welcome the commitment given to sustainable transport modes and particularly the determination to “develop a new approach to regional transport planning that brings together strategic land-use planning and our economic ambitions for each of the regions of Wales”, which needs to be resourced as a key priority.

We note at pg 53 “Working in Partnership” the commitment to “implement and support effective regional transport planning and delivery through Corporate Joint Committees (CJCs), who will be empowered and supported to plan for services at a regional level, aligned with other regional and local planning priorities.” Please see our response to the following consultations:

- Establishing the Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021 www.rtpi.org.uk/new-from-the-rtpi/?region=Wales&contentType=Consultations
“Adequate support and resources are vital in delivering this agenda.”
- Regulations to Establish Corporate Joint Committees
www.rtpi.org.uk/consultations/2020/december/regulations-to-establish-corporate-joint-committees/

2.3: P3 – The commitment to helping businesses choose more sustainable transport options is particularly welcomed. This should be taken further within the WTS, with a firm commitment around the preparation of organisational travel plans by key employers within both the private business and public sectors. Reducing the demand for travel needs to be a key element within this.

Q3A: Do you agree with our 5-year priorities?

Five Year Priorities

Priority 1 - See our comments at Q1. Reducing greenhouse gases by better planning needs to be a key priority as outlined. Development needs to be avoided in locations that are poorly served by public transport. A key issue in this respect is the tendency for development to be permitted in peripheral locations close to motorway junctions, which immediately places emphasis on car travel, extra pressure on congested stretches of road, greenhouse gas emissions and air quality etc. Building additional roads itself generates the demand for more development, leading to a spiral in demand for car journeys.

Another key method of reducing greenhouse gases by better planning, is by allowing the density of development to be higher in locations well-served by public transport, and this approach should be explicitly recognised and supported by the WTS.

Priority 2: Reducing greenhouse gas emissions and improving air quality will be dependent on growing public transport use. Mechanisms need to be found to bring extra revenue for bus services in particular. A key opportunity in this respect would be for legislation to be brought forward to empower local authorities and regional bodies to effectively co-ordinate the provision and integration of local and regional public transport services and for local authorities to be able to run their own services locally. Whatever mechanisms are favoured, changes in governance needs to be backed up by the resources required to support services that meet all needs and the back-office functions needed for delivery.

Priority 3: With rising sea levels, billions of pounds worth of transport infrastructure which also acts as coastal flood defences will be at risk. The status of the Welsh Government in its highways authority role, as a Risk Management Authority, under the Flood and Water Management Act 2010, emphasises the importance of the Welsh Government’s statutory responsibilities in this respect.

Ensuring effective co-ordination between Future Wales, the Welsh Government’s recently updated National Strategy for Flood and Coastal Erosion Risk Management, and the WTS, needs to be a key priority for Welsh Government, and should be reflected explicitly in the WTS. These considerations also emphasise

the importance of the WTS being guided by long term priorities in responding to climate change, including Shoreline Management Plans, which extend well beyond the 20 year time horizon of the current draft of the WTS.

Transport investment will need to play its part in helping our coastal communities and our ports to respond to the issues presented by the climate emergency, and in particular in the challenging process of coastal adaptation.

Priority 4: Behaviour change in making sustainable transport choices will be the critical factor in determining outcomes, see our comments in Question 1.

Congestion charging and work place parking levies might play a role and could provide ring fenced income for use in funding sustainable transport services. It will be important that any charges or levies raised reflect concepts of equity, that liability for charges is determined by transport considerations and not simply by local authority boundaries, and that funding generated is available for use across journey to work travel areas.

The WTS should also recognise the heavy toll of death and injury on Welsh roads which is above that for England and Scotland. The strategy should make the reduction of the casualty rate on roads in Wales a clear priority and set out how this will be achieved.

Q3B: Do you think that we have the right number of priorities or should these be further refined? If so, do you agree with the following three priorities:

1. We will reduce the need to travel.
2. We will encourage modal shift – when people need to travel we will encourage them to take fewer car journeys and use sustainable forms instead through supply of better services, and stimulating demand for them through behaviour change measures.
3. We will adapt out infrastructure to meet the challenge of climate change, and ensure our transport system is well-maintained, safe and accessible.

As stated above we think the link to the role of the planning system needs to be reflected in the priorities. Priority 1 could be amended as shown below to achieve this:

Priority 1: reduce greenhouse gas emissions by planning ahead for better physical and digital connectivity, new developments accessible by sustainable travel, more local services, more home and remote working and more active travel, so that fewer people need to use their cars on a daily basis.

Q4: We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

Measures

4.3: Reflecting comments above on the wider societal role of transport infrastructure in mitigating flood risks, an additional measure should be included:

“Properties protected from flood risk by transport infrastructure,” to ensure that these additional benefits from maintaining infrastructure are recognised. This would also help to support the aims set out in 5.1 of connecting better with other Welsh Government priorities, and in 5.3 Working in Partnership.

Q5: Do you think we should include specific targets for more people to travel by sustainable transport?

Specific targets would help the monitoring and review whilst helping to articulate the strategy ambition. Without specific targets on modal shift, greenhouse gas emissions, the proportion of daily trips made by active modes, there is danger that the strategy will lack the sense of urgency required to stimulate the rapid change that is needed across a broad and challenging agenda.

RTPI research on Net Zero Carbon Transport and Measuring Planning Outcomes provide interesting discussion on outcomes and targets and can be viewed here: www.rtpi.org.uk/netzerotransport and www.rtpi.org.uk/find-your-rtpi/rtpi-nations/rtpi-cymru/policy-and-research/

Q6: We have identified a set of actions to deliver the draft strategy. Are they the right actions?

Delivery

5.2: We welcome the delivery mechanisms set out in the consultation and the commitment to working with partners. The National Transport Delivery Plan (NTDP) will clearly have key role to play, but partners will need more information on the process and timescales for its preparation, approval, monitoring and reviews. With such a key role, widespread consultation in a manner similar to that undertaken in reviewing the WTS will be essential. As a means of co-ordinating investment in transport and other investment, the Wales Infrastructure Investment Plan (WIIP), which also needs to be reviewed and rolled forward, will also have a key role to play and both must be reviewed in the context of Future Wales.

Working in Partnership

5.3: We note that the bullet point on local authorities does not include recognition of their important role in preparing development plans and making decisions on planning applications, given the role that these systems will need to play in helping to deliver the WTS. As noted in our introduction, a stronger emphasis upon cross departmental/organisation/sector working and collaboration is important if we are to achieve goals and a modal shift.

Better Transport Governance and Policies

5.4: The recognition of the urgency of updating Technical Advice Note (TAN) 18 is particularly welcomed. This needs to be included within Welsh Government's work programme as a key priority. Local planning authorities will need up-to-date guidance and policies if they are to play their full role in helping to deliver the WTS.

Q7: We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these?

Mini Plans

7.4: Roads, streets and parking

There should be reference to the [Placemaking Wales Charter](#) which sets out principles for placemaking, including movement and to the Manual for Streets to draw out the commitment in the WTS to quality standards.

7.7: Freight and Logistics

The WTS should recognise that there are locations in Wales where heavy road traffic passes through communities including town centres, often passing through very narrow streets and the environmental and safety impact of this on those communities.

7.8 Ports and Maritime Transport

We note the proposal to develop a Welsh Ports and Maritime Strategy and look forward to receiving further information on this. The interface between this strategy and Future Wales and regional and local development plans and shoreline management plans will be particularly important in integrating this strategy with wider coastal planning.

Q8: We have shown how transport will use the 5 ways of working set out in the Well-being of Future Generations (Wales) Act 2015. Do you agree with this approach?

Setting out the links with the 5 Ways of Working is useful. While we note the inclusion of “collaboration” and “involvement” in this section, these could go further to emphasise the need for multiple organisations and partners to work together to achieve goals.

Q9: If charges for road use were to be introduced to help meet goals for cleaner air, a safe climate and better health, how can this be done in a way that’s fair to everyone?

The RTPI supports the introduction of charges in principle. Road user charging can be used to correct existing inequalities arising from gaps in provision for active and sustainable modes of travel. However, careful consideration and consultation is clearly needed to ensure this is achieved.

It is also essential that engagement with local authorities commence at the earliest opportunity in order that any proposals be informed by experience and knowledge at a local level. The implementation of schemes and improvements which would provide essential enabling infrastructure for modal shift prior to the introduction of any charge must be a primary consideration at the outset, including detailed analysis to reduce the number of vulnerable households affected and indicate where investments in sustainable modes can most effectively provide an alternative to car use.

Question C: We have a duty to consider the impact of our policies on people or groups who share protected characteristics.

Do you think this draft strategy will deliver positive benefits for people who share protected characteristics? If so, which are the most important?

Whether or not the strategy benefits people who share protected characteristics will depend upon the degree to which individuals are engaged in the design and operation of transport infrastructure and services.

Having the capacity to build this engagement into local transport delivery is a continuing challenge in the current climate of financial austerity, which is likely to continue following the Covid19 crisis. Local planning authorities in Wales are under increasing pressure to deliver more services with fewer resources, having seen their budgets cut by more than 50% in the last five years and transport services are likely to have been similarly affected.

Question E: Are there any further comments that you would like to make on Llwybr Newydd: a new Wales transport strategy?

General points:

- We note the links throughout the document, aiming to create “educational and other programmes that encourage behaviour change and give people more confidence to walk and cycle” (S2 pg15). We have called for this education link in previous responses and therefore would support this. Broadening awareness of issues is something we supported in relation to air quality, but applies equally in other areas where changes in behaviour are required. RTPI Cymru’s response to the consultation on the Clean Air Plan for Wales (March 2020) supported “a multi-faceted approach involving greater collaboration between key agencies such as those in the health sector, local authorities, academic bodies, third sector and local advocacy groups and covering educational initiatives and information campaigns targeting key actors with a role to play”. Waste and recycling is a good example of how clear targets alongside education has worked well to embed a change in behaviour.
- We look forward to the development of an Electric Vehicle Charging Plan and note the current consultation. This will play an important part in the rolling out of low emissions vehicles. We are interested in how and when the network of rapid charging points will be created. We recognise the need for investment in charging infrastructure across Wales. There are direct links here to energy generation and transmission and consideration of this needs to be integrated into the WTS. We need to engage with other sectors and parts of the UK on this policy, approach and longer term development. We would expect links to be made with Planning Policy Wales (PPW) on charging point detail.
- There appears little justification in the WTS for the balancing of air travel against wider sustainability goals. It may be that this is documented elsewhere and could be referenced.
- The WTS provides little information on the role and the development of the metro proposals and how this will impact on its delivery.
- The role of National Park Authorities (NPAs) as special purpose planning authorities should also be recognised in the WTS, with specific actions setting out how they will be involved in helping to deliver the Strategy. While NPAs are not transport authorities, they face distinctive transport challenges, and as planning authorities they can use their planning policies to influence travel patterns. They also have a strong interest in improving

sustainable travel in particular in improving access for rapidly growing numbers of visitors to their areas. Welsh Government has specifically asked NPAs (and AONBs) “to seek to improve travel planning for visitor attractions and increase the use of demand responsive transport” in its Valued and Resilient Policy Statement (2018). There is a reference to the National Parks and AONBs in sections 7.4 and 7.5 of the WTS, but their roles need to extend beyond roads and the third sector. It is not clear how sustainable access to these areas will be supported. While the recognition of the importance of access to National Parks is welcomed, this needs to be backed up with clear proposals.

- We note the WTS has been drafted in the context the COVID-19 pandemic. The RTPI Cymru Plan the World We Need campaign has called for a balanced approach towards recovery, which must:
 - Make decisions for the long term, based on sound and transparent evidence, integrating objectives, strategies and plans;
 - Build on positive behavioural change and environmental improvements, with a long term focus on climate action;
 - Adopt a focused partnership approach;
 - Ensure a framework which enables the prioritisation of appropriate investment;
 - Provide clear quality standards in the short term, for long term benefits; and
 - Ensure appropriate resourcing for planning to do its job.

The full RTPI Cymru Plan the World We Need paper can be viewed at:
www.rtpi.org.uk/media/5728/wales-plan-the-world-we-need-final.pdf