

RTPI response to the DLUHC technical consultation ‘Stronger performance of local planning authorities supported through an increase in planning fees’

April 2023

This is the Royal Town Planning Institute’s (RTPI) response to DLUHCs consultation on the ‘Stronger performance of local planning authorities supported through an increase in planning fees’ which can be found [here](#).

About the RTPI

The RTPI champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

General comments

We are pleased that, following repeated concerns expressed by the RTPI and others, the government is taking the capacity and capability challenges that Local Planning Authorities face seriously. This is not before time. The situation regarding resourcing in both policy and development management teams is urgent, as many LPAs have already planned damaging staffing cuts for the coming financial year. Fundamental questions remain about how the system should operate and be resourced as a whole remain. Planning services have become increasingly dependent on fee income, as opposed to other sources of funding, which is not optimal.

We support the ring fencing of planning income as this will assist development management services in becoming self-funding. Ultimately, there should be greater freedom for LPAs to set their own fees.

We are also heartened by the government’s awareness that raising fees alone won’t solve the resourcing crisis in LPAs, and welcome the government’s request for suggestions of additional steps it could take in response. We recommend:

- The introduction of Chief Place Makers (who should be Chartered Town Planners);



- Greater government support for planning education and entry points into the profession including firm government exhortation for much greater use of councils' apprenticeship levy for town planning;
- Widespread uptake of and support for our Planning Agencies model of public sector consultancy;
- Exploring new ways in which plan making, monitoring and enforcement could be funded.

We support the collection of more fine-grained qualitative and quantitative data on LPAs' performance. However the government should be cautious about focusing too heavily on a narrowly-defined 'customer experience'.

Fees increase

Question 1. Do you agree that fees for planning applications should be increased by 35% for major applications?

Yes. We are pleased that following concerns repeatedly raised by the RTPI and others, the government is taking the capacity and capability challenges which LPAs face seriously and looking at the fee rates.

This is not before time. The situation regarding resourcing in both policy and development management teams is critical. Many LPAs will have already planned damaging staffing cuts before the end of 2022-23 for the financial year 2023-24.

In recent months we have approached several senior members in LPAs to understand how they anticipate budget cuts will affect their departments. We collected the following remarks:

"£300,000 saving agreed by Full Council on 27/02/23 and projected loss of up to 10 posts in worst case scenario."

Paul Barnard, Service Director Strategic Planning and Infrastructure, Plymouth City Council

"We ... run a very slimmed down service and due to the general lack of planners and difficult to fill vacancies we are often having to pay exorbitant rates for temps. Our planning policy team was trimmed to the bare minimum following the adoption of our local plan in 2018. If we are to fulfil some of the expectations outlined in the LURB then we will need to increase capacity. We would agree that the fee increase is well over due."

Kate Ingram, Burnley Council

"The projected fee rise, whilst extremely welcome, is being brought in against the backdrop of a very tough financial landscape. In Trafford whilst domestic applications have risen considerably, other activity remains sluggish – and activity has not bounced back post-pandemic as much as anticipated. As a result we are running a deficit against our fee income target – both this year and (unless things change significantly) next year as well. As a consequence a significant chunk of the projected rise will go against plugging an existing funding gap, rather than improving capacity or quality.... Currently we have a great planning team that is delivering on local & national objectives – but the



function is running at an unsustainable deficit – and without a timely increase in planning fees, service & staffing reductions are bound to follow.”

Adrian Fisher, Director of Growth & Regulatory Services, Trafford Council

“Due to our financial position, which is mirrored across the country, redundancy is the only realistic option unless resources can be ploughed into the service. In this respect, we had hoped that the ring-fenced fee increase proposal had been at a more advanced stage to enable us to maintain and improve on existing service provision without putting jobs at risk. As a Chief Officer, I am desperate for some clarity on this.”

Derek McKenzie, Chief Planner, Sefton Council

“Fortunately my finance director allowed me to postpone the savings until 2024-25 (because the Council had a better than expected financial settlement) so we are keeping the posts vacant to avoid any potential redundancies and will fill with agency if needed for short periods. But had that saving not been deferred then I wouldn't be making any redundancies (as the posts have intentionally been kept vacant), but the funding for those posts would be removed from budget.”

Alice Lester, Director Regeneration, Growth and Employment, LB Brent

These testimonies demonstrate that questions remain about how the system should operate and be resourced. The planning fee issue must be viewed in the context of the wider crisis in local government finance, which has placed greater and greater reliance on fee income as other sources have dried up.

In 2019 we observed that income from development management had gained dramatically in terms of the overall funding of planning departments. In 2009-10 income from development management was equivalent to about a quarter (26%) of the total spending on planning. By 2017-18 income from development management was greater than core funding for planning, and equivalent to about half (48%) of all spending on planning. It will likely have risen to above 50% in 2018-19 given the fee increase (and again even further as a result of the proposed 2023 fee increases).

The shift towards funding planning from development management income, is a result of central government ambitions to reduce public spending. Local authorities now dedicate much less core funding to planning services. This reduction in funding of planning policy in runs directly contrary to government pronouncements regarding the importance of local plan making.

Furthermore, as we found at the time of the last fee increase in 2018, a headline increase does not translate simply into revenue, and can even be associated with falling revenue. Whilst some large applications clear a surplus, many are run at a loss. The proposed fee increases won't change this much. Therefore, revenue largely depends on the mix of applications received by a council in a given year. With a looming down turn in the housing sector, there is a possibility that the larger applications will decrease but the loss-making ones will remain steady.

Question 2. Do you agree that the fee for householder planning applications should be increased by 25%?

Yes, this increase is welcome and long overdue.

However, we would welcome a greater increase for planning applications of this type, ideally so that they achieve full cost recovery. While major applications often cover a good proportion of the costs LPAs face in processing those applications, householder planning application fees, which are currently very low, do not. As such they represent a bigger resource drain than major applications.

Application fees make up an extremely small percentage of the overall cost of building works, surveys and inspections for this kind of development. An increase would bring planning application fees in line with the fees paid for other services. Indeed, following the expansion of permitted development and prior approval over several years, many smaller applications made by householders fall into that regime, meaning that only larger-value householder applications would be subject to this increase.

We discuss the expansion of permitted development and prior approval in more detail below.

Question 3. Do you agree that fees for all other planning applications should be increased by 25%? If not, please include in the comments box the particular application types where you believe the proposed increase is too high or too low. Your comments should be accompanied with evidence/costs if possible.

We assume that this question is referring to minor applications. If so, yes, this increase is welcome.

This lack of clarity points to an important issue: the wide range of fees and exemptions which currently exists is complex. This presents a serious administrative burden on both development management teams and applicants. Over the longer term, the government should consider simplifying the fees regime.

We recently wrote to the Secretary of State along with Milton Keynes City Council to point out that the current "prior approval" system is both complex and a drain on resources. Fees for prior approval of permitted development should be raised considerably to reflect the fact that they involve professional and administrative activity. See Q4 below.

Question 4. Are there any other application types or planning services which are not currently charged for but should require a fee or for which the current fee level or structure is inadequate?

We respond to this question in relation to, a) application types, and b) planning services.

A) Application types

The following types of application require a larger fee because associated free rates/structures are not reflective of the work required by LPAs to process them:

- a. Tree Preservation Orders;
- b. Conservation area consent;
- c. Applications for the approval of details reserved by condition;
- d. Section 73 applications for the removal or modification of conditions;



- e. Section 96a applications for non-material amendments to an existing permission; and
- f. Prior approval and prior notification applications for permitted development (full cost recovery).

The last of these are a particular concern. After several years of change it is now possible to deliver very large residential changes of use through 'permitted development'. These schemes can be complex, and despite the intentions driving these reforms, deciding them has increasingly come to rely upon professional judgement, much like standard planning applications. They therefore require a large amount of time and expertise to process, and the fees that planning departments receive for doing so should be commensurate with this, and match the fees received for standard planning applications.

We welcome the DLUHC's intention to: 'introduce a new fee structure for the variation of planning permissions to take account of the proposed new route to make minor variations to permissions in the Levelling Up and Regeneration Bill once the provisions come into force'.

B) Planning services

In line with the scope of this consultation, and the range of resourcing challenges that the planning system currently faces, we have interpreted the term 'planning services' widely. It thus encompasses planning services provided by LPAs to applicants, provided by LPAs as part of their general plan making work, and provided by other public bodies as part of the wider planning process.

There are four types of planning activity which LPAs currently provide free which should be considered for moving towards greater cost recovery: enforcement, local plan making, monitoring, and pre-application services and Planning Performance Agreements.

Enforcement

[Our report Planning Enforcement Resourcing](#) (2022) worryingly found that currently only 50% of authorities have the capacity to monitor compliance of planning conditions once successful enforcement action had been taken. 80% of respondents reported that there aren't enough officers in their team to carry out the workload, and 89% that their councils are experiencing a backlog. The burden on enforcement is likely to grow dramatically with the introduction of Environmental Outcomes Reports and Biodiversity Net Gain, making the resource crisis in this area even more critical to respond to. Please see our response to Question 8 for more on the resource cost of enforcement action and how LPAs being able to set their own retrospective planning fee could be beneficial.

Local plan making

Planning policy teams have been disproportionately affected by cuts. This will be compounded by new burdens introduced through the Levelling Up and Regeneration Bill including: the preparation of authority wide documents such as design codes, the abolition of SPDs, and the preparation of a local plans to new requirements within a faster timeline. In the absence of greater central government funding for LPAs' planning policy teams, and as part of a wider conversation about effectively resourcing local planning policy, the government should consider ways in which monetary resources can be found for local plan making.



Given the potential implications for the public interest and public confidence in the system, implemented fee-raising measures require careful consideration. However, there are processes – for example during the call for sites process – where it may be done without prejudicing outcomes, such as one would pay for a planning application.

The Government has recently (2020 White Paper) expressed enthusiasm for a greater level of “upstream” decision making. We and many others regret that local plan allocations do not seem to be reflected straightforwardly by planning permissions, or, if they do, they often result in poorer outcomes than communities were expecting. Under these circumstances it is reasonable that those who benefit from the site allocation process should contribute to it, but only in return for a greater degree of certainty that site allocations will be fulfilled as planned, and to the greater satisfaction of communities.

Monitoring

Monitoring is an important planning activity which is currently not funded. We estimate that given the incoming policy changes monitoring will become an increasingly fundamental aspect of the system.

- Public concern has been expressed frequently over the failure of some developers to complete planning applications according to plans.
- There are fairly intense debates occurring almost continuously, both nationally and locally, regarding the numbers of houses completed, and the numbers of houses represented by extant planning permissions and site allocations. Many local residents contend that there is insufficient justification for granting additional permissions, although the evidence underpinning this is sometimes difficult to come by. In particular, its efficient aggregation at subregional and national level seems to prove somewhat elusive.
- There are specific new burdens which will be added such as checking that biodiversity net gain is being delivered as promised in BNG plans, and monitoring that investment in nutrient pollution mitigation actually works.
- There are promises made in Travel Plans by applicants, such as certain kinds of travel behaviour once developments are occupied, which require higher levels of monitoring.
- Claims are regularly made about building performance in connection with net zero. However, we know surprisingly little about actual resident behaviour in relation to energy use.
- The introduction of environmental outcomes reports will bring a welcome focus on the performance of both plans and projects in use post permission.

Taken together these represent a significant monitoring challenge. Yet in recent years dedicated monitoring teams within councils have been reduced, as the service is not perceived as essential. It is worth exploring additional sources of revenue for monitoring, some of which will arise in connection with changes in legislation and practice. For instance, biodiversity net gain funds could be used partly to pay for monitoring over the 30 years of operation of BNG. If it is possible to ensure that BNG activities operate over 30 years it should likewise be possible to use that same mechanism to ensure monitoring of those activities.

The digitization of evidence gathering for local plans should enable lower costs of data collection alongside higher levels of data returns. The underlying principle here should be that data is volunteered in a pre-emptive way, not extracted following complaints or generated for

specific purposes such as plan making in a more reactive way. Ideally, relevant data should be captured by the local planning authority regularly and automatically rather than being sought or expensively procured.

Citizen science can contribute here, along with other new sources such as mass anonymized data on people and freight movements taken from mobile phones. Indeed, sometimes the council may, in its other departments, hold relevant information such as on air quality or noise which may not be accessible to planning departments despite its utility. Essentially, schemes which are given planning permission should monitor themselves, and that flow of information should inform the next local plan.

PPAs and pre-application services

Pre application meetings and Planning Performance Agreements can represent a significant income stream for some LPAs. This is partly a consequence of the reduction in non-fee sources of income. However, it is important that applicants who are paying for these services receive value for money. In particular, concerns have been raised that the timetables in PPAs are not always be kept to. We would not wish to complicate the PPA process unduly, but would stress that efforts should be made within the sector to ensure that best practice, such as recommended by the Planning Advisory Service, is understood broadly and followed.

Discretionary and bespoke planning services

Question 5. Please can you provide examples of bespoke or ‘fast track’ services which have worked well or you think could be introduced for an additional fee? Are there any schemes that have been particularly effective?

We answer this question in two parts, first in relation to fast track services, and second in relation to ‘bespoke’ services, which we interpret mainly to mean the use of PPAs.

Fast track services

Horsham District Council provide a comparison of different ‘fast track’ planning application services [here](#). Our members provided examples of fast track services introduced by other authorities, such as Charnwood, Redbridge and Surrey Heath, but given how much these services differ, and in the absence of robust research on the topic, we are unable to provide further comment on the efficacy of the services.

Nonetheless, it is important to weigh the costs and benefits associated with LPAs delivering fast track services. Where fast-track services can be provided in a way which is entirely self-sufficient and in addition existing services (i.e. new development management planners can be hired to deliver the fast track service using the funds raised by the service) they may be beneficial on a case-by-case basis.

However, where fast track services are run with resources diverted from teams processing ‘normal’ applications, or are dependent upon fast track applications being prioritised over standard ones, there could be a series of negative consequences. For example:

- There is a difference between quick decisions and good decisions. There is a risk that by ‘chasing’ additional income from fast track services as a way of plugging gaps in their resourcing, LPAs sacrifice the latter for the former.



- Given that application fees comprise only a very small percentage of the cost of new developments but delays can be extremely expensive, there may be very little reason for most developers not to apply for fast-track services where they are provided and they would guarantee a higher quality of service than a regular application. If this is the case is it not more logical to raise all planning fees to a level at which LPAs would be able to sustainably and universally deliver a service to the quality required?
- Developments which are in the public interest, but which have not been fast tracked, may be deprioritised and not come forward promptly. On the flip side, ensuring full cost recovery would do more to safeguard LPAs taking an even-handed and more strategic approach to all applications.

This last point links to a more general principle which should be firmly maintained: planning is a public service which ensures that development occurs in the public interest, regardless of the applicant. This should not be compromised in pursuit of higher fees from those able to pay them.

Bespoke services

When used effectively, bespoke services provided through pre-application advice and Planning Performance Agreements (PPAs) can be extremely valuable and mutually beneficial to both LPAs and applicants, especially for large and complex projects. PPAs especially can be a useful tool for ensuring that the right resources are brought to bear by LPAs and developers at the right time, and that collaboration in pursuit of high-quality projects is effective.

Greater Cambridge Shared Planning Service's [PPA service](#) was highlighted by some RTPI members as particularly effective. They pointed to its inclusion of a Quality Review Panel, which increases applicants' certainty that having gone through the process their applications will be supported, and a [Planning Performance Agreement Charter](#), which provides certainty to applicants on the quality of service they should expect.

However, for a variety of reasons the quality of service which LPAs deliver through PPAs varies significantly, and there is little recourse for applicants where it is substandard. To address this the government should consider:

- Offering clearer guidance to LPAs on how to provide PPA services. For example, LPAs should:
 - Provide a single point-of-contact case officer;
 - Ensure that this contact is a planner directly employed by the LPA's development management team rather than an external consultant. This is to ensure that the case officer carries and builds the LPA's institutional knowledge, and to give planners working in development management the opportunity to engage in stimulating work – a lack of which is an underlying driver of many LPA's recruitment challenges, particularly in this area of practice;
 - Make use of multi-party PPAs where the processing of an application is heavily dependent on the swift responses external consultees. For instance, Local Highways Authorities, often have resourcing challenges, and are a key source of delay to planning decisions (see below).
- Monitoring the outcomes of PPAs, particularly whether the advice given in the course of a PPA is in line with decisions made, in order to assess which approaches are most



effective and how support can be provided most efficiently (whether through guidance or additional resourcing).

Indexation

Question 6. Do you agree with the proposal for all planning fees to be adjusted annually in line with inflation?

Yes, we agree with this proposal. We have tracked the performance of planning fees against the GDP deflator since 2018, which is the recommended measure for public institutions, and find that the proposed fee increases would be sufficient to compensate for inflation but it has been some time coming. The indexing proposal would mean that a stop/start approach to fees will be replaced by a more responsive process.

Ringfencing of additional fee income

Question 7. Do you consider that the additional income arising from the proposed fee increase should be ringfenced for spending within the local authority planning department?

Yes, we strongly agree. It would be beneficial for the planning system as a whole if development management services were fully funded, and ringfencing goes some way towards this. However, local planning authorities ought to be free to set their own fees.

Fees for retrospective applications

Question 8. Do you agree that the fee for retrospective applications should be doubled, i.e. increased by 100%, for all applications except for householder applications?

The National Association of Planning Enforcement (the RTPI's specialist network) Management Committee has considered the proposal of doubling of fees for retrospective applications (except householder). It accepts the doubling of fees for all retrospective application types, including 'free go'.

However, doubling the fees for retrospective applications could disincentivise the submission of retrospective planning applications where they would be beneficial and in turn leading to more enforcement appeals. As the fees for ground (a) appeals are proposed to remain the same as retrospective fees there would be little incentive to apply for planning permission rather than await and appeal against an enforcement notice. Where development is not regularised by means of retrospective planning applications, significant resource would need to be applied to take enforcement action to force a determination on the issue, but without the additional disincentive of a higher appeal fee for ground (a) appeals. This is likely to result in more ground (a) appeals, resulting in more pressure on PINS. Overall, doubling fees for retrospective applications could result in a resource drain on the system, rather than boost.

In addition, the issuing of notices where the development is acceptable (subject to conditions) would lead to more notices being quashed at appeal. This would deter LPAs from serving enforcement notices.

Therefore we propose that not only are retrospective application fees are doubled, but fees for ground (a) appeals are also increased by 50% to maintain the current differential.

Removal of the ‘free-go’ for repeat applications

Question 9. Do you consider that the ability for a ‘free-go’ for repeat applications should be either:

- (a) removed
- (b) reduced for re-applications within 12 months
- (c) retained
- (d) none of the above
- (e) don’t know

There was some disagreement across the RTPI membership on this question. Overall, we support the removal of ‘free-go’ repeat applications. In general this would bring more consistency to the system and apply logically where a planning application has been decided in time, and the refusal is legitimate. Additionally, some of our members reported that there is a tendency for the ‘free go’ to be used instead of LPAs’ pre-application service.

It is important to note, however, that ‘free go’ applications can sometimes act as a ‘pressure valve’ in instances of non-determination, where developers are seeking a timely decision on their applications, which might not otherwise be forthcoming.

Introduction of a prior approval fee for the permitted development right allowing development by the Crown on a closed defence site

Question 10. Do you agree that a fee of £96 (or £120 if the proposed fee increase comes forward) should be charged for any prior approval application for development by the Crown on a closed defence site?

No comment.

Increasing resources in the planning system - Supporting the resilience, capacity and capability of local planning authorities

Question 11. What do you consider to be the greatest skills and expertise gaps within local planning authorities?

Local authorities are currently experiencing a crisis of capability and capacity within their planning departments. The latest LGA Workforce Survey found that planning officers were the most difficult occupation to recruit and retain, with over half of county, district and single tier respondents saying that they were struggling to recruit planning officers, with 36% having problems retaining them.

Skills and expertise gaps within LPAs can be considered across two different dimensions: seniority (i.e. generic experience, generally described by a planner’s overall number of years in

the profession) and specialism (expertise in a particular discipline or area of practice, whether an aspect of the town and country planning system itself, such as enforcement, or a policy area, such as ecology). We consider each below.

Seniority and general experience

Our members from both the public and private sector have reported that for several years one of LPAs' greatest resourcing challenges is their ability to recruit and retain experienced planners who have built up tacit knowledge of the system and practice alongside more 'generic' skills like effective teamworking, leadership, change management, project management and financial management (see [this 2021 metanalysis](#) by the RTPI on the training needs of planners over time). Research conducted by the RTPI in partnership with academic researchers found that this phenomenon:

“...is seriously undermining the public sector’s ability to deliver high quality services, leaving planning departments vulnerable to disempowering reform, undermining institutional memory, and reduced strategic oversight – including for commissioning – with consequences for both public and private sectors’ ability to serve the public interest.” ([Serving the Public Interest, 2019](#))

These challenges stem from the inability of many LPAs to compete with private sector wages, and the pressures the planning system is currently under, which mean the private sector can often offer more fulfilling work. This was also documented by the research:

“Austerity and restructuring have led to a lack of experienced senior planners in the public sector, and consultancies offer an enticing, well-regarded, well-paying alternative to a public sector that is commonly regarded by planners as having serious image problems.” ([Serving the Public Interest, 2019](#))

Specialisms

The general state of under-resourcing across the planning system means that specialist skills are widely lacking. The specialisms listed below are only those which have been particularly highlighted in recent research, or which were prevalent representations for this consultation:

- *Enforcement:* RTPI research [Planning Enforcement Resourcing \(2022\)](#) found that 80% of planners felt there simply aren't enough enforcement officers to carry out the workload; 70% of their councils reported difficulties recruiting enforcement officers in the last five years; and less than 50% of authorities are able to monitor compliance.
- *Urban design, arboriculture, listed buildings, heritage and flooding, sustainability, EIA and SEA:* These are highlighted as major concerns in the [Planning Advisory Service's 2019](#) survey of planning departments. Urban design, particularly in relation to the preparation and enforcement of design codes, is a significant issue.
- *Ecology and Biodiversity Net Gain (BNG):* Ahead of the introduction of BNG in November this year, a [2022 survey of 192 LPAs](#) and their ability to deliver biodiversity net gain in England by the Association of Local Government Ecologists (ALGE) found that “Only 5% of respondents say that their current ecological resource (including in-house and external sources) is adequate to scrutinise all applications that might affect biodiversity.” It also concluded that “Nearly 70% of planners have no experience, or spend less than a third of their time, on applications that involve BNG. This would suggest that there is a need for



considerable skills development within many LPAs.” Fewer than 10% of respondents reported that their current expertise and resources will be adequate to deliver BNG. The government’s February 2023 announcement of new funding up to the beginning of mandatory BNG in 2023 is welcome, as is the delay to the introduction of BNG for small sites, but the success of this policy will depend on the sufficient ‘new burdens funding’ to follow and LPA’s ability to recruit trained officers with it.

Question 12. In addition to increasing planning fees, in what other ways could the Government support greater capacity and capability within local planning departments and pathways into the profession?

The RTPI has undertaken significant research that is relevant to his question. Below are some of our key proposals relating to developing more pathways into the profession, increasing the overall number of new planners, and building capacity and capability within local planning departments.

1. Increasing leadership capacity within LPAs by requiring them to have a chartered Chief Planning Officer

Requiring local authorities to appoint a chartered Chief Planning Officer within their corporate management teams is a relatively low-cost intervention that would:

- Strengthen the corporate influence of planning within local authorities. This would ensure that planning services receive the investment which they need as part of a wider corporate strategy and that, in turn, strategic priorities that depend on effective planning are delivered upon. This corporate influence will be particularly important to avoid the potential scenario we describe in our response to Q7, in which local authority finance directors cut expenditure on planning services in line with the additional funding those services receive from the ringfenced increase in planning fees.
- Help to address the shortage of senior and experienced planners which we describe in response to Q11 by creating high-profile, attractive, and influential roles for planners in the public sector.

We believe that Chief Planning Officers should be Chartered Town Planners who have the appropriate skillset for such a task. Planners are trained to support collaboration, bringing different parties together to help shape the built environment. We suggest they should be Chartered because the public and other stakeholders need confidence that qualified professionals, working to the highest standards, are working in everyone’s best interest.

This is not an entirely new proposal. The 2006 [Barker Review of Land Use Planning](#) identified the need for Chief Planners to have higher status, and Scotland has already introduced a requirement [for all local authorities to have a chief planning officer](#).

The Building Better Building Beautiful Commission also recommended that each local planning authority should have a “chief placemaker” .

Our research on this proposal is available [here](#).

2. Examining the business case for central grant funding of planning services

At a higher level, government should examine the business case for grant funding the local delivery of planning services. Government should consider the economy-wide benefits of a more efficient planning system, how crucial local planning is to the delivery of the levelling up agenda, and the fact that planning is itself a public service.

Development management and enforcement teams provide crucial services to business (including house builders and infrastructure providers) and on behalf of communities. Policy teams are central to the government's ambition for a genuinely plan-led system, which provides certainty, and is capable of shaping resilient, low-carbon, healthy and productive communities.

The RTPI are currently commissioning further research into the economic value of planning.

3. Providing further support for the RTPI student bursary schemes to increase the number of entrants to the profession

The [RTPI bursary schemes](#) aim to encourage and convert diverse talent and graduates from a variety of related disciplines and under-represented backgrounds to study a fully accredited planning Masters. DLUHC has supported the RTPI Future Planners Bursary programme between 2019 and 2022. Last year, the programme attracted 90 applications from potential planners. We were able to award 42 students who enrolled on an RTPI accredited Master's degree for the academic year 2022-2023 with £2000 each.

Further funding would enable an expansion of this programme and provide a boost to the number of planners entering the workforce.

4. Supporting professional apprenticeships

Apprenticeships provide an alternative route into the planning profession for those who may not wish, or are unable, to study for a fully accredited planning Masters. [Two types of apprenticeship currently exist:](#)

- *Chartered Town Planner degree apprenticeships:* these are degree level qualifications and on completion confer professional membership. They can take between 3 and 6 years depending on entry qualifications and experience.
- *Town Planning Assistant:* these are a first step in a career in planning. They are designed for those who would either like to embark on a career in town planning from school or college, or those currently working in support roles in the profession who would like to gain a first qualification that recognises their skills. It can open up new career paths into full planning positions.

The government should consider incentivising LPA take-up of both apprenticeship schemes as a way of addressing staff shortages. Councils pay the apprenticeship levy and, with large staffs, this can amount to large sums. However, far from all councils use their apprenticeship levy to take on planning apprenticeships. The RTPI has worked hard to establish apprenticeship courses within training institutions and to get them officially recognised. Far more councils should take advantage of these schemes to upskill and recruit planning staff, and the government should set clearer expectations for this, in return for the increase in fees.

5. Take steps to ensure that a career in the discipline is attractive for potential and current planners.

Several sources, including [RTPI research](#), the [2023 Careers Survey by The Planner magazine](#), and a collection of submissions to the [50 Shades of Planning](#) podcast, suggest that morale in many planning departments is low, which is detrimental to the attractiveness of planning as a career. This is anecdotally reported throughout the RTPI's membership, via both public and private sector members.

These sources suggest that this in part stems – via lower pay and stretched capacity – from the resourcing crisis which this consultation aims to address. Evidence suggests that misinformation and inflammatory reporting in the media about the role of planning, planners, and planning processes, are also culpable. These underlying causes are supported by data gathered in The Planner magazine's [2023 Career Survey](#).

In response, the government should support public-facing educational resources about the planning system, planners, and what they do, such as [Planning Your World](#), published by the RTPI. This would improve the working environment that planners face. Additionally, it would potentially ameliorate local engagement in decision making and ease local politics around planning, including regarding the difficult trade-offs that planners have to make (see [here](#)). The RTPI have published the resource with this ambition.

The perception that the government is anti-planning, or regard planning as burden on the economy, is also significant. Though high-level, this is crucial to address. The government has a vital role to play in shaping the national conversation and should, as we argued in our response to the [recent consultation on the NPPF](#), use national policy and statements to make 'unambiguous commitment to using planning to achieve a range of society's goals, not just housing supply, in partnership with communities and with clear priorities...'.

Finally, improving the wellbeing of existing planners is also essential for staff retention as we discuss [here](#).

6. *Encouraging more efficient and positive institutional structures*

Shared approaches to service delivery could improve the capacity and capability of the planning system across England.

We propose the creation of '[Planning Agencies](#)'. Learning from the French system of *agences d'urbanisme* ('Urban Planning Agencies') and Greater Cambridge's Shared Services model, Planning Agencies would pool together planning resources across a geographical area, building well-resourced teams that cover all facets of planning and equip regions with the appropriate planning teams to deliver upon their ambitions.

The establishment of a Planning Agencies model could help to:

- *Develop planning skills and professionals:* Planning agencies would be prestigious, reaching a wider pool of talent and facilitating career growth with opportunities for development and mentorship. Their multidisciplinary approach would also help to recognise and support less visible disciplines within planning like enforcement, and ecology under a larger umbrella.
- *Develop expertise and local knowledge:* Planning agencies would commission research, hold and use local data, deliver greater technical and specialist knowledge and generate added value from geospatial data and environmental assessments.
- *Respond effectively to leaders and the community's needs:* They'd maintain accountability, operating under the most appropriate governance structures for their area and could be

given strong leadership through a Chief Planning Officer. They'd also encourage collaborative responses to local challenges. Interact with residents, business and community groups and build resilient networks and relationships.

- *Underpin place-based action:* Planning agencies would maximise and share resources more equitably and help to address key challenges like socio-economic inequality, adapting to and mitigating the impacts of climate change and delivering the infrastructure needed to make developments more sustainable for new and existing residents. They could develop interventions at scale and take a holistic, solutions-focused approach.

More information is available [here](#).

Question 13. How do you suggest we encourage people from under-represented groups, including women and ethnic minority groups, to become planning professionals?

A more inclusive profession starts with a robust evidence base, which is best achieved by collaborative working. In 2019, RTPI estimated the number of individuals from racialised minorities working in planning at approximately 3-4% of the total of people working in planning in the UK. We are currently working to update this data. Greater clarity and certainty will enable better and more targeted interventions. Government support to develop this evidence base would be very useful.

The RTPI has a number of initiatives to encourage under-represented groups into the profession, most notably the work experience programme EXPLORE. In its first year the programme worked with 100 young people (16-17) of which 47% were female and 53% from Asian, Black and minority ethnic communities. Before the placement, 43% said they would consider a career in Planning and the end of the programme 90% said they would, which clearly indicates that high quality work experience can influence young people towards the profession. Government could consider engagement with the RTPI and other stakeholders to increase the reach of this initiative. Consideration should also be given to restarting/relaunching the PATH Programme, which was initially launched in 2003, to increase diversity of planners in the profession by targeting adults who are seeking a career change and supporting them into the profession.

The RTPI has developed a 'Future Planners' bursary programme to convert students to study for a career in town planning at postgraduate level. The programme has benefitted from grant contributions from government in previous years, and any future funding would enable us to build on the work so far and look at ways to further target this support to under-represented groups coming into the profession.

However, encouraging diverse talent into the profession is not sufficient. We also need to make sure that we are retaining that talent. Women remain under-represented in senior positions across the profession. Ensuring that the profession is a place which empowers planners to progress and thrive is essential to securing the diversity of the profession. RTPI has a number of initiatives tackling this not least the commitment and action plan agreed with other professional membership bodies (CIOB, RICS, ICE, THE LI and RIBA) to drive forward inclusion across the sector, and the RTPI Inclusive Framework.

Tightening the Planning Guarantee

Question 14. Do you agree that the Planning Guarantee should better mirror the statutory determination period for a planning application and be set at 16 weeks for non-major applications and retained at 26 weeks for major applications?

Statutory determination periods

In principle, it is sensible to monitor the impact of the proposed fee increase on LPAs' services against statutory deadlines. It is also logical for the Planning Guarantee to mirror statutory determination periods.

However, statutory determination periods should be realistic. Currently, major applications often overrun it, which suggests that 26 weeks is simply too short a period, given the system's current limitations.

However it should be recognised that making a decision within the statutory determination period is not entirely within LPAs' control. Overruns are often a result of delayed responses from statutory consultees and other actors in the system, and sometimes even applicants.

The Planning Guarantee

The Planning Guarantee itself is widely seen as toothless. Given the small percentage of development costs which planning fees represent, and how crucial good relationships with planning departments are for developers, it is highly unusual for applicants to pursue refunds for decisions which have overrun. For these reasons, the government should consider automatically refunding fees when the threshold has been passed in the absence of a written agreement about an extension of time or a PPA.

Extension of time agreements and Planning Performance Agreements

Question 15. 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?

The RTPI strongly believes that LPAs' speed of decision making should be assessed on a mixture of data, which includes both the percentage of applications that are determined within the statutory determination period, and the percentage of applications that are determined outside the statutory determination period, but within a mutually agreed extension of time (EoT) or PPA.

Measuring both is necessary because, while LPAs can use EoTs to extend deadlines with little benefit to applicants (something which masks evidence of poor performance in the national data), EoT and PPAs can also have important roles in the planning process when properly used and implemented by mutual agreement. LPAs should not be penalised in these cases. Indeed, with larger and more complex applications it is often impossible to reach good-quality decisions within the agreed timeframe. For instance, applicants may need/wish to submit more information, and PPAs which involve EoTs can give all parties greater certainty when delivering schemes. Therefore the data should distinguish between PPAs/EoTs used with the proactive



agreement of applicants, and those used by LPAs to prevent an application being recorded as over time.

At the same time, assessing performance against the statutory deadlines is a positive suggestion that will aid in monitoring the performance of the fee increase. Finally, it is worth noting that, as we lay out in more detail in question 20, the RTPI believes in taking an outcomes based approach to evaluating the performance of the planning system rather than focusing solely on narrow and procedural metrics.

Question 16. Do you agree that performance should be assessed separately for

(a) Major applications - Yes / no / don't know

(b) Non-Major applications (excluding householder applications) - Yes / no / don't know

(c) Householder applications - Yes / no / don't know

(d) Discharge of conditions - Yes / no / don't know

(e) County matters applications - Yes / no / don't know.

The RTPI agrees that performance should be assessed separately for each of these categories.

We are in favour of the government gathering more detailed and higher quality data to effectively monitor performance, support more targeted interventions, and better evidence national-level policy making on planning.

Our key concern is whether resources will be put in place at the local level to enable reporting (where the data is not already being collected), and at the national level to ensure it is effectively and proactively aggregated and analysed.

Broadening the planning performance framework

Question 17. Do you consider that any of the proposed quantitative metrics should not be included?

We agree that all of the proposed quantitative metrics should be included as, for the reasons detailed above, we are in favour of higher quality and more detailed data, providing its collection and analysis are properly resourced.

Question 18. Are there any quantitative metrics that have not been included that should be?

There are number of important causes of delay to deciding planning applications which should be included in the government's quantitative metrics for a clear view of the system and where additional support or reform is needed.

Some of these relate to LPAs' performance (like those metrics listed in Question 16), for example:

- Length of time taken to process applications for the approval of reserved matters;
- Length of time taken for validation;



- Actual performance against standards agreed in PPAs (see our comments in response to Question 5 about the mixed quality of services delivered through PPAs).

But crucially, some relate to organisations/agents other than LPAs, that have a crucial role in the planning system:

- The response times of statutory consultees;
- The length of time taken for the Secretary of State to decide an application they have called-in; and
- The length of delays brought about by the courts.

How this data is used is crucial. A shift to a target-led system in which the speed of decision making is prioritised over quality of decision making runs the risk of perverse outcomes, such as LPAs rejecting applications in order to meet arbitrary deadlines.

Measuring customer experience

Question 19. Do you support the introduction of a qualitative metric that measures customer experience?

The RTPI supports incorporating qualitative data into the government's efforts to measure 'customer' experience. As DLUHC recognises, key aspects of the quality of service delivered by LPAs can only be captured by this kind of data.

However, we caution against the government focusing too heavily on so-called 'customer' – generally interpreted in this consultation as applicant - experience alone. The core purpose of the planning system is to create places and enable development which serves the public interest as a whole. Therefore, there is a very strong case to be made that it is all the participants in the planning system who are "customers", not just applicants.

Question 20. What do you consider would be the best metric(s) for measuring customer experience?

The government should be wary of the fact that a simple Likert-scale approach to measuring satisfaction is likely to skew towards responses from 'customers' most aggrieved with the system. And, crucially, these grievances may be due to the outcome of a decision – not the LPAs' fairness, efficiency, or transparency in coming to that decision (which may be in the public interest and well evidenced).

Considering these limitations, the percentage of appeals allowed in a local authority area may give insights into the robustness of an LPAs' decision making and how effectively it works with its planning committee.

The overall significance of outcomes

We believe that the speed and efficiency of decision making should not be unduly prioritised over qualitative outcomes for communities. Planning performance assessments have tended to be narrowly centred on process metrics such as the speed of processing applications, the number of consents given and the amount of housing units delivered. Whilst these metrics have some value, to achieve better quality placemaking outcomes we support the principle of measuring outcomes and impact on the ground.



The Measuring What Matters: Planning Outcomes Research published in 2020 by the RTPI provides a route map to moving towards an outcomes-based approach to performance management, which also considers efficiency and transparency in decision making and community engagement.

This ties in directly with the need to understand what data sets are necessary and what digital solutions are in place to monitor performance. Further information on the toolkit, can be viewed here: [RTPI | Measuring What Matters: Planning Outcomes Research](#)

Question 21. Are there any other ways in which the performance of local planning authorities or level of community engagement could be improved?

We are also heartened by the government's awareness that raising fees alone won't solve the resourcing crisis in LPAs, and that it is asking for suggestions of additional steps it could take in response.

- The introduction of Chief Planning Officers (which should be Chartered Town Planners) to make the case for planning at the top table in councils would be a powerful intervention.
- Greater government support for planning education and entry points into the profession could also prove vital, via the RTPI student bursary scheme and by encouraging greater take-up by LPAs of professional planning apprenticeships. The establishment of such apprenticeships could reasonably be a condition of the increase in planning fees being ringfenced.
- The adoption of our Planning Agencies model - voluntary, shared services model that local planning authorities can use to help them do more with less – could bring significant benefits including creating a more rewarding career path for entrants into the public sector and raising the professional profile of planning.

Public Sector Equality Duty

Question 22. Do you have any views on the implications of the proposals in this consultation for you, or the group or business you represent, and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

We do not consider these proposals are likely to impact on businesses who are in position to pass this increase onto clients. We consider that the proposals could have a greater impact on Black, Asian and/or single parent households. We know that Black and Asian families are more likely to live in overcrowded housing/with extended families and the increase in planning fees for households may make it more difficult for those households to make changes necessary to improve those conditions. Single parent households, particularly in a cost of living crisis may find it more difficult to make changes/improvements needed as needs change. Households that need to make substantial changes that fall outside of permitted development for a disabled family members i.e. a changing spaces style bathroom and bedroom as a downstairs extension may also find the increases in fees a barrier.