

Priorities for the Local Government and Housing Committee consultation

Response by The Royal Society of Architects in Wales (RSAW)

The RSAW supports around 600 Chartered Members of our parent body, the Royal Institute of British Architects (RIBA), who live and work in Wales.

Following a consultation feedback session with RSAW members, we have identified some possible changes within four key policy areas that we feel the committee should carefully consider. Our suggestions below are purposefully succinct, and we welcome the opportunity to speak with the committee to elaborate on any or all of the points raised.

1.0 Planning

1.1 We feel strongly that the *Strategic and Spatial Choices: Future Wales' spatial strategy* in the *Future Wales: the national plan 2040* NDF should inform all planning decisions across Wales. It should run as a 'golden thread' through all planning decisions to ensure joined-up thinking across the country.

1.2 Small Business Rates Relief Wales: We advocate an uplift of the threshold for Permanent Small Business Rates from £6000 to £12000 (as is the case in England). This would help to keep as many of our small and independent traders on our high streets viable and ensure our town centres are as vibrant as possible.

1.3 Under resourcing of Local Planning Authorities: This has several knock-on effects, not least losing the best young talent to the private sector. We feel raising the cost of planning applications could help LPAs increase revenue.

1.4 Opportunity for Chartered Architects to self-certify certain scale planning applications if it is demonstrated within the application that all relevant policies have been adhered to. This would greatly help with dealing backlog and resources issues of LPAs.

1.5 Abolish the pre-application consultation process and return to early discussions with the planners if the application is made with a Chartered Architect.

1.6 Change of approach by planning inspectorate: Try and get back to more 'planning' and less of the Development Control style of working, which has become more and more adversarial and about policing and less about encouraging and supporting development.

1.7 Flexibility with change of use.

2.0 Retrofit

2.1 VAT exemption/equalisation: We understand any changes of this nature would need to be made by the UK Government, but we would advocate an equalisation of VAT payable for new builds and retrofit (of around 10%). We feel there must be a financial incentive to encourage reuse of existing buildings.

2.2 Sustainability credentials for retrofit are rewarded.

2.3 Reuse of commercial buildings within town and city centres to revitalise them: This is particularly important in the post-pandemic world. With the pandemic

changing the way we work, we feel great consideration should be given to how redundant space in our town and city centres should be repurposed.

2.3.1 Aberdare town centre example.

2.4 Educate contractors to develop their sustainability knowledge for all building types.

3.0 Rural housing as second homes

3.1 Finding loopholes in the system: We suggest that planning consent is required before a dwelling can be categorised as a business for council tax purposes so that (i) it avoids situations where owners circumvent attempts by local authorities to tax second homes (ii) it allows planning authorities to 'control' the number of homes classed as holiday accommodation and avoid over-saturation; and (iii) discourage this process since it is difficult to secure domestic mortgages on properties classed as holiday accommodation rather than a dwelling.

3.2 Efforts have been made in certain 'second homes hotspots' across the UK to enact local policies to disincentivise second home ownership. We recommend the committee considers the approaches taken in [Cornwall](#) and [Orkney](#).

4.0 Design Commission for Wales (DCfW)

4.1 We feel that recommendations made by DCfW should override any contradictory decisions made by planning officers where applications are rejected on the grounds of a perceived design problem. Primacy of DCfW recommendations would ensure better outcomes.

4.2 Promote with [key examples](#) showing the positive impact on development in Wales.