



RTPI Cymru

Royal Town Planning Institute
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e-mail response sent to: planconsultations-g@gov.wales

Dear Sir/Madam,

Response to: Changes to Planning and Related Application Fees

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.

Our response to the consultation questions is set out below.

RTPI Cymru's response to the consultation questions are set out below. 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

Q1. Do you agree with the proposed 20% increase in application fees, excluding pre-application services? If not, why not?

We note the proposal to retain the current fee structure set out in the 2015 Regulations in the short-term and increase planning fees across the board by approximately 20%, more information on how this percentage has been calculated would be useful. Planning fees are intrinsically linked with budget cuts, service delivery, workforce skills and capacity etc. and it would therefore be helpful to have more detail on the fee increase and wider related issues.

RTPI Cymru supports a well-resourced planning system and while we support the proposed 20% increase set out in this consultation in principle, moving forward, we would like to see regular, small and transparently justified changes to fees. We believe that planning fee increases should be evidence based and supported with clear proposals to improve delivery.

We support the commitment set out in the consultation document (paragraph 2.15) to carrying out “research to identify the true costs of running development management services in greater detail against the cost of individual applications.” We understand this work is already underway and we would be happy to contribute to any discussions on this.

As part of this research, Welsh Government should consider the underlying reasons for planning fees currently not representing cost recovery. Periodic fee increases also come forward against a backdrop of cuts, which have seen local authority planning (LPA) services diminished across the whole of Wales – impacting on staff numbers and skills. Planning services in Wales have seen budget cuts of more than 50 per cent over the last decade, leading to the stretching of planning officer capacity and a decrease in skills in key areas. Problems have been further exacerbated by a drop in the number of trainees entering the profession in the public sector. These fundamental issues must be addressed, and fees must be ring fenced for LPAs to help improve the planning service.

RTPI Cymru believes that efforts to deliver a more efficient and effective service should focus on skills and workforce development. We would suggest that supporting the development of project management skills could be an effective means of ensuring that applications are processed to a high standard in a timely fashion.

We would also suggest that any research, where possible, should take a longer term view, taking into account any future known costs likely to be incurred by any new duties arising from changes in legislation.

Q 2. Do you agree with introducing a fee of £230 for applications for Certificates of Appropriate Alternative Development, made under section 17 of the Land Compensation Act 1961? If not, why not?

RTPI Cymru makes no comment on the detail of fee amounts. Those who process applications, and applicants, are better placed to comment on this. However we would be happy to participate in any research that looked into the planning fees schedule as set out above.

Q3 Do you have any comments to make, or evidence to put forward in relation to the current fee regime, or any suggestions for improvements?

See our comments above regarding the need for a strong evidence base to inform planning fees.

LPAs are often reliant on third parties such as statutory consultees, who can markedly affect the timeliness and decision making by an LPA. The quality of submissions should also be considered. If a submission is not complete or the supporting information is lacking, then this can affect the length of time taken for an application to be determined and the reason for this time delay is masked in the current performance management of 8 and 13 weeks.

New technology may also offer opportunities for improving the working lives of planners. RTPI is currently working with the Connected Places Catapult to explore how technology can free up planners time to work on more proactive planning.

The Scottish Government have recently consulted on their planning fees and proposals for change. Good practice and lessons learnt should be shared with other nations where appropriate. A quick comparison of planning fees in Wales and Scotland appears to show that maximum fees are in some cases capped significantly lower in Scotland than Wales.

There is uncertainty around the planning fees and how they reflect the cost of processing applications for development or whether they reflect the true costs of any delays. What the figures do not reflect is the benefit that the planning system delivers. The RTPI has recently undertaken research to explore public and private sector planners' experiences of how local planning service delivery is changing, and what these changes mean for the planning system's ability to deliver in the public interest. We need to look beyond patching up the holes that have been created by cuts, to see public funding of planning as an investment in delivering the land use we need to deliver the social, environmental, economic and cultural outcomes we aspire to. To deliver this we need more resources for planning, and broad new investment in place to bring in more place-based professionals across the board.

Furthermore there is an obvious financial case for local authorities investing in planning. Planning fees and other income from development management are just a small part of the story. Planning and placemaking can also raise income by developing new industrial and employment space, which comes with increased business rates. It can make a place more attractive to visit which brings income to the local economy. And it can help provide new homes in places people want to live, which brings in more council tax, as well as reducing societal costs linked to poverty and health.

Q4. We would like to know your views on the effects that changes for planning and related applications fees would have on the Welsh language, specifically, on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Those entering the profession in the public sector have reduced and this is linked to the reduction in investment in the service and the image of working in the public sector. This is compounded for some planning services in Wales who report the difficulty of recruiting planners able to work through the medium of Welsh.

An ambition of the RTPI is to encourage a profession which is representative of communities, which include Welsh speaking communities. We are proposing the use of the apprenticeship route as a good way of recruiting a broader mix and representative candidates into the profession; it is currently being implemented successfully in England. Currently, the vast majority of planners enter the profession after graduating from RTPI-accredited undergraduate or postgraduate planning degrees. We would encourage the Welsh Government to support degree-level apprenticeships to support this diversification.

Q5. Please also explain how you believe the proposed policy for changes to fees for planning and related applications could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

There is an overarching need to provide more investment in planning services to offer quality jobs and attract and retain more quality entrants into public planning services. This includes those able to deliver services through the medium of Welsh to meet the needs of communities across Wales.