



RTPI Cymru

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e-mail response sent to: SeneddClimate@senedd.wales

Dear Sir/Madam,

Response to: Priorities for the Climate Change, Environment and Infrastructure Committee

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 26,000 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 above consultation. We welcome the opportunity to comment on the Committee's priorities.

The pandemic has had a significant impact on all our lives and the economy. Whilst there are many uncertainties around how we will emerge from the pandemic, it is likely that many of the issues which Wales already faced will continue and even be compounded.

Areas of Wales have traditionally faced complex place-based issues, including a decline in economic growth, changes in our high streets, poverty and inequality, the delivery of quality housing in the right locations and the resilience of Wales is frequently tested by severe weather events. The role of planning is to look to the long term and act in the long-term public interest, making a balance between competing interests and setting the framework and decisions for a sustainable future.

The planning system sets the context for development and creates the enabling conditions for a sustainable and healthy built environment. Planning shapes the environments where people work, live, learn and interact.

Wales has a strong national planning policy framework guided by the Well-being of Future Generations Act. There is increasing recognition that the planning system and Wales' sustainable development ambitions are intrinsically linked, and this is recognised in national planning policy.

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." The RTPI and other stakeholders have long called for the adequate resourcing of the planning system in order for it to achieve its full potential in addressing the complex and challenging issues it faces.

Planning services are under particular pressure and scrutiny. Total expenditure on planning services have fallen by 50% in Wales since 2008-09. These budget constraints have forced LPAs to prioritise meeting statutory obligations around development management over plan-making. Compounding these budget cuts, LPAs are under pressure to quickly address applications and deliver housing targets. The system is sometimes perceived as an impediment rather than an enabler of housing development due to the uncertainty and complexity of the current development management process. 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 a stronger, proactive and strategic planning system. RTPI Cymru would support further investigation of actions and interventions, such as the ring fencing of planning fee income and full cost recovery models to support the planning service. 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. Local authority corporate management teams provide leadership, vision and priority setting for areas, by shaping the strategic operational direction and investment decisions of local authorities. The implications of these corporate decisions on new investment, infrastructure, development activity, local services and policy delivery are significant, particularly at this time. The RTPI believes that making the role of the Chief Planning Officers a more prominent and strategic position within local authorities would positively influence the outcomes of planning and support good growth and a balanced recovery.

While we note and support in principle the issues identified in the Minister and Deputy Minister's priorities for the next 12 – 18 months ([the Minister and Deputy Minister's priorities for the next 12-18 months](#)), alongside the proper support and resourcing of the planning system, the following key issues should also be considered. We have indicated where an adequately resourced planning system can have a positive impact on these priorities:

Deliver long-term climate mitigation and resilience actions, including biodiversity enhancement.

The planning system can prevent locking-in inefficient, high-carbon infrastructure that will be used for decades. Through stringent climate requirements, the planning system has the potential to avoid significant carbon lock-ins from fossil-fuelled infrastructure that make it difficult to shift to lower-carbon pathways. This will be critical to supporting the net-zero transition. Planning that protects natural environments, safeguarding the landscapes and places we will value in the future must be supported. Wales' environment and its natural resources are one of its particular strengths and even economic advantages.

Invest in and seize the opportunities from Future Wales – the National Plan 2040 to prioritise the right investment decisions.

Spatial planning can positively support the economic performance of Wales through influencing factors that determine productivity, by defining the future role of key settlements and strengthening their interrelationships, by providing enhanced connectivity etc. Future Wales – the National Plan 2040 (the National Development Framework (NDF)) is an essential new addition to the development plan in Wales and will aid Welsh Government, other public agencies and private investors to make strategic investment decisions for Wales. Future Wales will play an important role in identifying infrastructure projects at a time where there is uncertainty around the future of planned projects, infrastructure finance and as Britain leaves the European Union.

Support and use the hierarchy of plans to make long-term decisions, including supporting the delivery of SDPs.

Equally, bringing forward Strategic Development Plans (SDPs) at a regional level will enable planning and stakeholders to address the more complex regional spatial issues that cross boundaries and may require different responses across Wales. This strong plan framework is vital to the balanced recovery of Wales and for long-term decision-making. It is important to recognise the spatial distinctiveness of places in developing policy. Future Wales – the National Plan 2040, SDPs and Local Development Plans (LDP) 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 and facilitate joint working and maximise benefits on the ground. Place Plans can also add value at the local level for those communities which have them. The policy framework would be strengthened by emphasising the importance of these links and the use of the evidence that they provide.

Introduce the Infrastructure Consenting Bill

The regulatory framework to support the change in the infrastructure consenting regime needs to be brought forward to provide an effective process for making decisions on large infrastructure, providing clarity to support needed infrastructure and balancing this with the needs of communities.

Encourage collaborative working to support rural planning

National planning policies set out in Future Wales, Planning Policy Wales and Technical Advice Notes (TANs), as well as Local Development Plans and other local strategies address rural related development. Both development planning and the development management functions need to be recognised as important tools in addressing health, food security, climate change, flooding, energy, landscape enhancement and protection etc, with the ability to give consideration to the wider land use and spatial implications of such issues.

Housing: Support and invest in the delivery of quality homes in the right places across Wales.

Without the planning system, Wales is unlikely to meet affordable housing targets. It is estimated that an average of 7,500 new homes will need to be built each year to meet housing needs, of which 3,500 will need to be affordable homes. To achieve ambitious national targets, planners will need to identify where housing, including affordable housing, is needed, enforce quality standards, ensure new homes have good access to amenities, support community cohesion, and coordinate developer contributions. The planning system supports delivering ambitious targets for suitable and affordable housing. Planning can support delivery of affordable housing, which may not be delivered through the private sector, even where total supply issues are remedied. High quality homes, safe living environments and access to opportunities for exercise and recreation enable population health. Public Health Wales prioritises environmental and social conditions which affect public health. Key planning-related priorities in the Public Health Wales 2018-2030 strategy, include creating cleaner air, improving mental health conditions and reducing childhood health inequities. Well-planned places, particularly those with access to green infrastructure and that enable community cohesion, are important for supporting the mental and physical health of residents. Access to greenspace is particularly important for childhood development; having high access to greenspace in childhood can reduce risk of developing mental health diseases later in life by up to 55%.

Encourage and support inclusive, affordable, sustainable public transport

“Large parts of Wales are rural in character with 40% of the population living in settlements with fewer than 10,000 people. Commuting patterns are a distinctive feature of our regional economies, with significant daily movements of people to their place of work”. [Update to Future Wales - The National Plan 2040 \(gov.wales\)](#)

RTPI Cymru has long called for a “more integrated approach to transport and land use planning” in line with the findings of the [RTPI Net Zero Carbon Transport research](#). It is vital that we work to better integrate an inclusive and affordable sustainable public transport system if we are to enable more sustainable places, a modal shift, achieve decarbonisation, net zero targets and climate action goals.

We have recommended the Welsh Government work closely with the UK Government and other devolved nations to support the development of common technical standards and practice.

Active Travel: Continue to enable the delivery of active travel.

The planning system can play a key role in encouraging active travel through identifying new opportunities and facilitating infrastructure investment. Active travel is currently impeded by a lack of safe and accessible infrastructure with safety factors being reported as a key factor for deterring people from cycling. Providing active travel infrastructure requires community engagement to identify where active travel is most needed, spatial planning, funding for infrastructure and stakeholder coordination. Active travel helps deliver a range of benefits including reducing pollution caused by private car usage, provide health benefits from being active and reduces congestion with its economic negativity.

Welsh Language and Identity

Invest in and roll out a common methodology to carry out linguistic impact assessments. The Welsh language is an important part of Wales' identity, and this is important in placemaking. The development of robust policies and mechanisms would enable LPAs take significant account of the Welsh language in land use decisions to support Cymraeg 2050.

Community engagement in plan making

The promotion of community engagement in plan making at all levels is an important strength of planning. Planning can support local neighbourhoods to shape development, retain their identity and enable community buy-in to the right form of development in their local areas through the planning process. A range of engagement mechanisms to enable as many parts of communities to engage in informing policies should be invested in. New mechanisms for digital engagement to be used more will facilitate engagement with many groups who traditionally do not engage with the planning process, including young people.

Support capacity-building in public sector planning and bring forward a Bill on Planning Law Consolidation.

Strategic plan-making requires technical skills and a deep understanding of community needs and priorities. Prioritising strategic planning includes non-financial actions, such as freeing up resources by reducing needlessly burdensome regulations and changing performance targets to measure quality instead of speed or efficiency. Recommendations from the Law Commission on a consolidation bill for planning should be taken forward. This will reduce the burden of the complexity of the current planning legislation contained in multiple Acts.

Support the delivery of vibrant town centres

Town centres are vital economic, community and social hubs. The closure of non essential businesses, as a result of the pandemic, has had a significant impact on high streets and town centres. Several major retailers went into administration as income collapsed. Others are restructuring and renegotiating leases. However, industry figures show that local corner stores and independent grocery stores experienced a 63% boost in trade in the three months leading up to 17 May, along with a 75% increase in online grocery sales in the last month of this period. It is essential that a town-centre first approach is maintained by taking a holistic, plan-led approach to the integration of high-quality homes, including affordable homes, a regular and affordable sustainable public transport system and the repurposing of

vacant commercial space for uses which support community resilience and environmental sustainability.

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,

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