

Investing in Planning: a consultation on resourcing Scotland's planning system

Heads of Planning Scotland (HOPS) is the representative organisation for senior planning officers from Scotland's local authorities and national park authorities.

This consultation response summarises key points made by Scottish Planning Authorities, but we note that there will be differences of opinion between authorities and would defer to their own responses on specific local issues.

Working smarter

1. Which assessments might benefit most from improved proportionality?

HOPS note that assessment requirements should be defined in legislation and additional information required by any precautionary approaches taken by local authorities have been impacted by the lack of clarity within new legislation. We acknowledge that the responses to this question by other stakeholders will provide a comprehensive list of areas which require further examination.

HOPS would be happy to contribute to any short life working groups on proportionate approaches in future.

2. To what extent do you agree that processing agreements are an effective tool for creating certainty in planning decision making timescales? Please explain your view.

No view

There is no consensus view by local authorities on the effectiveness of processing agreements in creating certainty in planning decision-making timescales. Some authorities strongly agree that they can be effective, others do not use them for varying reasons. From the Planning Performance Framework data collected between 2012 and 2023, it is estimated that approximately 30% major applications are subject to processing agreements and the use varies drastically between authorities.

Many of the authorities who do not regularly use processing agreements have noted that good pre-application discussion may negate the need for a processing agreement. Processing agreements may also place additional administrative and time burdens on planning staff, this in turn may result in slower application processing overall.

3. Do you consider that current resourcing issues are impacting on the use of processing agreements?

Partially agree

We note that resourcing issues will have an impact on the use of processing agreements. In many authorities the primary reason will be due to time frame obligations. Smaller authorities in particular have noted their concern on staff time to implement processing agreements.

4. Would you be prepared to pay a discretionary fee to enter into a processing agreement? Please explain your view.

No view

HOPS recommend considering the individual views of planning authorities on this matter as opinions differ and while processing agreements may be a useful tool for some, they may be an unnecessary burden on others. We have stated no view in the answer to this question purely on the basis that not all planning authorities charge discretionary fees for various reasons. We also have concerns whether

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a paid for processing agreement would raise the expectation of what can be delivered in the timescales set out, as this may be outwith the control of the planning authority.

5. What additional actions can we take to improve certainty in the planning process?

HOPS have gathered in the views of planning authorities and the following key areas were identified improvement actions.

Validation processes was seen by many as an issue in the system, HOPS have requested in the past that the legislation should be reviewed, and previous provided a good practice document to assist with the submission of quality applications, we do acknowledge that differences in validation requests between local authorities do not help with this issue. Taken from local authority Planning Performance Framework reports, the validation rate in 2023/23 was averaged at 43% and this number has slipped in the past 5 years. The current process does not adequately address poor quality applications and puts planning authorities in a difficult position if applications meet the minimum validation requirements but fail to meet the requirements that the planning authority requires to make a decision. Planning authorities are looking at processes such as automated validation but to fully implement new ways of working a more efficient system would have to be in place.

The policy landscape in Scotland has become more complex in recent years, HOPS ask for guidance and support from Scottish Government on NPF4 policies to achieve consistent decision-making. Addressing gaps in skills and interpretation of new assessments introduced by NPF4 is critical. HOPS also consider there to be a need for guidance to be published alongside policy changes rather than follow months or potentially years downstream. Perhaps time delays between Scottish Government drafting policy that will be used by local authorities and implementation would give officers better chance to understand and troubleshoot potential issues, HOPS would encourage further joined up work by the Scottish Government and Local Authorities as the planning authorities to make this happen.

Statutory deadlines are having a detrimental effect on certainty within the planning process. For example, the four-month lead in time for major developments does not take in to account lead in times required for planning committees. Certainty of timescales is required to an extent and realistic timescales can be discussed by applicants and planning authorities; HOPS see certainty of outcomes as a much more important part of the process. The planning system should at its core be working *"to manage the development and use of land in the long-term public interest"* and to do these needs to fully consider the complex factors brought in by NPF4 such as addressing biodiversity and net-zero.

More clarity on infrastructure delivery and increased resource to support this, then this should greatly reduce timescale to planning application delivery.

HOPS expect more certainty would be gained in a system with more trust placed in planning professionals and less decisions being taken by elected members, proportionate delegation to planning officers will assist this.

Being able to ring-fence income was seen as one way of being able to provide a better service as authorities would be able to more accurately plan for future requirements.

6. Do you have further ideas on opportunities for streamlining, alignment or standardisation?

Exploring the potential to tie together processes related to Roads Construction Consent (RCC), building warrants, and planning could lead to more efficient procedures and reduced duplication of efforts.

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The simplification of prior notification procedures and permitted development rights could streamline decision-making processes while ensuring appropriate oversight.

Considering variations in the length and content of committee reports across local authorities, there's an opportunity for the Scottish Government to provide guidance or produce standardised templates to ensure consistency and clarity in decision-making processes. There are examples of approaches using checklists for delegated reports, this could be explored as a potential model for standardisation.

7. Are there any skills actions which you think should be prioritised?

Attracting people into the profession and then retaining them key. Apprenticeships seems a very positive way forward. These could be undertaken by career changers as well as school leavers. We are aware of the positive impact of the Pathways into Planning programme in England and this should be replicated in Scotland if possible.

Greater interaction between higher education, planning authorities and other stakeholders should be used to identify skills gaps and opportunities. The Partners in Planning Group could be used as a catalyst for this. We are aware that this group does not meet on a regular basis and it would be useful to see more regular meetings for wider stakeholder input.

The funding model for degree courses needs to be revisited so that Distance Learning options can be developed, with access to the limited number of planning schools in the country this may open up planning as a career choice to some who otherwise would not be able to pursue it.

Identification of opportunities to create and provide shared services or specialised skills across authorities may be beneficial and cost effective, if the hub noted in the questions below can be utilised effectively it may assist with this.

HOPS would hope that industry would step in to assist with upskilling where there are no conflicts of interest.

HOPS have previously identified to the Scottish Government areas of policy support that planning authorities require. We see this as policy support as an easy win for the planning system as it will help to upskill existing staff and relies only on the policy writers upskilling those implementing the system.

- Biodiversity – Policy 3
- Climate mitigation and adaptation – Policy 2
- Tackling the climate and nature crises – Policy 1
- Community Wealth Building – Policy 25
- Local Living and 20 Minute Neighbourhoods – Policy 15
- Energy – Policy 11
- Housing: Quality Homes – Policy 16 and Rural Homes – Policy 17
- Brownfield, vacant and derelict land and empty buildings – Policy 9
- Soils – Policy 5
- Infrastructure First – Policy 18

In addition, we have identified the following areas of work which will require staff upskilling in the near future.

- Visual impacts especially for wind turbines and battery storage

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- Planning impacts of innovative renewable energy technologies
- Health aspects of planning
- EIA developments

8. Are there any skills actions not identified which you think would make a significant impact?

HOPS have a call for resources for planners to allow for continued training, potentially led by the Scottish Government through CPD sessions addressing specific queries or issues raised by planners. NPF4 policy areas will be key as there has been substantial increase in the knowledge that local authority planning officers are expected to have. HOPS have previously notified Scottish Government of priority policy areas and are still awaiting assistance to help address some of the areas.

Further discussion should be had with planning schools to look at the wider range of skills needed by planners coming into the system. We are encouraged to see that Universities are incorporating aspects such as climate change and biodiversity into planning courses.

9. Do you think that the concept of a 'planning hub', modelled on the Building Standards Hub would support authorities and deliver improvement in the system? Please explain your view.

No view

There are mixed views on the planning hub by local authorities. While HOPS agree that the concept of a support system would be welcomed, we would wish to help define the details of how the hub would work in practice.

We have concern that the hub may draw experienced planning staff away from local authorities. There is already a lot of pressure on planning authorities to recruit and retain staff and this would provide another outlet to lose staff to. Authorities have already noted this has been the case for the building standards hub.

The hub may provide a solution to shared services and pooled resources. We envisage it may assist in providing specialist skills and services, on issues such as Biodiversity, Net Zero, Renewable Applications. HOPS hope that it would offer a way for authorities to resource short term needs without the reliance on temporary contracts.

The financing of the hub in a similar manner to the Building Standards hub would not be welcomed without further review of planning fees. Top slicing statutory fees which already do not cover the resource requirements of planning authorities was seen as problematic. This also would rely on the proportionate use of the hub.

10. Are there other ways a hub could add value and provide support in the short and longer term?

HOPS envisage the hub could provide a training function to assist with the work being carried out through the National Planning Improvement Framework, it would be able to quickly address areas of improvement being identified through these statutory reports. We see this as an action that could be carried out on a regular basis in line with the reports.

Many seen the hub as potential short-term resource for assistance with planning applications. This would be to supplement existing planning authority functions as decision making should be kept local.

The hub could host a register of specialist skills and potentially consultant planners.

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The hub may also be a useful place for authorities to second members of staff. This would be used to upskill them in different areas of work that they may not be able to within their authorities. We are keen that the hub does not draw staff away from planning departments on a long-term basis.

11. Which of the options do you think is most suitable, and why?

No view

HOPS have stated no view to this question due to the various positions held by local authorities.

Several authorities have mentioned that it should not sit within Scottish Government or host authority as the impartiality of the hub may be questioned. HOPS would see the hub as an impartial and supportive function available to planning authorities as required.

As the proposed functions of the hub may have a significant impact on the performance of local authorities HOPS would wish that the hub would be regulated, monitored and scrutinised in an appropriate manner. Suggestions were given that Audit Scotland or the Improvement Service may be able to provide oversight of the hub.

12. How do you think a Planning Hub could be resourced?

Using a percentage of application fees was seen by some as an inequitable solution as it may not reflect the use of the hub compared to the amounts authorities would pay in. The functions that the hub will deliver would very much determine whether this would be a fair solution.

Some suggest that a Planning Hub should operate on a pay-as-you-use basis for applications or specialist resources. However, there's scepticism about whether all authorities would use it equally and whether it's appropriate for councils to financially support each other in this manner.

There was a suggestion that the hub could also play an important role in employing and developing graduate planners as they may be able to cover some of the function of the hub without the need to take away experienced staff from planning authorities, the loss of experienced staff to the equivalent building standards hub has been seen as a negative.

Planning fees

13. Do you agree that planning fees should increase annually in line with inflation? Please explain your view.

Strongly Agree

HOPS strongly agree that planning fees should, at minimum, be increasing with inflation. Local authority service costs will be increasing at roughly the same rate so this solution will at least maintain the status quo. HOPS wish to raise with government again that correctly set planning application fees will be required for the long-term resilience of the planning system.

14. Is a calculation based on the 12-month Consumer Price Index the most appropriate mechanism? Please explain your view.

Partially Agree

As stated above we agree that fee increases should increase by an established methodology. Using the Consumer Price Index (CPI) will be beneficial to help provide transparency in fees for all stakeholders.

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HOPS wished to know if Scottish Government have considered the General Building Cost Index (GBCI) as an alternative to CPI. Developer contributions through Section 75 agreements will, in the majority of cases, be index linked to the GBCI. It is another established methodology and linked to fewer extrinsic factors than the CPI.

15. Should an annual inflationary increase apply to:

Individual fees, increments and maximum

HOPS are of the opinion that any increase should apply to all parts. Limiting maximum costs will have significant impact on planning authorities' ability to recover costs.

16. What would be your preferred approach to how planning fees are set in the future?

HOPS note that the majority of planning authorities hold the stance that they are not supportive of locally set fees and prefer nationally set statutory planning fees to ensure consistency and certainty in the planning process. A national approach to fee-setting is crucial to avoid competition, under-resourcing, and uncertainty in attracting investment.

Discretionary fees such as pre-application could be set locally as they currently are. The charges for these discretionary fees need to accurately reflect the services that the planning authority chooses to offer and what will work locally.

HOPS have previously held the position that full cost recovery of the development management process would be the minimum acceptable solution. While the fee increase for major applications did make some difference, we note that this additional income was welcomed, it was not shared equitably across all authorities, and we are yet to attain close to full cost recovery of the development management process.

With changes to policy meaning that Local Development Plans are becoming increasingly more complex and resource intensive, authorities are asking HOPS to reconsider our position on what full cost recovery should include.

The RTPi have summarised the resourcing of the planning system in Scotland well in their December 2023 report. With falling local government expenditure on planning there is further requirement for planning fees to be set to the correct level.

<https://www.rtpi.org.uk/research-rtpi/2023/december/resourcing-the-planning-service-rtpi-scotland-research-briefing/>

17. Are there key principles which should be set out in the event that fee setting powers are devolved to planning authorities?

As noted above HOPS are of the consensus position is that there is benefit to nationally set fees for clarity and consistency in the planning service. This also runs against our principle of full cost recovery and a proportionally resourced planning service.

HOPS would suggest if it were to be devolved minimum and maximum planning application fees should be set nationally. This would allow for some local flexibility but not distort the market or price certain types of development out of the system.

18. What other processes that support the determination of a planning application could authorities be given powers to charge at their discretion?

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The following options for discretionary charges have been suggested, we do note that not all suggestions would be applicable for all authorities.

1. Implementing a surcharge for validation issues and extra administrative fees would provide an incentive for applicants to submit well-prepared applications. Further comments were given on charges for applications submitted without changes.
2. Charging a discretionary fee for applications requiring validation more than twice would provide an incentive for applicants to submit complete applications initially, reducing administrative burden.
3. Charging for formal screening opinions could ensure that the costs associated with this service are covered and encourage applicants to submit complete applications upfront.
4. Fees for the completion and monitoring of legal agreements could cover the costs associated with negotiating and ensuring compliance with these agreements.
5. Charging for Environmental Impact Assessment (EIA) screening and scoping exercises could help cover the costs of assessing environmental impacts and determining the scope of required assessments.
6. Funding a clerk of works type role within the council through planning application fees could ensure proper monitoring of construction sites and compliance with planning regulations.
7. Encouraging discretionary fees for resource-intensive parts of the local development plan process, such as promoting development sites, could help invest in planning resources.
8. Considering charging for Roads Construction Consents (RCC) applications could address the significant burden these applications place on resources.
9. Fees should be charged for applications falling under Schedule 2 of the EIA regulations, as these require screening by the council.

19. Do think the circumstances where a refund can be requested is set out as part of any published information regarding the introduction of a discretionary charge?

If considered necessary, it should be set out in guidance and applied nationally to secure consistency and fairness of application. Local authorities should however have the ability within this to fully cover costs for work carried out.

20. Do you agree with the principle that authorities should have discretionary powers to increase fees for a proposal on an unallocated site within the development plan?

Strongly agree

HOPS agree with the principle that a fee could be charged as this would require additional work for the planning authority and should be properly resourced.

Community upset due to proposals deviating from established plans was seen as a significant issue. This highlights the need for careful consideration and possibly additional resources to address community concerns.

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HOPS had a suggestion of applying double fees specifically for major applications on unallocated sites. This approach recognises the significant impact of major developments on unallocated land and aims to provide a deterrent while ensuring fair treatment for smaller-scale applications.

21. Do you agree that planning authorities should be able to recoup the costs of preparing a Masterplan Consent Area through discretionary charging?

Strongly agree

HOPS strongly agree with the principle that local authority resources spent preparing a Masterplan Consent Area should be recouped, without this discretionary charging authorities would not be able to recoup income they would otherwise have gained from Planning Permission in Principle Applications.

Resourcing other parts of the system

22. Do you agree with the types of appeals that should incur a fee?

No view

HOPS note there was not consensus from the planning authorities on all types of appeal that should incur a fee. We would wish to raise the following points:

In general, we are of the principle that any increased burden on authority planning staff or legal staff should incur an appropriate fee. The introduction of Local Review Bodies does not seem to have worked as intended. These are seen as a time-consuming process and require significant resourcing.

It was noted that fee-free non-determination of applications would not be an ideal solution. These appeals can be more onerous and resource intensive for the planning authorities and consultees, the application has not reached its conclusion and may not have been fully assessed and/or consulted upon. Non-determination may also be outwith the control of the planning authority due lack of information and/or supporting information required to make the decision.

Concern was expressed that appellants may use this process as a mechanism to bypass negotiations with the planning authority if they consider the application is likely to be refused as this appeal opportunity avoids incurring a fee at appeal.

23. Do you agree that setting the fee for applying to appeal the refusal of planning permission (to either DPEA or the planning authority) is set as a percentage of the original planning application fee? Please explain your view.

Partially agree

There should be a minimum fee as well as a percentage (if the minimum is more). If there is just a percentage fee the planning authority still unlikely to be able to recoup all the costs incurred.

We also note that there is a grey area charging for appeals especially where there is an officer recommendation for approval, meaning that all planning matters have been satisfied. There is an inherent unfairness in charging in these circumstances.

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- 24. If a percentage of fee approach to appeal charging was considered most appropriate, what level do you consider would be most appropriate to reflect volume of work by Directorate for Planning and Environment (DPEA) or the Local Review Body (LRB)? Please explain your view.**

Other

HOPS consider this should be charged at 100%. These are de-novo appeals and will be looked at afresh by a new officer starting at the beginning, therefore it would be expected that the fee charge should be set to the same level to account for staff time.

- 25. Do you agree that an authority should consider waiving or reducing an appeal fee where they have offered such a waiver on the related planning application? Please explain your view.**

No view

HOPS are aware of differing views on the subject by planning authorities. HOPS would in general discourage the with the need to introduce another waiver.

In terms of resourcing the planning authority such an appeal would have a double impact on the resources have been reduced both on the initial application and further at the appeal.

- 26. Do you have views on how a service charge for applying for planning permission or a building warrant online could be applied?**

HOPS have concern about additional charging for online applications. Online planning submissions are the preferred method. There are already of examples of authorities applying a service charge for paper applications to cover the administrative tasks of scanning and filing etc. We see incurring an additional charge for online methods to be a backwards step.

HOPS appreciate that there are different stances taken by planning authorities on this matter but are of the position that fees charged for planning permissions and building warrants should at minimum cover both the time taken for administrative duties by planning authorities to process the application and ongoing upkeep of the eDevelopment Services.

There may be merit in the fees based on the value of works or a percentage of the application fee, but these would need to be above the base rate set to recoup planning authority costs and come with a commitment to be re-invested in the improvement of the eDevelopment Services for both applicants and authorities.

- 27. What other options are there to resource the operation and improvement of the eDevelopment service?**

Any charging mechanism could be a deterrent to online submissions which HOPS would not be in favour of. Additional charging through the planning system would be difficult to justify. Some form of alternative funding stream needs to be considered.

Have Scottish Government considered broadening the scope of the eDevelopment service to include other regulatory processes like Road Construction Consents, possibly with associated charges, to enhance value and support digital channel shift.

- 28. Should the current threshold of 50MW for applications for electricity generation which are to be determined by authorities be altered?**

Yes

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The current megawatt threshold which requires handling by both planning authorities and the Scottish Government Energy and Consents Unit. For note HOPS have raised the benefits of increasing the megawatt threshold at a ministerial level. The expectation is that this should be set out as a potential solution to expediting decisions.

HOPS full position on Fees Charged for Applications Under the Electricity Act 1989 can be found on our response to the 2022 consultation. We note that planning authorities are still severely under-resourced for the input and time taken to process these applications.

<https://hopscotland.files.wordpress.com/2022/08/hops-response-to-proposed-changes-to-fees-under-the-electricity-act-final.pdf>

29. Should different thresholds apply to different types of generating stations?

Yes

HOPS would emphasise the point that any additional burden on planning authorities requires to be fully funded. We have previously noted that fees for these complicated and often controversial planning applications are not high enough and should be set at a rate which reflects the time and effort of the planning authority.

Technology is currently advancing far ahead of thresholds set in the previous act and differentiation of generating stations with appropriately forecasted thresholds would be beneficial in terms of bringing in appropriate resources to planning authorities now and future proofing the work required for future applications. Planning authorities have for a significant amount of time been severely under resourced for energy applications.

30. What would be the resource implications of increasing the threshold for the determination of applications for onshore electricity generating stations?

An increase of the threshold shift to planning authorities of applications such as pumped hydro or windfarms would see significant workload increases. Planning authorities may need to set up processes and procedures for dealing with these types of applications as the relevant legislation differs from the Planning Act

It was also suggested a special resource to support Environmental Impact Assessment would be beneficial.

31. If Scottish Government were to make a voluntary contribution equivalent to a percentage of the offshore electricity fee to authorities, what level of contribution would be appropriate to support some recovery of costs? Please provide justification for your answer.

HOPS acknowledge that the assessment considerations for planning authorities for these types of applications will be less. Estimations from local authorities note that a contribution of around 20% may be appropriate but would err on the side of caution and collect a robust evidence base before committing to a value.

32. Should we introduce a new category of development for applications for hydrogen projects? If so, how should these fees be set/calculated? Please explain your view.

Yes

HOPS would recommend in favour of introducing a new category for hydrogen projects.

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HOPS do not currently hold enough information on the resource burden of hydrogen applications, but initial feedback has been that these would be a much more significant resource burden to the authority compared to a typical category 13 application.

33. Are there different considerations for hydrogen production when compared with proposals which are concerned only with storage and distribution? Please explain your view.

Yes

HOPS consider that there will be additional Health and Safety issues for hydrogen production compared to storage and distribution. This will have an impact on planning authority resources including time required to get input from the Health and Safety Executive.

34. Do you agree that the standard £100 which applies to most prior notification and approval applications is appropriate? Please explain your view.

No

HOPS do not think the £100 fee for prior notification and approval applications is appropriate.

Prior approval often requires increased staff time than the proposed amount would bring in, this is impacted by complaints, freedom of information, dealing with dealing with neighbour notification (when applicable) and often greater level of negotiation than a formal planning application. Especially where prior approval is required or some type of assessment completed, then a higher fee is necessary and justifiable, to ensure the associated work is fully funded and does not result in a financial burden on planning authorities.

In general HOPS do not support prior notification as a process. It does not help streamline any planning processes or assist with resourcing the planning service. It adds another layer of bureaucracy to an already complex system. Authorities note that the distinction between prior approval and planning permission is unclear to communities, leading to confusion about whether they can provide input.

35. Are there particular PDR classes where you think the current fee should be amended? If so, please explain why that is considered to be the case.

For applications related to rail activity there is currently, no fee required. This is because those applications move straight to Prior Approval rather than requiring Prior Notification first. The way the guidance is written indicates that a fee should be taken when moving between Prior Notification to Prior Approval. This should therefore be amended in the interests of clarity, consistency and so that a fee can be taken.

Prior Approval relating to coal authority matters tend to require significantly more work than other Prior Notification or Approvals. The fee for this requires to be significantly uplifted.

36. Would a reduction of the current fee (£200 per 0.1 hectare) be an appropriate approach to resolving this issue?

HOPS do not currently hold enough information on the matter to inform a position and would defer to the advice of planning authorities dealing with significant numbers of shellfish farm applications on this matter.

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37. What would you consider to be a reasonable fee for shellfish farm applications? (Please elaborate on your answer using an average shellfish farm development (5 x 220m twin-headline longlines at 20m spacing with 30m end moorings) as an example.)

HOPS do not currently hold enough information on the matter to inform a position and would defer to the advice of planning authorities dealing with significant numbers of shellfish farm applications on this matter.

Cumulative impact

38. Which proposal would you most like to see implemented? Please explain the reason for your answer.

An easy to implement step would be the annual increase in planning fees to keep pace with inflation. This ensures that the fees remain adequate to cover the costs associated with processing planning applications and maintaining planning services. It's seen as a necessary step to sustain the quality and efficiency of planning services over time. This would only be a first step into the full cost recovery required.

Streamlining Permitted Development Rights, issuing consolidated legislation. Getting rid of Prior Approvals/Notifications would be highly beneficial to planning authorities freeing up time and resources to concentrate on meaningful planning input to the system. At a minimum the fees associated with Prior Notifications need to be revisited and reassessed to ensure they accurately reflect the costs involved.

Recognition of the skills requirements required to work in the current system, HOPS hope for further support by Scottish Government in implementing NPF4 policy through guidance and training.

39. Do you have other comments on the cumulative impact of the proposals?

As stated in the answers above we have noted where we see benefit in the proposals. We would however wish to ensure that implementation of these is carried out in such a manner that it does not itself create additional burdens. HOPS would look to see changes being carried out in a transparent manner fully supported with timelines and guidance where appropriate.

40. Do you have other ideas to help resource the planning system? Please set out how you think the proposal could be resourced.

HOPS overall goal would be for appropriate statutory planning fees to match the resources required by planning authorities. We are not yet at this level of cost recovery and would strongly encourage a move for fees to reflect this. Changes to full cost recovery would best be implemented quickly given that this has been a matter of consideration for over 10 years. Any dilution or phasing of the introduction of increased fees would have a negative impact on planning authorities at this time. We suggest a 5-year (maximum) review of statutory fees be built into any system going forward to ensure the fees accurately reflect the demands of the planning system.

HOPS are also reviewing our own position on full cost recovery. Given increasing resource demands many authorities are requesting this should include aspects of development planning. For example, site assessment work is a detailed and considerable work task for planning authorities. The associated discretionary fees should therefore be recognised as an important element of resourcing planning authorities.

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One of the HOPS key tenets is that simplifying the planning system will have multiple benefits for all stakeholders in the system, the resources of planning authorities and other stakeholders are all impacted by complexity in the system.

Bringing more planners into the system is an ongoing ask, we are well aware of the need for more planners in both the public and private sector. Possibly working with the RTPi to help increase capacity by reducing the stringent requirements for RTPi accreditation of courses considering the evolving nature and lack of planning schools in Scotland.

Infrastructure first approaches need to be looked at further, there should be scope for internal recharging for council projects and growth deals that will need regulatory input.

Impact assessments

41. Please provide any information on the potential impacts of our proposals to assist with preparation of the following impact assessments:

Business and Regulatory Impact Assessment
Equality Impact Assessment
Islands Communities Impact Assessment
Children's Rights and Wellbeing Impact Assessment
Fairer Scotland Duty
Strategic Environmental Assessment

No further comment.

Further information about your organisation's response

This consultation response summarises key points made by Scottish Planning Authorities, but we note that there will be differences of opinion between authorities and would defer to their own responses on specific local issues.

HOPS regularly supply Scottish Government with information on planning fee income and workforce planning data.

HOPS have previously produced the following papers and consultation response which have helped inform the positions stated in the proceeding questions.

Future Planners Project Report (July 2022)

<https://hopscotland.files.wordpress.com/2023/06/future-planners-project-report-16th-june-2023.pdf>

Proposed Changes to Fees Charged for Applications Under the Electricity Act 1989 (June 2022)

<https://hopscotland.files.wordpress.com/2022/08/hops-response-to-proposed-changes-to-fees-under-the-electricity-act-final.pdf>

HOPS Planning Fees Position Statement – Time for Change (Nov 2021)

<https://hopscotland.files.wordpress.com/2021/11/hops-briefing-paper-resourcing-the-planning-system-final-published-9th-nov-2021.pdf>

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HOPS Briefing Paper – Resourcing the Planning System (Nov 2021)

<https://hopscotland.files.wordpress.com/2021/11/hops-briefing-paper-resourcing-the-planning-system-final-published-9th-nov-2021.pdf>

HOPS Research on Costing the Planning Service (February 2019)

<https://hopscotland.files.wordpress.com/2019/03/hops-costing-the-planning-service-action-report-220219.pdf>

HOPS Research Paper on the Increase in Major Fees (February 2019)

<https://hopscotland.files.wordpress.com/2019/02/finalised-hops-report-on-major-application-fees-040219.pdf>
