



RTPI Cymru

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

Dear Sir/Madam,

Response to: Revised planning guidance in relation to air quality, noise and soundscape

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 general planning comments are set out below.

We welcome the update of this important Technical Advice Note (TAN). RTPI Cymru have previously called for national guidance for Wales which would integrate land use planning considerations with those of emissions legislation and controls. While the draft TAN does refer to working with Environmental Health Officers and pollution control specialists, further detail and clarification could be provided on the relationship and boundaries between different sectors, legislation, policy and practice in areas such as noise and air quality etc. We assume that different sectors have been involved in the development of the TAN?

“It is widely recognised that Local Planning Authorities (LPAs), along with the wider public sector, are struggling to meet expectations and unlock the value planning has to offer. LPAs in Wales have had significant reductions in the budgets to support their work, along with reduced resources to other public services.” [RTPI | The Big Conversation](#) It is essential that any new guidance, processes, or procedures are adequately resourced in both the short and

longer term, with training and practical guidance. For example, we note the emphasis in paragraph 3.2.2 of the draft TAN on forward planning and the allocation of land uses. However, sites, particularly in lower viability areas, often do not have promoters at an early stage. Further clarification of how this can be effectively managed and resourced would be useful.

There needs to be a balance between future growth and diversity, employment uses, weighed against residential uses, with both noise and air pollution. This requires a multi-faceted approach towards air quality and soundscape, that shares and promotes good practice.

Broadening awareness of air quality issues and encouraging changes in behaviour that contribute to improving air pollution is an important but challenging priority, that should support this TAN and other guidance. We believe that any positive change will require a joined-up approach involving greater collaboration between key agencies such as those in the health sector, local authorities, academic bodies, third sector and local groups. It is therefore essential that policy, plans and investment are fully aligned with achieving Welsh Government's commitments to improve air quality and tackle the climate change emergency. For example, as planning and investment decisions in respect of infrastructure provision can positively or negatively impact upon air quality, it is essential that air quality be referenced within the remit of the National Infrastructure Commission for Wales.

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