

Barker Review of Land Use Planning **A response by the Retirement Housing Group**

Introduction

The Retirement Housing Group of the Home Builders Federation consists of retirement housing developers and housing managers, both RSL and private sector and the Association of Retirement Housing Managers. Its ex officio members include representatives of the charity, the Elderly Accommodation Counsel, and the Advice and Mediation Service (AIMS) of Age Concern. Its members are therefore involved in the building, management and provision of advice on housing for those of retirement age and over.

General

We welcome this opportunity to respond to this major review of land use planning and note that its terms of reference include examining ways of *"improving the efficiency and speed of the system, building on the reforms already in place, to deliver economic growth and prosperity alongside other sustainable development goals"*.

The Planning Framework

The national planning framework, as established by statute, is critical to the successful delivery of economic growth and prosperity.

ODPM Ministers claim that, as it was designed to do, the 2004 Planning Act is making the system fairer, faster and more predictable, bringing *"clarity, certainty and a new sense of strategic direction"* and providing the framework for *"a new system to make better plans, and make better planning decisions, more quickly"*.

We would ask the Review team to examine the implementation of the Planning and Compulsory Purchase Act 2004 on the basis of the evidence available to date and by identifiable trends going forward. Achieving higher levels of economic growth and prosperity will be hampered if the conclusion is that the new planning system, introduced by the Act, is not achieving these objectives and is failing to improve the efficiency and speed of the system.

Improving the Planning System – recommendations

The Planning Officers Society's recent paper, *"Making the Planning System Work"* questions whether speed and efficiency is being delivered in practice. It concludes that serious problems are already apparent and it puts forward a number of proposals about how the operation of the Act could be improved so that it does become faster and more efficient. We wish to take this opportunity to endorse and support them.

POS observes that delivery is being “*potentially undermined by bureaucracy and a focus on process at the expense of good planning outcomes and that lack of resources in planning ...have been exacerbated by increasing workloads and the diversion of staff and funding into work with little added value*” (our emphases).

We support POS’s suggestion that the system could be improved, without the need for primary legislation, by:

- **ensuring that planning documents are proportionate to their purpose and the value they add** for all concerned, including the community. We would agree that Local Development Documents (LDDs), Strategic Environmental Assessments (SEAs) and Sustainability Appraisals (SAs) are over-elaborate, as are many of the documents now required to support planning applications, and that LDDs and SAs are likely to bring the planning process to a halt, while also consuming scarce resources within local planning authorities, the Inspectorate, Government Offices, the private and voluntary sectors;
- **reducing bureaucratic process**, which is already obstructing good planning and timely delivery, such as the requirement that Supplementary Planning Documents be subjected to a statutory process, because the consequential timescales result in a failure to deliver development and regeneration opportunities quickly and effectively;
- **taking applications for minor development out of the system** through any one of several possible routes, including amendments to the GPDO, so that scarce planning resources can be directed to where they are needed most;
- **addressing funding issues beyond 2007/8 and reducing the number of arbitrary targets in the interests of good planning:** POS notes there must be recognition of the limited resources available to deal with growing bureaucracy and the constant stream of consultations and new initiatives. It is unlikely that the private sector has infinite capacity to take on a significant increase in workload if work is outsourced from local planning departments and if Planning Delivery Grant ends after 2007/8 (as currently planned) a formula for post PDG funding becomes essential if matters are not to deteriorate further, with consequential reductions in service delivery.
- **identifying and removing the barriers that an overly-complex system has created which reduce LPAs ability to resource pre-and post-application discussions:** shortage of

planning resources impacts on the ability of LPAs to offer pre-application discussions, which are encouraged, in principle, by national government. As POS notes, once an application has been submitted it must be processed within the targets set by Government and may be rejected because it runs out of time. Such targets do not encourage LPAs to take a pro-active approach to negotiation, either pre or post submission, and can have a negative impact on bringing forward developments that national policy encourages.

Conclusion

In conclusion, we would argue that the operation of the 2004 Planning Act is not, in reality, delivering the increased efficiency and speed, flexibility, transparency and predictability that was anticipated to the detriment of UK plc and that practical measures to identify bottlenecks and remove them, as proposed above, must be considered as a matter of urgency.

The unanticipated consequences of the implementation of the 2004 Planning Act on the economy will work to the detriment of all, including the country's ageing population. There are ways to improve this quickly without the need for further legislation and we would strongly recommend their adoption to the Review.

We would be happy to answer questions or provide further information.

Retirement Housing Group
44 Judges Walk
Norwich NR4 7QF
Tel: 01603 507855