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Patron HRH The Prince of Wales KG PC GCP

Dear Sir/Madam,

27 February 2017

Consultation on Raising Planning Fees – RTPI Scotland Response

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,100 members in Scotland and a worldwide membership of nearly 23,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places in Scotland; and
- improve the understanding of planning and the planning system among policy makers, politicians, practitioners and the general public.

Overview

RTPI Scotland supports the immediate raising of the fee cap for major applications to the level proposed in this consultation. Adequate investment is vital to securing a high performing planning service. RTPI Scotland analysis of local government resourcing data shows that staff levels across planning departments have decreased by 18% since 2011ⁱ. Meanwhile an estimated average of 0.57% of local authority budgets were spent directly on planning functions in 2016ⁱⁱ.

Towards full cost recovery

Among RTPI Scotland members from the public and private sectors there is consistent feedback that applicants and their agents are happy to pay higher fees for a better planning service. To enhance performance increases in fees must therefore be linked to further investment in the planning service. RTPI Scotland believes that planning application fees should be ring-fenced for development management and associated

support services, to achieve full cost recovery. Income generated from planning fees should be retained to reinvest in the functions and planned improvements needed to deliver an effective planning service. The Scottish Government advocates full cost recovery for public services with chargesⁱⁱⁱ. However, this has been difficult to achieve in planning and development management in particular. On average only 55% of the costs of processing a planning application were recovered by the fees charged in 2015/16^{iv}.

Resourcing more widely

There is a need to explore how planning authorities can best cover the costs of running an effective planning service, beyond development management. This is related to continuing to develop clear and dynamic performance criteria and rewarding improvement in processes and outcomes. RTPI Scotland recognises that this wider issue is addressed by the current Scottish Government consultation *Places, People and Planning*, and will therefore submit more detailed comments in our response to this. In principle however, we support the development of more sophisticated performance benchmarking through the further development of the Planning Performance Framework.

Towards further fees restructuring

As with changes to the Planning Performance Framework, RTPI Scotland welcomes and will be responding to the Scottish Government's proposals for wider changes to the planning fees system. While this initial increase in the fee cap is welcome, Scotland's varied geography means that raising the fee cap on major applications may have a greater impact on income in some local authority areas than in others. Flexibility for local authorities to manage fees income based on their circumstances will therefore be important.

I trust that you will find these comments helpful. If you would like to discuss any aspect, or require clarification of any points raised, please contact me on 0131 229 9628 or by email to kate.houghton@rtpi.org.uk

Yours sincerely,



Kate Houghton
Planning and Practice Officer

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- i HOPS Planning Performance Framework between 2011/12 - 2015/16, Staffing Numbers
 - ii Scottish Government (2015) Provisional Outturn 2015-16 and Budget Estimates 2016-2017
 - iii Scottish Government (2006) Scottish Public Finance Manual, Fees and Charges
 - iv HOPS Planning Performance Framework 2015/16, Costs