

**Barker Review of Land Use Planning
West Sussex County Council – officer comments
March, 2006**

1. The terms of reference of the Review, and the questions posed by it, are inappropriately framed. They seem to suggest that the key purpose of the planning system is to deliver economic growth and economic prosperity, when planning has a much wider remit, as presented in the Government's sustainable development agenda.
2. The Review suggests placing economic objectives over all others, failing to make it clear that meeting demand may be unsustainable for environmental or social reasons. The Government appears to be taking this line in the light of the Barker Review of Housing Supply (2004) which took an economic approach to housing shortage and affordability problems, rather than a sustainable approach. The concern is that the current Review takes a similar approach to setting the framework for planning decisions and development. Rather than resulting in improvements to the planning system overall, it is likely to generate more conflicts and tensions between the various tiers of planning, and between the communities and stakeholders involved in it.
3. A more helpful approach to analysing the current situation would be to ask whether meeting demand *per se* is sustainable. This might lead to identifying other ways to assist achieving sustainable economic objectives, using the strengths afforded by conditions that meet social and environmental objectives. In other words, rather than stating a set amount of development is needed to create the economic growth we desire, we should ask how to create sustainable economic growth within development levels that are identified as socially and environmentally sustainable for the area under consideration, and can be supported by the necessary infrastructure.
4. Planning is part of a much larger "package" which delivers development, and impacts on economic development. The issue of skills falls outside the planning system though broader issues of matching labour supply with demand is related to planning issues. A wider approach needs to be taken in the Review, considering all aspects of social, environmental and economic development, not just the land use issues.
5. In considering the planning system it should be noted that the system, and policies emerging through it, can have different impacts in different parts of the Country. For example, in the South East conditions in the local, regional and wider economies, together with an apparent lack of interest in development other than housing, can mean that businesses look to expand and locate elsewhere. Whilst there may be a need to consider what influence the planning system can have on the market and economic development, the wider context must be carefully considered, along with the implications and impacts of development.
6. The paragraphs below set out responses to a number of the specific questions posed by the Review.

Question 1 – reference to the "right development in the right place" begs the question of what is right for whom? Different policy measures may be required for different situations in different areas. Businesses might not appear to see the planning system as flexible or responsive, but that does not mean that the system is at fault. There are wider issues than business and economic development to be considered and addressed in a democratic and open process.

Question 2 – there needs to be greater transparency in the responsibilities of the various parties involved in planning. There are suggestions that, for example, there is confusion over the roles and content of the South East Plan, Structure Plans, and Local Development Frameworks, and the various tiers of planning authorities.

Question 3 – the review needs to be strategic, noting that planning is part of a wider “package” encompassing the principles of sustainable development.

Question 6 – At this stage in the South East, the Regional Economic Strategy and the draft South East Plan are not sufficiently joined up despite interaction between the authors throughout the preparation of each document. This may be due, in part, to the fact that the planning system is not sufficiently joined up within central Government. For example, issues raised by the Highways Agency regarding the much-needed A27 improvements do not square with matters relating to housing provision and economic development along the south coast. Another example relates to the provision of water resources and treatment facilities in the South East does not appear to have been taken seriously by the Office of the Deputy Prime Minister in setting out arguments relating to housing provision.

Question 7 – large projects can take a considerable time to progress. There are usually a number of good reasons for the careful consideration of large-scale proposals, some of which are dealt with through the planning system as legitimate planning matters. Other factors include funding, including from central Government, and risk aversion/reduction of both the private and public sectors.

Question 8 – there is no evidence that the cost of submitting an application deters investment. If investors have a viable and serious scheme, the cost of an application is not a deterrent.

Question 10 – the planning system is, to some extent, led by market demand. If there is a proven sufficient market then applications come forward.

Question 13 – it is often difficult to achieve business community engagement in the planning process apart from making, or in response to, applications. Some commentators suggest that there are so many attempts to engage with communities – for example Economic Strategies, Development Documents, Regional Spatial Strategies – that stakeholders can become confused over who is responsible for what and how systems work. Experience has shown that when business representatives do engage in the planning process, but do not immediately see their issues being addressed, they lose interest. This may be due, in part, to the nature of the business interests which often exceed the influence of planning touching on, for example, education, skills and training, overheads and bureaucracy. This highlights the need for a wider assessment of the environment for economic and other development.