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16 August 2019

e-mail response sent to: [SeneddEIS@assembly.wales](mailto:SeneddEIS@assembly.wales)

Dear Sir/Madam,

**Response to: Decarbonisation of 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 Inquiry.

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 successful decarbonisation and land use planning.

We note that the Terms of Reference for this Inquiry covers 4 points, however in our response will we focus on the following 2 points:

- What action is required, and by whom, to achieve the targets, policies and objectives?
- How should the new Wales Transport Strategy reflect the actions needed to decarbonise transport?

In doing this we have focused our comments around the Sustainable Transport Hierarchy set out in Planning Policy Wales (PPW) (pg 48).

## **What action is required, and by whom, to achieve the targets, policies and objectives?**

The location design of development can have a profound influence on travel patterns. Developments which are poorly integrated with existing settlements and which are difficult to access by sustainable modes of transport are likely to increase car-based journeys. This is why Local Planning Authorities (LPAs) have an important role to play, through the functions of plan making, master planning and determining planning applications, in securing developments which support sustainable and active travel.

The planning system if used effectively can be part of the solution to major social, economic and environmental challenges, including 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 is guided by important legislation such as the Well-being of Future Generations Act 2015 and the Environment Act 2016. The Welsh Government’s National Development Framework (NDF) has now been published for consultation and there is a renewed emphasis on regional working.

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), Strategic Development Plans (SDPs) and well-resourced LPAs in guiding change and use.

The vast majority of planning decisions are taken by LPAs, and they need to be properly resourced. Local resourcing and capacity are core concerns of the RTPI. Indeed, under-resourcing in LPAs is a key barrier to effective planning for climate change. 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 underfunding of LPA services. RTPI Cymru would support moves to LPAs 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 LPAs effectively resource their planning services, so that they are in a position to tackle whatever we may face in the future.

A combination of sufficient officer capacity and the right skills are required not only to deliver planning functions, but to ensure that land use plans are fully integrated with other local authority strategies and plans, such as Local Transport Plans (LTPs) and Active Travel Network Maps, ensuring that planning decisions support their delivery.

The environments in which we live, work and spend leisure time, both the physical nature of places and the social environment of communities have a large impact on our health and wellbeing. The RTPI’s [Planning Horizons project](#) ‘Promoting Healthy Cities’, examines the vital role that planning can play in delivering improvements to health. This report states: “We need to develop a new urban agenda focused on healthy placemaking for all. Planning in the broadest sense, from development management and infrastructure to the location of health and community services, can play a central role in creating environments that enhance people’s health and wellbeing. We need to develop more integrated strategies for healthy placemaking, gather greater intelligence on the social and economic determinants of urban health to guide decisions and investments, reform and strengthen institutions to develop systems of governance that urban populations need, and involve more professions and communities to promote healthy cities.” The links between health and planning are already recognised in planning guidance and policy used by planners. PPW clearly sets out the links between the built and natural environment and health and well-being (see page 31).

All sectors and stakeholders involved must recognise the importance that the early provision of active travel, together with longer term support mechanisms is helpful to establish healthy, sustainable travel patterns, including walking and cycling routes. Delaying such provision until developments are at an advanced stage is more likely to result in car based travel patterns. PPW, paragraph 4.1.29 requires active travel to be an essential component of development schemes; it requires LPAs to “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.” LTPs are a useful mechanism to achieve co-ordination with the development of local land use development and promote active travel 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. We refer to the past Welsh Government consultation, Improving Public Transport (December 2018) [https://gov.wales/sites/default/files/consultations/2018-12/improving-public-transport\\_0.pdf](https://gov.wales/sites/default/files/consultations/2018-12/improving-public-transport_0.pdf).

In response to this consultation RTPi Cymru noted [https://www.rpi.org.uk/media/3243040/improving\\_public\\_transport.pdf](https://www.rpi.org.uk/media/3243040/improving_public_transport.pdf) that 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.” The consultation document recognised the need to ensure bus services meet the needs of passengers and are integrated with rail and other transport services. We welcomed this position. There are important links between the development and viability of bus services, the present and future patterns of land use and decarbonisation. We would also wish to see better integration with active travel proposals.

PPW clearly sets out the links between land use and active travel. Active travel must be recognised as being able to decarbonise travel, particularly for short journeys. LDPs are an important part of the planning system in Wales and 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.

### **How should the new Wales Transport Strategy reflect the actions needed to decarbonise transport?**

We support the continued preparation of LTPs by local authorities. These are a useful mechanism to achieve co-ordination with land use development, and need to be well integrated with the preparation of LDPs. 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 SDPs.

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.

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. We must also ensure that bus stations, bus stops and taxi ranks are well designed and well maintained, with good links to pedestrian routes to enhance the experience of using them.

Although appreciating that 'alternatively fuelled cars' is at the bottom of the sustainable transport hierarchy, consideration does also need to be given to the infrastructure required to facilitate the transition to EV/hydrogen cars by the time petrol/diesel cars are phased out in 2040. This is especially so in the more remote areas of North, Mid and West Wales, which are likely to be more car dependant. The transition to EV will increase the electricity demand overall and additional renewable/low carbon generating capacity will be required to meet that demand, at a time when new renewable/low carbon generating capacity also needs to replace old fossil-fuel generating stations which are being phased out. Likewise, any transition to hydrogen-fuelled cars will require infrastructure improvements. The capacity of the grid, adequate renewable/low carbon generating capacity and the sparsity of charging points are key issues for the short-medium term, along with supporting the roll out of infrastructure to support EV/hydrogen vehicles.

If you require further assistance, please contact RTPI Cymru at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



Dr Roisin Willmott OBE FRTPi  
**Director**  
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