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Dear Ms Howard

Barker Review of Land Use Planning: Response by RPS Cambridge

These comments are made by RPS Planning, Cambridge, part of RPS plc. Our clients range from individuals to major landowners, local and national businesses and national house builders. As a practice specialising in providing planning services to such clients our comments are therefore founded upon our long established experience of planning and the development and housebuilding industries.

We welcome the review by Kate Barker of the land use planning system in England. However we are concerned that this is occurring after the introduction of the Planning and Compulsory Purchase Act 2004 as the new planning system created by this Act is not improving the speed and efficiency of the system and is in fact making the process very difficult for our clients, particularly those whose business activities are affected. We therefore set out below our comments on the main aspects of the new system.

Government Planning Policy Guidance

The Government's approach to reviewing its Planning Policy Guidance Notes (PPGs) was supposed to make the resulting Planning Policy Statements (PPS) shorter and more focused. However, in practice the result has been a shorter PPS but one dependent upon a series of companion documents to provide the detail of the Government's policy, many of which are longer than the PPG that they replace, and are not produced until after the PPS is in place.

A current example of this is the draft PPS3 on Housing. Much of the detail of how policy is to be implemented is to be contained in several companion documents. However, the consultation process is severely undermined by the fact that most of these documents are not yet ready, making it difficult to respond meaningfully. The resource implications for local authorities and for the expected contribution from the

private sector will also be a huge burden if the ODPM's draft proposals are implemented. This over complicated regulation is likely to further slow the process of meeting the recognised current shortfall of housing.

Revisions to the Development Plan System

One consequence of the changes brought about by the 2004 Act is that some local planning authorities have abandoned the process of reviewing their local plans part of the way through or even at a late stage and have decided to start the process again from scratch. This means that those who have responded to the local plan consultation process, expecting to be able to make progress with their development proposals once the plan was adopted, now find themselves back at the start of the process having wasted considerable time and money.

The portfolio approach to the Local Development Framework (LDF) means that Councils will be bringing the component parts of the LDF forward over a period of time in a fragmented way. This means that planning authorities will be in a constant state of consultation over the various elements of the LDF, particularly as earlier approved documents reach a stage where they need to be reviewed.

Very few parties, either in business, or as private individuals, will have the resources to devote to engaging in the development plan process for the length of time envisaged by most Local Development Schemes. Monitoring the various emerging plans and making representations upon each component, including detailed Sustainability Statements and other supporting technical documents, as well as potentially having to appear at numerous inquiries into every LDF document is going to be a major commitment for any party, as well as for the planning authorities themselves, which will be difficult to sustain both in terms of time and finance.

Development Control

Businesses and other applicants are still experiencing considerable problems with getting planning decisions due to the slow speed of the decision-making process, the increasing complexity of the process and the amount of supporting material that is now being required. Ironically it is the target-led approach to the way in which Local Planning Authorities (LPAs) are required to deal with planning applications that is in itself creating serious problems. Whilst setting an 8 or 13 week target may have seemed to be a means of encouraging LPAs to expedite decisions on applications, the combination of this with the Planning Delivery Grant has resulted in many, in our experience, refusing permission or asking applications to be withdrawn, rather than negotiating for changes to improve the proposal, purely in order to meet the target and receive the financial incentive. Lack of resources and experienced staff in LPAs continues to be part of the problem, as staff are under considerable pressure and are also unwilling to make judgements about negotiating acceptable schemes.

In conclusion, the current planning system is not working well and must be made more efficient and predictable with less unnecessary regulation and complexity, to ensure that it does not restrict business activity and productivity.

Yours sincerely
for RPS

Helen Phillips
Principal Planner