



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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PDP Resources (Fees)
Communities and Local Government
Zone 4/J2
Eland House
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Dear Madam

PLANNING FEES IN ENGLAND: PROPOSALS FOR CHANGE

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Institute welcomes the opportunity to comment.

The consultation paper deals only with proposed changes to the scale of planning fees and their justification. It does not consider widening their scope to include, for example, listed building consents although we are aware that some planning authorities have argued for this. The Institute's response to the consultation reiterates our current policy of opposing fees for listed building applications, but we accept the merits of the opposing argument and would be happy to engage in discussions about this should the CLG think this might be useful.

Q1 Would a fee level increase of 25% be reasonable? Should householder applications be largely shielded from that increase?

On the basis of its answer to Question 2, the Institute thinks that this option is the more realistic. It is not clear to the Institute why householder applications should be shielded. Householder applications often involve considerably more work than covered by the application fee and, as with all building operations, the current fee is only a small fraction of the cost of preparing and implementing a scheme of building works. The Institute would prefer to see reductions in fees given to proposals that met certain criteria, such as low carbon footprints and use of renewable materials.

Applications for listed building consent should remain exempt of fees.

Q2 Would you prefer that fees go up by the full 40% to provide more resources for planning?

The Institute believes this might be justified only if the increase actually gave rise to service improvements. It is not clear how the relationship between higher fees and service delivery might be forged given the severe dearth of staffing resources in many authorities.

Q3 What are the likely effects of any of the changes on you, or the group or business or local authority you represent? Will there be unintended consequences, do you think?

The Institute does not foresee any of these proposals affecting the interests of historic assets to any great extent.

Q4 Performance on development control is currently measured against targets to turn around 60% of major applications within 13 weeks, 65% of minor applications and 80% of other applications within 8 weeks. Given the desire for further service improvements flowing from any fee increase – without perverse incentives – what do you think would be the best form of performance measurement for development control and what should be an appropriate benchmark?

Time target performance measures are broad based. Applicants are generally interested in only one application. What is important to them, and the community as a whole, is the quality of the decision-making process and the outcome. So any time target based on percentages is going to be arbitrary. It is not easy to see how the current performance measures could be improved upon. Retaining qualitative measures relating to the process and outcomes, in addition to the time targets set out above

Q5 Are current fee maximums serving any useful purpose?

The Institute has no view on this question.

Q6 Do you welcome the proposed fees for discharge of conditions? Do you agree this should not apply to conditions imposed on, say, listed building consents?

The Institute supports this proposal. It is a fee for work that ought to be in the competence of the developer to undertake himself in most cases. The non-application of this to listed buildings would be consistent with the rest of the fee structure.

Q7 Will it be useful if the local planning authority can offer a 'premium service'?

The Institute supports the context of premium service for large schemes and those where substantial pre-application negotiations are required, including those involving heritage assets. Consideration should be given to abatement of application fees in cases where authorities have made a charge for pre-application work, perhaps to the extent of the charge,

Q8 Currently, Government sets planning fee levels. How do you feel in principle about the idea that each local authority should be able to fix its own (non-profit-making) planning charges in future?

The Government has made great strides in standardising procedures for making life easier for applicants who have to deal with many authorities. This proposal would be a step in the wrong direction.

Q9 Do you have any comment on the outcomes predicted in the partial RIA, in particular the costs and benefits (see Annex B)?

The Institute has no comment on the RIA other than to reiterate its comment that increases in fees should be related to increases in performance.

We would be grateful if these comments could be taken into account.

Yours faithfully



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