



RTPI Cymru

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e-mail response sent to: Framework.RegionalInvestmentInWales@gov.wales

Dear Sir/Madam,

Response to: Framework for Regional Investment in Wales

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 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.

This 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.

Thank you for the opportunity to respond to the above consultation. Since this consultation was issued the Coronavirus pandemic has dramatically impacted on the public finances and introduced changes in perceptions and behaviour. At present, government funds are being redirected to the pandemic requirements. The proposals in this consultation require consideration and balancing against the current situation, the future impact of the pandemic, capacity, governance issues etc

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

Question 1: What are your views on the proposed model where:

- **strategic, pan-Wales initiatives are co-ordinated at national level; and**
- **designated regional bodies design and deliver their own programmes of investment aligned with national-level policy?**

It will be important for programmes of investment at the national level to fit within the spatial framework provided by the National development Framework (NDF) and at the regional level to be aligned with Strategic Development Plans (SDPs) and Local Development Plans (LDPs). The purpose of these spatial development plans is to provide coordinated, evidence based direction to investment decisions. (See question 13).

A key issue for the proposed regional bodies, given that these will not be directly elected, will be ensuring that they are properly accountable and that they serve the Local Authorities within them. Openness and transparency should be key components of their design, and they should engage effectively with the local communities, using Town and Community Councils where they exist.

In terms of the proposed model on page 10 of the consultation document, given the Coronavirus pandemic, we question whether there should be more emphasis on innovation and exploring different approaches. We will need to adopt significant behavioural changes in the future, which should be reflected in the programme, particularly given the current economic situation.

Question 2: Do you support our proposals for some investments to be led by the community in which the activity takes place?

Investments led by the community are welcomed, subject to these being effectively aligned with LDPs and any Place Plans. However, it is important to recognise that place based policy outcomes become most tangible to the community at the local level. Engagement at higher levels requires a strong commitment at the outset, both in relation to spatial planning and wider community planning.

Community mapping exercises to help engagement with a wider cross section of the community and not just those that are already engaged could be useful. Town and Community Councils will also play an important role.

Question 3: Do you agree that we should continue to increase our use of repayable finance where this is viable and, where it is not, that models of combined support that maximise the repayable element should be developed?

A mix of funding types and options to meet different needs is supported.

Question 4: What are your views on our plans for the transition period?

The response to the Coronavirus pandemic may mean some early repurposing of funds, etc and this should be taken into account.

Question 5: How best can we integrate the horizontal themes of equality, sustainable development, gender mainstreaming and the Welsh Language into investments delivered at national, regional and local levels?

Equality: Structural Funds programmes across Wales have long recognised the disadvantages faced by West Wales and the Valleys. Annex B provides a socio economic analysis, demonstrating the extent to which those geographic areas need to continue to have a high degree of prioritisation within the new regional investment framework for Wales.

As demonstrated by Figure 3.1 (page 10) of Annex B, GDP per head in that area in 2017 was only 66% of the EU average, whereas in East Wales it was 94%. The need to continue to prioritise West Wales and the Valleys must be reflected in the regional investment programme as it moves towards its implementation.

Sustainable development: See answer to Question 13.

Gender mainstreaming: In relation to gender mainstreaming the RTPI's Women and Planning Research Paper (February 2020) <https://www.rtpi.org.uk/media/4325/women-and-planning.pdf> may be of interest. The report sets out 15 recommendations for improving gender equality in planning.

Welsh language: see Question 6.

Question 6: How best can we increase the use of the Welsh language through our proposals for regional investment, and ensure it is treated no less favourably than the English language?

Investment that respects linguistic needs is important. Investment should support areas of linguistic sensitivity and promote support for the implementation of Cymraeg 2050.

Question 7: What are your views on the proposed delivery model for the strengthening of partnerships, co-operation and trade across borders, within the UK and with international partners?

In respect of international partnerships there are many programmes that have been valuable in forging links on spatial analysis and land policy. Links should be maintained and strengthened on this subject area.

Question 8: What do you think of the proposed strategic objectives across the four investment priority areas? Are there other objectives that should be considered?

Reflecting our broader comment (see question 13) on the need for the framework to be bolder in addressing the challenges of climate change, we would propose the following additions / amendments to the strategic objectives. Our proposed additions are underlined within the text below.

Productive and Competitive Businesses (page 21)

Objective 6. Support businesses in adapting to the challenges of climate change.

Supporting the transition to a zero-carbon economy and the process of adapting to climate change (page 24)

Objective 3. Support housing capital build initiatives and adaptations to reduce emissions and to improve resilience to climate change

Objective 6. Support initiatives which enable residential and business communities at increasing risk due to climate change to make the necessary adaptations

Objective 7. Support infrastructure adaptations required by climate change.

Healthier, fairer and more sustainable communities (page 26)

Objective 3. Improve social, environmental, cultural and economic infrastructure to promote sustainable rural and urban places.

We consider it is also important for the objectives to reflect the current situation with Coronavirus, given the impact on the economy, for example the need for digital technology

to support more sustainable communities, social distancing and the economy/productive businesses etc.

Question 9: Which indicators do you think should be used to measure progress towards achieving the proposed strategic objectives?

The RTPI has recently commissioned a UK-wide project exploring how Local Authorities and national Governments can go beyond simple metrics like speed of processing applications and number of housing units delivered. Welsh Government is providing support for this project along with the Scottish Government, Irish Government and UK Government. The research is due to be published in September 2020 and there may be outputs that are relevant to this framework.

Question 10: What are your views on the approach described in ‘Fair, transparent, and consistent rules’?

We would support a system which promotes fairness, transparency and consistency in its application of rules. Rules which promote sustainable development should be prioritised.

Question 11: Should the capacity to deliver the monitoring and evaluation proposals be prioritised?

With reference to point 6 (page 31), “ensure the sharing and spreading of best practice and lessons learned across Wales”, while we support this target any opportunities to share and learn across the UK and internationally should be encouraged. This would then link with co-operation and collaboration on projects.

Question 12: Do you agree with the proposal outlined for development of monitoring and evaluation at the regional and local level?

Sharing of good practice is particularly welcomed. Any process for gathering information should be efficient and straightforward to collect.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this consultation to address them.

Alignment with Spatial Plans

We welcome the recognition (page 11) that the framework needs to align “with other policies for capitalising on growth and tackling poverty”, and in particular the NDF. Reflecting the Economic Action Plan, the consultation document (p13) recognises the importance of supporting “the shift to a place-based economic policy”, and this is a shift which we particularly welcome. It is important to recognise the spatial distinctiveness of places in developing policy. At the national level, it will be the NDF which can 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.

However, we also note the determination to decentralise decision-making to the regional, local and community level. It will be important then in achieving effective integration, to ensure alignment with spatial plans at the appropriate level of the spatial hierarchy. This needs to include the emerging SDPs at the regional level, the well-established LDPs within Local Authorities, and Place Plans for those communities which have them. The framework would be strengthened by emphasising the importance of these links and the use of the evidence that they provide.

Climate Change

We also feel that the framework, as well as “aligning with other policies for capitalising on growth and tackling poverty”, should also recognise the importance for our economic future of responding to the environmental challenges represented by the climate emergency. Aligning with other policies on this key area of concern for our future is of equally critical importance. There is a lack of recognition within the document of the Welsh Government’s Climate Change Adaptation Plan.

There is a strong case for widening the priority area for investment - “supporting the transition to a zero-carbon economy” to include resilience to the challenges of climate change. The focus on decarbonisation feels too narrow. The framework needs to address the urgency of climate change adaptation as well as mitigation. With rising sea levels, this will be particularly important in engaging with the need for coastal adaptation, where substantial residential and business communities together with key infrastructure will need to address the challenge of adaptation. In addition, a number of the growth areas identified by the NDF are areas of high flood risk, and the framework needs to have the capacity to enable these risks to be mitigated.

The framework needs to guide behavioural changes at the regional, local and community level in the way that we approach planning and invest in the places where we work and live. We urge Welsh Government to be bolder in its approach to integrating responses to climate change into its policy frameworks.

People on the Ground

We welcome the recognition in the foreword of the need for people on the ground to translate regional economic policy into practice, and (page 11) the statement that the approach taken will need to ensure that regions and local areas have the capability and capacity required. In this regard, we do have concerns about the capacity of Local Planning Authorities. Most authorities have lost significant capacity in recent years, support for Planning Authorities would improve integration and mitigate risks around projects requiring planning consent.

Infrastructure

In many parts of Wales, key constraints on growth for communities and businesses are presented by deficiencies in infrastructure. The framework for regional investment should be a key vehicle for enabling key deficiencies in infrastructure to be addressed. The current document does not go into detail on this subject. This does appear to be a critical weakness of the approach.