

Ms Ruth Gow  
Local Government Finance Division  
LGF1  
Ground Floor/CP2  
Welsh Assembly Government  
Cathays Park  
Cardiff  
CF10 3NQ

2005/03

28<sup>th</sup> January 2005

Dear Ms Gow

### **Consultation on Business Improvement Districts (Wales) Regulations 2005**

I am writing in response to the above consultation (found at [www.wales.gov.uk/subilocalgov/content/consultations/bid-regs-con-2004-e.htm](http://www.wales.gov.uk/subilocalgov/content/consultations/bid-regs-con-2004-e.htm)). The consultation paper has been considered by the Welsh Planning Policy Panel of the Royal Town Planning Institute (RTPI), and as such, I can offer the following comments:-

#### **GENERAL COMMENTS**

1. The Institute welcomes the proposal to establish Business Improvement Districts (BIDs) in Wales as an additional mechanism to support regeneration and economic development. However, as stated in our response to the Welsh Assembly's consultation on BIDs draft guidance in November 2003, BIDs should not be seen as a panacea for unsatisfactory public places, but should be treated as an integral part of planning strategies developed not in isolation, but alongside key strategies such as 'A Winning Wales' the Wales Spatial Plan and the Sustainable Development Scheme and Action Plan. Better environments will be achieved through long-term strategies rather than through short-term area based projects.
2. The Welsh Assembly's forthcoming guidance on BIDs is to be welcomed and it is agreed that this should be updated once the regulations are finalised and in light of future developments and information resulting from the pilots in place in England and Wales.

#### **DETAILED COMMENTS**

##### **Q1. Is the definition of a BID body adequate or are any other definitions needed?**

3. It is considered that the definitions are adequate.

##### **Q2. Should the BID body include at least 50% from the private sector?**

4. Yes, it is considered that it is important to have proportional representation from the private sector.

##### **Q3. Should BID proposers have access to the information set out?**

5. Yes as this information can be requested under the Freedom of Information Act.

**Q4. Do you think anyone else should be included in this definition?**

6. The Institute does not consider that anyone else should be included.

**Q5. & Q6. Does Schedule 1 contain sufficient information for the ratepayer to be able to decide how to vote on the proposals in the ballot?**

7. It would be useful if Schedule 1 contained information on how the proposals will link to wider area plans set out in the local authorities' community strategies and unitary development plans (UDPs)/local development plans (LDPs) for an area.

**Q8. Do you have any comments on Regulation 5?**

8. The inclusion of direct reference of how BID proposals fit into wider plans and strategies under Schedule 1 (see above) will help the billing authority assess BID proposals. Furthermore, it will ensure that the early dialogue referred to takes place between businesses and local authorities and also with the wider community. Local authorities are obliged to consult and involve communities and stakeholders in preparing and adopting statutory UDPs/LDPs for their areas. Local authorities must also have regard to the Wales Spatial Plan in preparing UDPs/LDPs. As such, explicit reference should be made by the proposer as to how BID proposals fit into these wider statutory plans.

**Q9. – Q17. Agree with proposals**

**Q18. Are the criteria sufficient to enable the local authority to make the right decision in exercising the veto?**

9. The inclusion of additional information at the proposal stage (as referred to above) will also help local authorities to assess BID proposals more fully.

**Q19. Is the timescale sufficient?**

10. Yes

**Q20. If a BID spans more than one local authority area, which local authority should have the power of veto?**

11. The overriding consideration should be whether the BID proposal is in accord with the local authorities' statutory unitary development plan/local development plan.

The Institute appreciates the opportunity to comment on the consultation paper and has no objection to these comments being made public. Please do not hesitate to contact me if you have any queries

Yours sincerely

**Rebecca Phillips**  
**Welsh Planning Policy Officer**