

BARKER II REVIEW: EXECUTIVE BOARD'S FURTHER SUBMISSION

Proposal: that the Forum endorses the Executive Board's further submission to the Barker II review dated 22 September 2006, and considers adding a statement along the following lines:

At its meeting on 17 October, National Planning Forum members agreed - based on work undertaken by its Culture Change and Delivery Working Groups - that the planning system needs sustainable resources to ensure that it can play a positive, pro-active, role in delivering sustainable development, while facing challenges including those of competitiveness and climate change. It also requires:

1. a BRIDGE to be built between the different areas of planning (community visioning, spatial plan-making, development management and implementation), and between planners and those who make economic decisions;

2. a clearer understanding of DEVELOPMENT ECONOMICS and its integration with social justice and environmental considerations through targeted training and professional development; and

3. CROSS-SECTORAL UP-SKILLING to build a rounded understanding of the issues, help foster shared understanding, and where possible a shared vision, and devise viable solutions that produce economic, social and environmental benefits.

(A) EXECUTIVE BOARD'S COVERING LETTER:

Ms Kate Barker
Barker II Review Team
HM Treasury
4/E1 Horseguards Road
London SW1A 2HQ
Our ref : NPF 06 09 KB II letter
Date : 22 September 2006

cc NPF Executive Board: Mark Southgate,
Liz Peace, Mike Hayes, Cllr Bettison,
Simon Marsh, Graham Jones;
DCLG: Colin Byrne, Paul Hudson, Tony
Thompson, Aaron O'Brien

Dear Ms Barker,
The Executive Board of the National Planning Forum would like to thank you for the very helpful meeting with you and Alison Moore of your team on 29 August. The agreed note of meeting is attached.

We responded to your initial call for evidence (letter dated 27 March 2006) with the collective view of the Forum on:

- **the value of the planning system and its role in ensuring more certainty, consistency, and improved environmental quality;**
- **there is no appetite for comprehensive change at this stage, but delivery of the planning system must continue to improve, and be simplified;**
- **that even if there was a case for review, there is no consensus on how to plan more effectively, despite attempts (to identify this) over the years; and**
- **the current system can be made to work, but it must be properly resourced or the workload reduced and/or simplified.**

We were glad to note that you came to similar views in your Interim Report. Nothing in your report, or in the reaction to it to date, has given us any cause to revise the above views. We were also pleased that you have invited formal responses to your Interim Report. This letter comprises the response of the NPF Executive Board.

The issues involved in spatial planning are complex; the stakeholders are many and various, crucially including Government itself. The impact of your final report cannot be overstated, and we hope that it will be informed by the cross-sectoral views set out in this submission.

Planning is essentially about outcomes; it is delivered, but not dominated, by process. And it will only be possible to evaluate the success of policy and practice on responding to competitiveness (as for flood risk and climate change) in the longer term, because of the time-lag inherent in the development process.

In embarking on the reforms that are currently bedding in, the Government has issued a tremendous challenge to all those involved in spatial planning. The new system involves understanding complex, inter-related, issues that are often themselves in a state of flux; engaging communities, business and the voluntary sector in developing a vision for their area; producing a sound LDF - in an exacting time-frame - that stands up to scrutiny against demanding criteria; and taking decisions on the appropriateness of proposals. At the same time those providing the planning service are under pressure to provide an increasingly fast and effective development management service with in many cases inadequate resources.

It is a tall order. Improvements won't happen overnight. They won't happen unless planning is resourced properly. They won't happen unless it is recognised that all the stakeholders have a part to play.

The Executive Board agrees with your view that there are "unlikely to be simple magic bullet solutions", however we understand that there is always room for improvement in any system, and that those involved in planning need to be seen to be effective in adapting appropriately to changing circumstances, in explaining the process simply, and making sure that as many people as possible get a chance to contribute to thinking about the future of their area.

The 4 points in bold above remain our starting point, but we have collated views from Forum members on the 3 issues which were identified for further exploration in your review, namely:

1. efficiency of process
2. efficiency of land-use
3. flexibility and responsiveness

These proposals are attached. They are not formally endorsed as NPF policy, but we are putting them forward as an Executive and will put this letter and the attachments to the next meeting of the Forum, as we consider that they give examples of potentially helpful policies and actions. The NPF's Culture Change and Delivery Working Groups are also working with the Department of Communities and Local Government on further proposals to support the new agenda. We will confirm the Forum's views following our meeting on 17th October.

Our member organisations are all part of the solution, and we are willing to work with you and the Government to play our part in finding appropriate ways forward. If there are any issues in this letter or attachments needing clarification please do not hesitate to contact me.

Yours sincerely,

Kay S. Powell
Secretary, National Planning Forum

(B) AGREED NOTE OF MEETING: KATE BARKER/ NPF EXECUTIVE BOARD: 29 8 06

Present: Kate Barker; Alison Moore HMT; Tony Thompson, Aaron O'Brien, DCLG
NPF EB: Mark Southgate (Chair), Liz Peace, Mike Hayes, Graham Jones,
Kay Powell (Secretary) **Apologies:** Henry Oliver, Simon Marsh, Cllr Jim Harker

Following the introductions, Mark Southgate (MS) thanked Kate Barker (KB) for agreeing to meet the National Planning Forum's Executive Board (EB). He emphasised NPF's cross-sectoral nature and hoped that this meeting would enable NPF to input further to thinking on the review following publication of the Interim Report.

KB noted NPF's input to the Review (letter dated 27 3 06 with 4 key points), and note attached outlining the NPF remit. Her final report would take account of additional information received, other things going on in Government including read-across to Lyons, Eddington, Energy Review, and consolidate on areas of interest. She had a number of questions arising from the NPF letter:

(a) What kind of certainty is needed/possible?

EB members responded that the concept of certainty was provided in planning by:

- an agreed vision/spatial plan – in terms of aspirations for “making place”
- land-use allocations in the development plan -for land people own, and neighbouring land
- setting out the principles that are broadly acceptable

- this requires:

- strong, informed, decisive, community leadership
- ensuring certainty/longevity so process is plan-led, and also responsiveness
- investment in infrastructure
- links with corporate policy (national, regional, local)
- support for implementation
- engagement of all sectors (though with an understanding that everyone can't have everything they want)
- the LDF process needs to be simplified as far as possible
- LDF policy to be made clearer by DCLG, relying more on “reasonableness” than precise technical conformity, so that LDFs are more resistant to frivolous Judicial Review

- and holds difficulties including:

- real problems when infrastructure isn't provided (eg A14 Northants – thousands of housing consents are on hold because of lack of a decision on improvements to this); it would be better if the Highways Agency (HA) was involved in plan-making.
- differences of view between Government Departments
- achieving certainty/longevity but also (market) responsiveness

Planning is about outcomes - delivered, but not dominated by, process. Whilst the EB was keen to maintain high standards, it was regrettable that the recent result of Examination of the first 2 core strategies was that the Planning Inspectorate was forced to conclude that they were both unsound – this should have been resolved before submission. However, it is important that every LDF reflects what makes that particular place special.

In terms of development control, certainty for business was more about a clear development plan framework, clarity on the requirements for documentation to accompany an application, good pre-application advice, and an understanding about likely timescale for decision, than artificial targets such as 13 weeks.

KB asked TT to check the origin of the 8/13 week targets. TT noted that a new consultation document issued 2 weeks ago on the role of the HA in planning; this is on the DfT's web-site. There is new draft guidance on transport assessment which aims to divide applications into those for which no assessment is needed, those needing a simple one, and those needing a full one.

(b) What quality of people is required for preparing plans, and what skills and resources are needed?

The important issues are:

- how society sees/values planning
- how robust, realistic yet stretching are the visions
- that planning is seen as more than a technical process, and that it contributes to place-making
- householder applications should be dealt with via a separate process (involving neighbour dispute resolution where needed), and the resource released used for dealing with major applications and with plan-making
- this will require up-skilling of planners in spatial planning, and also development management, honing skills and more empowerment
- the Royal Town Planning Institute (RTPI) has re-thought what the profession is about and this encompasses life-long learning
- the culture change is happening already – more focus on plan-making, visioning, project management, team-working, negotiation, facilitation, personal skills – but there is a long way to go
- a problem is that not all those who should be up-skilling are doing so for a variety of reasons including workload pressure

KB asked whether regional economics formed part of the curriculum. The EB said that Planning Schools were delivering a new curriculum reflecting RTPI's, but it was possible that development economics needs a higher profile in that and in short courses. Requirements include:

- Member and Chief Officer leadership
- Further culture change, ensuring planning is seen as enabling rather than regulation

KB asked whether ASC had made any difference, and if Members involved in Planning need more support. The EB said that ASC was yet to make an impact; they could help to deliver the cross-sectoral programmes that were still needed. ASC was set up in response to Egan – a good report; ASC should facilitate training to help develop the skill sets needed for cross-sectoral working. Member support was also important – NPF was involved in presentations to the Planning Summer School for 200 elected members in early September. Again, participation was not universal. Unfortunately the Cabinet model of local government (and the narrow interpretation of propriety) limits wider member engagement in plan-making, so members on a Development Control Committee have no input in the policy they are required to implement.

TT noted the link between this review, Lyons and the forthcoming Local Government White Paper.

(c) How do local authorities attract planners?

This was agreed as a problem, particularly in some areas such as London, because of the positioning of planning – sometimes the service is split into 2 or 3 parts, if there's no Chief Planner on the Management Board of the local authority (LA), planning lacks status/a voice at senior level.

A key requirement is to integrate development management and strategic planning – some LAs separate the two, taking too literally the need for propriety in decision-making. The NPF had commissioned a study of Creative Planning from Andrew Wright, Planning Officers' Society Enterprises [copy to be forwarded to KB] that considered this issue.

There is a possibility that LAs could dampen the enthusiasm generated by the new planning syllabus. There was also a general lack of resources, despite Planning Delivery Grant (PDG). Ways round the issue of attracting and retaining good staff include some LAs offering a

3.

package as attractive as consultancies eg flexible working including opportunities to take extended unpaid leave to travel; time off for funded training; bonuses if people stay etc

KB asked about employing overseas planners. EB member said this was often done, and one or two could be very useful, but more could be counter-productive as although they are generally good workers they:

- are relatively expensive if provided through an employment agency
- don't stay long
- don't have local connections
- lead to loss of institutional/casework memory

Despite some good examples of sharing specialist staff amongst LAs, some further issues in LA planning were:

- politics (member and officer) stopping cross-boundary working
- a big gap between national guidance and what happens locally
- central government planning policy seen as too prescriptive, and thus the system too centralised when it isn't, there's actually not enough clarity
- too large a volume of material which is not easy to assimilate, and LAs not having expertise to judge/assess it
- achieving clarity and simplicity in policy/LDFs requires time/expertise/careful thought
- the planning system needs people with intellectual capacity, technical ability and able to make sensible judgements and take responsibility
- it needs officers of sufficient seniority and experience to take brave decisions that don't risk judicial review

(d) What could be cut out or simplified?

NPF has collated suggestions. For example, for Wales there is one (relatively short) integrated planning policy document. All DCLG's Planning Policy Statements (PPSs) and extant Planning Policy Guidance (PPGs) could be drawn together in one document – reducing volume and eliminating duplication. Ultimately this could lead to a statement of the 25/30 key national planning policies, applicable everywhere across England.

The key is proportionality and reasonableness at all levels.

KB said that an RTP1 survey had found large numbers of major applications were submitted without the right documents. This is certainly a problem – a large number of documents and assessments are needed to enable assessment of large scale applications. However, some of this is a product of the target-driven system; applications are not registered until complete. Many businesses/consultants are under pressure to submit an application, so again it can be difficult to assess where the problem lies. This would be helped when electronic applications are the main conduit, or could require a pre-checking system to be set up.

(e) How can the link between planning permission and implementation be improved? Why do some large developments not proceed when they have planning permission?

One idea to improve links between planning and implementation is to link LDFs to Spatial Investment Plans – the latter set out what infrastructure is needed, as what cost, funding packages/option, and when it is needed. The LDF provides the policy framework for decision-making and for funding via S106/tariffs/PGS. LDFs need to be robust, giving the overall direction of policy, capacity for growth, quantity and quality of development, but need to be resilient to changes in funding programmes.

It would help enormously if eg the Highways Agency was involved in ensuring delivery of major developments such as Ebbsfleet – this and similar schemes require a separate Delivery Plan.

The EB said that in their experience the causes for unimplemented permissions vary – from applications being for valuation purposes; to disagreements over the S106, or one or more of the conditions attached to the permission; to changes to the applicant's circumstances. The planning process doesn't start with submission of an application, and doesn't stop with the S106/planning permission. Targets need to pay attention to the whole of the process, not just applications. A wide variety of triggers and motives is involved. The process needs incentives for the LA, applicant and community to enable development.

(f) How should transport and energy decision-making work? Would a National Spatial Framework (NSF) help, and if so what would it look like?

Transport, energy, waste, ports etc need strategic decision-making – at the level appropriate to the scale. There needs to be a balance between the market and strategic direction. At present there is lack of clarity and certainty at national (and inter-regional) level. An NSF – or at least strategic policy statements at national level backed by good evidence and analysis – would help. The issue is as much about the process of integrating and reconciling infrastructure needs across government departments and other bodies as it is about end product.

The Forum had received presentations on an NSF at its last meeting; the EB would be considering responses on the principles for such a framework at their meetings immediately after this one, so could forward the revised draft with the note of this meeting.

An NSF would provide a high level framework for strategic decision-making. A first stage could be to look at whether the RESs join up, whether they make sense in terms of transport, the growth agenda, water infrastructure, energy, ports policy, waste hierarchy etc and whether they are realistic – anecdotally there are 7 English Regions aspiring to be amongst the top 5 performing regions in Europe; such clear policy conflicts need to be addressed spatially.

Other points included:

- an NSF would not necessarily need to cover all topics in one document, although many of the issues are inter-related eg housing and water supply, flood risk, ports and land transport etc
- there's a need for public and private sector investment to complement each other
- there are other issues eg provision of health and education services where investment decisions taken without consideration of spatial implications can have huge ramifications
- issues such as flood defence can be a catalyst for discussion/a process of education of the wider community
- DCLG would be in a good position to coordinate preparation of an NSF
- it should cover only issues needing to be tackled nationally eg to identify the general location of the small number of hazardous waste installations, leaving decisions on local siting to be decided locally
- it would need cross-Departmental/Ministerial and Prime Ministerial sign up
- an NSF would need to link to regional, sub-regional and local plan-making and would require a lot more effort and culture change, but there would be commitment/support from NPF members for tackling the issues in a proportionate/appropriate way.

TT said that national ports policy had been consulted on recently – responses were being analysed but there was still an opportunity to contribute views.

KB summed up by saying that the NPF would be welcome to send in more contributions to the review, answers to the questions posed (in the Interim Report) were important. She added that she had found the discussion helpful and informative. The meeting closed at 2.20pm

ANNEX: NATIONAL PLANNING FORUM: DRAFT PRINCIPLES FOR A NATIONAL SPATIAL FRAMEWORK (NSF) AS AT 5 SEPTEMBER 2006

An NSF should be:

- visionary, long-term, flexible, both a product and a different way of doing things

It should:

- integrate the social, environmental and economic strands of sustainability
- give spatial clarity/specificity
- accord with subsidiarity, ie cover only policy that needs to be set at national levels, leaving the regional, sub-regional, local and community issues or decision at those levels
- provide a framework against which policy and decisions should be spatially proofed
- reduce frictions that stop people cooperating/coordinating
- be clear, easily understood and prepared in a participative and transparent way
- be independently assessed before being confirmed

(C) NATIONAL PLANNING FORUM: EXECUTIVE BOARD: BARKER II INTERIM REPORT: PROPOSALS FOR CONSIDERATION

(i) GOVERNMENT AGENCY

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process	Statutory consultees prioritising early engagement in plans	Amend target driven culture to focus on quality of outcomes rather than speed of decision making (Central Government)
Efficient use of land	More work on environmental capacity/limits to help determine sustainable locations for future growth	National Spatial Framework to set clear locational priorities and integrate different interests (Central Government)
Flexibility and responsiveness	Statutory consultees setting out clear guidance and focussing on ways of delivering sustainable development	Stronger encouragement for businesses to engage with the planning system at an early stage (Business sector and Government)

Other (brief) comments on the Interim report:

No analysis of benefits of planning for the economy and business

No recognition of the value of the environment as an asset for business (locational attractor, quality of life for employees, environmental economy)

(ii) PROFESSIONAL INSTITUTE

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process		CENTRAL GOVERNMENT: Although Planning Policy Statements (PPSs) have been of some use in reducing levels of complexity, the accompanying guidance notes to these is often lengthy and the time taken to produce the statements has been considerable. The Government can address this by being clearer as to when the remaining PPSs will be published and by giving assurances that they will not be adopted in a final form until they have been completed and published.

Efficient use of land		CENTRAL/ LOCAL GOVERNMENT: The influence of clusters upon the planning process is unclear. The possibility of establishing 'virtual clusters' should be examined further.
Flexibility and responsiveness		CENTRAL/ LOCAL GOVERNMENT: The planning system can be made more responsive and flexible by addressing the shortfall that currently exists in suitably qualified planning staff.

Other (brief) comments on the Interim report:

Efficiency of process

- Pleased that a fundamental overhaul of the planning process is not suggested and that the focus will remain on making the existing planning process work more efficiently.
- There must be a balance between speed and efficiency and quality of output. The focus on targets and speed of decision-making has been at the expense of quality of output and has increased the pressures on already understaffed departments.
- Regional Planning Guidance and Regional Spatial Strategies should continue to provide the broad strategy for the region but should not prescribe micro-level measures such as the need or level of additional floorspace in the retail, leisure or office categories.
- Town centre planning must link to the national, regional and local levels. This can be achieved through further devolution of budgets and functions to the city-region level and decisions to the local level. We look forward with interest to further announcements on this theme in the local government white paper.
- Although Planning Policy Statements (PPSs) have been of some use in reducing levels of complexity, the accompanying guidance notes to these is often lengthy and the time taken to produce the statements has been considerable. The Government can address this by being clearer as to when the remaining PPSs will be published and by giving assurances that they will not be adopted in a final form until they have been completed and published.
- A reduction in the number of statutory consultees would speed up the processing of planning applications, reduce the number of conditions attached to them and free up valuable time for planners. Nonetheless, it will continue to be important that a broad range of interests are taken into account when considering planning applications.
- The adoption of a sequential approach would allow complexities such as that presented by the transport infrastructure to be overcome. Such an approach should take account of the economic level (in order to incorporate regional economic strategies and the like), the spatial level (in order to reflect the major questions arising from the economic strategy of 'how much', 'how big' and 'where'), and housing and transport plans (in order to ensure delivery).

Efficiency of land use

- The 'town centre first' approach should be supported with its emphasis upon higher density, multi-storey developments and the use of compulsory purchase powers to assemble sites. The possibility of extending guidance in this area beyond the core of the town centre to out-of-town urban sites should be examined.
- The influence of clusters upon the planning process is unclear. The possibility of establishing 'virtual clusters' should be examined further.
- Local planning authorities are able to respond to market changes and monitor local impact. It is important that these powers are not applied too prescriptively and that

some powers – such as the requirement for a maximum gross amount of floorspace – could be detrimental to the economic growth of an area if applied too prescriptively. The role of planning policy should be to “load the dice” in order to motivate positive land use and quality design outcomes rather than by direct intervention and therefore it may be better if local planning authority powers are phrased in terms of guidelines.

- Nonetheless, the emphasis for new developments should remain on development in town centres rather than low density on out of town sites. Town centre extensions should only be considered where such growth cannot be facilitated by this means. Local authorities should be encouraged to adopt policies to ensure that sites in preferred locations are developed ahead of less central locations.

Flexibility/ responsiveness

- The time taken to make decisions could be improved by ensuring that supporting guidance is more clearly articulated and is issued in a timely fashion. A timetable for the issuing of guidance would be a positive development.
- It is right that social, economic and environmental interests are taken into account when planning applications are considered. However, more responsive processes should be in place for resolving objections than currently exist.
- A more physical way in which the planning system can be made more responsive and flexible is by addressing the shortfall that currently exists in suitably qualified planning staff.

(c) PROFESSIONAL INSTITUTE

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process	<p>This begs the question about the purpose of planning. Shifting the emphasis of planning towards a more market-orientated approach (as Barker implies) will render planning less efficient. In particular it will weaken further the link between land-use and transport planning - yet the integration of transport and land-use is a key objective of Government policy.</p> <p>Dispersal of traffic generating uses has already increased car dependency and undermined public transport. Barker proposes to remove some of the restrictions on out-of-town retailing. By damaging the economy of town centres and cutting across government policy to reduce car dependency this will limit the efficiency of the planning process and the effectiveness of transport policy.</p>	
Efficient use of land	<p>The key planks of the drive for more efficient use of land have been higher densities, the sequential test</p>	

	for new development, and brownfield land targets. Releasing more greenfield land on the urban fringe will run counter to all three approaches. The result will be lower density development, longer trips by private car, and more use of greenfield land. This is the antithesis of efficient land-use. It should be opposed on the basis of sensible housing, planning and transport policy.	
Flexibility and responsiveness	-	-

(iv) NPF SECRETARIAT

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process	[NPF] Seek commitments to early and effective engagement in plan-making (in RSSs and LDFs) and decision-making from all sectors	[DCLG] Prepare a single, concise, PPS (rather than the current large set) with eg 25-30 key national policies, illustrating Government's commitment to, and requirement for, concise documents. [Voluminous material is a key impediment to efficient process.]
Efficient use of land	[NPF] Encourage all sectors to find solutions that integrate the social, environmental, and economic (market) aspects of development and conservation	[DCLG] Move from output indicators for development control to a small set of indicators including measurement of the value added by plan-making and development management. This would emphasise the integrated nature of planning. Measures could include whether patterns of development are getting more or less sustainable (eg are densities increasing adjacent to transport nodes, has access to public transport improved due to planning action), not just speed of producing plans.
Flexibility and responsiveness	[NPF] Contribute to a cross-sectoral training programme to improve understanding and enhance participation	[DCLG] Scrutinise policy with spatial and sustainable development implications across Government (transport,

		energy, health etc), to parallel HMRC scrutiny of financial implications
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Other (brief) comments on the Interim report: Many positives, including the helpful acknowledgement that the spatial planning system and other reforms need time to bed in, but a report with some conflicting messages about the need for speed - apparently regardless of outcome. Nevertheless it provides an opportunity to create the right conditions nationally for truly sustainable development.

(v) 3rd SECTOR

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process	Effective and appropriate community engagement in the planning system is essential to deliver high quality and sustainable outcomes. We will continue to educate our members (over one million) about the planning system through our website, literature and community planning project, and will encourage other NGOs to do the same.	<p>Better strategic planning, especially at the national level, would reduce delays and uncertainties at the project level. We support calls for a national spatial framework made by the RTPi and TCPA. A NSF should integrate major infrastructure development (such as for energy and transport) with national environmental objectives (such as those set out in the UK Biodiversity Action Plan). It must be subject to meaningful democratic accountability, public and stakeholder involvement and robust strategic environmental assessment, without reducing local accountability.</p> <p>This is an action for Government, in particular DCLG, DTI and Defra.</p>
Efficient use of land		<p>An efficient use of land in market terms is not necessarily the same as an efficient use in terms of social welfare and sustainable development. Planning must now contribute to sustainable development. This implies an integrated approach to decision-making, which forces us to ask challenging questions about the form and location of development.</p> <p>Land designated for biodiversity or landscape value is crucial to our quality of life, but with climate change and continuing biodiversity losses, biodiversity in the wider countryside and urban areas is assuming greater importance.</p>

		<p>The planning system has always been good (although not perfect) in preventing wrong development in the wrong location; the new system should enable it to be more positive about promoting the right development in the right place, at all levels in the planning hierarchy.</p> <p>However, despite positive Government planning policy (notably in PPS1), there needs to be a culture change in the planning and development sector towards the understanding and implementation of both sustainable development and the value of the natural environment.</p> <p>DCLG should therefore firmly embed these concepts within its culture change programme.</p>
Flexibility and responsiveness		<p>We remain very concerned that making the planning system more responsive to price signals or giving financial incentives for pro-growth strategies will distort the plan-led system and will lead to poor quality decision-making, which will hinder the achievement of sustainable development.</p> <p>While it would be timely for DCLG to review PPG4, its policy content must be firmly plan-led, to ensure that planning decisions made do contribute to sustainable development. The same comment applies to PPS3, currently under consideration.</p>

Other (brief) comments on the Interim report:

In our view, the greatest gains for productivity are likely to be found through increased efficiency of process, and further actions by Government should concentrate on this aspect before undertaking more fundamental reforms to the planning system. We will be making a fuller response to the interim report. This is likely to focus on the extent to which planning is crucial to productivity and the challenges of sustainable development, biodiversity and climate change.

(vi) PRIVATE SECTOR

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process	Submission of complete and comprehensive applications (by Planning Consultants) following effective pre-application discussions.	Severing the link between simple targets and PDG and concentration on efficient service on all applications (instead of just the 60/80%)

		Alternatively introducing a scale of penalties for the length of time any decision goes beyond target period. And use of planning delivery contracts. (DCLG)
Efficient use of land	Willingness to incorporate a mix of appropriate uses within a development with an initially single-use focus. (Business)	Review (by LPAs) of full potential capacity of urban areas (including sports pitches where these are in sustainable locations for housing and there is potential for replacement in accessible but more peripheral locations or where investment can be made in securing more capacity and diversity in other sports facilities).
Flexibility and responsiveness	Early consultation with LPAs and technical consultees and preparedness to respond to their reasonable contextual objectives in the formulation of proposals. (Business)	Expedition of LDF documents, monitoring and review of LDSs to respond quickly to changing circumstances, as envisaged in the devising of the new planning system. (LPAs)

Other (brief) comments on the Interim report:

What is not needed at this time is another major review of the forward planning system. The recent changes have not yet had a chance to be proven and the LDF process is now underway and being monitored. It would be more positive to ensure that problems identified in this initial period – including evidence that it is not as speedy a process as intended – are addressed. This will require establishing the issues and responding with clear and concise guidance notes.

Householder applications – these were traditionally handled in many LPAs by technical staff but increasingly their posts have been replaced by professional planners. There is a resourcing issue, especially in the supply of professional planners and there will be other staff in LPAs (eg Building control) who could take on this work.

I do not agree with the proposal to take this category of development out of the planning system or with the suggestion that the thresholds of PD rights should be raised – these are one-size-fits-all solutions which this could each have serious consequences for some communities and it is right that such matters (of all application types) are determined locally.

However, I suggest appeals in this category could be dealt with other than by the Planning Inspectorate – perhaps by local design panels or the Government Offices.

(vii) Local Government Officers

ISSUE IDENTIFIED	ONE KEY ACTION/ PROPOSAL [for your organisation/ sector]	ONE KEY ACTION/ PROPOSAL [for others - insert who]
Efficiency of process)) Efficient use of land)) Flexibility and responsiveness))	[Local Government] Give pre-application processes a higher priority for resources	[DCLG] Simplify the LDF process where possible eg not requiring PINS to examine statements of community involvement, nor a statutory process for supplementary planning documents

		<p>Emphasise the need for shorter documentation.</p> <p>Revise targets, particularly for major applications</p> <p>Continue Planning Delivery Grant, and/or consider alternative funding arrangements</p> <p>Take minor developments out of the planning system by appropriate revision of the GPDO, codifying householder development, or local development orders</p>

Other (brief) comments on the Interim report:

The injection of significant additional funding and investment into planning through Planning Delivery Grant and increases in planning fees has been very welcome and has produced some impressive improvements in terms of development control performance. However, it has been at the cost of diverting resources from other important aspects of the service.

Whilst there are benefits from using private sector to supplement capacity and specialist skills this is not a panacea as there is no indication that the private sector has the capacity, without recruiting from the public sector and so making matters worse. And in spite of very welcome initiatives to increase the flow of people into the profession, there is still a shortfall of experienced planners, particularly in London. A sustainable resourcing strategy is essential.

Clarity is needed from DCLG, GOs and PINS on what is needed from LDFs.

A clear statement is needed of the significance of climate change in policy-making and decision-making.