

Planning Fees Review Team
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Sent via email: feesreview.planning@doeni.gov.uk

Dear Sir/Madam

Re: Consultation - Planning Fees in Northern Ireland: Proposals for change.

I write in response to the above consultation as Regional Director of the Quarry Products Association NI which is the principle trade association representing the quarrying and quarry products industry in Northern Ireland.

Our members produce over 95% of aggregates extracted in the country including sand and gravel and crushed rock. They are also responsible for the manufacture of approximately 95% of concrete, asphalt and other quarried products. They range in size from a number of major companies to a high number of SMEs employing directly in excess of 3000 people.

Ensuring that the planning system in Northern Ireland is efficient, meets the needs of our members and the sectors within which they operate is of great importance to us. The Association has recently emphasized the high rates of mineral fees our industry is already paying compared to neighbouring jurisdictions. The winning and working of minerals and use of land for disposal of waste fee classes are double that of the rest of the UK and Ireland. QPANI agrees that a planning system needs to be properly resourced however we believe that this should be in a justified manner and not to continue financing an inefficient system.

The quarrying and quarry products industry alongside the construction industry has been profoundly impacted by the economic downturn. Planning Service declares how they have been impacted by the economy but they have not assured the industry how they will be mindful of their customers' needs in recovery. Industry must be reassured in its efforts to come out of recession that there is effective use of resources. As a service paid for by the applicant, there must be clear outputs delivered to timescale by Planning Service.

We wish to respond to two specific proposals in the consultation paper:

Increase the fee maximum for category 5 applications:

QPANI are content with the proposed increase and charging methodology. Though, hasten to add that Permitted Development Rights for the industry should be implemented as swiftly as possible, this will remove many applications from the system and consequently cost to Planning Service.

Charging a more appropriate fee for applications requiring an Environmental Impact Assessment (EIA):

We do not believe that applications requiring an EIA should warrant an additional fee. Most of the applications submitted by our industry are accompanied by an EIA which is time consuming and costly to produce, this is an upfront cost that is borne by the applicant. Any additional fee would be an unfair burden placed on the applicant. An EIA in fact assists the decision making process as it helps to provide a comprehensive framework for assessment. Charging a fixed fee or indeed any fee for the submission of a planning application with an EIA would give no added value to the process nor would it result in an improved service.

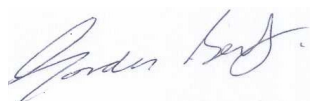
Planning Service has offered no monetary evidence to support their rationale or indeed explained how a fixed fee of £10,000 or a combined fee capped at the fee maximum is justified. There is no justification of costs incurred of processing an EIA application; does Planning Service have to employ specialist skills or external consultants to be able to process applications? The consultation paper is not transparent in how current fees and proposed fees are calculated. This proposed additional fee is obviously intent on mineral applications and other applications handled by the Strategic Projects Team. While Planning Service estimates that only 0.26% of the total number of applications received in 2009/10 required an Environmental Statement to be provided, the impact will be on relevant applications (around 50). To demonstrate this point it is estimated that the number of mineral extraction application received in any one year would average around 33 cases. QPANI consider that whilst a mineral application with an EIA application is likely to involve more work for planners and consultation with stakeholders, it must be assumed that this is already reflected in the higher fees that are assigned to mineral fees.

Implementation

There is no defined timescale for implementation of any proposed changes other than mentioning 'Proposals for immediate reform'. Whilst recognising that there is a 'Phase 2' being conducted and that a subsequent consultation paper will be issued in 2011-12, QPANI suggests that Planning Service consults early and directly with the sectors affected by the proposed changes with vision to discuss a sustainable and robust funding model prior to publishing more consultation papers. This could be facilitated in a workshop approach.

We hope you find our comments useful and informative. Please do not hesitate in contacting us if I can be any further assistance.

Yours sincerely,



Gordon Best
QPANI Regional Director