

### BUILDING CAPACITY THROUGH COLLABORATION AND CHANGE

RTPI Research Paper

NOVEMBER 2023

Making the most efficient and effective use of existing planning resources in Wales



RTPI champions the power of planning in creating prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors and over 1,300 members in Wales. 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.

#### **Acknowledgements**

RTPI Cymru is grateful for the inputs of everyone who engaged in the stakeholder workshops and provided additional information to inform the project findings. Thank you also to the members of the RTPI Cymru Policy and Research Forum for their involvement in shaping the project.

This report and on-going work is commissioned by RTPI Cymru and delivered by Dr Neil Harris MRTPI (Cardiff University). Neil's experience has helped inform not only the evidence gathering process, but also generating discussion around practical solutions. We would like to thank Neil for his work and continued support on this project.

Front cover image: Nick Treharne https://www.nicktreharne.com/

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#### You can get involved in the conversation...

We want to involve our members and others in **a continuing conversation** about how to make more effective and efficient use of current resources in the planning system in Wales. We are **looking for interesting and innovative ideas** from within Wales or elsewhere that can deliver an efficient and effective planning system. You can participate in the project and **send us your ideas** – go to the following link and have your say. We will ask you just **three simple questions** and it will take you no more than a few minutes.

#### Complete the survey: https://forms.office.com/e/m3LSQsjhQm

Send us your ideas **by Friday 22<sup>nd</sup> December 2023** – and we will collate your ideas and report back in early 2024. Survey - Building capacity through collaboration and change



## **Executive Summary**

This project explores the ways in which **existing resources in the planning system in Wales** can be used as efficiently and effectively as possible. The project continues the conversation and builds on other recent projects that make a case for improved resourcing of the planning system.

This project's findings are based on a desk-based review of recent reviews of planning services and a series of workshops with selected stakeholders. The project also identifies **existing practices and potential changes to the planning system** that could deliver greater effectiveness and efficiency within current resources.

The key findings of the **desk-based review** include:

- There has been a **significant decline in resources** in the planning system and this has impacted on the capacity of the planning system
- There is a lack of capacity in some local planning authorities due to **difficulties in recruiting** and retaining planning staff
- There are increasing demands of the planning system and an increase in stakeholder expectations the planning system has been **trying to 'do more with less'**
- There is a skills deficit in some important but specialist areas of planning
- There is a need to improve some local planning authorities **performance data and other workload information** to secure better and more focused use of their resources

The report identifies **existing good practice and potential for further development** of more effective and efficient planning services in Wales in five key areas:

- Ensuring quality applications and decisions for example, helping landowners and developers bring forward suitable sites for inclusion in Local Development Plans, and supporting applicants and agents to provide good quality information when submitting planning applications
- **Building expertise and capacity** for example, identifying those areas of specialist expertise that are in limited supply and exploring shared service models to sustain this expertise, as well as building planners' expertise and confidence more generally
- **Communications and information** including making it easier for users of the planning service to find key information, managing planning enquiries in a more efficient way, and making planning and other data more accessible to the public and external users
- Support systems and workload management for example, using systems that promote more timely and efficient management of staffing and other resources, as well as building better insight into how well planning services are performing
- Strategy and prioritisation including working out what to focus on when resources are under pressure, as well as how planning services can connect with corporate priorities and their wider organisational context

The report identifies a series of recommended actions for the Institute working in partnership with other organisations involved in the planning system. These recommended actions include:

- Establishing an effective performance management and monitoring system for the planning system in Wales
- **Building capacity for sharing of good practice** in improving the effectiveness and efficiency of planning services
- Working collaboratively across organisations to build **high quality**, **accessible information and resources for users** of planning services

The report identifies the importance of **political and professional leadership**, as well as **collaboration** between different organisations, in developing a collective response to the challenge of resource constraints in planning.

## Introduction

This project explores the ways in which existing resources in the planning system can be used as efficiently and effectively as possible. The project continues the conversation and builds on other recent projects that make a case for improved resourcing of the planning system in Wales.

The context for the project is set by other studies that identify the need for more resources to be invested in order to deliver the planning system effectively – especially in local planning authorities, but also in other organisations. Resources are however constrained and there is competing demand for available public funding and other resources. This project recognises that while there is a continuing need for improved resourcing of the planning system there is also a demand for more effective planning services.

The project explores if and how public sector planning organisations are being driven to innovate and examine their efforts to make more efficient use of existing resources. The scope of the project extends to the statutory planning system, including development management, development plan preparation, and planning support and administration. The primary focus is on local planning authorities, yet any innovation or actions to drive efficiency in other public sector organisations is also in scope. The project also recognises that various users of the planning system, such as planning consultants, may be able to provide useful input to the project.

#### **Project aims**

The aims of the project are:

- To identify examples of innovative practice that help to maintain and improve planning services and enhance planning outcomes within existing resource constraints
- To identify the conditions that enable local planning authorities, and other public organisations in planning, to innovate in how they deliver planning services as a way of dealing with limited resources
- To identify any barriers to local planning authorities and other planning organisations introducing new practices that improve the efficiency and effectiveness of the use of their resources

The project included a desk-based review of recent research and audit reports on the planning system in Wales and other parts of the United Kingdom. The review provided the basis for a series of online workshops with various stakeholders in the planning system in Wales. elected projects and initiatives were then identified for short follow-up interviews and enquiries. The project work was undertaken in the period August to October 2023.

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# Efficiency and effectiveness – the planning system in Wales

This section reports the findings of a desk-based review of existing studies and reports that have examined the theme of resourcing of the planning system in Wales and other parts of the United Kingdom. The review is organised here around these key sources, starting with Audit Wales' review of planning services, then progressing to RTPI Cymru's 'Big Conversation', and then briefly to studies in other parts of the United Kingdom.

The review concludes with a summary and identification of key areas to be explored in the workshops.

## Wales Audit Office - The Effectiveness of Local Planning Authorities in Wales (2019)

The review of local planning authorities by Wales Audit Office published in 2019 provides important context for this study. The review has many detailed findings and paints **a very challenging picture for delivery of planning services** locally across Wales. Some of the headline findings in the review include:

- "local planning authorities have seen a **significant reduction in capacity** and struggle to deliver their statutory responsibilities" (paragraph 9)
- "With less money to fund services, planning officer **capacity is stretched and skills are decreasing** in key areas of work" (paragraph 10)
- Report acknowledges **challenges of recruiting and retaining staff** in local planning authorities, as well as skills and experience deficiencies due to retirement and career change.
- Identifies significant reduction in resources in **development management** functions, and specific challenges in responding in a timely way to planning enforcement enquiries.
- Lack of access to legal expertise and advice leads to risk-averse practices
- many people have difficulty finding information on planning information is often inaccessible and not useful' and can result in increased workloads for simple information requests
- "the Auditor General has concluded that **Planning Authorities are not resilient enough** to deliver long-term improvements because of their limited capacity and the challenge of managing **a complex system**" (paragraph 15)
- "The evidence from our review highlights that with **less resource**, growing expectations and reducing capacity, local planning authorities alone cannot respond to the demand placed on them" (paragraph 2.16).

#### Local authority funding and expenditure

In terms of funding and resources the report notes that "Local planning authority expenditure has reduced significantly in the last decade. In real terms, net expenditure has fallen by 50% from £45 million in 2008-09 to £22.8 million in 2017-18 – Exhibit 6. The largest reduction has been in development control where funding has reduced by 59%" (paragraph 2.2)

#### Collaborative working and sharing of resources

One of the main recommendations of the report is for **local planning authorities to collaborate regionally to address deficiencies in capacity and skills**. This includes pooling of resources to commission evidence in support of local development plan preparation where significant costs are incurred:

"Adopting a Local Development Plan can be a costly process. In 2015 Welsh Government estimated the costs of producing a Local Development Plan was between £1.1 and £2.2 million" (paragraph 1.5)

The report went on to express some **disappointment with the extent of collaborative working** and integration of planning services: "However, despite senior officers and members of planning

committee responding to our survey highlighting that they are collaborating and integrating services to reduce costs and build capacity, we found only **limited evidence of this taking place**. Rather, most planning authorities are trying to do everything but with less resources." (paragraph 2.16).

#### Positive experiences and examples of good practice

The report identifies some good practices of the time in using resources effectively. These include:

- Enhancing pre-application and registration services (Newport City Council)
- **Integration** of planning policy teams with development management and building control with a 'development team ethos' (Ceredigion County Council)
- Joint production of local plans in England with the realisation of cost savings of £1.5 million that have been used in part to invest in early career staff (Plymouth and South West Devon Joint Local Plan); and other similar collaborative policy work resulting in savings of £2.2 million and a significant reduction in volumes of supplementary planning guidance (county and borough councils in Suffolk).

#### Summary

The overall findings of the report paint a very difficult and challenging situation for local planning authority services across Wales, as summarised in the following extended extract:

"However, the weight of our evidence shows that **reducing staff numbers, the loss of experience, less training and trainees** and a less prominent role for planning in strategic decision-making structures, raises some **real concerns over the future resilience of the service**. Indeed, many survey respondents felt that the level of expertise in planning authorities has eroded in recent years and **the service is neither 'fit for the future' or able to deliver what is needed**. This raises some important questions about how sustainable planning services are, and whether they can play the role expected by many in shaping the future of Wales." (paragraph 2.20, emphases added).

The next section explores reviews of individual local planning authority services undertaken since the all-Wales review.

#### **Reviews of local planning authority services**

Audit Wales has also conducted a series of reviews of individual local planning authority services in the period since its all-Wales review of the effectiveness and efficiency of the planning services. Some local planning authorities have also conducted their own internal reviews. This section summarises some of the areas of concern in each review but also **identifies positive initiatives leading to enhancement of planning services**. Reports are included here for five of the local planning authorities in Wales.

#### Carmarthenshire County Council

Audit Wales published its Review of Planning Services for Carmarthenshire County Council in July 2021. The report's main conclusion was that "significant and long-standing performance issues in the planning service need to be urgently addressed to help support delivery of the Council's ambitions" (p.4). Key aspects needing addressing included determination of major applications, significant performance issues in development management and planning enforcement, and general performance management and service improvement.

Audit Wales published a follow-up to its review in October 2022. The follow-up report commended the Council for its swift and effective response to all recommendations in the initial report. Service

improvements are noted arising from: clearer strategic focus and alignment with corporate objectives; improved collection and use of performance management data; improved staff capacity, including recruitment of staff; identification and mitigation of risks in key areas of the planning service; and benchmarking with and learning from other local planning authorities.

Specific changes referred to that are of relevance to this project include: a 'team' approach to major projects and applications; improved definition of roles and responsibilities for key positions in the planning team; establishment of a 'Planning Hwb' as first point of contact for all service users; active prioritisation of a backlog of enforcement cases and establishment of technician and assistant roles in planning enforcement. The 'Planning Hwb' appears to have been a significant enhancement with positive impact on the planning service.

#### Ceredigion County Council

Audit Wales published its Review of the Planning Service for Ceredigion County Council in October 2021. The report focused principally on the **governance arrangements of the Council's development control committee**, including whether these were supporting the council in its corporate objectives. The report also noted the challenges of **vacancies in planning staff** and the impact of this in performance of the planning service. Staff capacity was noted as a 'significant concern' (p. 4) and a risk to the resilience of the development management function. The taking of positive enforcement action and committee decisions contrary to officer recommendation are other key issues addressed in the report.

Some of the recommendations of most relevance to this study include: providing for **opportunities for learning from good practice** of other local planning authorities; ensuring that **governance and decision-making arrangements** make most effective use of resources (e.g. definition of application types, schemes of delegation); effective management of information and consultation leading to more efficient use of time at planning committees.

#### Wrexham County Borough Council

In March 2022 Wrexham Council considered the recommendations of the Planning Advisory Service on the Council's planning committee and development management services. The review and recommendations followed concerns about the Council's planning services. The report made a series of recommendations with the most relevant ones to resources **including investment in improved IT systems**, and reviewing staff resources. The inadequacy of IT systems was noted as causing significant inefficiencies and **difficulties with managing flow of work**. Financial challenges and constrained resources had impacted on recruitment and retention of staff, and also resulted in significant pressures on existing staff. Detailed recommendations also focused on **ensuring that highly-skilled and experienced officers were focused on those matters where their skills were most beneficial**.

#### Powys County Council

Audit Wales published its Review of the Planning Service for Powys County Council in April 2023. The headline finding was the expression of "concerns about the fundamental strategic, operational and cultural weaknesses of the Council's Planning Service. These weaknesses hinder its ability to consistently and sustainably support staff and Members to deliver an effective service that helps the Council achieve its corporate objectives".

"In common with other Welsh local authorities, the Council is currently facing **financial constraints** and is having to take difficult decisions on how it funds public services. The Council's planning service has not been protected from these financial pressures and it **is having to deliver more for less**" (p. 4, emphasis added).

The report explores a range of issues, yet highlight the **importance of clarity in roles**, **responsibilities and governance arrangements** for the efficient and effective delivery of planning services. The report also noted instability in staffing and employee practices, as well as weakness in data collection and monitoring of performance. The report highlighted too that there had been a lack of corporate awareness and oversight of the issues facing the planning service.

Some of the recommendations of most relevance to this project include: providing **opportunities for communication and discussion within the planning services team (e.g. planning team surgeries)**; learning from good practice in other local planning authorities; mechanisms for consistent **relationships with consultants, applicants and developers**; making more effective use of performance management data and **linking performance data to council priorities**; ensuring effective **registration of planning applications** and ensuring that missing information is addressed promptly.

#### Blaenau Gwent County Council

Audit Wales published its Review of the Planning Service for Blaenau Gwent County Borough Council in May 2023. The report noted in its opening sections a very significant change in a wide number of key personnel in the planning service across both officer and elected member positions. The review noted that earlier issues of staff vacancies and capacity had been addressed resulting in a fully-staffed planning service. **External consultants had provided valuable support** previously with some short-term gaps in capacity.

The reported identified a series of **positive features of the planning service**, including planning staff feeling well-supported, and **good coordination of and communication between staff as part of a 'team'** approach. The use of '**planning surgeries'** was identified as especially useful in planners being able to discuss interpretation of policies in deciding planning applications. Member training for those on planning committee had also been provided to support improved decision-making.

The report notes a **positive culture of learning within the planning service**, including learning from and networking with other local planning authorities. This has helped inform the council's practices in procuring IT systems and revising its scheme of delegation.

Areas of focus for enhancement included **performance data and reporting** in support of corporate objectives, and continuing improvement in **governance arrangements** for planning committee. The report also noted the **need for more effective business planning** for the development of the planning service, including the need for specific actions in future years. The report also noted the need to better support the planning service through **enhanced use of existing IT platforms**. The report identified a need for more accurate reporting of performance data. The planning support systems used in the council were identified as 'basic' – with the effect of limiting both service users' experience and performance management. A new system is being implemented to help deliver improvements in this area.

#### RTPI Cymru - 'The Big Conversation' (2023)

RTPI Cymru published a research report in January 2023 on its 'Big Conversation' study. The report identified that current investment in the planning system was making it **difficult to meet expectations** and deliver valuable outcomes. The Big Conversation had a specific focus on the wellbeing of planners working in the planning system in Wales. The context for the Big Conversation was a recognition of **constraints on and reductions in the financing of planning services**, especially within local authorities.

The Big Conversation report noted the real challenge facing the planning system in Wales:

"For the planning system in Wales to fulfil its statutory duties and deliver quality placemaking there is **a critical need for more investment**" (p. 8, emphasis added)

The report also goes on to identify that this need for investment occurs at a time of financial constraints, especially in support for public services:

"RTPI Cymru recognises that fully addressing the shortfall in investment and budgets for planning at the current time is not straightforward and there is a need to consider wider additional solutions" (2023, p. 4).

The Big Conversation noted increasing workload in planning organisations and identified a number of reasons for this. These can be summarised as:

- Challenges of recruiting and retaining sufficient staff, especially those with experience and specialist skills
- Increasing expectations of users of the planning system and planning services
- Expanding and widening requirements resulting from changes in legislation and policy with the need for specialist and technical inputs (e.g. drainage, flooding, ecology, viability)

These challenges are particularly impacting on local planning authorities, but the impacts also extend to expert advisory organisations and the private sector. The Big Conversation referred specifically to Natural Resources Wales and Cadw in terms of the need for **improved timeliness of specialist inputs** to planning decisions. The report also identifies a wider range of issues and themes where specialist input to planning is required focusing on water and other environmental issues (p. 20). **Access to specialist expertise and skills** is identified as impacting on both development management and local development plan preparation.

The Big Conversation report noted the significance of day-to-day 'operational issues' impacting on delivery of planning services, including planning administration, communication, ways of working, digital planning and IT (p. 18). The Big Conversation also reported **a lack of investment in digital support for planning services** with consequential impacts on workload and efficiency.

The report also noted an increase in the use of external contractors for delivery of core planning services. The report does not make clear why this is occurring given the suggestion from some respondents that recruiting permanent team members would be more suitable. Small planning policy teams in local planning authorities is noted as a factor in needing to source external expertise for plan-making.

The report specifically notes some scepticism about the added-value of pre-application community consultation – an example of increasing requirements of the planning service needing to be justified in terms of their additional workload and cost implications.

#### Good practice, solutions and innovations

The Big Conversation report advanced a range of potential solutions to the challenges experienced in the planning system. These include:

- Increasing public sector resources
- Increasing the supply of professional planners
- Improving skills and training
- Investing in digital planning
- Sharing specialist skills and resources on a regional or collaborative basis
- Collaborating on gathering evidence and commissioning expertise

"The need for more resources for planning was raised by most respondents as the main solution to workload issues." (p. 30).

More specific solutions identified in the Big Conversation report include:

- The need to **reduce 'wasted time'** for users of planning services through improved accessibility and communication with local authority planning teams
- Improving access to training and development opportunities, especially for development of specialist skills
- Value of mentoring of colleagues by more senior and experienced planners
- Access to legal advice to support planning decision-making
- Sharing of evidence-gathering across local planning authorities in support of local development plan preparation with joint or regional support and advice on specialist issues such as mineral, conservation, ecology, etc.
- A more focused approach to national planning that concentrates on core land-use planning issues and consequently enables direction of local resources to these issues
- **Co-ordinated and team-based approaches** to dealing with larger-scale planning applications, involving planners and specialist officers

There are several other issues and themes explored in the Big Conversation that are not explicitly stated as potential solutions but lend themselves to exploration of potential solutions. These include:

- The challenges are particularly acute for smaller teams in planning services with **increased size of teams** potentially allowing for improved resilience.
- Systems and processes for managing complaints about planning services given the significance of complaints in diverting resources from core planning work.
- Making more effective use of social media in planning.
- Scope for **ring-fencing of fee income** from planning applications.

#### Welsh Government performance reporting

Welsh Government has historically monitored and published data on the performance of local planning authorities in Wales. The latest year for which information is published is 2018-2019 published in January 2020. This point is noted in some of the Audit Wales reports on individual local planning authorities. It would be useful to clarify if there are plans to resume publication of data and analysis on the performance of local planning authorities.

Reviews of planning systems elsewhere in the United Kingdom – see below – highlight the importance of both overall accountability for the operation of the planning system and the

significance of effective performance management data to support effective and efficient operation of the wider planning system.

#### Resourcing in other parts of the United Kingdom.

#### England

The Housing, Communities and Local Government Committee of the UK Parliament published its report on The Future of the Planning System in England in June 2021. Section 9 explored resources and skills. The report noted **local planning authorities do not have enough resources** to address existing demands or those that may arise from planning reforms. The report noted a significant reduction during the preceding decade in resources, staffing, and especially **specialist skills** in conservation, design, and ecology. Delays arise from the lack of resources and expertise. Improvement of the planning service and **embracing of digital planning** would require significant investment. Government ministers noted a commitment to review resources and skills in the planning system, and an intent to focus more on strategic planning work over administrative work. RTPI noted a need for £500 million investment in the planning system.

#### Scotland

The RTPI Scotland Research Briefing titled 'Resourcing the Planning Service: Key Trends and Findings' was published in December 2022. The report highlights the very **significant impacts of funding cuts** on planning departments and a reduction in staffing in local planning authorities. In addition, the report notes very **significant additional requirements of the planning system as a result of reforms** that are unfunded. The report identifies the need for **workforce planning and succession**, as well as quantifying the number of required new entrants to the profession. The reports calls for additional investment in service delivery and recruitment, ring-fencing of increased planning fees, and additional government funding to meet the costs of new duties and requirements arising from reform. **Funding to support digital delivery and transformation of planning services** and activities is identified as a priority.

The Improvement Service in Scotland – an organisation focused on supporting local government improvement – recently appointed a **National Planning Improvement Champion**. One of the first actions of the Champion is to issue a 'call for ideas' on what makes for a high-performing local planning authority. This work is expected to contribute to the creation of 'a new performance management model for planning authorities and a reporting and monitoring process that helps them identify areas for improvement'.

#### Northern Ireland

RTPI Northern Ireland is engaged in work arguing for more resources to support the delivery of planning in Northern Ireland while also acknowledging a series of 'fundamental issues' in delivery of the planning system. This work does call for more investment in planning, but also notes more nuanced points about **ensuring investment is allocated in the most appropriate way**. It also calls for promotion of **more collaborative working**, and investment in training and skills to support enhanced performance. There is also an **emphasis on achieving greater efficiencies** in planning services and making the system more resilient.

A report by Northern Ireland Audit Office (2022) highlights that the planning system is not working efficiently – noting the **poor quality of submitted applications** and resultant delays and inefficiencies, siloed working and lack of joined-up working between planning organisations, as well as lack of timely inputs from statutory consultees. The report also identifies some key issues, as with other jurisdictions, in **effective workload management** and governance arrangements (e.g schemes of delegation, committee decision procedures, etc).

The Northern Ireland Audit Office report (2022, pp. 57-58) is also valuable for identifying **barriers to the establishment of shared services** designed to address skills deficits. These shared services providers can also experience significant workload increases and capacity constraints within their existing resources. The financial support from subscribing authorities appears to be central to the continuation of these services.

#### Summary and key points

The desk-based review of use of resources in the planning system in Wales can be distilled into a series of key points:

- There has been a **significant decline in resources** in the planning system and this has impacted on the capacity of the planning system
- Some of the most acute workload pressures are experienced in **enforcement and development management** within local planning authorities
- There is an additional lack of capacity in some local planning authorities due to **difficulties** in recruiting and retaining planning staff
- There are increasing demands of the planning system and an increase in stakeholder expectations the planning system has been **trying to 'do more with less'**
- There is a **skills deficit** in some important but specialist areas of planning
- There is a challenge in securing **timely inputs to planning decision-making**, including from statutory consultees
- The internal **governance arrangements and decision-making protocols** of some local planning authorities create inefficiencies in use of limited resources and capacity
- There is a need to improve some local planning authorities **performance data and other workload information** to secure better and more focused use of their resources, as well as ensure clearer delivery of corporate objectives

Many of these issues are related to delivery of planning services within local planning authorities, which is partly due to the sources available for inclusion in the desk study.

#### Areas to explore for 'good practice' in use of existing resources

The following bullet points identify a series of areas based on the desk review where the workshops can try to identify existing good practice in making effective and efficient use of existing resources. The points have been organised under a series of key themes:

#### Ensuring quality applications and decisions

- Mechanisms for avoiding delays in the planning process through avoiding incomplete planning applications or lack of supporting information
- Mechanisms for improving the quality of schemes submitted by developers and consultants
- Reviewing planning decision protocols, including delegation and committee procedures

#### Building expertise and capacity

- Enabling access to timely and cost-efficient advice and input from specialists, particularly on environmental issues and assessment of viability
- Organising planning activity and other specialist inputs through a 'team approach'
- Practices for building planners' skills and abilities, including through sharing learning and understanding within and beyond local planning authorities

• Practices designed to improve recruitment and retention of members of the planning team

#### Communications and information

- Managing communication with the public, including managing significant volumes of email and other correspondence
- Enhancing communication between different stakeholders, including local planning authorities, Welsh Government, and specialist agencies.
- Making effective use of local planning authority websites to ensure ease of access to key information for users of planning services

#### Support systems and workload management

- Use of digital platforms and IT systems to enhance planning services and improve efficiency
- Effective management of planners' workloads, including identification of tasks that can be delegated to professional support services, and ways of establishing priorities among competing demands

#### Strategy and prioritisation

- Actions designed to prioritise planning activities on those that help most to deliver on strategic objectives and link closely with corporate priorities ('doing what matters most')
- Actions designed to secure the general prioritisation of resources when such resources are constrained ('doing less to achieve more')

## **Stakeholder workshops**

Three stakeholder workshops were held online in September 2023 to explore themes and issues identified in the desk-based review. The workshops focused also on identifying specific examples of good practice in effective and efficient management of planning resources. This section of the report summarises the main discussion points and ideas in the workshops. Specific examples of good practice and innovation are collated in the next section of the report.

The three workshops had a thematic focus: (1) development management and enforcement; (2) planning policy and local development plans; (3) supporting and managing planning services. Some key messages were repeated across more than one of the workshops and these are reported in the most relevant section.

#### **Development management and enforcement**

The first main theme in the workshop focused on activities to try and support **the submission of better development proposals and well-prepared planning applications**. There has been some positive development in local planning authorities providing pre-application advice to landowners, developers, and applicants. Workshop participants across public and private sectors considered these activities to be beneficial where they were done well and added value. Experiences for developers and applicants have sometimes been mixed. A key message is to **ensure that pre-application and frontloaded advice is focused on those applications where the advice can make the most impact** – and for 'quality' and added value to take priority. Pre-application and pre-validation meetings on site were highlighted as particularly valuable.

Several local planning authorities were identified as organising 'developer forums'. These were considered really useful vehicles for briefing developers and landowners of changes in planning policies and requirements for planning applications. These forums were supported by local planning authorities, planning consultants, landowners and developers. There is however a need to try and engage a wider range of planning consultants in these forums, especially sole practitioner and smaller-scale consultancies.

Participants highlighted the need to revisit **validation thresholds** to address the difficulties of 'just sufficient to validate' planning applications. These applications could later consume significant time and resource for local planning authorities, especially for some small-scale planning applications. A revised validation threshold and use of dedicated validation officers could contribute to better use of planners' time and resources.

Discussions in the workshops focused on the need to **modernise consultation and publicity practices** in development management. The continuing use of newspaper notices is considered costly and often ineffective. Participants felt there was scope for embracing technology for **quicker**, **wider-reaching and more cost-effective publicity and consultation** of planning applications – for example, a single portal for all applications mapped geographically, with parameters for setting notifications.

There are positive examples of **shared services** across local planning authorities in providing support for decision-making on minerals and waste applications, as well as other supplementary and related functions. Local planning authorities reported spending significant amounts of money on using consultants for specialist inputs that may be capable of being delivered through a more extended development of shared services. Key areas and specialist inputs that may benefit from more shared services included **retail, transport, built environment conservation and heritage, and biodiversity and nature conservation**.

The variety of **delegation protocols** and procedures across local planning authorities in Wales was identified as benefitting from some standardisation and consistency. Welsh Government has previously deliberated and consulted on a national delegation protocol for planning decisions. The **outcomes of the Welsh Government consultation exercise could be revisited** as a way of ensuring that planning committees remain focused on the most significant planning applications. This could have benefits in terms of efficient use of planning resources in supporting committee work.

Planning decisions may be subject to appeal and judicial review. Workshop participants identified that officers' planning reports to committee tend to be written comprehensively and in detail in anticipation of potential challenge to a decision. This can lead to **lengthy reports to planning committee** and considerable investment of time in report writing. Committee report templates sometimes contributed to the overall length of reports. These contextual factors can make it difficult to produce shorter and more focused reports. Nevertheless, one local planning authority was encouraging planning officers **to emphasise 'quality of decision' over length of reports**. Some training and guidance on writing concise yet complete reports could be very useful.

An efficient and effective planning committee is an important component of a well-functioning local planning authority. Workshop participants identified some **valuable training is being provided for elected members** on planning committees, including on the securing of developer contributions

through s.106 agreements. This training is not usually mandatory and workshop participants supported **stronger direction for elected members to attend training** before sitting on planning committees.

#### Planning policy and local development plans

A key theme in this workshop was supporting landowners, developers, communities and consultants to **bring forward suitable sites for inclusion in local development plans**. This includes local planning authorities coordinating specialist inputs and providing technical advice on individual sites. These services are sometimes provided free-of-charge, while some local planning authorities offer a fee-paying service. Workshop participants in the private sector considered these services to be **especially valuable and a good investment** for strategic and larger-scale sites. Participants suggested that there could be opportunity to **explore more income-generating activities** within the local development plan process as a way of securing additional resources.

Workshop participants identified a need to better **support case officers in development management with interpretation of development plan policies** when deciding planning applications. There is a need to enhance planners' skills and confidence in understanding policies in the development plan and how to apply these to specific development proposals and sites. Briefing notes on key development plan policies can be used to help case officers in development management to interpret plan policies and diminish reliance on planning policy teams for internal consultations. These are reported as being especially useful when new local planning policies are adopted.

Smaller local development plan teams noted the challenge of building specialist in-house expertise and experience in subjects of increasing importance to effective local development preparation. The buying-in of specialist expertise from the consultancy sector was identified as costly. Workshop participants suggested that the work of Corporate Joint Committees and development of Strategic Development Plans could be an **opportunity for networking people across organisations with an inventory of specialist expertise** that could be drawn upon in plan-making.

Planners with experience of **preparing a joint local development plan** noted the significant advantages this had for planning officers – including larger, extended teams with more capacity and access to a wider range of experience and skills. These planners recognised the political challenges for wider preparation of joint local development plans, but still identified **efficiencies in collaboration on commissioning of external inputs to plan preparation**. Strategic planning work – including that in south east Wales – could benefit from clearer delegation arrangements for commissioning of work in a more timely manner.

Participants identified **considerable duplication of information for communities**, the public and other stakeholders on the local development plan process across different local planning authorities. between local planning authorities A **centralised resource of well-designed public information** and engagement materials could be developed that all local planning authorities, as well as a range of other organisations, could direct stakeholders to.

Local planning authorities were also noted as providing differing access to spatial information relevant to planning and other services – with some **positive examples of geographic information being made readily available to the public** and diverting multiple enquiries to the planning

department for information. The preparation of Strategic Development Plans and the wider work of Corporate Joint Committees was also seen as an opportunity for updating and enhancement of IT and support platforms for plan-making.

Planners noted that they were sometimes 'locked in' to local development plan processes – and just **'managing the process' of making a plan**. They identified that useful opportunities to make a difference on the ground in their communities sometimes had to be neglected because of the focus on the local development plan. These opportunities were often short-term and included chances to secure additional funding – yet the opportunities were sometimes missed out on because of the inability to flex. The constraints on existing resources and the need to embrace a placemaking agenda could require **reconsideration of the resources dedicated to local development plans**.

#### Supporting and managing planning services

Workshop participants recognised that local planning authorities' **website information on planning functions and services could be extensive and difficult to navigate**. This can in turn generate many direct enquiries to the planning team and take up considerable staff time and resource. Participants suggested **a clearer focus on core information** that needed to be accessed regularly by users, and that this information should be easily accessible and simplified in content. Key areas suggested as a priority for easier and simpler access to core information included submission of valid planning applications, both via Planning Applications Wales or directly to local planning authorities, and public enquiries about opportunities to comment on planning applications and get involved in plan-making consultations.

The **language used in planning** was identified by workshop participants as often being complex, hard to understand, and poorly related to the ways in which the public and communities may understand them. The use of excessively technical language was suggested as being a barrier to working with and for local communities.

The **challenge of recruiting planners** to vacant positions was noted and some local planning authorities had adopted different strategies to try and address this. Some had supported placement year opportunities for students on planning courses as a way of immediately **building early-career capacity** as well as growing a balanced career profile over the longer-term. There is support for developing an apprenticeship scheme in planning in Wales alongside developing more part-time courses to enable more early-career capacity. Some participants identified the need for **strategic mapping of career structures and progression** across regions and Wales as a whole – providing an opportunity to map out skills gaps and risks to loss of critical expertise, and respond to these in a coordinated way.

Workshop participants reported that each local planning authority usually commissions its back office systems and operational platforms separately. Participants noted potential for **significant efficiencies in collectively commissioning a common, purpose-designed system**. This could offer potential for more integration of data platforms, mapping, and other resources – with real-time, latest data and information available in easy-to-access digital form.

An example was identified in the workshop of **refining internal performance management systems** within one local planning authority to enable current data on how the department was performing. This was identified as having significant advantages over previous systems that primarily

reported on more dated past performance of a couple of months ago. The new system mean that resources could be redistributed and activities prioritised to enable timely response to performance management issues.

#### **Cross-cutting issues in the workshops**

Workshop participants highlighted the **need for improved sharing of good practice** across local planning authorities and other stakeholders. There are some positive examples of informal groups for the sharing of experience and providing support, for example in providing a network for planning enforcement officers across north Wales. Participants also noted the **absence of a national**, **independent organisation for sharing good practice** and delivering practical training in planning in Wales.

Planners – like many other professionals in both the public and private sectors - have increasingly been **working from home** since the coronavirus pandemic and taking advantage of the benefits this can offer to employees in terms of flexibility and reduced commuting time and costs. Workshop participants felt that this had **impacted negatively on planners' ability to 'learn on the job'** and to share experience within the workplace. This was resulting in skills deficits and loss of shared experience. Some employers have introduced **weekly team meetings where planners can engage in informal exchange of issues**, problems and experiences between colleagues. This was seen as very positive in building capacity and experience.

Several participants in the workshops identified the need for planners to embrace specialisms in their work but at the same time **sustain their skills and abilities as 'well-rounded' planners**. The sustaining of a well-rounded overview of planning matters was identified as leading to better understanding of the range of planning work and potentially leading to greater confidence and improved efficiency. This could be achieved through planners securing some rotational experience across sections within their organisation.

Workshop participants identified considerable **scope for local planning authorities to collaborate and work together** across many issues that could lead to improved efficiency and effectiveness of the planning system. These issues include use of common information for users of planning services – for example, the stages of preparing a Local Development Plan and opportunities to get involved – design of various forms that users may need to submit, and a degree of standardisation in decision-making protocols. They also recognised that this would perhaps need **support and facilitation from Welsh Government and other organisations** if it is to happen, and lead to better coordination and alignment between local planning authorities.

# Key examples for improving the use of existing planning resources

#### Introduction

This section of the report outlines examples of where actions and initiatives have been developed to make more effective and efficient use of resources in the planning system. The ideas and

examples are organised under the themes identified in the desk-based review and are sourced from that review and the workshops.

#### **Ensuring quality applications and decisions**

#### Supporting effective site identification in local development plans

Monmouthshire County Council offers a Candidate Sites Advice Service as part of the preparatory work on its replacement Local Development Plan. This is a discretionary service that landowners, developers and site promoters can request of the Council. The service is modelled on the more established development management service offered for pre-application advice. The service incurs a fee, varying depending on the level of service, and is **income-generating**. The service is offered at two different levels. Level one provides for a desk-based assessment of a potential candidate site along with a meeting with planning officers. The level one service also provides an assessment of the compatibility of the proposed site with the Council's plan strategy with detail depending on the stage of progress in establishing that strategy. The level two service attracts a higher fee and provides an example of a 'development team' approach to evaluating candidate sites. The level two service includes a site appraisal by a planning policy officer, an extended meeting with planning officers and other officers providing other specialist inputs, such as highways and green infrastructure, discussion of s.106 contributions and community infrastructure levy payments, plus an additional meeting. The level two service also includes provision of a written report. Planning consultants who had engaged with the service on behalf of clients reported that the service was extremely valuable and effective in bringing forward sites and development proposals.

#### Helping agents and applicants to understand planning application requirements

Several local planning authorities in Wales use 'developer forums' and similar opportunities to engage planning consultants, landowners and developers in open discussions about bringing forward good quality development proposals and valid planning applications. Examples include those provided by Swansea Council, Rhondda Cynon Taf County Borough Council, and a joint forum between Pembrokeshire County Council and Pembrokeshire Coast National Park Authority. These forums are considered most effective when the discussion is conducted in a collaborative, open, honest and transparent manner. The forums provide an opportunity to discuss 'hot topics' and for planners and others specialists to advise agents on expectations of new development and submission of valid planning applications. Examples of 'hot topics' addressed in different forums include sustainable drainage, biodiversity, and nutrient neutrality. Elected member participation in these forums was considered valuable too, even though some of the challenges are recognised in their role as decision-makers on any submitted planning applications.

#### **Building expertise and capacity**

#### Developing shared services and sustaining specialist expertise

The North Wales Minerals and Waste Service is a valuable example of the development of a shared service supporting a number of local planning authorities with access to specialist expertise in deciding planning applications. The service has been in place for over ten years and revised service-level agreements have recently been renewed between the service and its subscribing local planning authorities. The service was established in response to the challenge of sustaining effective minerals and waste planning expertise in local planning authorities following reorganisation of local government. A key driver for the service was avoiding the risk of poor planning decisions rather than securing financial savings or cost efficiency gains. The shared service has had some additional advantages in providing scope for specialist officers to work within a team and with the availability of career pathways and promotion, alongside flexibility within a team to adapt to differing demands. Key elements in the success of establishing the service included

a clear focus and scope for the service, use of external facilitators to support design of the service, identification of a lead officer, and all subscribing partners bringing resource and expertise to the shared service. The service operates out of two locations, has a team of seven officers, and has different options for contract service levels. The service is also **contracted for other related work** that helps to sustain the service in financial terms, including work funded by Welsh Government.

Audit Wales considers that there is **scope for further development of shared services** in the planning system. The North Wales Minerals and Waste Service highlights the importance of several issues in considering the scope for wider development of shared services within the planning system in Wales. These issues include clarity of scope and purpose of the shared service, the development of a business model that generates income streams, the commitment at senior level of partner organisations, and recognition of the set-up phase that can take up to two years.

#### Sharing good practice and building support networks

Planners value the opportunity to also **informally share experience** with others planners working in similar roles. This is especially so for those working in either specialist areas of planning or working in small teams or as individuals. One example is the **North Wales Planning Enforcement Officers network** which has been developed as a platform for conversation and sharing of experience. Planning enforcement teams are often small with local planning authorities and opportunities to share experience and ask questions can be an important way of **building expertise and confidence**. These informal networks can provide a more local complement to wider subject networks such as the National Association of Planning Enforcement.

#### Developing a 'pipeline' of planners

Many planning organisations in Wales report **challenges with recruiting planners** and other specialists with appropriate qualifications, experience and expertise. This is especially so for local planning authorities. Some planners refer to recruiting to their own organisation and this simply resulting in 'gaps' for other organisations. This has led to planning employers adopting various strategies including 'growing their own' and trying to build a 'pipeline' of planners. The Vale of Glamorgan Council has for many years supported the provision of placement year opportunities for students on professionally-accredited planning degree programmes. This has enabled the Council to secure staff capacity for early-career roles and activities, as well as providing longer-term scope for recruiting and retaining early-career planners to support the planning service.

#### **Communications and information**

#### User-focused information answers to frequently asked questions

**Cyngor Gwynedd** has a clear and accessible webpage for planning information for residents and the wider public. This is used to try and enable the public to **find core information quickly** and easily. The webpage is organised around key icons and the Council has also organised its material around the key questions most frequently asked in enquiries to the Council. Investment in well-organised information for the public on key planning issues can be a way of **diverting multiple**, **simple enquiries** that use too much officer time.

#### Supporting service users with a central focus for enquiries

A key action in **Carmarthenshire County Council** improving its planning services within existing resources was the development of a '**Planning Hwb**'. This was developed in response to the Audit Wales recommendation that the Council 'better consider and apply the perspective of its service users in designing and delivering its planning services to continuously improve the service in a sustainable way'. This was reported as having led to improvement in **accessibility** of the Council's planning services to users and **improvement in communication** with those users. The Council was commended for how it had implemented changes to enhance planning services through userfocused design. Carmarthenshire County Council has also developed a useful and focused set of frequently-asked questions for users of the planning service and for the wider public.

#### Making data available to users

Local planning authorities manage and generate significant amounts of data and information. Some of this data and information is **spatial or geographic** in character. Making this information available to the public and users of planning services can divert direct enquiries to planning services and improve efficiency. The **Vale of Glamorgan Council** makes spatial and map-based information available publicly on its web portal as a '**My Maps'**. 'My Maps' export material from the Council's geographic information system to a public interface. This includes information on the local development plan, planning applications, and planning 'constraints' such as flood risk areas, protective designations, areas with restricted permitted development rights, and archaeology. There is also information provided on planning enforcement and breaches of planning control. The planning information is available alongside a **wide range of other council information** such as school catchments.

The information **is relayed on map-based layers and is searchable** by postcode and house number. The provision of this information to the public can **support general enquiries** for planning information and about various area-based designations. The information can also be useful in **helping applicants for planning permission** assemble information for submission as part of their application. The 'My Maps' interface has also been useful in **Local Development Plan consultation**, enabling people to search out specific issues or themes they are interested in.

#### Support systems and workload management

#### Improving systems to better manage performance

Rhondda Cynon Taf County Borough Council has adapted its performance management systems to better support its senior leadership in identifying recent and current-time performance. The Council recognised that its **performance management data** for the planning service was typically looking too far backwards in time. This did not allow the service to respond to current and ongoing issues. The revised systems and reporting mechanisms provide **better quality information** for managing the planning service and how it is performing. This allows for earlier address of emerging issues with performance and more appropriate direction of resources to managing these.

Some other councils are also using **data dashboards to enable better strategic oversight** of planning services and their linkage to corporate priorities.

#### Strategy and prioritisation

#### **Connecting planning to corporate priorities**

Local planning authority services and functions sit alongside many other services and responsibilities. Resources are constrained across the board for this wide range of services, and especially so in local authorities. These can include service areas that sometimes attract more political scrutiny and attention, such as education and social services. The argument for more resourcing of the planning system, alongside better understanding and appreciation of the role of planning, depends on **planning making clear contribution to the strategic and corporate objectives** of organisations. The Wellbeing of Future Generations Act alongside the **placemaking agenda** provide opportunities to reconnect planning with the wider priorities and objectives of the organisations in which planning services are delivered. **Local Development Plans** also need to make clear how they help to deliver and support corporate objectives.

# Conclusions and recommended actions

This final section identifies the main conclusions of the project and sets out a series of recommended actions for RTPI Cymru working in partnership with other stakeholders.

#### Conclusions

The project has three aims and these are:

- To identify examples of innovative practice that help to maintain and improve planning services and enhance planning outcomes within existing resource constraints
- To identify the conditions that enable local planning authorities, and other public organisations in planning, to innovate in how they deliver planning services as a way of dealing with limited resources
- To identify any barriers to local planning authorities and other planning organisations introducing new practices that improve the efficiency and effectiveness of the use of their resources

There are **examples of innovative practice** across Wales that support improved planning services within the parameters of existing resources. Many of these have been explored in the previous section of the report. The key examples include:

- Development of **shared services** to support local planning authorities in provision of expert advice on specialist planning subjects, including minerals and waste
- **Support and advice for developers** when promoting sites through the local development plan process and at pre-application stage, as well as regular engagement through developer forums to set out expectations and advise on new and important planning issues

- Support for **placement year opportunities** as part of undergraduate planning courses to ensure balanced career profiles in organisations, as well as to deliver longer-term recruitment opportunities
- Use of **information technology and virtual engagement platforms** in preparation of local development plans

The **conditions that support** innovation and improvement by local planning authorities and other public organisations in planning, include:

- effective linkage between planning roles and responsibilities and the **corporate objectives** of the organisation
- effective professional leadership and a strong commitment to deliver improved services
- the employment of planners with **technical skills and abilities**, including the skills to make spatial data available more widely and to embrace the opportunities presented by digital planning platforms
- **investment of time and resources** in delivering change to achieve greater effectiveness and efficiency over the medium- and longer-term

There are some important and continuing **barriers** to local planning authorities and other planning organisations introducing new practices that improve the efficiency and effectiveness of the use of their resources.

- the **resource and workload pressures** in many planning organisations and local planning authorities in particular do not allow space for significant innovation and improvement there is limited capacity to reflect, design and enact change
- an additional barrier identified by participants is the need for more brokerage and leadership in effecting change – participants pointed to the absence of a strategic improvement organisation for planning in Wales, and one that could facilitate collective and coordinated action across local planning authorities and other stakeholders
- some changes to practices that would enhance the efficiency and effectiveness of planning necessarily require additional expertise and investment of resources to help realise those efficiencies – with planning support systems, performance management tools, information and task management platforms, and digital planning support being key areas

#### **Recommended actions**

This final section of the report sets our recommended actions for RTPI Cymru working in partnership with a range of other organisations involved in the planning system in Wales. Collaborative working across various partners is essential in addressing the resources challenge in the planning system.

Key organisations involved in developing this work with RTPI Cymru will include Welsh Government, Welsh Local Government Association, Planning Officers Society Wales, Planning Aid Wales, other professional and advisory bodies, statutory consultees, as well as planning consultants and developers.

### R1. Welsh Government should review and re-establish a performance management and monitoring framework for the planning system in Wales.

The absence of up-to-date information means it is difficult to establish an understanding of how well the planning system across Wales is performing. This recommendation is intended to help all stakeholders in Wales better understand how efficiently and effectively the system is working – and may enable some analysis of changes in performance over time.

## R2. Explore the establishment of a planning improvement service for Wales with the aim of sharing good practice, enhancing the efficiency and effectiveness of the planning system, and brokering common approaches and shared services.

A key issue raised by stakeholders in this project has been the absence of a strategic organisation to promote improvement in planning services in Wales. There are various models that could inform this work, including the Planning Advisory Service in England and more recent initiatives in Scotland in appointing a planning improvement 'champion'.

#### R3. Revisit and review the range of recommendations made in planning reforms since 2012.

The planning system in Wales has been the subject of a series of reviews in the period leading up to the Planning (Wales) Act 2015 and in the period since. The various reports and documents over the past decade include many recommendations for change – and a number of these recommendations are directed at what continue to be concerns and challenges for the planning system in Wales. This exercise of documenting and reviewing recommendations made since 2012 should include an assessment of those recommendations that have been accepted and progressed, and those that should be revisited and potentially implemented. This should include returning to the Welsh Government consultation exercise on delegation protocols for making decisions on planning applications.

## R4. Conduct a review of public information for users of planning services on local planning authorities' websites. This should form the basis for developing a set of core and commonly-used information that local planning authorities can direct users to.

This recommendation is designed to prevent each local planning authority directing its resources to general information on the planning system and how it works. The work can ensure that core information is simple, well-designed and accessible to all users of the planning system. This work could also extend to identifying a wider range of resources and materials where a single common approach across local planning authorities is possible.

R5. The Royal Town Planning Institute Cymru and other partners – including Welsh Local Government Association and Planning Officers Society Wales - should identify those areas of specialist expertise that are 'at risk' in terms of providing effective input to planning decisions and plan-making. This work should then extend to exploration of whether it would be appropriate to deliver these inputs on a shared services basis.

The services provided in Wales on a shared basis appear to have initially been prompted by a need to ensure that planning decisions were made effectively with appropriate specialist expertise and

input. These services being offered on a shared basis has also had other positive outcomes. The building of regional inventories of expertise could be a useful component of this work. A further extension of this work could build data on the 'pipeline' of planners, to include future recruitment needs and areas of specialism that need to be reinforced in terms of capacity.

## R6. Planning Officers Society Wales working with strategic partners should promote the sharing of information on planning support systems being used by local planning authorities in Wales.

This recommendation should start to build a better picture of some of the medium- and longer-term opportunities for commissioning or developing improved back-office support systems for planning services. This work could include identifying future requirements and timescales for any renewal and investment, and is designed to enable coordination in commissioning of new systems.

### **R7.** Support the building of thematic groups to enable early and mid-career planners to informally share experience and expertise across different organisations.

Participants in workshops identified the value in informally sharing experiences and challenges on specific areas of planning work they are engaged in. The building of thematic groups across Wales or within regions within Wales could have significant value in upskilling planners and building their confidence. The thematic groups have the potential of meeting virtually for informal networking and sharing of practical case studies.

### R8. Examine the potential for further fee-based, income-generating activities for planning services additional to existing services in development management.

This work could also extend to the promotion of more focused use of pre-application advice services to ensure that services provided are high quality, add value, and are delivered on a cost-effective basis.

### **R9.** Develop material on how planning services and functions can support local planning authorities and other organisations in delivering on their corporate objectives and priorities.

The purpose of this work it to try and better connect planning services with the wider corporate context – and demonstrate that planning can be supportive of strategic priorities. The placemaking and wellbeing agendas in Wales could provide a valuable opportunity to reconnect planning with high-level political agendas.

## R10. Map the training provided to elected members and other decision makers in the planning system, identify priority planning issues for elected member training, and develop resources to support further training.

Making planning decisions is an important responsibility and it is important that all decision-makers have a good understanding of core principles and practices in the planning system in Wales. This work may also consider the issue mandatory training for elected members on planning committees and those with responsibility for local development plans.

#### You can get involved in the conversation...

We want to involve our members and others in **a continuing conversation** about how to make more effective and efficient use of current resources in the planning system in Wales.

We are **looking for interesting and innovative ideas** from within Wales or elsewhere that can deliver an efficient and effective planning system.

You can participate in the project and **send us your ideas** – go to the following link and have your say. We will ask you just **three simple questions** and it will take you no more than a few minutes.

#### Complete the survey:

https://forms.office.com/e/m3LSQsjhQm

Send us your ideas **by Friday 22<sup>nd</sup> December 2023** – and we will collate your ideas and report back in early 2024. Survey - Building capacity through collaboration and change





## For more information about the RTPI Cymru's policy work

www.rtpi.org.uk/policyandresearchcymru

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