
AQS35 Royal Town Planning Institute (RTPI)

Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change,
Environment, and Infrastructure Committee**

**Bil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru) | The Environment
(Air Quality and Soundscapes) (Wales) Bill**

Ymateb gan Y Sefydliad Cynllunio Trefol Brenhinol yng Nghymru | Evidence from
Royal Town Planning Institute



RTPI Cymru
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21 April 2023

e-mail response sent to: SeneddClimate@senedd.wales

Dear Sir/Madam,

Response to: the Climate Change, Environment, and Infrastructure Committee's Scrutiny of The Environment (Air Quality and Soundscapes) (Wales) Bill

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.

We welcome this draft Bill and Welsh Government's ambition to addressing air quality and soundscape. We strongly support the public health focus of this work. Our planning related comments in relation to the Bill are set out under the relevant headings below.

Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them

Resources

The planning system, if used effectively, can be part of the solution to major social, economic and environmental challenges, including responding to climate change. However, there are many challenges facing the sector, including resourcing, which restricts its ability to perform effectively.

The RTPI have long called for the proper resourcing of planning services. "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 the strain the public sector is currently under is recognised in developing legislation, policy and target setting, so that achieving those targets and ambitions is realistic. Sufficient resourcing

of public bodies, investment in key skills and specialisms and effective and efficient consenting processes are all important aspects of meeting targets. We understand there have been instances where, for example, many LPAs are so stretched that they have not had the resource to be able to enter into Planning Performance Agreements, which would enable them to make timely decisions on renewable energy schemes.

We welcome the recent publication of the Welsh Government's Net Zero Skills Action Plan, which seeks to create a more strategic approach to supporting skills. The [RTPI's Big Conversation](#) discusses the skills issues in planning and associated sectors and recognises the bigger picture within which skills must be considered, including ongoing training, capacity, salaries and job opportunities.

We note, "New demands for clean electricity from transport, buildings and industry mean electricity supply in Wales must double by 2050. In Wales, low-carbon electricity generation will shift from 27% now to 100% by 2035, cutting Welsh power sector emissions by more than 95%." ([Net Zero Wales by 2050: Wales faces a decisive decade to get on track to an emissions-free future - Climate Change Committee \(theccc.org.uk\)](#)).

We would expect planning applications for renewable energy projects and associated development over this period to increase and the resource, including specialisms, must be available within LPAs, Planning and Environment Decisions Wales (PEDW) and Natural Resources Wales (NRW) to deal with the workload.

Implementation of policy, on the ground

We note that "the Noise and Soundscape Action Plan (NSAP) 2018-2023, together with Planning Policy Wales Edition 10, earned the Welsh Government the John Connell Award for soundscape in 2018, with Wales being recognised as being the first nation to embed the concept of soundscape in national policy." However, we question whether planners and other stakeholders fully understand the term soundscape, and if this and other world leading policy needs to be better understood by stakeholders. This would ensure that legislation and policy are implemented as planned and its delivery on the ground is not compromised due to uncertainty in discussions or negotiations.

RTPI Cymru is working with the National Infrastructure Commission for Wales (NICW), holding cross-professional discussions to explore the issue of policy delivery in Wales. As part of this, stakeholders came together from across Wales to discuss how we can better ensure that the strong national policy framework in Wales can be better implemented on the ground, delivering "excellence in the everyday".

Multi-faceted approach

Planning for places and communities requires 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.

In responding to the recent consultation on revised planning guidance in relation to air quality, noise and soundscape [rtpi-draft-tan-11-response.pdf](#), RTPI Cymru called for guidance for Wales which would integrate land use planning considerations with those of emissions legislation and controls. We believe that further 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.

It is important we look at the wider picture in addressing air quality and pollution, for example, following on from the Wales Roads Review, RTPI Cymru would support opportunities to discuss movement and connectivity with stakeholders across the sectors, including planning, transport, health, tourism etc. Discussions should include rural connectivity, public transport and EV charging. Bringing together all relevant stakeholders to focus on pertinent issues and challenges, could support evidence in this area. Wales faces a number of issues such as geographic connectivity, grid infrastructure, investment etc. which could be addressed in a proactive and joined up way.

Future Wales: The National Plan 2040, emerging Strategic Development Plans, along with Corporate Joint Committees and Local Development Plans all have a role to play in addressing the spatial impacts of the transition to net zero. It is essential to work together, making the links between net zero and other policy areas including flooding, connectivity and energy if we are to address adaptation to climate change. The role of the natural environment in addressing both air quality and soundscape is important but is not something that comes through in this draft Bill or accompanying documents. It would be useful to acknowledge this important relationship. The way we manage the natural environment is an important part of the bigger picture, aligning with the ambitions of the Well-being of Future Generations Act and recognising the contribution the natural environment can make.

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 legislation and policy. 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, transport, 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 specifically referenced within the remit of the NICW.

Vehicle emissions (sections 19 to 21)

Clean Air Zones/Low Emission Zones

RTPI Cymru recognises the benefits of Clean Air Zones (CAZs)/Low Emission Zones in terms of reducing air pollution, but these must carefully take account of wider social impacts in terms of charging, the use of more polluting vehicles and the displacement of traffic and social equity. Such measures should also be supported by education and other initiatives to support the transition to sustainable travel behaviour change.

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