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e-mail response sent to: planconsultations-a@gov.wales

Dear Sir/Madam,

Response to: Promoting a resilient and high performing planning service

The Royal Town Planning Institute (RTPI) is the largest professional body for town planners in the UK and Europe and represents around 27,000 members in over 80 countries worldwide, with approximately 1,300 members in Wales. The Institute has been shaping planning policy and raising professional standards for over 100 years and is the only body in the UK to confer Chartered status to planners, the highest professional qualification. The RTPI champions the power of planning in creating prosperous places and vibrant communities. Our ambition is to promote healthy, socially inclusive, economically and environmentally sustainable places.

Thank you for the opportunity to comment on the above consultation. 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, the Wales Planning Consultants Forum and a roundtable convened by RTPI Cymru.

Our response to the consultation questions is set out below, however we have the following comments to raise in relation to the broader picture surrounding planning fees. Firstly, RTPI Cymru welcomes this consultation and the wider consideration and debate associated with planning fees and the costs of delivering an effective planning service. In the past, periodic fee increases have come forward against a backdrop of cuts, which have seen Local Planning Authority (LPA) services diminished across the whole of Wales – impacting on staff numbers, skills, morale and delivery, 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, which has coincided with

a growth in job opportunities in the private sector, especially the energy sector. These wider, associated issues are fundamental to the operation and delivery of the planning service and must be addressed. Planning fees are intrinsically linked with budget cuts, service delivery, workforce skills, capacity and training and we believe must be considered as part of these wider, longer-term issues to ensure the planning profession can deliver on the Welsh Government's objectives.

There is uncertainty regarding the true costs of delivering an effective planning service, but we welcome the intent to move towards full cost recovery using the Arup data, acknowledging that this is the best available information. In addition to the costs of service delivery to Local Authorities, the failure to improve planning service delivery will continue to result in social, economic and environmental costs due to delays. However, what the figures and this consultation do not reflect is the benefit and value that the planning system delivers, and planning fees are just a small part of the story. For example, planning and placemaking can help provide new homes in sustainable places, close to employment, with active travel routes and with associated investment in infrastructure secured via S106 agreements, as well as reducing societal costs linked to poverty and health. It can support economic growth, job creation and prosperity by developing new industrial and employment space, which then attracts additional business rates. It can make a place more attractive to visit and to live, which brings income to the local economy. Planning and placemaking underpins the delivery of sustainable development, ensuring high quality development in the right locations. The planning system, if used effectively, can be a significant part of the solution to social, economic and environmental challenges. There is an obvious financial case for Local Authorities to invest in planning. However, resourcing continues to be a key challenge for planning and its supporting sectors and services.

Recent data collected for Wales by the RTPI shows net expenditure on Local Authority planning services was cut by 50% from 2008 to 2021 in real terms, while the ambitious Planning (Wales) Act was introduced in 2015, putting high expectations on the planning system to implement policy and contribute to sustainable development (RTPI State of the Profession Report 2023 [Plan The World We Need](#))

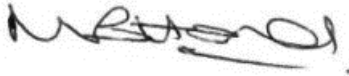
It is essential that the strain planning and its supporting services and sectors, including the wider public sector is currently under is recognised in developing a long-term strategy for planning fees and budget proposals, so that achieving ambitious policy and targets is realistic. This includes the adequate resourcing of Natural Resources Wales, Planning and Environment Decisions Wales (PEDW) and the Welsh Government's own Planning Directorate to enable it to support LPAs, and ensure the policy aspirations of Welsh Government are understood and implemented.

We note paragraph 111 of the consultation document says that "Part 2 of this paper contains proposals that are in the early stages and are not yet firmed up". We agree that some proposals set out in this consultation could do with more clarity and detail before committing to a definitive answer.

Our comments on the consultation questions are set out below.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Mark Hand at walespolicy@rtpi.org.uk

Yours faithfully,



Mark Hand MRTPI
Director

Question 1: Do you agree with our proposals to change planning applications fees from a percentage uplift approach to FCR?

- Yes
- No
- Don't know

Please give your reasons

Yes. However, it isn't clear from the consultation document exactly what is meant by "full cost recovery (FCR)". For example, does FCR refer to solely the development management service, or does it include policy/planning making, enforcement and the many other associated services which the planning service relies upon for specialist input?

It is important that FCR is clearly defined and the true cost of running a planning service is continuously monitored and understood, so that moving forward, fee increases can be regular and transparently justified, in line with inflation.

RTPI Cymru strongly believes that additional income arising from fee increases must be reinvested in planning services in order to improve service delivery. This should include the wider planning service including policy/plan making, development management, enforcement and directly related consultees e.g. ecology and highways. The increased income must not be used to offset budget pressures in other Council services or to otherwise reduce financial support for planning services: the additional charges must result in investment and improved services.

Question 2: Do you agree that the 'FCR Pathway', ensuring most applications reach FCR in 3 to 5 years, is an appropriate approach?

- Yes
- No
- Don't know

Please give your reasons

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.

Further clarification of the term FCR and what it includes is required to provide a full and considered response on FCR and the proposed pathway. In principle, RTPI Cymru supports a pathway approach - over time, supported by clear proposals and actions to improve delivery. However, it is unclear why such a long transition period is required for householder applications.

It is important to recognise that income is not the sole driver of performance. Performance is affected by many factors, including the quality of management, processes, systems, expertise, culture, support services etc. Our members have also stressed the importance of recognising the time required to deliver improvements to the planning service. Expectation must be managed through a clear and achievable improvement plan as part of the performance monitoring framework (See Q35).

Consideration should also be given to the external factors and conditions that have a significant impact on planning delivery, for example, LPAs are often reliant on third parties such as statutory consultees, who can markedly affect the timeliness and decision making by an LPA:

- Statutory consultees and supporting services (as well as planners) are already overwhelmed by the volume of projects in the system. Supporting effective collaborative working is an important element of increasing fees and improving service delivery. To achieve this, all contributing parties need to be resourced and aware of the role they play and their responsibility within this service.
- The quality of application submissions can be an important factor in timely delivery of decisions. 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 often 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 Cymru has commissioned Dr Ruth Potts and Dr Brian Webber, from Cardiff University to undertake research that will scope the potential for digital planning to ease resource pressures and improve planning outcomes in Wales. This research is expected to be published mid-2025.

Consideration should also be given to better ways of using existing resources, such as increasing permitted development rights for decarbonisation.

The RTPI Building Capacity report published in 2023 ([RTPI | Building Capacity through Collaboration and Change](#)) explores the ways in which existing resources in the planning system in Wales can be used as efficiently and effectively as possible. The report sets out a number of case studies and recommendations.

Question 3: Do you agree that for those fee categories not considered by the ARUP Study, they should be increased to the 2024 baseline only and uplifted for inflation annually?

- Yes
- No
- Don't know

Please give your reasons

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 this would appear a sensible approach for those fee categories not considered by the ARUP Study.

Question 4: Do you agree with our proposals to increase fees for Pre-Application Services to the 2024 baseline, taking account of inflation only?

- Yes
- No
- Don't know

Please give your reasons

While RTPI Cymru makes no comment on the detail of fee amounts, the approach set out in the consultation appears sensible in relation to statutory pre-application services.

We recognise the importance of the pre-application stage, across all scales of development, and it is important that this is properly resourced.

Question 5: Do you agree with the proposals for planning fees to be adjusted annually in line with inflation?

- Yes
- No
- Don't know

Please give your reasons

Yes, we support regular, justified changes to fees, in line with inflation. However, this must be supported by a clear and transparent plan for improving service delivery, so that all parties including planners, statutory consultees, applicants are all aware of the long-term plan for improvement and their role within this. It is equally important that any improvement plan is monitored to ensure evidence-based improvement and a clear vision.

Question 6: Do you agree that the Bank of England CPI is the most appropriate index measure to use?

- Yes
- No
- Don't know

Please give your reasons

Yes

Question 7: Do you agree that publishing fees three months in advance of any fee increase coming into force is enough time for notification and publication arrangements by LPAs?

- Yes
- No
- Don't know

Please give your reasons

We would propose that fees are reviewed on a set month annually, so that any increase becomes a regular, clear and expected process, rather than taking place on an ad hoc basis. This might mean a shorter lead-in time is required.

Question 8: Do you agree with our proposals to reduce the variable fee thresholds for residential outline, full and change of change of use planning applications?

- Yes
- No
- Don't know

Please give your reasons

Yes, for the reasons given in the Arup report. It is suggested that the definition of major development should be amended to align with these thresholds (25 dwellings or 1.2 ha not 10 dwellings or 0.5ha). This could improve the proportionality of other aspects of planning service delivery.

Question 9: Do you agree with our proposals to increase householder application fees to meet cost recovery?

- Yes
- No
- Don't know

Please give your reasons

Yes, provided fee increases are reinvested back into the planning service to improve service delivery, noting the broader, interlinked factors that impact on LPA performance (See Q2).

Question 10: Do you agree with our proposals to introduce a lower fee of £85 for those householder application types covered by Part 2 (Schedule 1) Paragraph 7a.

- Yes
- No
- Don't know

Please give your reasons

RTPI Cymru makes no comment on the detail of fee amounts. Other stakeholders are better placed to respond to this detail.

Question 11: Do you think householders will be encouraged to build habitable garden rooms rather than build an extension to their homes because of the lower fee?

- Yes
- No
- Don't know

Please give your reasons

Application fees are negligible compared to build costs. Build costs, the likelihood of getting planning permission (if needed) and other practicalities such as tree roots or drain routes will be far more likely to influence decisions than the application fee.

Question 12: Do you agree with our proposals to double the fee for retrospective planning applications?

- Yes
- No
- Don't know

Please give your reasons

There are clear pros and cons. It might help deter unauthorised development and will help fund enforcement services. However, an unintended consequence might be that it deters people from applying to regularise a breach of planning control, which can helpfully bring an enforcement case to a conclusion for all parties.

Careful consideration will be needed regarding the implications of an appeal against the refusal of a retrospective application, which would also be subject to a 50% appeal fee.

Question 13: Do you consider that our proposed fees for reserved matters applications is an appropriate reflection of the resources/costs of processing these applications? If not, what fee structure should be used instead?

- Yes
- No
- Don't know

Please give your reasons

RTPI Cymru makes no comment on the detail of fee amounts.

Question 14: Do you consider that our proposed fee for Renewal Applications in Annex A is a robust reflection of the costs of processing these applications?

- Yes
- No
- Don't know

Please provide evidence

RTPI Cymru makes no comment on the detail of fee amounts, however given that a S73 application results in a new planning permission, the amount of work and consideration required is significant and the fee increase should reflect this.

Question 15: Would it be more appropriate for a renewal application to have the same fee as the original application for planning permission being renewed (either the full or outline permission fee)?

- Yes
- No
- Don't know

Please provide evidence

RTPI Cymru makes no comment on the detail of fee amounts. Other stakeholders are better placed to respond to this detail.

Question 16: Do you consider that a fee should be charged for applications relating to LBCs or CACs?

- Yes
- No
- Don't know

Please give your reasons and submit data/evidence

RTPI Cymru is not in a position to provide evidence regarding the volume of applications processed or the resources and costs associated with this, however we recognise that this issue is intrinsically linked to the issue of full cost recovery, the delivery of an effective service, and the loss of specialist services within planning.

It is noted that both application types must currently be advertised by way of a bilingual press notice, so the LPA is financially out of pocket before commencing any work.

Conversely, owners of listed buildings are custodians of our built heritage so any fees should be proportionate and reasonable. Unauthorised works to a listed building constitutes a criminal offence, so we need to be mindful of unintended consequences.

Question 17: Do you consider that a fee should be charged for applications relating to TPOs?

- Yes
- No
- Don't know

Please give your reasons and submit data/evidence

Yes, a modest fee should be charged to cover service delivery, noting that works to dangerous or dying trees do not need consent so would not be affected by this proposal.

Question 18: Are there any application types for which fees are not currently charged but which should require a fee?

- Yes
- No
- Don't know

Please give your reasons and submit data/evidence

Consideration should be given to whether a free resubmission following refusal or following withdrawal of an application remains appropriate. Pre-application advice should minimise the need for resubmissions, but it is helpful to encourage a resubmission rather than an appeal and this reduces work and expense for both the applicant and LPA. However, a resubmitted application still requires significant work by the LPA such as publicity and consultation and, sometimes, reassessment against policy if there have been changes. A discounted fee (rather than free) might be appropriate.

Applications submitted for a permitted development right removed by an Article 4 Direction are not able to raise a fee. However, if an LPA implements an Article 4 Direction to remove permitted development rights (for example, between the use classes of C3 to C5 and C6, (from a main dwelling to a second home or short term let accommodation), for the whole LPA area, it is likely to result in a significant increase in planning applications and pressures on staff time and resources.

Question 19: Do you consider that the additional income arising from proposed fee increases should be ringfenced for spending within LPA planning departments?

- Yes
- No
- Don't know

Please give your reasons

Yes, it is essential that additional income generated through development management fees is reinvested in improving planning services. LPAs should report on the additional fee income received as a result of the fees uplift (perhaps compared to the previous five year average for that LPA) and explain how the additional income has been reinvested.

Care is needed over the language used. The objective is to secure an improved planning service, not to reduce the level of Local Authority budget currently subsidising planning services, resulting in no net gain.

Question 20: What are the current challenges/barriers to the ringfencing of planning fees in planning departments?

Please explain and give your reasons

The strain the wider public sector is currently under along with competing priorities at a local and regional level are recognised as key challenges in relation to reinvesting in the planning service.

Long term vision and strong leadership is key in this respect. RTPI Cymru continues to campaign for Chief Planning Officers in every local authority. In Scotland, this has been successful through the Planning (Scotland) Act 2019 which introduced a provision where each planning authority in Scotland must have a Chief Planning Officer.

<https://www.gov.scot/publications/chief-planning-officers-guidance/>

The key role of the Chief Planning Officer should be to provide advice to the Local Authority as a whole on the spatial and place-based implications of decisions and investments in the short, medium, and longer term.

In 2018 and 2019, the RTPI published two pieces of research, the one study found “only 23% of local authorities surveyed in the UK and Ireland had a Head of Planning service that reported directly to the Local Authority Chief Executive.” [RTPI | Chief Planning Officers](#). The second study investigated case studies highlighting the positive impacts where planning has been placed at the heart of corporate decision making in Local Authorities. [RTPI | Chief Planning Officers](#).

Question 21: Do you consider that to support LPAs in ringfencing planning fees, Welsh Government should only implement fee increases where there has been a written commitment from an LPA to do so?

- Yes
- No
- Don't know

Please give your reasons

A two-tier fee structure would be potentially confusing for applicants and could cause regional inequalities across regions and LPAs in the longer term.

We refer to Q20 and the need for strong leadership within Local Authorities, through the provision of Chief Planning Officers within Local Authorities.

Question 22: Do you agree that appellants should pay a fee to submit an appeal?

- Yes
- No
- Don't know

Please give your reasons

Differing views have been expressed by members across the sectors, in relation to the introduction of appeal fees.

- Some members have noted the strain that PEDW is currently under, and recognised that the additional income generated through appeals, and re-invested within PEDW, would have a positive impact on the longer-term resourcing of the service and might deter spurious appeals.
- Other members feel that the right to appeal should not incur a fee due to the principle of access to justice.
- Some members have expressed concern at the idea of a fee attached to an appeal of a decision that went against officer recommendation at planning committee. However, we note that the appeal relates to the LPA decision, and that Committee overturns are an established part of the democratic process. If a fee is introduced, consideration should be given to how this relates to the appeal costs regime and whether an element of that high bar of unreasonable behaviour should be lowered with regards the application fee.
- Consideration needs to be given to appeals against non-determination, where the applicant has not received a decision, and therefore has not received the service they paid for. An appeal fee in those circumstances would seem unfair.
- Consideration needs to be given to the combined impact of doubling the fee for retrospective applications and introducing a fee to appeal a decision on a retrospective application.

It would be helpful to better understand the impact of development management appeal fees on PEDW and if this would represent a significant income for them in comparison to their fee income from development plan examinations which are already funded by LPAs.

We question if there is an alternative way of supporting PEDW, elsewhere in the system, so the fee isn't attached to the appeal itself?

Question 23: Do you agree that the 'costs' system provides a suitable mechanism to recover costs, which may include the appeal fee, following unreasonable behaviour by any party?

- Yes
- No
- Don't know

Please give your reasons

We note the bar is set high, in terms of recovering costs and therefore we would suggest that this is not currently a suitable mechanism. Is it possible to set a lower bar in relation to the LPA refunding the appeal fee?

Question 24: Do you agree that a percentage of the planning application fee is the best way to set fees for planning appeals?

- Yes
- No
- Don't know

Please give your reasons

No comment.

Question 25: Do you agree that 50% of the original planning application fee is fair and proportionate charge for planning appeals?

- Yes
- No
- Don't know

Please give your reasons

No comment

Question 26: Do you agree with the proposed exceptions to a Planning Appeal fee? Are there any other appeal types that could be included as exceptions?

- Yes
- No
- Don't know

Please give your reasons

See response to Q22

Question 27: Do you have any other comments in relation to Planning Appeal Fees?

Please give your reasons

See response to Q22

Question 28: Do you agree that fee categories should be simplified in the future?

- Yes
- No
- Don't know

Please give your reasons

We note the consultation document states, "The ARUP Report acknowledges that refinement of existing fee categories is a complex task with many disparities and interactions between categories that will need to be carefully considered." A simplification of fee categories would make it simpler for customers and reduce administrative time dealing with fee enquiries by officers.

While we support simplification where necessary and required, priorities in relation to fees need to be clear. The contribution of regular, justifiable increases in fees to the planning service is a key issue that requires action before the consideration of simplification. We therefore support proposals to allow any changes to 'bed in' before considering future reforms. This will provide time to gather evidence on the true and up to date cost of operating development management processes and procedures.

We question how the Infrastructure (Wales) Act 2024 fees sit alongside the proposals set out in this consultation?

Question 29: What are your views on the options proposed?

Please give your reasons

The consultation document states that "any changes to the fee regulations, development management processes and procedures will be subject to further consultation". We would support this further discussion with the different LPAs across Wales in the future.

Question 30: What is the current 'gap' in monetary/percentage terms between revenue received from current fee levels to the costs of running the development management service in your LPA area?

Please provide data

No comment

Question 31: What impact, positive or negative, will our proposals have on the income received in monetary and percentage terms, and the relationship to the costs of running a development management service both now and in the next 3-5 years until FCR is achieved?

Please provide data and explain your reasons.

No comment

Question 32: In relation to householder applications, what are the current costs associated with a “typical” householder application vs fee income (including officer time, admin time (registration, validation, comms), statutory notices etc)?

Please provide data

No comment

Question 33: For applicants using planning services, do you consider that our proposals will improve service delivery?

- Yes
- No
- Don't know

Please give your reasons

Service improvements will only happen if additional fee income is reinvested into improving planning services. The financial pressures facing Local Authorities are understood, but asking a customer to pay more for a specific service means it is only right and fair that services improve. If that doesn't happen (and acknowledging that improvements will take time), there will be significant reputational damage to the public sector in Wales (both Welsh Government and Local Authorities) and potential economic and investment implications, with Government objectives not delivered.

Question 34: For applicants using planning services, what are your general views on the impacts, either positive or negative, of our proposals?

Please give your reasons

No comment

Question 35: Do you agree with that the Planning Performance Framework should be re-introduced?

- Yes
- No
- Don't know

Please give your reasons

Yes. Monitoring, reviewing, and reflecting on performance should be an essential feature of planning service operation and management. Regular reporting and sharing of performance data between planning authorities should also be an essential component of review and reflection, allowing performance to be benchmarked, trends to be established and good practice to be shared to inform improvement action.

The first recommendation of the RTPI Cymru project 'Building Capacity through Collaboration and Change' ([RTPI | Building Capacity through Collaboration and Change](#)) was that Welsh Government should review and re-establish a performance management and monitoring framework. The data gap arising from the pandemic is particularly

frustrating in preventing the provision of a series of comparable data. The existing Performance Framework should be re-introduced immediately, with a review to follow in the short term, as LPAs are familiar with it and will already have arrangements for providing the data.

We are aware that some LPAs have continued to submit APRs. We support the proposal of all APRs be submitted in October 2026.

The performance report could include:

- 1) A record of how much extra income has been received;
- 2) How that has been reinvested in planning service improvements, which might be extra people, new IT, specialists etc.

This information could support background data on number of applications received, decisions made, speed of decision making etc. to show if the investment is making a difference and benchmarked against previous years.

RTPI Cymru believes that the existing Performance Framework should be re-introduced, while reviews, updating and additions are discussed and implemented.

Ways of supporting LPAs performance should also be considered as part of a review. For example, there is a clear need for training and supporting documentation when new policy, legislation, practice etc. is introduced. This would support LPAs performance as they navigate change, potentially providing the opportunity to share information and experiences.

There is a need to ensure that planning performance indicators effectively measure critical planning and climate outcomes, for example flood risk. Recommendation 4 of the NICW Report Building Resilience to Flooding in Wales by 2050 ([Building Resilience to Flooding in Wales by 2050 – Report – The National Infrastructure Commission for Wales](#)), states “ensure Planning Policy, as well as the latest TAN 15 (which should be published and implemented with no delay) avoids unnecessary development in flood risk areas and encourages appropriate spatial planning as well as more innovative development. It should also establish a new nationally consistent planning performance flood metric and new reporting framework which considers all sources of flooding. We also note the report states according to “Sustainable Development Indicator 4, from 2013/14 to 2018/19, a total of 2,628 residential units were consented in areas at risk of flooding”. The report highlights uncertainty and unreliability in relation to data collection and calls for a consistent approach. Moreover, there are concerns about the veracity of that indicator and it needs amending. However, some form of measurement is required.

We note the RTPI’s Measuring What Matters Research reviewed the Planning Policy Framework in 2020 and suggested, “the Measuring What Matters: Planning Outcomes Toolkit performs a different role to the Planning Performance Framework. There may be

some value in integrating the performance framework, the toolkit, and other measurement activities into one framework.” <https://www.rtpi.org.uk/media/7714/toolkit-for-wales-nov-2020-final-version.pdf> Welsh Government provided funding support for this research.

In Scotland, the Improvement Service has published a “new National Planning Improvement Framework ... developed with stakeholders from a range of perspectives and interests in planning. The process has been supported and guided by the High Level Group on Planning Performance and it builds upon the learning gathered from the last 12 years of Planning Performance Frameworks (PPFs). [National Planning Improvement Framework | Improvement Service](#)

Question 36: Do you think that future planning application fee increases should be specifically linked to performance?

- Yes
- No
- Don't know

Please give your reasons

It is a reasonable expectation that increases in planning application fees should lead to improvements in performance provided that the increased income provides net additional funding to enable the planning service to invest in better service delivery, however there are many factors that could influence this, and it is not guaranteed. Again, we would stress that income is not the sole driver of performance. Performance is affected by many factors – financial resources are one, but other factors include, the quality of management, processes, systems, expertise, culture, support services (inc internal services, such as IT, legal, highways, and external consultees).

The question of whether future fee increases should be specifically linked to performance is very dependent on whether increased fee income translates into real net additional funding through the local budget process. Moreover, many of the factors affecting performance lay beyond the LPA's direct control (e.g. statutory consultees, significant legislative or case law change e.g. nutrient neutrality, quality of applications submitted, speed of completing S106 agreements).

It is unclear in the consultation what is meant by “specifically linked to performance”. Further clarity is required. It is also unclear whether the proposal refers to a Wales-wide performance-to-fee-increase linkage or a link which applies at individual planning authority level?

Consequently, we believe that a holistic approach which focusses in the first place on identifying the reasons for performance issues and on supporting the creation of an improvement plan is a positive approach towards obtaining performance improvement. The extent to which LPAs have utilised increased income from additional fee income should also be assessed to ensure that the objective of providing additional financial resources to planning services is being achieved in practice.

RTPI Cymru believes it is essential that planning performance is not addressed in isolation from planning outcomes. See Q35.

Question 37: Do you have any comments on the proposed content of APRs?

- Yes
- No
- Don't know

Please give your reasons

The existing framework includes relevant and valuable quantitative indicators and targets and that, at this stage, it is beneficial for them to be retained. It will also provide an updated picture which bridges the publication of the last set of statistics in Dec 2019 and the proposed reintroduction of the framework.

The suite of existing indicators was developed and agreed over many years and consists of indicators covering plan making, efficiency in determining applications, quality (determinations and appeals outcomes), public engagement and enforcement. It provides a sufficiently broad suite of indicators to justify re-introduction immediately while discussions take place on review, updating and other proposals. The time needed to agree changes and additions and the detailed definitions required should not be underestimated.

Question 38: What are the key indicators which you think the performance of authorities should be measured against?

Please explain and give your reasons

In relation to benchmarking, we would suggest that benchmarking is against a Wales average and Wales top quartile, so that we aim for higher-than-average performance.

Question 39: What are your views on the current performance bands - Improve (red), Fair (yellow) and Good (green)? Do you think they should be changed?

- Yes
- No
- Don't know

If yes, please give your reasons

The traffic light system allows a widely recognised and easily understood assessment. The Performance Report provides scope for narrative to explain the data behind the % and rating.

Question 40: Are there any quantitative metrics not included which should be?

- Yes
- No
- Don't know

Please indicate what additional quantitative metrics you consider should be included and explain why

Pre-application advice would be a useful addition (take-up, degree to which the advice followed through to final decision, degree to which it sped up the consideration of the planning application etc.).

Question 41: Are there any qualitative metrics not included which should be?

- Yes
- No
- Don't know

Please indicate what additional quantitative metrics you consider should be included and explain why.

See response to Q40

Question 42: Do you think the current targets and indicators are the correct ones in relation to the performance of the development management service?

- Yes
- No
- Don't know

Please give your reasons

The existing indicators which have been subject to considerable work over the years can be regarded as a reasonable set of performance indicators for the development management service while a thorough review takes place, in the short term.

Ideally there would be a measure of quality rather than a focus on speed, but no-one has yet successfully found an agreed measurement of quality.

The RTPI's Measuring What Matters research considered how LPAs can measure the outcomes of planning, going beyond simple metrics like speed of processing applications and number of housing units delivered and assessing planning in terms of placemaking aspirations and social, economic and environmental value, in order to track and improve the impact of planning. [RTPI | Measuring What Matters: Planning Outcomes Research](#)

The Planning Improvement Service in Scotland is doing some interesting work in this space <https://www.improvementservice.org.uk/products-and-services/planning-and-place->

Question 43: Do you think the current targets and indicators are the correct ones in relation to the performance of the development plan service?

- Yes
- No
- Don't know

Please give your reasons

In the absence of TAN1 and any alternative, a measure of housing delivery against housing targets and housing need is important.

Question 44: Do you agree that the performance of local planning authorities for speed of decision-making should be assessed on the percentage of applications that are determined within the statutory determination period i.e. excluding extension of times and Planning Performance Agreements?

- Yes
- No
- Don't know

Please give your reasons

We believe that further thought needs to be given to the potential consequences of this proposal, to avoid unintended consequences.

Extension of time agreements and PPAs serve a valid purpose to support constructive negotiations between local planning authorities and applicants. They also provide time for applicants to respond to issues that arise during application processing and to consider amending their proposals. It might be thought that assessing performance by disregarding extensions of time might push Local Authorities more towards early determinations which would work against the purpose of extensions and PPAs. It would be useful to report on the proportion of determinations that include extensions of time and PPAs.

Measuring performance solely against statutory determination periods fails to recognise the legitimate steps by LPAs to agree time extensions and negotiate better outcomes. This can lead to perverse behaviour, as was seen in England a few years ago where targets were chased to secure funding. Conversely, solely measuring performance against agreed time limits means that a true indication of time taken is not provided.

Often issues can arise in planning determinations which have not been identified at the pre-application stage, which is not the fault of either party, but does result in the decision taking longer than the determination period. Equally matters such as the Committee cycle or Committee agenda capacity can also impact determination periods.

Both indicators should be measured. If statutory targets are to be measured, they should be reviewed to be realistic in today's complex planning system.

Question 45: Do you think that introducing resilience measures into APRs is a useful addition to performance reporting?

- Yes
- No
- Don't know

Please give your reasons

Yes. Contextual information is important and helpful in interpreting and understanding performance and would support the development of useful data through the proposed working group.

The issues affecting performance are identified in the consultation as 'cultural or systematic or impacted by resources and capacity matters, both financial and staffing'. However, there are other issues which can affect performance, e.g. capability, support systems and services, external consultee inputs.

This an area where further discussion would be beneficial prior to introduction of additional data collection. The data needs clear definitions to ensure that it is consistent across authorities, and it needs to be practical and relatively easy to collect – all matters which ought to be discussed in depth with LPAs before being introduced. LPAs will then need time to set up systems to provide data.

Question 46: Do you agree with the broad measures proposed? If not, why and what others should be included?

- Yes
- No
- Don't know

Please give your reasons

Further discussion and the agreement of measures should be further considered through the proposed working group.

Question 47: What do you consider to be the greatest skills and expertise gaps in local planning authorities and what impact is this currently having on service delivery?

Please provide examples/evidence

RTPI Cymru is not currently able to provide our position on planning skills, recruitment, and retention issues as part of this consultation (Q47 – 59). We look forward to researching these issues in more depth over the coming months and discussing our findings with the Welsh Government.

Question 48: What do you consider to be the main barriers faced by LPAs in recruiting and retaining staff?

Please provide examples/evidence

Question 49: Are current salaries and career structures sufficient to retain planning staff?

- Yes
- No
- Don't know

Please provides examples/evidence.

Question 50: Does your LPA currently offer opportunities for early career planners? Have you had success in retaining staff?

Please provide examples/evidence

Question 51: In addition to increasing planning fees, in what other ways could Welsh Government support greater capacity and capability within local planning departments and pathways into the profession?

Please provide examples of existing good practice or initiatives if possible

Question 52: Do you have any other ideas to help resource the planning system?

Please explain how you think the proposal could help resources

Question 53: Is there demand for undergraduate/post graduate bursary schemes in Wales? If responding on behalf of an LPA how many individuals would you wish to put forward and how often?

- Yes
- No
- Don't know

Please gives your reasons

Question 54: Is there demand for undergraduate/post graduate apprenticeship schemes in Wales? If responding on behalf of an LPA how many individuals would you wish to put forward and how often?

- Yes
- No
- Don't know

Please give your reasons

Question 55: Where do you consider additional staffing resources secured via bursary/apprenticeship schemes should be directed to have the most impact? For example, within LPA planning services and or the delivery of CJC strategic and specialist planning functions.

Please provide evidence and explain your reasons

Question 56: What are your views on merits and challenges of establishing regional/larger than local shared services?

Please provide evidence and give your reasons

Question 57: Do you agree that planning skills hubs should be located within CJsCs

- Yes
- No
- Don't know

Please give your reasons

Question 58: How do you think a planning skills hub(s) could be resourced considering governance, financial and staffing requirements?

Please provide evidence and give your reasons

Question 59: Do you agree that planning skills hubs could potentially be funded by a proportion of fee income from each LPA be used to resource the hub?

- Yes
- No
- Don't know

Please give your reasons

Question 60: Do you agree with our proposal to change the statutory review period for LDPs from 4 to 6 years?

- Yes
- No
- Don't know

Please give your reasons

Further discussion and clarification are required around the proposal and intended and unintended consequences. It would make sense to avoid the need to review new Local Development Plans (LDPs) if adoption of the Strategic Development Plan (SDP) is imminent. However, in a Plan-led system the absence of up-to-date Plans is a significant barrier to achieving outcomes and Government objectives, such as housing, economic prosperity, and environmental protection. Delaying Plan review might therefore have unintended consequences unless there are mechanisms to allow outcomes to be achieved pending Plan review and replacement.

Question 61: Do you think that a shorter or longer review period would be more appropriate?

- Yes
- No
- Don't know

Please give your reasons

No comment

Question 62: What would be the resource implications, both staffing and financial, if the statutory review period was changed to 6-year review period?

Please provide data and evidence

No comment

Question 63: To what extent would a six-year review period assist LPAs in moving towards the regional delivery agenda?

Please give your reasons

No comment

Question 64: What, in your opinion, would the likely effects of our proposals have on the Welsh Language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English? Do you think there are opportunities to promote any positive effects? Do you think there are opportunities to mitigate any adverse effects?

Please explain and give your reasons

Those entering the profession in the public sector have reduced. 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. The bursary/apprenticeship route is one way of recruiting a broader mix and representative candidates into the profession; it is currently being implemented successfully in other UK nations.

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 bursaries and apprenticeships to support this diversification.

Question 65: In your opinion, could any of our proposals be formulated or changed so as to:

- have positive effects of more positive effects on using the Welsh language and not on treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Please explain and give your reasons

No implications have been identified by our members via our discussions to date

Question 66: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No comment