

**Submitted by email to:**

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## **Response to Consultation on Increasing Planning Fees and Performance (April 2023)**

Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. We bring together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across England and Wales and further afield.

We welcome the opportunity to respond to this consultation but have chosen only to respond to selected questions as set out below.

### **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**

If the proposed increase in planning fees is introduced, the additional income which results should be ringfenced for spending within the local authority planning department in order to improve planning performance. If the additional income resulting from increased development in an area is focused on building capacity and resources in the planning department and enhancing planning outcomes, local planning authorities will be better equipped to undertake the full range of tasks needed to ensure that development in an area is helping to support nature and climate recovery.

If planning is to deliver positive outcomes for nature, local planning authorities need the resources to properly assess the impacts of proposed developments, identify the appropriate conditions required to limit any detrimental impact on the environment, and to monitor and enforce those conditions if the development is approved. Currently a lack of specialist expertise in areas such as ecology and landscape, and a lack of resources generally in planning departments, can limit the extent to which these issues are addressed effectively through the planning system.

**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?**

**Yes**

As well as recognising the additional costs local planning authorities often incur in such cases, doubling the fee for retrospective applications will act as a deterrent, helping to lower the risks to nature posed by applications that do not have planning consent and have not been subject to a thorough assessment through the planning system.

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

The greatest skills and expertise gaps within local planning authorities are ecology and monitoring and enforcement.

Currently, local planning authorities do not have sufficient capacity or ecological expertise to fulfill their statutory planning functions. A 2021 study funded by Defra and undertaken by ALGE<sup>1</sup> found that as many as 26% of LPAs do not have access to ecological expertise. A 2016 survey conducted by ALGE<sup>2</sup> found that there is huge variation in the quality of ecological reports, with many ecological reports paying insufficient regard to the mitigation hierarchy, provided with insufficient information, and in assessing impacts there is a wide variation in the quality of work and in conformity with CIEEM guidance.

Sufficient capacity and funding for local planning authorities to undertake monitoring and enforcement is essential to ensure positive outcomes for nature. However, enforcement action is discretionary, and it is clear that it is an area where activity has declined as local planning authorities have been forced to make savings. There were 30% fewer enforcement notices issued in 2018/19 (3,867) compared to 2008/09 (5,532).<sup>3</sup> The Government has already identified a need for practical and financial support for local planning authorities, including new good practice guidance and funding for planning enforcements in order to ensure greater consistency in the use of planning enforcement powers.<sup>4</sup>

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

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<sup>1</sup> <https://www.adeptnet.org.uk/sites/default/files/media/2022-07/ALGE-ADEPT%20Report%20on%20LPAs%20and%20BNG.pdf>

<sup>2</sup> <https://www.alge.org.uk/wp-content/uploads/sites/15/2021/01/ALGE-Ecological-Report-Fitness-for-Purpose-Full-Report-2016.pdf>

<sup>3</sup> <https://researchbriefings.files.parliament.uk/documents/SN01579/SN01579.pdf>

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/917668/Unauthorised\\_development\\_and\\_encampments\\_response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/917668/Unauthorised_development_and_encampments_response.pdf)

**departments and pathways into the profession? Please provide examples of existing good practice or initiatives if possible.**

The Government can support greater capacity and capability within local planning departments by providing a robust framework for planners to do the job they want to do – to create sustainable, healthy, beautiful places for people and nature.

A statutory purpose for planning to deliver the targets and objectives of the Climate Change Act 2008 and the Environment Act 2021 would support planners in making policies and decisions that are good for people and nature.

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