



By email

18/02/2020

RE: Public Accounts Committee - Inquiry into effectiveness of local planning authorities -  
for the Commissioner

Dear Claire,

Thank you for your letter.  
Please see my response to your Planning Inquiry.

### **Planning Inquiry – Public Accounts Committee 24 February 2020**

#### **Question 1: The challenges of delivering planning services with less resources;**

**Cuts to planning services is a real concern and a real challenge.**

I am pleased the Wales Audit Office raised the issue and this Committee is looking into this too as it is really important to well-being and future generations.

RTPI reports cuts of more than 50% in the last 10 years – there is a loss of skills and there are less new planners joining the service.

**It is safe to say this is unsustainable and inadequate in the context of well-being and placemaking** – new more comprehensive and holistic requirements on the planning system. Failure to invest in the system will hamper delivery of the Well-being of Future Generations Act.

**Planning needs to be reprioritised as a key service** as placemaking is one of the best opportunities to embed well-being in Wales and it will be more demanding on planning officers at first until it is fully embedded.

Planning can and should support all corporate strategies / objectives – deliver on local and regional objectives.

#### **Additional resources are needed in the system to support the change needed**

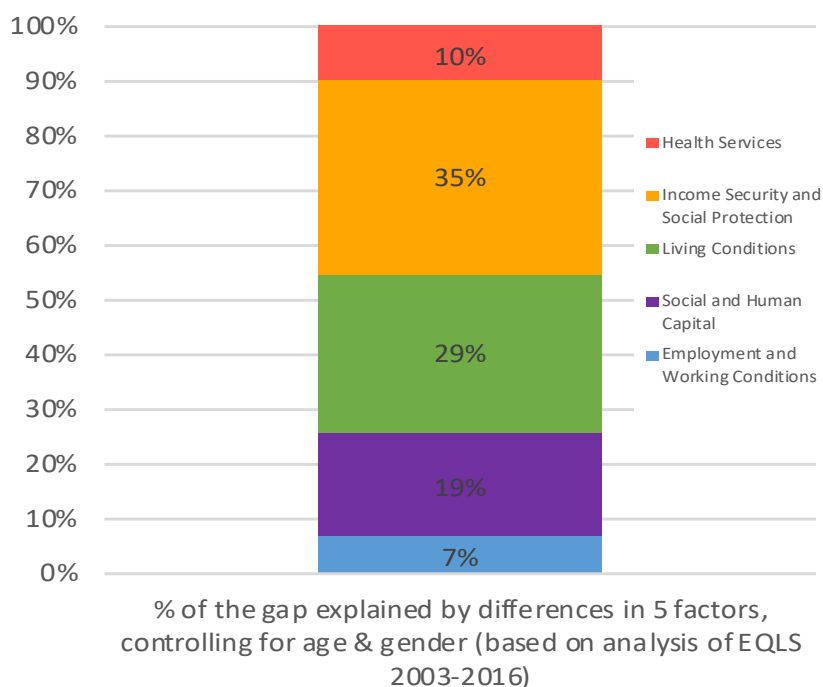
We understand Welsh Government is looking at what could be done for planning to be a full cost recovering service (Arup have been commissioned) but there are queries as to whether this will be enough and whether it could exacerbate inequalities.

## Question 2: How can Planning deliver its responsibilities under the National Development Framework and the Well-being of Future Generations Act 2015 (WFG Act)?

Planning Policy Wales 10 and recast of planning policy unique to Wales is fundamental to the realisation of the aspirations of the Act. Wales is leading the way, now we need to show the world how we apply it to improve Wales' well-being.

The built environment has a huge impact on our well-being. For example, the World Health organisation identifies living conditions such as housing, access to nature and air pollution as accounting for 29% of the gaps in health status between richest and poorest. 19% relates to human capital such as relationships and connection to your community which are also largely determined by the characteristics of the design of communities and the built environment.

Decomposing the gap in health status between poorest and richest income quintiles over 36 European countries



**There is a need for the planning system to operate more holistically but this is not always happening.** Planning function is often missing from key decision-making forums and seen as the end of the process (when an

application is submitted) rather than a key element of all the plans and strategies and well-being objectives of all public bodies.

An example of this – the Welsh Government Annual Report - Land-use planning is only referred to in terms of agriculture. Placemaking is crucial to delivering a large number of the well-being goals and yet Welsh Government have not recognised their reform of Planning Policy Wales as a major step towards meeting their objectives.

**Placemaking demands integration and collaboration with the other departments and agencies regulating the built and natural environment such as housing, highways, Welsh Water, Local Health Boards, Natural Resources Wales and local communities.** I understand another pressure point for planning is delays in responding from statutory consultees who might also be struggling with their own resources – this might also be considered by the committee as part of this inquiry?

**Budget cuts mean it is challenging to maintain a the status quo let alone find the time and space to support transformational change** - RTPi research at the UK level has shown that the budget cuts have an impact in the manner they handle planning applications being more 'pro-development' and 'tick-boxing' which undermines the public's confidence in the system and is at odds with what is required through the WFG Act.

"Local Planning Authorities have had to adapt to survive in this environment, often adopting private sector working practices and aggressively pro-development stances to draw in the funding they need to resource their planning teams."

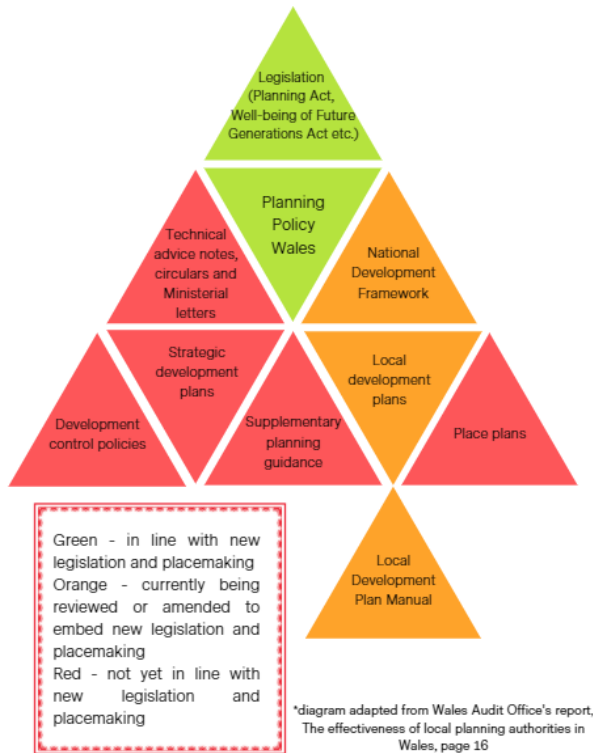
"'Proceduralism' – in other words, a 'tick-boxing' culture – has closed down a lot of the space planners traditionally had for reflection, professional discretion, and proactive planning. [Exceptions – large projects often in urban areas]." From RTPi written evidence to this Committee inquiry.

**The relationship between the planning system and the WFG Act is complex especially because the full planning system is yet to be aligned with the Act.**

This planning system is currently being overhauled - which I welcome but we are in the middle of a recast with elements not always aligned.

Only two elements of the recast are completed – Planning Act and Planning Policy Wales. The NDF and the Local Development Plan Manual, but this will still be far from a fully aligned system.

A complete recast will take time but is important. It should become a precedent for a full recast on areas such as housing and highways.



## Planning Policy Wales 10 embeds the Well-being of Future Generations Act, the National Development Framework must support and reinforce Planning Policy Wales, not weaken it.

In my response to Welsh Government's consultation on the draft National Development Framework (attached), I raised my concerns about potential expansions of airports and ports not in line with decarbonisation targets, declaration of Climate Emergency, as well as the goals of a Resilient Wales, a Prosperous Wales (low carbon economy) and a Globally Responsible Wales. This will need to be addressed in the final framework which must be published alongside a detailed assessment of how it supports the carbon reduction in the Environment Act (and accepted revisions).

### Good placemaking can save money to the public services overall, for example

- health (with the promotion of active travel, better housing, improving air and water quality...),
- waste (reduction and collection),
- energy with clean energy projects and infrastructure,

- biodiversity enhancement with green infrastructure - Nature based solutions should be part of planning as part of placemaking and possibly attract joint funding (prevention, integration, long term and collaboration)

### **A Placemaking approach could also increase revenues from Local Authorities according to RTPI.**

“Planning fees and other income from development management are just a small part of the story. Planning and placemaking can also raise income by developing new industrial and employment space, which comes with increased business rates. It can make a place more attractive to visit which brings income to the local economy. And it can help provide new homes in places people want to live, which brings in more council tax.” (RTPI)

“Investing in planning is an investment which will bring not only social return, but increased tax revenue for local authorities by bringing people and economic activity into areas and by reducing social costs. Spending on planning is a very small part of total public spending, which means relatively major increases in resourcing could be made with little overall impact on budgets. Moreover these investments would deliver huge returns – rather than being forced to rely on generating more fees, Local Planning Authorities could help deliver social, environmental and economic outcomes which make society more resilient, happier and fairer.” (RTPI)

### **Realising all these ambitions and savings requires strong leadership.**

Leaders both in Welsh Government and in local authorities need to change the culture from the cheapest option (way of operating or development authorised) to the one that can maximise contribution to the national well-being goals. This also applies to the housing and procurement sectors.

### **Question 3 - How Planning Services have to be more creative in how they deliver the Well-being Future Generations Act – especially around the community involvement and the role of planning committees and their decisions.**

The Well-being of Future Generations Act is about finding more creative ways to address the problems of the present with the future in mind.

**Local authorities should recognise the importance of the role of planning and placemaking in its senior staffing structures (within the Local Authority and in terms of partnership arrangements e.g. Public Services Boards) - RCTPI and Building Better Building Beautiful Commission 'Living with Beauty Report' called for similar role a few weeks ago.**

Monmouthshire Council has created a role of 'Head of Placemaking, Housing, Highways and Flood'.

**Strong leadership and investment is needed to see the value and potential of planning** as a key mechanism to deliver on their corporate and well-being objectives and who drive a new culture of searching for and prioritising developments which help save money in other parts of the organisation.

A useful tool for this - RTPI Value of planning tool is currently being used by Merthyr and Bridgend.

**There should be an increased demand on developers to show their use of 5 Ways of Working and real effort to maximise contribution to the goals** and should be the norm for local authorities before approving proposals.

**Increasing use of technology could also be an opportunity to drive efficiencies and have benefits to the environment.** For example;

Going paperless supports a reduction in waste and saves in huge printing costs.

Inspections could be done by satellite or drones to save on the travelling costs and carbon emissions.

**Adopting Strategic Development Plans would help with regional placemaking - more effective use of resources** and lighten the requirements of Local Development Plans (only needing to be light if a Strategic Development Plan is adopted).

**There should be better monitoring of planning outcomes** – currently the onus is on the general public and Councillors to object. Welsh Government should look into improving scrutiny of decisions and monitoring outcomes of planning. The initiative from the Minister to call in every application (post 15 Jan 2020) of more than 10 houses, or more than 0.5 hectare, conflicting at least 1 provision of the Local Development Plan, is a step in the right direction.

**On involvement specifically:**

**There is public concern about the transparency of the planning process** - Planning is the topic people contact me about the most.

**Resourcing involvement and public participation is a particular challenge for Local Authorities currently.**

**Involvement happens at the wrong time** – often at the consideration of planning applications rather than at the plan making stage – more effort in this area could save time and money at the application stage and the pre-application phase should be used more often to better involve local communities and businesses affected.

**Removing barriers to involvement such as changing the legal requirements for consultation and notification** – I welcome the Wales Audit Office recommendation to review Development Management Procedure Order 2012 and update the engagement and involvement standards for local planning authorities.

**Co-designing projects is key for communities to feel fully involved but it has to be resourced** which is difficult given there has been 50% of staff reduction in planning departments and communities themselves can lack resources. For example, Woodland Trust have told me that in the case of the Dinas Powys flood protection plan, the community was unhappy with the initial process and decision and complained. I understand that Natural Resources Wales has now agreed to go back and take a co-design approach; however, this will take a lot of time and effort from the community who are not resourced either and who are relying on volunteers.

**Place Plans should be widely adopted** - Agree with the Wales Audit Office.

**Technology can help to engage** – webcasting of meetings, 3D software to show potential developments and how they would integrate in the current environment, better use of social media etc.

For example, Brecon Beacons National Park Authority used a 'Minecraft' style approach to engage with children in their area to plan their communities of the future.

**Planning committees are an integral part of the planning system and an important part of giving voice to citizens but there is a perception of political considerations sometimes overtaking the technical aspects of the planning process.** I agree with the Wales Audit Office, that councillors need to be trained so that they understand the consequences of their decisions against the well-being goals and well-being objectives.

Yours sincerely,



Sophie Howe  
Future Generations Commissioner for Wales