



RTPI Cymru

Royal Town Planning Institute
Sefydliad Cynllunio Trefol Brenhinol

Royal Town Planning Institute
Cymru (RTPI Cymru)
PO Box 2465
Cardiff
CF23 0DS
Tel +44 (0)29 2047 3923
email walespolicy@rtpi.org.uk
Website: www.rtpi.org.uk/rtpi_cymru

12 June 2018

e-mail response sent to: StrengtheningLocalGov@gov.wales

Dear Sir/Madam,

Response to: Strengthening Local Government: Delivering for Local People

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 spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The 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.

Thank you for the opportunity to contribute our views to the above consultation.

Our response to the consultation questions are set out below.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

General Comments

We are responding to this consultation in particular from a perspective of looking to safeguard and strengthen the delivery of local authority planning services in Wales. In doing so, we have particular regard to the Welsh Government's Prosperity for All strategy, and its recognition of the planning system as one of the four key levers to deliver its central goal of prosperity for all. As the strategy says: *"The right planning system is critical to delivering our objectives in this strategy."*

In this context, we note with concern the reduction in resources which have taken place in the delivery of planning services through the local authorities in recent years. We are not convinced that the merger of authorities as proposed in the consultation document will on its own be sufficient to address the financial and service pressures experienced by planning authorities. Mechanisms need to be found for putting more resources into local authority planning services.

In June, we published figures which demonstrated the value that planning services bring to their areas and provide evidence to explain the benefits of a strong planning service. Details can be found at: <http://rtpi.org.uk/media/2896429/Value-of-Planning-Handout.pdf>

We have no comments in relation to many of the specific questions, but have concentrated our comments on those where we have particular issues and concerns.

Chapter 3

Consultation Question 1

In Chapter 2, we restated our commitment to regional working in key areas but recognised the need for this to be supported by further change. In chapter 3, we set out the broad options for moving toward fewer, larger local authorities and summarise features of the process which would be common to each option.

a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

We welcome the recognition in the document (para 2.18) that strategic land use and transport planning is needed at the regional level. The Planning (Wales) Act 2015 makes provision for Strategic Development Plans to be prepared at the regional level, and the recent Planning Policy Wales consultation encourages their preparation. However, progress has been disappointing, reflecting the underfunding problems highlighted above. There is a strong case for the Welsh Government to take a more leading role in ensuring that planning authorities prioritise their preparation.

There are already areas of collaboration between authorities at the regional or sub-regional level in specialist areas of planning, including minerals, waste and flood risk management, and we would hope that these arrangements will be supported and encouraged.

On transport planning, we note that some local authorities have collaborated on the preparation of their Local Transport Plans at the regional or sub-regional level, while others have prepared them individually. We hope that all authorities will be encouraged to prepare them collaboratively when they are next updated, and that they will be prepared in an integrated manner with Strategic Development Plans.

We note that, in South East Wales, the local authorities have collaborated in creating a non-statutory regional transport authority in support of the City Deal. We believe that the Welsh Government should consider the use of its powers to create a statutory regional Passenger Transport Authority (PTA) for this region and other regions in Wales. A critical benefit of a PTA is the ability to levy a precept on council tax bills. This would provide a source of revenue funding for bus and rail services, and would widen opportunities for borrowing. It would also level up the playing field in competing with the English city regions.

b) What are your views on the common elements to the process of mergers we outline in this section?

No comment.

c) What are your views on the options for creating fewer, larger authorities which we have set out?

RTPI Cymru believes that there is a need to ensure that there are sufficient elected Members to enable the effective, democratic input to the discharge of local government functions, including planning. We feel that the establishment of significantly larger local authorities and in particular LPAs would give rise to concerns regarding the ability to connect with local communities. The perception of remoteness and peripherality is an issue at present, particularly for the large rural counties, and this would be significantly more difficult to address if authorities were geographically larger and lacked the sense of identity that the current authorities have.

Performance figures for the LPAs across Wales do not demonstrate that larger authorities necessarily perform better. We are concerned about the impact of a reduction in the numbers of councillors could have on their ability to effectively engage in the planning processes involved in dealing with planning applications and LDPs, which could in turn lead to a greater distancing between Council Members and electors, with the risk of creating a democratic deficit.

Interaction with community and town councils is an important part of the planning process. We note there is a Cross Party Independent Review of the Community and Town Council Sector underway. We understand its final report is due in October 2018 - <https://gov.wales/topics/localgovernment/communitytowncouncils/review-of-community-town-council-sector/?lang=en>

d) Are there other options for creating fewer, larger authorities we should consider?

No comment

e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

No comment

Chapter 4

Consultation Question 2

Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.

a) Do you agree that providing clarity on the future footprint of local government is important?

Discussion around local government reorganisation has been taking place over a considerable number of years and this causes uncertainty for those not only working in the sector but also those engaging. This includes investors looking to take forward projects and decisions. It is important that clarity is provided to avoid the confusion and uncertainty the ongoing discussions are having.

b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

In the event of mergers being progressed, new authorities' boundaries should be determined by the way in which people live their lives, reflecting travel to work patterns and housing markets. It is essential that they are based on evidence.

c) What are your views on the new areas suggested in this section?

No comment.

d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

No comment.

e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

If local authority boundaries are to be changed, it would also be worth reviewing other public boundaries to enable a strong framework for joint working across sectors and in particular within the context of the Public Service Boards and taking forward the Well-being of Future Generations Act.

Chapter 5

Consultation Question 3

Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.

a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

It would be worth reviewing lessons learned in the 1996 local government reorganisation in terms of transition, but recognising that at this time use of IT was minimal.

b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

No comment.

c) Do you have any other thoughts on the proposed process?

No comment.

Consultation Question 4

The consultation suggests holding any local government elections in June 2021.

Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No comment.

Consultation Question 5

The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

No comment.

Consultation Question 6

What are your views on the approach which should be taken to determining the parameters of electoral reviews?

No comment.

Chapter 6

Consultation Question 7

a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

No comment.

b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

RTPI Cymru commissioned research into the effectiveness of Planning Committees in Wales. A number of the findings from this study would be relevant here, including the need for compulsory training for members and also 'customer care' arrangements for the public. The study can be found at: <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-legislative-programme/study-into-the-operation-of-planning-committees-in-wales/>

Consultation Question 8

a) Are there other powers which local government should have? If so, what are they?

No comment.

b) Are there other freedoms or flexibilities which local government should have? If so, what are they?

No comment.

Consultation Question 9

a) Which areas offer the greatest scope for shared transactional services?

In a planning context, we would recommend consideration of strategic issues, which include those land uses which by their nature cross multiple boundaries, such as transport.

b) How might such arrangements be best developed?

Through Strategic Development Plans and the National Development Framework.

Consultation Question 10

a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No comment.

c) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

No comment.

d) Which of the issues identified above or in your response should be prioritised for early resolution?

No comment.

Consultation Question 11.

We would like to know your views on the effects that the proposals within this consultation 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.

a) What effects do you think there would be?

No comment.

b) How could positive effects be increased, or negative effects be mitigated?

No comment.

Consultation Question 12

Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) 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.

No comment.

Consultation Question 13

The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.

a) Are there any positive or adverse effects not identified in the assessment?

No comment.

b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

No comment.

Consultation Question 14

The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

No comment.

b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

No comment.

Consultation Question 15

Please provide any other comments you wish to make on the content of this consultation.

The consultation draft update of Planning Policy Wales encourages the preparation of Place Plans at the community or neighbourhood level as "a powerful tool to promote collaborative action and placemaking". In areas with town or community councils, it is expected that these local councils will take the lead in initiating the preparation of Place Plans. However, those parts of Wales which lack town or community councils are not well-placed to engage in collaborative action in this way, and are at a disadvantage, experiencing a democratic deficit which we feel would be worsened in the event of local authorities merging to create larger authorities.

We therefore refer again to the ongoing review of town and community councils, mentioned at Q1, c.