

NATIONAL PLANNING FORUM 17 OCTOBER 2006

**MAKING THE PLANNING SYSTEM WORK
Planning Officers Society 2006**

The Planning Officers Society is committed to making better places and making the planning system work to achieve this objective. This short paper outlines changes which we think can and should be made in the short term, without the need for primary legislation, to improve the effectiveness of the system. This is a message to Government and to Local Government, but also to other interested organisations, public, private or voluntary sector, who can identify with the same issues and want to work for improvement.

We support a plan-led system with Local Planning Authorities playing a leading role. Local Development Frameworks should be at the heart of Local Authority policy making with a clear and direct relationship to Community Strategies and Local Strategic Partnerships and linked to resource allocation at the local, sub-regional, regional and national levels.

The 2004 Act provides the principles for positive planning, but delivery is potentially undermined by bureaucracy and a focus on process at the expense of good planning outcomes. Problems of lack of resources in planning are well documented and have been exacerbated by increasing workloads and the diversion of staff and funding into work with little added value.

The Planning System must be 'fit for purpose' and continuing review is to be welcomed, but there comes a point where review becomes synonymous with uncertainty and re-examination of process detracts from product. There are a number of concerns which the Society feels could be dealt with to improve the existing system without radical reform. This paper excludes comment on many current issues, such as Planning Gain Supplement, which are the subject of specific consultation responses. As the title suggests, we are concentrating on those issues we see as necessary to make the system work better.

Specific Issues are:-

Proportionality: Planning documents should be proportionate to their purpose and the value they add. One of the key objectives of the Local Development Framework (LDF) process was to promote more streamlined, concise, flexible and comprehensible plans. There is a real concern that this is not happening and that scarce resources are being consumed in producing over-elaborate and exhaustive Local Development Documents (LDDs), Strategic Environmental Assessments (SEAs) and Sustainability Appraisals (SAs). Many of the documents now required to support planning applications are similarly of extreme length and yet have limited impact on the decision making process. These documents do little to de-mystify the planning process in the eyes of the public and act as a barrier to effective community engagement. The process for the adoption of Statements of Community Involvement (SCIs) is too complex, too long and deters meaningful engagement or review. PINS scrutiny of SCIs adds little value at significant cost.

With a new and as yet untried system there is an absence of best practice examples that have been tested and many Local Planning Authorities (LPAs) are understandably reluctant to take risks. POS believes that the new system is about

concise, focussed and comprehensible plans, and supporting documents should be proportionate to their purpose. This message needs stressing and reinforcing at every opportunity. There is a real risk that the system will fail if exhaustive, exhausting and incomprehensible LDDs and SAs bring the process to a grinding halt while consuming scarce resources – within LPAs, PINS, Government Offices and for the private and voluntary sectors.

Bureaucracy: We are already seeing how the bureaucracy of the new system is standing in the way of good planning and timely delivery. For example, subjecting Supplementary Planning Documents to a statutory process may be desirable in principle, but in practice the timescales involved mean that Supplementary Planning Documents (SPD) cannot deliver site specific redevelopment and regeneration opportunities quickly and effectively. Examples of major opportunity sites being dealt with outside of the statutory planning process, through locally adopted briefs or through inviting planning applications are becoming increasingly apparent and are undermining the credibility of the new planning system and the plan led approach to sustainable development.

Capacity and Resources: In spite of some very welcome initiatives (bursaries, Tomorrows Planners) the capacity of LPAs to deliver the new system and all its implications remains fragile. These new initiatives will take time to bear fruit and recent survey results in London demonstrate that staffing problems are actually getting worse. Difficulties are being experienced in filling key posts throughout the country. These capacity issues are not helped by the diversions of disproportionate responses referred to earlier and the steady stream of consultations and new initiatives adding to the continuing demands of meeting targets and chasing Planning Delivery Grant (PDG). Many LPAs are using the private sector to supplement both capacity and specialist skills, and POS supports cross sectoral partnership. However there is no indication that the private sector has capacity to take on a significant increase in workload without recruiting from existing public sector staff.

Planning Delivery Grant has been instrumental in driving planning performance and raising planning's profile within local authorities. POS has been critical of aspects of PDG allocation, but has welcomed this major injection of funding and its continuation through to 2007/8 which has enabled significant investment in planning services. A formula for post PDG funding is now essential. If PDG is to cease with no alternative funding streams, which would be regrettable, LPAs need notice to enable them to devise alternative strategies. If there are to be alternative funding streams, such as fee increases, again early notice is essential if services are not to be disrupted. Without alternatives LPAs will not be in a position to continue funding the full range of service improvements and there will be an inevitable contraction in planning resources and reductions in service delivery.

Targets: POS fully appreciates the changes brought about by the 'carrot and stick' of PDG, targets and performance standards. The injection of significant additional funding and investment into planning through PDG and increases in fees has been very welcome and has produced some impressive improvements in terms of DC performance. However, it has been at a cost, and the target driven culture has diverted resources away from e.g. pre-application processes and negotiating on applications. Targets also fail to deal with applications not determined within time limits, where no incentive remains to determine them in a timely and efficient manner. Targets do not encourage LPAs to take a constructive or pro-active approach to negotiation, either pre or post submission, and can therefore impact negatively on what could otherwise be valuable developments.

These impacts are particularly concerning in respect of major applications which are likely to be significant in delivering housing and regeneration objectives. We would like to see targets reviewed particularly for major applications which cover too wide a range of developments. We see the positive benefits of Planning Delivery Agreements replacing targets for some types of applications.

Positive Planning: We would also want to see pre-application processes being given much higher priority for resources. Real planning for major developments should happen before applications are submitted. Once an application is with the LPA, there is no time for planning, only time for processing within the target driven culture..

Taking minor development out of the system: The Society fully supports the principle that much minor development impacts on private rather than public interests and should be taken out of the planning system. There are a number of avenues which could achieve this, by revision of the GPDO, codifying householder development or through local development orders. Taking such development out of the system, to enable planning to focus on strategic issues of public interest, would release skills and resources to be employed where they are most needed.

Climate Change: Climate change is a subject of great public interest and increasing concern. The Society feels strongly that it is of such importance that a clear Government statement of its significance in policy making and decision taking is now essential. Planning is one mechanism available to both attack the causes and mitigate the impact of climate change and planners need clarity that policies and development control decisions which address climate change will be supported.

And to reinforce comments made above:

Delivery: There is a need for clarity (from DCLG, GOs and PINS) on what is required from LDFs.

The Planning Officers Society has well established working relationships with the key stakeholders in the planning system and this is an open invitation to work with Government and other organisations, public, private or voluntary sector, to address these issues. Together we need to deliver practical and workable solutions which will improve planning in the public interest.