



RTPI Cymru

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

Dear Sir/Madam,

Response to: National transport delivery plan: 2022 to 2027

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 27,000 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. Our planning related comments are 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 think the plan will have a positive impact on the Welsh Government targets for creating modal shift to more sustainable forms of transport?

Positive

Please provide comments and reasons for your response here:

We welcome the emphasis in the Plan on active travel and public transport, which is now starting to be seen in the emerging policies and development plans of local planning authorities. However, in supporting this approach we believe that such initiatives will only be successful in altering travel patterns if they are implemented with sufficient investment to produce a substantial upgrading of infrastructure and services. That will require investment at national level and through financial support for local authority schemes and initiatives.

This in turn, needs to be supported by long term behaviour change and we are pleased to see this addressed in the list of programme, projects and initiatives at Annex 2.

Q2: Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

Neutral

Please provide comments and reasons for your response here:

The RTPI have long called for new developments to include infrastructure for active travel and public transport at an early stage of new development rather than a later one to ensure that desirable travel patterns are established early through positive habit forming. We believe that a key challenge for the future will be to progress sustainable place making.

We welcome the focus of the Plan on decarbonisation. However, we are very concerned that the plan does not recognise another key aspect of the climate emergency, which is the need for adaptation.

Adaptation policy will require joined-up working across sectors, along with funding to support delivery of policy on the ground. Adequately resourced, collaborative working will be the key to involving a wide range of stakeholders. How this collaboration can be properly encouraged, funded and structured is an important discussion. RTPI Cymru believes that the issue of adaptation requires further consideration at a national level. Our response to question 8 expands on these concerns.

We note pg72 of the Plan refers to EV charging. [Scottish Government have recently issued a consultation relating to the provision of facilities for charging electric vehicles through changes to permitted development rights](#). In response to this consultation, RTPI Scotland has commented:

“There is difficulty in finding the right balance between simplifying the consenting regime to support delivery of EV charging to meet net-zero targets whilst still undertaking the necessary checks and controls to protect public and private interests.

The consenting regime and delivery environment for EV charging installation is complex and planning has been cited as a key factor in the slow roll-out of such technology. However, RTPI Scotland are aware of concerns from stakeholders that extending PD with the removal of restrictions in the specified areas currently listed in Class 9E(3) could result in insensitive development that could have either individually or cumulatively have a significant negative impact on the character and appearance of certain areas.”

[RTPI | Place-Based Approaches to Climate Change](#) (UK: March 2021) research focuses on the importance of a ‘place-based’ approach to climate change, exploring how collaborative working between departments in local authorities can mainstream climate action within planning and vice versa. The research suggests that while there are significant opportunities for joint working between planning officers and climate and sustainability colleagues, there is a resourcing and skills gap within the planning profession that needs to be addressed so planners can play a leading role in the place-based response to the climate and ecological emergency from within local authorities.

Q3: To what extent, within the funds available, do you think the plan will meet the headline 5-year priorities set out within Llwybr Newydd: The Wales Transport Strategy 2021?

Unsure

Please provide comments and reasons for your response here:

No comment

Q4: To what extent, within the funds available, do you think the plan will meet the well-being ambitions set out within Llwybr Newydd: The Wales Transport Strategy 2021?

Unsure

Please provide any further comments here:

The ambitions include one that focuses on confidence and safety. The absence of an adequate response to the need for climate change adaptation raises questions about the confidence that communities and businesses can have in the continuing availability of key elements of transport infrastructure.

Q5. To what extent, within the funds available, do you think the plan will meet the 5-year priorities set out within each of the modes and sectors mini-plans in Llwybr Newydd: The Wales Transport Strategy 2021?

Please provide any further comments here:

No comment

Q6: Do you think the plan provides the right balance between the modes and sectors to meet the Welsh Government ambitions set out in Llwybr Newydd: The Wales Transport Strategy 2021?

We support the approach and balance taken by the Plan between the modes and sectors, which supports the transport hierarchy. The transport hierarchy is set out in Planning Policy Wales thus embedding integration between national planning policy and transport policy.

Whilst the emphasis is on the delivery of active travel and public transport, we welcome the recognition that some investment in road improvements is also required to support these ambitions and improve road safety for all.

Q7. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

No, Unfortunately the Sustainability Appraisal Report (Table 2-1) pg 26, fails to include any reference to the Welsh Government's Climate Change Adaption Plan.

Nonetheless, it does include the following statement (Table 2-2):

"The UK Climate Risk Independent Assessment (CCRA3) Technical Report and the Evidence for the third UK Climate Change Risk Assessment (CCRA3): Evidence for Wales highlight a number of key risks and opportunities facing Wales with regard to business. These could have effects on a number of factors including health and wellbeing, employment and the economy. Such matters facing Wales can be summarised as risks to business from flooding, loss of coastal locations, water scarcity, reduced access to capital, reduced productivity from disruption to infrastructure etc., disruption to supply chains and changes in demands for goods and services."

It is not evident that the draft Plan has responded to this element of the Integrated Sustainability Appraisal Report.

Q8. Do you have any further feedback or comments on the plan?

It is disappointing that the Chapter setting the strategic context fails to identify both the Welsh Government's own Climate Change Adaptation Plan of 2019, and its Strategy for Flood and Coastal Erosion Risk Management (FCERM) 2020 as elements of the Plan's strategic context.

The Adaptation Plan makes it clear that protecting infrastructure from flooding is a key priority for the Welsh Government. The FCERM Strategy emphasises the need to adapt our communities and infrastructure in the face of severe weather events, increases in the risk of flooding, and rising sea levels. The Strategy sets out a number of measures to be undertaken by Risk Management Authorities (RMAs). These RMAs (as defined by the Flood and Water Management Act 2010), include all local highway authorities, as well as the Welsh Government in its role as highway authority for trunk roads.

While the draft Plan recognises Future Wales, the National Plan 2040, as a key element of its strategic context, it fails to respond to the outcome set out in that plan that “people should live and work in places which are decarbonised and climate resilient”. In support of the National Plan policy 8 on flooding, the Welsh Government has published an updated planning TAN 15 on Development and Flood Risk which will have significant impact on proposals for the development of new transport infrastructure. It is not evident that the draft Plan has benefited from the new thinking encapsulated in the new TAN 15.

In parallel with this, Natural Resources Wales has published a new Flood Map for Planning. This identifies significant areas of Wales which will experience heightened flood risk due to climate change. Many of these areas contain significant transport infrastructure. Much of the strategic infrastructure of Wales is to be found around the coasts of Wales, where it is being threatened by rising sea levels. It is of great concern that the Plan’s references to asset management fail to recognise how critical these risks will be in prioritising the use of resources to secure a sustainable future for existing transport assets.

The Plans strategic context also needs to be updated where the Wales Infrastructure Investment Plan 2012-22 needs to be replaced by the new Wales Infrastructure Investment Strategy. A key statement within that strategy, addressing the need for resilience to future trends, says:

“In developing infrastructure investment proposals, spending departments must consider the long-term nature of the development, undertake an assessment of their sustainability in light of future trends and, when considering the appropriateness of development, they must recognise the implications of climate change including flooding risk.”

Section 2 of the Plan includes a Transport Decarbonisation Programme which is very welcome. However, it also needs also to be accompanied by a Transport Adaptation and Resilience Programme if it is to effectively respond to the challenges represented by the climate emergency.

Question A: We would like to know your views on the effects that the National transport delivery plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment

Question B: Please also explain how you believe the proposed policy, National transport delivery plan 2022 to 2027, could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comment

Question C: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No comment