

Welsh Government

**Research into the Cost of
Infrastructure development in
Wales**

Study Report

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This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Background

In April 2018, the Welsh Government Planning Directorate published a consultation paper¹ which proposed changes to the consenting of infrastructure development in Wales, following new powers given to the Welsh Ministers under the Wales Act 2017 (“the 2017 Act”). A formal Government response² on the consultation was published in November 2018.

The 2017 Act sets out amendments to the Government of Wales Act 2007, devolving further powers to Wales. Specifically, the 2017 Act devolves legislative and executive competence to the Welsh Ministers for:

- The consenting of electricity generating stations up to 350MW, both on and offshore and associated overhead electric lines, up to and including 132KV which are associated with devolved generating stations;
- Harbour revision and empowerment orders; and
- Marine licences beyond the inshore area up to the limits of the Welsh Zone.

On 29th November 2017, the Secretary of State for Wales set a commencement date for energy consenting provisions contained in the 2017 Act to come into force on 1st April 2019. Additionally, the 2017 Act has already devolved consenting for Harbour Revision and Empowerment Orders, made under the Harbours Act 1964, for most Welsh ports. These new powers came into force on 1st April 2018.

The 2017 Act places the consenting of this infrastructure in various regimes which will create a fragmented consenting process and ultimately may not provide an integrated and sustainable solution for infrastructure consenting that the development industry requires.

The Welsh Government acknowledges that the industry needs a ‘one-stop-shop’ for infrastructure consenting rather than various regimes. Therefore, to implement the 2017 Act in the long-term coherently, it is proposed to introduce a Welsh Infrastructure Consent (“WIC”); for the consenting of those newly devolved projects, as well as more widely to highways, rail, water and waste projects in a one-stop shop approach.

To inform the WIC and to take any new legislation to the National Assembly for Wales, a Regulatory Impact Assessment (“RIA”) is required. Part of the assessment will set out financial implications of a new Bill associated with the proposed WIC and its likely attached statutory duties.

¹ <https://beta.gov.wales/changes-approval-infrastructure-development>

² <https://beta.gov.wales/sites/default/files/consultations/2018-11/infrastructure-consultation-summary-of-responses.pdf>

The RIA will also aid the Welsh Government in determining an appropriate level of compensation for Local Planning Authorities (“LPA”) to recover their costs in contributing in any statutory part of a new consenting process, determining appropriate fee levels for applicants and to ensure costs are understood from current levels of participating in an infrastructure consenting process.

1.2 Purpose of the Study

Ove Arup and Partners Ltd. (Arup) was appointed by the Welsh Government to undertake independent research to gather quantitative data on applications received by consenting authorities over the past five years. This data is in relation to a series of pre-defined (by Welsh Government) categories of development to determine the current and prospective procedural costs to stakeholders from a defined sample.

The purpose of this research study is to inform the RIA of the Welsh Government’s proposals to create a unified infrastructure consenting process in Wales.

The study aims to; primarily quantify the number of applications for ‘infrastructure development’ in Wales and secondly, collect data from LPAs, statutory consultees and the development industry relating to their costs for planning different types of development.

The data gathered will help the Welsh Government determine current and prospective procedural costs for stakeholders involved in different infrastructure consenting regimes. This is an important part of the RIA described above.

1.3 Structure of Report

This report outlines the findings of data collection undertaken from LPAs, statutory consultees and the development industry, relating to procedural costs for existing infrastructure consenting regimes in Wales and England (as appropriate).

This report is structured as follows:

- Chapter 2 sets out the methodology used for data gathering;
- Chapter 3 provides a summary of the findings; and
- Chapter 4 summarises the research.

2 Methodology

2.1 Task 1 – Applications

Task 1 involved the collation of data on applications received by consenting authorities in Wales and Welsh Waters, and then in England over the previous five years. The focus was to seek data that satisfied the requirements of the study by obtaining information across all the identified consenting regimes, whilst trying to consider as many development sectors as possible.

This aims to help the Welsh Government consider useful case studies for the research across different types of projects and their associated consenting regimes.

2.1.1 Task 1A

Task 1A sought to gather existing published information regarding infrastructure developments in Wales and Welsh Waters that the relevant consenting authorities hold, submitted between April 2013 and February 2019.

For the purposes of the study, infrastructure developments included:

1. Electricity infrastructure;
2. Oil, gas and minerals;
3. Transport;
4. Water; and
5. Waste.

For the purposes of the study, categories of development included:

- a) Planning permission under s.57(1) of the Town and Country Planning Act (TCPA)1990;
- b) Developments of National Significance (DNS) permission under s.62D of the Town and Country Planning Act 1990;
- c) Orders under s.1 or s.3 of the Transport and Works Act (TWA) 1992;
- d) Orders under s.10, s.14, s.16 or s.18 of the Highways Act 1980;
- e) Development Consent Orders (DCO) under s.31 of the Planning Act 2008;
- f) Consents to construct and operate generating stations under s.36 of the Electricity Act 1989;
- g) Consents to install overhead electric lines under s.37 of the Electricity Act 1989; and
- h) Harbour Revision and Empowerment Orders (HRO) under s.14 of the Harbours Act 1964.

Relevant consenting authorities included those responsible for determining the above types of development as follows:

- LPAs (application type a);
- The Welsh Government (application types b, c and d); and
- The Secretary of State (application types e, f, g and h).

Desk-based research was completed to obtain this information from a range of online sources including the Planning Inspectorate, Welsh Government, LPAs and developer's websites.

For each application falling under the appropriate consenting authority, the following information was gathered:

- i. The type of application (from the application types identified in (a)-(h) in Section 4 of the specification;
- ii. Full description of the proposal;
- iii. A measurable output of the infrastructure project (i.e. Energy projects measured in MW, roads and railways in KM etc.);
- iv. The local planning authority area in which the development is situated or whether the projects is in Welsh Waters;
- v. Site address or location;
- vi. The applicant;
- vii. Whether it is EIA development;
- viii. Application submission date;
- ix. The decision (or whether a decision has been made);
- x. The date of the decision;
- xi. Whether the decision was subject to an appeal (if applicable);
- xii. The appeal decision (if applicable); and
- xiii. The fee required for the application.

This information was recorded in a spreadsheet using Microsoft Excel (see Appendix C for the results).

2.1.2 Task 1B

To provide a robust data-set of most relevance to the Welsh Government research, at least five applications submitted in the last five years within Wales for each category of development were sought. However, in certain cases Welsh consenting authorities received fewer than five application types during this period. To help supplement the data, relevant applications from England were sourced when and where necessary.

Task 1B involved gathering existing published data for infrastructure developments in England in relation to those application types where there were less than five applications in Wales.

Applications in England were sought for the following categories of development:

- a) Town and Country Planning Act 1990;
- c) Orders under s.1 or s.3 of the Transport and Works Act 1992; and
- e) Development Consent Orders under s. 31 of the Planning Act 2008
- f) Consents to construct and operate generating stations under s.36 of the Electricity Act 1989.

This information was recorded in a spreadsheet using Microsoft Excel (see Appendix C for the results).

2.1.3 Case Study Selection

Following the completion of Task 1A and 1B, a sample of five case studies per application type were selected with discussion and agreement by the Welsh Government. This sought to inform Task 2A and 2B as required by the research (see sections below).

During the selection of the case studies, it was agreed with the Welsh Government that a range of projects across different consenting regimes would be sought, in order to help maximise the value of the research. The exercise of selecting case studies was collaborative between Arup and the Welsh Government during a small workshop event.

The criteria for choosing each case study was on the basis that each case study would provide a fair and diverse representation of applications under different consenting regimes and stakeholders were considered to have a reasonable likelihood of responding (based on previous experience and existing relationships between those stakeholders, the Welsh Government and Arup).

Where five applications were not found for each application type (a-h) in England or Wales, as per the scope, no further applications were sought (a reduced sample size was deemed to be either acceptable or inevitable).

A list of selected case studies is not shared for the purposes of protecting the anonymity and commercial interests of the stakeholders involved.

2.2 Task 2 – Costs

Task 2 involved determining the current and prospective procedural costs to stakeholders as part of infrastructure consenting processes.

To undertake this exercise, information requests relating to project costs (using the case studies as selected) were issued to up to four stakeholders as appropriate, comprising:

1. LPAs;
2. Consultees 1 (Natural Resources Wales, Environment Agency and/or the Marine Management Organisation);
3. Consultees 2 (Cadw, Historic England); and
4. Developers (applicants, both private and public sector).

2.2.1 Information requests

Initially, an introductory letter was issued to Heads of Planning in Wales and Natural Resources Wales by the Welsh Government Planning Directorate, explaining the background to the project and that the study being undertaken by Arup would be requesting cost information (see Appendix A).

Following this, information requests were issued by Arup via email correspondence to all stakeholders relevant to each case study, with the following documents attached:

- Covering letter setting out the information requested and the reasons for and procedures associated with data collection;
- Written request in the form of a letter from Arup on behalf of the Welsh Government explaining the project; and
- A bespoke template spreadsheet for the stakeholder to complete and return.

All documents were sent in both English and Welsh languages.

The template spreadsheets comprised questions (set by the Welsh Government, Part 2 of the scope) relating to general and specific procedural costs for all parties, when participating in an application. Each developer, determining authority or consultee received a bespoke information request spreadsheet relevant to case studies which they were to provide information for.

Where possible and to avoid unnecessary duplication and effort, the information requests were rationalised in cases where the stakeholder was involved in more than one case study. In those cases, responses were collated as part of a single information request.

The covering letter issued to all stakeholders clarified the Welsh Government's agreement on data protection. It confirmed that the information shared with the study would be held by the Welsh Government in strict accordance with the relevant data protection regulations.

The information provided by stakeholders will not be shared or made public in any way so that it can be made attributable to the stakeholder or project.

Moreover, during the publication of the RIA, the data provided will inform a generalised and anonymised range of costs associated with different types of costs relevant to different types of consenting regimes.

A template copy of the information request documents issued to each of the stakeholders is presented at Appendix B.

Details of the specific and general procedural costs as requested are set out below.

2.2.2 Specific Procedural Costs

For each application relevant to the appropriate consenting authorities, the following specific procedural costs were sought as follows:

Local Planning Authorities:

1. Estimated costs of providing pre-application services to applicants in line with Regulations, prior to an application being submitted [applicable to application types (a) and (b) only];
2. Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee [(a)-(h)];
3. Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought) [(a)-(h)];
4. Estimated costs of producing and submitting a Local Impact Report [(b) and (e)]; and
5. Estimated costs of participating in an examination of an application (excluding any written response to a consultation or notification) [(a)-(h)].

Consultees:

1. Estimated costs of providing a substantive response to applicants for pre-application consultation [(a) (b),(e)];
2. Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee [(a)-(h)];
3. Estimated costs of providing a response to an application following submission [(a)-(h)]; and
4. Estimated costs of participating in an examination of an application (excluding any written response to a consultation period) [(a)-(h)].

Developers:

1. Estimated costs of application preparation [(a)-(h)];
2. Estimated costs of undertaking any statutory pre-application consultation (where it is a requirement) [(a), (b),(e)];
3. Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements) [(a)-(h)];
4. Estimated costs of participating in an examination [(a)-(h)];
5. Estimated costs of making a material amendment to a project during the examination of an application, where one has been made [(a)-(h)]; and
6. Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made [(a)-(h)].

2.2.3 General Procedural Costs

Additionally, non-specific costs were sought as follows:

Local Planning Authorities:

1. Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served;
2. Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display;
3. Estimated costs of preparing and serving notice of unauthorised development or a breach of, or failure to comply with, conditions (see sections 172 and 187A of the Town and Country Planning Act 1990);
4. Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week; and
5. Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas).

Developers:

1. Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months; and
2. Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week.

2.2.4 Issues and Limitations

Contacting stakeholders and lack of responses

In administering the information requests, it was initially agreed with the Welsh Government to issue the written requests via email, then follow up with two telephone calls to the parties involved.

The purpose of the telephone calls was initially to help ensure that the request was clear, and then to help ensure co-operation within the study programme.

Significant efforts were made to source and contact stakeholders. This ultimately involved multiple attempts and, in some cases, more than five telephone calls with more than one point of contact within a stakeholder organisation.

Whilst many attempts were made to all stakeholders via both phone and email, a small number of developers were uncontactable.

There were several requests for clarification about the information requests. For example, some stakeholders queried whether the questions involved in the information requests were relevant to their organisation, specific development type, consenting regime or country. Arup sought to be open and honest and explained the task, questions involved in the information request and how the questions could translate to their organisation (if appropriate). It was clarified that the questions had been set by Welsh Government to contribute to their RIA and were directed to the Welsh Government if any further queries arose.

Receiving the completed information requests from stakeholders was in some cases challenging and problems were encountered, including; the liquidation of organisations, busyness of stakeholders and (their stated) lack of incentive to cooperate.

This serves to help demonstrate the significant efforts made to help maximise participation in the study and satisfy its requirements over and above Welsh Government expectations.

Programme

The information requests were distributed to stakeholders on the 21st December 2018 and the deadline for returning the requests was the 25th January 2019. The timeline of the study provided a sufficient response period when taking into account the level of effort required to complete the responses. However, to be flexible and help ensure participation, this deadline was extended subject to the request being agreed in many of the cases. As explained above, some stakeholders faced barriers including lack of resources, and so the Welsh Government agreed to provide additional time to help accommodate their needs.

Stakeholders were made aware that any information received after the 25th February 2019 (end of the study period) would not be included in the report, however, any late information provided would be shared with the Welsh Government for review, whom would then undertake any necessary updates to the research if required and as appropriate.

Bespoke responses

Several organisations did not track their costs in a way that allowed them to contribute to the study by completing the information request. Some felt that they were best able to contribute in alternative ways such as providing a narrative of their involvement with a project and the general associated costs (including additional consenting regimes) and providing a lump sum or estimated average cost for a similar type of consenting regime.

This bespoke data was considered and taken into account as appropriate when calculating the average costs for each application type and is summarised within the findings in Chapter 3.

Monitoring and mitigation

To monitor the data received, a tracking spreadsheet was created to record the interaction, responses and status of the information requests in addition to any communicated delays in receiving the requested data.

The tracker was shared weekly with the Welsh Government during the study programme. Sensitive information, including full names and contact details were removed from these spreadsheets to avoid data protection issues.

Regular progress meetings took place with the Welsh Government, around every four weeks during the study. These were held to discuss the progress of the project, identify and address risks and mitigation measures.

Industry validation of data

As explained above, a potential risk to the study from the outset was the lack of cooperation and incomplete information response from stakeholders.

It was discussed and agreed with the Welsh Government that introducing new case studies to supplement those that were unsuccessful in generating responses would not be appropriate, given the case studies selected represent the most useful and likely cooperative respondents. Additionally, the risk of a lack of cooperation on potential new case studies would remain.

To help mitigate this risk, in addition to the information requests, Arup internally undertook a cost validation exercise to quantify the low, high and average costs related to each application type for developers.

To verify this information, the material was shared with existing groups of expertise in the development industry. This provided the opportunity for industry experts to provide their thoughts and validate the lower boundary, upper boundary and average costs related to each application type. It was made clear that the benefit to industry bodies would be the opportunity to engage in emerging policy with their contributions.

The data has supplemented the study to provide evidence where the stakeholder information request resulted in incomplete or null responses. In a situation where three or fewer responses were received from developers, industry estimated average costs were included when calculating the average general and specific procedural costs.

Commercial concerns

It is also important to note that in order to help reduce the risk of null or partial responses to the requests, it was agreed with stakeholders that anonymising and generalising general and specific costs would avoid or reduce concerns of participation in terms of the sharing of commercially sensitive information. This was made clear in the information request,

The sharing of commercially sensitive information was voiced as a concern on a few occasions; however, stakeholders were assured, as per the information request covering letter, that the information shared will be held by the Welsh Government in strict accordance with the relevant data protection regulations.

Additionally, it was explained that the information provided will not be shared or made public in any way that it is not attributable to the organisation or project.

It was explained that during the publication of the RIA, the data provided will inform a generalised and anonymised range of costs associated with different consenting regimes.

2.2.5 Data Presentation

On receipt of the information submitted by stakeholders, the data supplied, and any associated commentary was recorded in a study spreadsheet and logged in the monitoring tracker. All correspondence was also saved as a record in a data folder. This was password protected given the involvement of contact details. The raw data will not be shared beyond the Welsh Government and is kept in accordance with the General Data Protection Regulation.

Average costs were calculated for all application types in respect of costs incurred to the developers, determining authorities and consultees.

In a situation where fewer than five responses were received per application type; the industry average costs were input into the average calculation to supplement the data.

Average costs were rounded to the nearest decimal point.

Where there were extreme variations in project costs, albeit of similar types of development and consenting regimes, the context of the costs was recorded, where known.

Appendix C comprises the study spreadsheet, including the tabs related to each task involved in the study. Specifically, the data spreadsheet includes:

- Tab 1 comprises data on the applications received by consenting authorities in Wales and Welsh Waters over the previous five years.
- Tab 2 comprises information on applications received by consenting authorities in England and in English Waters over the previous five years.
- Tab 3 comprises the average costs per application type related to the general and specific costs.

3 Findings

3.1 Task 1

As required by the study, applications submitted within the last five years within Wales have taken precedence and additional applications from England have been explored when and where necessary and to add value when appropriate.

A minimum of five applications across the identified consenting regimes have been sought and, in most cases, this has been achieved.

The results from Wales (Task 1A) and England (Task 1B) are presented within the study spreadsheet (Appendix C).

In summary, the number of applications considered under each consenting regime include:

Consenting regime	No. applications considered
Planning permission under s.57(1) of the Town and Country Planning Act 1990 (Application Type A)	12
Developments of National Significance (DNS) permission under s.62D of the Town and Country Planning Act (Application Type B)	20
Orders under s.1 or s.3 of the Transport and Works Act 1992 (Application Type C)	5
Orders under s.10, s.14, s.16 or s.18 of the Highways Act 1980 (Application Type D)	8
Development Consent Orders (DCO) under s.31 of the Planning Act 2008 (Application Type E)	10
Consents to construct and operate generating stations under s.36 of the Electricity Act 1989 (Application Type F)	4
Consents to install overhead electric lines under s.37 of the Electricity Act 1989 (Application Type G)	0
Harbour Revision and Empowerment Orders under s.14 of the Harbours Act 1964 (Application Type H)	5

Forty-six applications relate to the energy (including electricity) sector, seven relate to transport and one to water.

The breakdown of application types is set out in Appendix C.

A summary of the shortfalls encountered in relation to specific consenting regimes is set out below:

- Only English Orders under Section 1 or Section 3 of the Transport and Works Act 1992 (application type C) were found which meet the study thresholds (i.e. new railway lines and light rail transit).
- All Development Consent Order applications (application type e) within the study period in Wales involve electricity infrastructure developments.
- Applications that previously fell under Sections 36 (for development in excess of 50MW) (application type F) now fall under the Planning Act 2008 in Wales and England. Applications for the new generation under Section 36 precede the study period (limited to applications submitted in the past five years) and therefore, applications to vary existing consents under Sections 36 have been included only.
- While there is an awareness of a significant amount of applications for overhead electric lines up to and including 132KV under section 37 of the Electricity Act 1989, this information is not kept publically. Furthermore, records which BEIS hold do not distinguish the nominal voltage and whether the project is devolved. These records could not be reliably analysed, thus the applications considered for the purpose of this study is noted as 0.

Additionally, shortfalls in relation to specific sectors were encountered:

- No new reservoir development applications within the study period were found, however, a new English reservoir application has been included in the study (application type A, Planning Permission under s.57 of the Town and Country Planning Act 1990).
- Desk-based research did not result in finding any development types that fall under the 'oil, gas and minerals' or 'waste' criteria, excluding Town and Country Planning Act applications.
- There have been no waste developments within the study threshold in Wales nor have there been any geological disposal developments in Wales or England.

3.1.1 Case Study Selection

During the selection of the case studies, it was agreed with the Welsh Government that a wide range of sectors of projects across different consenting regimes would be sought. The case studies were chosen as they primarily provided a fair and diverse representation of applications under different consenting regimes.

Due to the shortfalls in gathering information for certain application types under certain consenting regimes noted in 3.1, it was not possible to find five case studies for all consenting regimes.

The findings of the case studies are found in tab 'Tab 2A and 2B Avg Costs' of the spreadsheet in Appendix C. To note, The Welsh Government is not publishing a list of the details of the chosen case study applications as they could be made attributable to the sensitive information involved in Task 2 as aforementioned.

3.2 Task 2

The average cost for each of the application types sought is provided in the following sections.

3.2.1 Application Type A (Planning Permission under s.51 (1 of the Town and Country Planning Act 1990))

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
Reference no.	Specific Procedural Costs				
1.	Estimated costs of providing pre-application services to applicants in line with Regulations, prior to an application being submitted.		£167		
2.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		£16,817		
3.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		£15,000		
4.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period or notification)		£53,769		
5.	Estimated costs of providing a substantive response to applicants for pre-application consultation			£800	£758
6.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.			N/A	
7.	Estimated costs of providing a response to an application following submission.			£400	

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
8.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)			N/A	£1,588
9.	Estimated costs of application preparation	£1,255,417			
10.	Estimated costs of undertaking any statutory pre-application consultation (where it is a requirement)	£64,542			
11.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)	£78,229			
12.	Estimated costs of participating in an examination in an application	£81,306			
13.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made.	£89,667			
14.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£5,750			
General Procedural Costs					
15.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		£300		
16.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		£450		
17.	Estimated costs of preparing and serving notice of unauthorised development or a breach of, or failure to comply with, conditions (see section 172 and 187A of the Town and Country Planning Act 1990)		£400		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
18.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week		£593		
19.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)		£250		
20.	Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months	£5,583			
21.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£5,992			

Issues and Limitations

Developer

There is wide variation in the specific procedural costs due to the varying nature and scale of projects selected by the Welsh Government.

In reference to the developer's specific procedural costs, industry averages were added to the specific and general costs as only two developers responded. This helped ensure the data is not skewed.

Determining Authority

Some specific procedural costs were not applicable to the determining authorities that responded, these included: the estimated costs of providing pre-application services to applicant in line with Regulations, prior to an application being submitted and the estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought).

One determining authority shared the following context to their response for the Welsh Government to consider further:

- The main cost for processing an application is consultants; such as landscape consultant, cultural heritage consultant and acoustic consultants. There are then the added costs of paying for them to review additional information and attend meetings.
- The aforementioned costs spiral if the application goes to a public inquiry, with consultants and counsel costing significant amounts.
- Given the additional costs required for consultants, expert advice would not be sought at pre-application stage unless a planning performance agreement is entered into.

One determining authority noted that a Planning Performance Agreement was entered into and therefore a lump sum fee was provided.

Consultees

Cadw provided a range of cost associated with the consultation process (from pre-application to examination), of which average costs have been applied for the purpose of this study.

Natural Resources Wales (NRW) do not hold records of their time or associated costs spent by staff when responding to statutory planning consultations or when engaging in hearings, examinations or inquiries. NRW therefore provided average costs for one anonymised case study in relation to application type A and this has been included in the average costs.

The Environment Agency noted that they were formally consulted on one of the case studies, however were unable to provide an estimate of the time spent or cost incurred on the application.

3.2.2 Application Type B (Development of National Significance permission under s.62D of the Town and Country Planning Act 1990)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England		
Reference no.	Specific Procedural Costs						
1.	Estimated costs of providing pre-application services to applicants in line with Regulations, prior to an application being submitted.		N/ A				
2.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A				
3.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A				
4.	Estimated costs of producing and submitting a Local Impact Report.		N/A				
5.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation or notification).		N/A				
6.	Estimated costs of providing a substantive response to applicants for pre-application consultation					£2,850	£710
7.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee					Not provided	
8.	Estimated costs of providing a response to an application following submission					£2,300	
9.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)					£750	

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
10.	Estimated cost of providing a response post decision			£200	N/A
11.	Estimated costs of application preparation	£670,000			
12.	Estimated costs of undertaking any statutory pre-application consultation (where it is a requirement)	£23,333			
13.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)	£22,500			
14.	Estimated costs of participating in an examination.	£116,667			
15.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made.	£29,667			
16.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£6,250			
	General Procedural Costs				
17.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		N/A		
18.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
19.	Estimated costs of preparing and serving notice of unauthorised development or a breach of, or failure to comply with, conditions (see section 172 and 187A of the Town and Country Planning Act 1990)		N/A		
20.	Estimated costs of publishing a notice in a local newspaper or relevant journal		N/A		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
	advertising an application for the purposes of EIA development, for 1 week				
21.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)		N/A		
22.	Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months	£17,500			
23.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£11,313			

Issues and Limitations

Developer

The developer that did respond noted that it was too early in the project timetable to provide specific costs, however, provided average costs for a similar DNS project.

The costs noted above for application preparation includes planning application fees and legal support. This does not include land costs, grid costs or communication costs which can vary greatly across different developments.

In reference to the developer’s specific procedural costs, industry averages were added to the specific and general costs as only one developer responded. This helped ensure the data is not skewed.

Determining Authority

Where the Welsh Government was the determining authority for DNS applications, they were not consulted in respect of costs incurred to determine the applications.

Consultees

Cadw provided ranges of costs for some of the case studies, of which averages have been applied for the purpose of this study. In other cases, Cadw provided more specific costs on a case study basis and these have been incorporated into the results.

Natural Resources Wales (NRW) do not hold records of their time or associated costs spent by staff when responding to statutory planning consultations or when engaging in hearings, examinations or inquiries. NRW provided typical costs for two anonymised case studies in relation to application type B and these costs have been included in the average costs as presented. In addition, NRW helpfully provided costs incurred post decision.

3.2.3 Application Type C (Orders under s.1 or s.3 of the Transport and Works Act 1992)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England		
Reference no.	Specific Procedural Costs						
1.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A				
2.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A				
3.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation or notification).		N/A				
4.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted.		£512			£150	
5.	How much of cost at question 5 was recouped through a fee.		N/A			£0	
6.	Estimated costs of providing a response to an application following submission		£1864			£250	
7.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)		£918			N/A	
8.	Estimated costs of application preparation		£2,110,000				
9.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)		£110,000				
10.	Estimated costs of participating in an examination		£800,000				
11.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made		£75,000				

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
12.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£40,000			
General Procedural Costs					
13.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		N/A		
14.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
15.	Estimated costs of preparing and serving notice of unauthorised development or a breach of, or failure to comply with, conditions (see section 172 and 187A of the Town and Country Planning Act 1990)		N/A		
16.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week		N/A		
17.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)		N/A		
18.	Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months	£20,000			
19.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£1,913			

Issues and Limitations

Determining Authority

Where the Secretary of State for Transport is the determining authority for Transport and Works Act applications, they were not consulted in respect of costs incurred to determine the applications.

Consultees

Cadw provided ranges of costs for some of the case studies, of which averages have been applied for the purpose of this study. In other cases, Cadw provided more specific costs on a case study basis and these have been incorporated into the results.

3.2.4 Application Type D (Orders under s.10, s.14 s.16 or s.18 of the Highways Act 1980)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England	
Reference no.	Specific Procedural Costs					
1.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A			
2.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A			
3.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation or notification).		N/A			
4.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee		N/A			£900
5.	Estimated costs of providing a response to an application following submission		N/A			
6.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)		N/A			
7.	Estimated costs of application preparation		£15,882,750			
8.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)		£433,650			
9.	Estimated costs of participating in an examination		£3,254,375			
10.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made		£2,912,500			

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
11.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£770,000			
General Procedural Costs					
12.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		N/A		
13.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
14.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
15.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week		N/A		
16.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)		N/A		
17.	Estimated costs of creating a maintaining a website which displays an entire application, for a period of 6 months	£17,500			
18.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£11,313			

Issues and Limitations

Developer

In reference to the developer's specific procedural costs, industry averages were added to the specific and general costs as only one developer responded. This helped ensure the data is not skewed.

Several developers shared the following context to their response for the Welsh Government to consider further:

- The estimated cost of application preparation assumed two people for three months;
- It was assumed that circa three Public Information Events took place during non-statutory pre-application consultation;
- The estimated cost of participating in an examination included legal review;

One developer included all costs within the 'estimated costs of application preparation'.

Determining Authority

Where the Welsh Government were the determining authority for Orders under s.10, s.14 s.16 or s.18 of the Highways Act 1980, they were not consulted in respect of costs incurred to determine the applications.

Consultees

Cadw provided ranges of costs for some of the case studies, of which averages have been applied for the purpose of this study. In other cases, Cadw provided more specific costs on a case study basis and these have been incorporated into the results.

Natural Resources Wales (NRW) do not record time spent by staff when responding to statutory planning consultations or when engaging in hearings/ examinations/ inquiries. NRW were not able to provide a meaningful response in relation to consultee costs associated with application type D.

3.2.5 Application Type E (Development Consent Orders under s.31 of the Planning Act 2008)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England	
Reference no.	Specific Procedural Costs					
1.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A			
2.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A			
3.	Estimated costs of producing and submitting a Local Impact Report.		N/A			
4.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period or notification)		N/A			
5.	Estimated costs of providing a substantive response to applicants for pre-application consultation				£500	£800
6.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted.				N/A	
7.	How much of question 6 cost was recouped through a fee.				N/A	
8.	Estimated costs of providing a response to an application following submission				£600	
9.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period).				£61,200	
10.	Estimated costs of providing a substantive response post decision				£300	
11.	Estimated costs of application preparation		£1,800,000			
12.	Estimated costs of undertaking any statutory pre-application consultation (where it is a		£266,250			

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
	requirement)				
13.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)	£685,000			
14.	Estimated costs of participating in an examination in an application	£1,154,167			
15.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made	£275,000			
16.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£70,000			
General Procedural Costs					
17.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		N/A		
18.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
19.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
20.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week		N/A		
21.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)		N/A		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
22.	Estimated costs of creating a maintaining a website which displays an entire application, for a period of 6 months	£9,500			
23.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£9,756			

Issues and Limitations

Developer

In reference to the developer's specific procedural costs, industry averages were added to the specific and general costs as only two developers responded. This helped ensure the data is not skewed.

Determining Authority

Where the Secretary of State for Energy and Climate Change is the determining authority for Development Consent Orders, they were not consulted in respect of costs incurred to determine the applications.

Consultees

Cadw do not record their costs in a way that contributed to the study and felt that they were best able to contribute in alternative ways such as; lump sums were provided rather than answering the specific questions set out in the information request spreadsheets.

Natural Resources Wales (NRW) do not hold records of their time or associated costs spent by staff when responding to statutory planning consultations or when engaging in hearings, examinations or inquiries. NRW provided typical costs for two anonymised case studies in

relation to application type E and these costs have been included in the average costs as presented. In addition, NRW helpfully provided costs incurred post decision.

3.2.6 Application Type F (Consents to Construct and operate generating stations under s.36 of the Electricity Act 1989)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England	
Reference no.	Specific Procedural Costs					
1.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A			
2.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A			
3.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)		N/A			
4.	Estimated costs of providing a substantive response to applicants for pre-application consultation.			£257		
5.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted.			£108		£700
6.	How much of question 5 cost was recouped through a fee			N/A		
7.	Estimated costs of providing a response to an application following submission			N/A		
8.	Estimated costs of participating in an examination of an application (excluding any			N/A		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
	written response to a consultation period).				
9.	Estimated costs of application preparation	£1,373,888.89			
10.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)	£21,222.22			
11.	Estimated costs of participating in an examination of an application	£148,291.67			
12.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made	£17,250.00			
13.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£11,312.50			
	General Procedural Costs				
14.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served		N/A		
15.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
16.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display		N/A		
17.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week		N/A		
18.	Estimated costs of writing and displaying a site notice as part of any publicity and		N/A		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency	Cadw / Historic England
	notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities, particularly those in rural areas)				
19.	Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months	£10,000			
20.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£4,538			

Issues and Limitations

Developer

In reference to the developer’s specific procedural costs, industry averages were added to the specific and general costs as only two developers responded. This helped ensure the data is not skewed.

Determining Authority

Where the Secretary of State for Energy and Climate Change is the determining authority for s 36 applications, they were not consulted in respect of costs incurred to determine the applications.

Consultees

Cadw do not record their costs in a way that contributed to the study and felt that they were best able to contribute in alternative ways such as; lump sums were provided rather than answering the specific questions set out in the information request spreadsheets.

Natural Resources Wales (NRW) do not hold records of their time or associated costs spent by staff when responding to statutory planning consultations or when engaging in hearings, examinations or inquiries. Whilst NRW have not been in a position to provide costs in relation to specific case studies identified at application type F, NRW have included several s.36 examples within marine developments at 3.2.8.

In addition to the required costs for application type F, The Environment Agency helpfully provided information relating to pre-application consultation.

3.2.7 Application Type H (Harbour Revision and Empowerment Orders under s.14 of the Harbours Act 1964)

		Developer	Determining Authority	Natural Resources Wales / Environment Agency / Marine Management Organisation	Cadw / Historic England
Reference no.	Specific Procedural Costs				
1.	Estimated costs of providing non-statutory pre-application services to applicants outside of statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee.		N/A		
2.	Estimated costs of providing a response to a notification or consultation request to an application following submission (where one is sought)		N/A		
3.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation or notification)		N/A		
4.	Estimated costs of providing services to applicants outside of any statutory requirements prior to an application being submitted and how much of that cost was recouped through a fee		£5,091		
5.	Estimated costs of providing a response to an application following submission.		£16,679		
6.	Estimated costs of participating in an examination of an application (excluding any written response to a consultation period)		-		

		Developer	Determining Authority	Natural Resources Wales / Environment Agency / Marine Management Organisation	Cadw / Historic England
7.	Estimated costs of application preparation	£176,333			
8.	Estimated costs of undertaking any non-statutory pre-application consultation (i.e. holding events, publicising events etc. outside of statutory requirements)	£150,000			
9.	Estimated costs of participating in an examination.	N/A			
10.	Estimated costs of making a material amendment to a project during the examination of an application, where one has been made	£47,450			
11.	Estimated costs of making a non-material or minor amendment to a project during the examination of an application, where one has been made	£32,500			
General Procedural Costs					
12.	Estimated costs of preparing and serving a Planning Contravention Notice (see section 171C of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display, where one has been served				
13.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display				
14.	Estimated costs of preparing, serving and displaying at a site, a temporary stop notice (see section 171E of the Town and Country Planning Act 1990) and the additional travel and subsistence cost of its serving and display				
15.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising an application for the purposes of EIA development, for 1 week				
16.	Estimated costs of writing and displaying a site notice as part of any publicity and notification requirements following the submission of an application (we acknowledge travel distances will vary significantly between authorities,				

		Developer	Determining Authority	Natural Resources Wales / Environment Agency / Marine Management Organisation	Cadw / Historic England
	particularly those in rural areas)				
17.	Estimated costs of creating and maintaining a website which displays an entire application, for a period of 6 months	£17,500			
18.	Estimated costs of publishing a notice in a local newspaper or relevant journal advertising a prospective application for development, for a period of 1 week	£5,906			

Issues and Limitations

Developer

In reference to the developer's specific procedural costs, industry averages were added to the specific and general costs as only two developers responded. This helped ensure the data is not skewed. It should be noted that the same developer was involved in two of the chosen case studies and they did not respond.

Consultees

Cadw do not record their costs in a way that contributed to the study and felt that they were best able to contribute in alternative ways such as; lump sums were provided rather than answering the specific questions set out in the information request spreadsheets.

Natural Resources Wales (NRW) do not hold records of their time or associated costs spent by staff when responding to statutory planning consultations or when engaging in hearings, examinations or inquiries. Whilst NRW have not been in a position to provide costs in relation to specific case studies identified at application type F, NRW have included several HRO examples within marine developments at 3.2.8.

In addition to the specific procedural costs set out within the scope, Natural Resources Wales (NRW) have helpfully provided additional costs associated with marine development, where NRW were either the determining marine authority or statutory consultee for the following application types:

- Harbour Revision Orders;
- Marine Licenses;
- Applications under s.36 of the electricity Act 1989; or
- Combination of the above.

For some cases, this includes fees charged to NRW Marine Licensing by CEFAS or another technical specialist for advice.

Some of the costs have not been included within this report as they could be made attributable to specific cases or include sensitive information, however the raw data has been shared with the Welsh Government.

4 Summary

The study has allowed for collection of data to assist the Welsh Government in the production of a Regulatory Impact Assessment for a new consenting process in Wales.

A compliance rate of 40% has been achieved, being the percentage of stakeholders that responded to the information requests as part of this study.

Where compliance has not been met for developer's general and specific procedural costs, this information has been supplemented with costs from industry bodies and consultants as a complementary data validation exercise.

There have been a number of issues and limitations faced when carrying out the research, largely associated with the sharing of data and all reasonable steps have been taken by the researchers to maximise participation and the value of the study.

The study findings are presented in full in Appendix C and a summary of the average costs associated with each application type are presented below:

Application Type	Developer	Determining Authority	Natural Resources Wales / Environment Agency / Marine Management Organisation	Cadw / Historic England
Specific Procedural Costs (£)				
A	1,574,910	85,753	1,200	3,085
B	868,417	-	6,100	2,125
C	3,135,000	-	3,295	400
D	23,253,275		-	900
E	4,250,417		62,600	2,600
F	1,571,965	-	297	700
H	406,333		25,438	700
General Procedural Costs (£)				
A	5,992	593		
B	11,313			
C	1,913			
D	14,034			
E	9,171			
F	4,538			