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Barker Review of Land Use Planning
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18th September 2006

Dear Ms Perryman-McDonald

Barker Review of the Land Use Planning System Interim Report

Since responding to the formal call for evidence in April 2006 the East Midlands Regional Development Agency (*emda*) has published the new Regional Economic Strategy 'A Flourishing Region' in July. We are therefore able to reflect more fully on the findings of the Interim Report within the context of the new agreed regional economic priorities and objectives for sustainable economic growth.

The East Midlands RES highlights the importance of ensuring that land and infrastructure are in place to support growth, and recognises that much economic development activity, particularly that relating to the development of priority sectors, supporting clusters, physical regeneration projects, and infrastructure provision all have land-use implications. An efficient and transparent planning system is therefore essential to help facilitate and support many of the regional aspirations and objectives for sustainable economic growth as outlined in the RES.

We are therefore keen to support and help the Barker review, and await with interest any recommendations which will improve the contribution of the planning system to regional and national economic development and sustainable growth. In response to the Interim Report, we consider that the following five issues should be addressed in the final stages of the Barker Study of the planning system:

1. Improving the Efficiency of the Planning System

Speed of decision making remains a critical issue, particularly for business. Performance levels have increased, but there are still issues, not least of which is the time taken to deal with larger, more complex planning applications – a key issue from an economic development perspective. There are indications that some of the gains at local authority level on speed of decisions have sometimes been achieved at a cost with less time focused on pre-application discussions which can lead to delays later in the process.



Meeting expectations is challenging - there is evidence that a shortage of experienced planners is affecting local authority's planning functions with planners being the second most difficult post to recruit to in local government, while the Planning Inspectorate is struggling to cope with the heavy workload of inquiries and appeals.

However, there is a danger in focusing too heavily on performance targeting. The Audit Commission recently reported that the emphasis on speed is having a negative effect on the quality of services delivered by some planning departments, and they argue strongly for the wider use of pre application agreements between the local planning authority as an effective means of clarifying issues and expectations.

Our view is:

- **Speed of decision making is important and local authorities should be encouraged to conform to Government targets. However, reliability and predictability of the time taken for decisions to be made are equally important in terms of certainty for the users of the planning system.**
- **Specific attention should be given to the processing of major applications - local authorities need to ensure that planning applications which create jobs and investment and make a critical contribution to economic development should be given higher priority than is often the case now. The East Midlands regional submission to the CSR07 includes the suggestion that Government introduce a 'Planning Innovation Grant' to help reward Local Planning Authorities which are proactive and efficient in their treatment of applications which would deliver economic and enterprise related outputs and impacts.**
- **Good practice in pre-application discussions between local authorities and developers should be further promoted to help improve the speed of the planning process, and understanding between the parties.**
- **Increasing expectations on the performance of local authorities needs to be matched by adequate staffing resources. The Government's promotion of planning bursaries to encourage more students to train as planners is welcome.**
- **Local authority members also need to receive adequate training to ensure that they are equipped to deal with complex decision making which is required.**
- **The Planning Inspectorate needs to be adequately resourced to respond to the heavy workload while ensuring that significant planning applications of national and regional economic importance are prioritised.**

2. Ensuring Effective Business Engagement in Planning

As the Interim Report identifies, there are clearly issues around how the planning system could be made more 'business friendly' by responding to concerns about delays, costs and uncertainty. There is work required to help the business community in general to understand a system which is often perceived as being jargon-led, complex and over-elaborate in procedures and processes.

Our view is :

- **More targeted support is required to facilitate greater engagement of SMEs in the planning system. Organisations such as Planning Aid should be supported to facilitate business planning workshops on planning issues and *emda* will promote this activity.**
- **The intention for the new planning system to be 'frontloaded' with participation early on in the process is worthwhile and should be encouraged. Key stakeholders, including the business community, should be invited to become more actively engaged in policy formation.**



- **RDAs are well placed to improve liaison, and further develop engagement with, the business sector - *emda* can assist by operating through networks such as the East Midlands Business Forum and the Federation of Small Businesses.**

3. Promoting a Culture Change for Planning

A culture change in planning is required to change the perception of it as a negative, regulatory, process driven, function to one which is positive, place shaping, outcome orientated and participatory. One of the aspects of this change is to ensure that the role of the economy in ensuring prosperity, growth and positive change is embraced. Often it seems that local authority planning and economic development voices are not sufficiently joined up, or engaged in working together to provide a consistent view. Unless addressed, this inevitably means that local plans do not reflect the wider economic development and regeneration priorities of local authorities.

Local authorities should be encouraged to work more closely with neighbouring authorities, particularly for the preparation of joint local development frameworks. Currently, the only Joint Local Development Framework being prepared in the region is between Corby, Kettering and Wellingborough in Northamptonshire. The East Midlands Regional Spatial Strategy is being reviewed with an emphasis on a Housing Market Area (HMA) approach to housing and employment land monitoring and delivery. HMAs are based around travel to work areas, meaning they have far more 'real-world' relevance than seeking to plan purely on an administrative boundary basis. This approach is welcomed as a way of transcending local authority boundaries and may provide more of a stimulus to local authority joint working.

Our view is :

- **The need for a culture change in planning is recognised and the DCLG is working to address this. As important stakeholders the RDAs support these efforts. This should include encouraging local authorities to concentrate on the 'bigger picture' and establish mechanisms to ensure larger, more difficult applications are given adequate priority.**
- **The professional and administrative boundaries between planning and economic development functions of local authorities need to be broken down so that planners are more aware of the economic development issues. The Sub Regional Strategic Partnerships in the East Midlands are cross-boundary, focusing on a wider spatial area which allows a more strategic economic view to be taken at the local level.**
- **We welcome the increasing emphasis on Housing Market Areas which extend across local authority boundaries as the basis of planning for housing and employment land needs.**
- **Local planning authorities should be encouraged to prepare Joint Local Development Documents or Frameworks on appropriate issues or sites – for example, large sites which sit on or close to boundaries, or in areas of substantial change or growth (like MKSM in the East Midlands as shown in the North Northants example).**
- **Changes to local government finance and incentives are powerful tools for bringing about change. The Government should consider if there are ways to use the Planning Delivery Grant to promote applications which can bring significant economic change and innovation. The Planning Gain Supplement may also facilitate a more proactive approach to economic development.**



4. Improving National Planning Guidance on Planning for Economic Development

While the planning system contains a wide range of guidance notes, and topic specific White Papers or policy documents, the UK does not have a 'National Spatial Framework'. However, such a framework could provide the context for:

- Regional Spatial Strategies
- National Infrastructure Priorities – roads, airports, and ports
- Sustainable Communities Plan, Northern Way and Midlands Way
- New Growth Points

While regional flexibility and responsibility to make key decisions is required, this would provide a framework to clarify national priorities in a joined up fashion, inform and steer regional and local planning policies, and reduce delay and cost for major planning applications. It could have particular value in the context of major transport and infrastructure applications, and help speed up the process by establishing the basic principle that development should take place. One of the main objectives of exploring this approach would be increased certainty to private and public sectors.

A review of PPG4 on 'Industrial and Commercial Development and Small Firms', published in 1992 would be a crucial factor in helping to rebalance local considerations towards a stronger consideration of the need for economic development. Updated guidance is essential to respond adequately to new forms of economic development including sectoral support, cluster development, live / work units, and the knowledge economy. At present, the absence of up to date guidance is making housing development, and in particular the focus on brownfield housing, far more of a priority than issues around employment land supply. This causes us concern in the context of ensuring balanced, sustainable growth, and in delivering regional economic objectives.

Our view is :

- **Consideration should be given to the benefits of having a 'National Spatial Framework' to clarify national spatial planning and infrastructure priorities, whilst retaining regional flexibility and decision-making on sub-national issues.**
- **The need for updated planning policy guidance on economic development issues is acute and the Government should prioritise the review of PPG4 as a matter of urgency. This issue is included in the emerging East Midlands regional submission to the Comprehensive Spending Review 2007.**
- **Relating to the above, the supply of good quality land for development is essential for a competitive economy and the consistent loss of employment land for residential use needs to be addressed.**
- **Employment land priorities need to be closely related to the priorities of the Regional Economic Strategy. New forms of economic development will require a more creative approach to employment land planning which considers qualitative aspects in addition to quantitative measures of supply.**

5. Regional Strategy Alignment

The interim Barker Report focuses almost exclusively on development control issues, ignoring many issues relating to strategy development and policy. For example, there is only one reference to the role of the RES, and the importance of alignment and complementarity with RSS. We would like to see the final Barker Report pay more attention to these issues around strategy, and the importance of the policy framework in steering development proposals, decisions and investments.

The alignment of Regional Spatial Strategy (RSS) and the Regional Economic Strategy (RES) is fundamental to securing improved economic performance. There are many



interactions and overlaps between the two strategies, so a consistent and supportive approach is essential. One of the RSS's main roles is in the allocation of the scale and amount of housing development, and this needs to be complementary to, and aligned with the economic strategy if progress against economic, and other objectives (including environmental) are to be met. Economic development is a strategic part of spatial planning and cannot be considered in isolation.

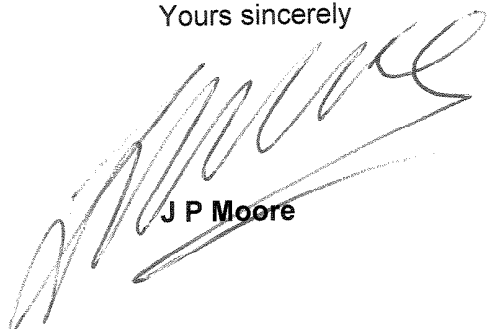
Strategy alignment is not helped by the fact that the East Midlands RES and RSS have different review timescales – the new RES was adopted in July 2006, whereas the RSS will not be formally adopted until early 2008. The RES underwent a full review whereas the RSS is undergoing a partial review. Until recently, the sub-regional areas used within both documents were to different boundaries, although this anomaly has been addressed through the new RES.

Our view is:

- **A mature 'joined up' approach to regional policy development is required involving close working between RDA, Regional Assembly, Government Office and other key stakeholders with a shared understanding and agreement of key regional priorities. The approach taken in the East Midlands based around a shared evidence base is considered an important part of efforts to better align the different elements of the strategic policy framework.**
- **Regional level strategy alignment has not been helped by different means of preparation, timescales and ways of working. Further consideration should be given to bringing the two processes closer together.**

I hope you will find these perspectives of interest in considering the formulation of the final Review. Please do not hesitate to contact me if you would like any further information of clarification.

Yours sincerely



J P Moore

