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19 March 2024

e-mail response sent to: <a href="mailto:ClimateChange@gov.wales">ClimateChange@gov.wales</a>

Dear Sir/Madam,

**Response to: Just Transition Framework** 

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 comment on Welsh Government's proposed strategic policy approach to achieving a 'just transition' to a decarbonised future, and meeting net zero targets. While many of the issues covered in this consultation sit outside the remit of planning, our response focuses on those issues that are relevant to planning.

Planning plays a key role in addressing the climate and ecological crisis and supporting the rapid transition to net zero carbon. "Good planning ensures the right development is put in the right place" (Future Wales: The National Plan 2024) which is vital to a 'just transition'. However, as recognised in the consultation document, neither Welsh Government nor individual sectors have responsibility or influence over many of the factors that contribute to achieving net zero. Collaborative efforts between stakeholders are required. However, given the strong policy context in Wales, Welsh Government is well positioned to provide a convening role in this joint working approach, to drive positive and proactive discussion and practice.

It is essential to make links between net zero and other policy areas including planning, flooding, connectivity and energy etc. if we are to address adaptation to climate change. Wales faces a number of issues such as geographic connectivity, grid infrastructure and investment which could be addressed in a proactive and joined up way, by bringing together relevant stakeholders to focus on key issues and challenges, providing evidence and supporting the transition. 'Future Wales: The National Plan 2040', emerging Strategic Development Plans, along with Corporate Joint Committees, and Local Authorities all have a role to play in addressing the spatial impacts of the transition to net zero. We note page 11 of the consultation document recognises lessons from other countries and while this learning is important, in practice we must consider the unique Welsh perspective. The Well-being of Future Generations (Wales) Act (2015) provides a strong policy basis on which to plan the transition for Wales.

Collaborative working across sectors needs to be supported and resourced with clear expectations and a common goal. For example, land use planning directly impacts on transport policies and vice versa. Yet there appears a disjointed approach to modal shift with the welcomed funding and promotion of the construction of active travel routes encouraging non-car transport, but significant funding uncertainties for public transport resulting in fewer routes and increasing car usage. Thought is also required for long term revenue funding for new active travel routes.

On-going education and communication is required to support a wider behaviour change. The Wales Centre for Behaviour Change has recognised that many people often have "sustainable intentions", but few keep up new behaviours in the longer term. "Policymakers have realised that just because an individual has the intention to change, this may not actually result in adaptations to their behaviour" (Wales Centre for Behaviour Change. Aims & Mission | Wales Centre for Behaviour Change | Bangor University)

We welcomed the publication of the Welsh Government's Net Zero Skills Action Plan, which seeks to create a more strategic approach to supporting skills. It is important to understand the scale of the work required and the skills and training needed to meet this. RTPI Cymru's 'Big Conversation' report recognises the wider picture within which planning skills must be considered, including ongoing training, capacity, salaries and job opportunities, that are all relevant to the transition to net zero <a href="https://www.rtpi.org.uk/BigConversationWales">www.rtpi.org.uk/BigConversationWales</a>

The proposed vision is supported. Securing green growth will require long term policy certainty to give investors confidence. The Welsh Government has provided positive leadership in its stance to end investment in fossil fuels and fracking. Further work is needed to ensure that the positive support for renewable energy generation and urgent need to increase generation are reflected in planning decisions and policies, as well as in investment in grid infrastructure. The commitment to green jobs needs to be reflected by the school curriculum to ensure Welsh young people are suitably qualified for the new sectors and can remain and be economically active in Wales.

The proposals for a just transition are welcomed, however at times brave and bold decisions will be needed that might not always be supported by the immediately adjacent community. Public investment in renewable energy should be encouraged and supported so that all benefits are retained locally.

We note page 16 of the consultation document recognises the need to align and integrate approaches. Figure 3 states the importance of integrating existing plans, "such as Wellbeing plans, Area Statements, Economic Development plans, etc or the development of Just Transition plans such as sectoral plans or community plans". RTPI Cymru has long called for stronger links to be made across these and other interconnected plans and strategies. The alignment of Strategic Development Plans and the second round of Regional Transport Plans can help with this. The latest Wales Infrastructure Investment Strategy (WIIS) 2021 Wales infrastructure investment strategy 2021 | GOV.WALES makes progress in this area, including a section on placemaking. We very much hope this sets a standard for further integration, not only in relation to future iterations of the WIIS but across all plans, strategies and levels of Government, including regional and local.

It would be useful to explain to stakeholders how carbon will be measured, including operational and embodied, along with imported carbon which includes materials made and transported from abroad. This will have an impact on embedding a fairer and greener Wales into local and global supply chains. Consideration should be given to how actions and decisions will be balanced against each other and the policy hierarchy, for example the urgent need for renewable energy versus the protection of best and most versatile agricultural land. Measures need to be put in place to allow clarity and transparency in decision-making.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Mark Hand at <a href="mailto:walespolicy@rtpi.org.uk">walespolicy@rtpi.org.uk</a>

Yours sincerely,

Mark Hand MRTPI

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**Director**