

Aviary Court
Wade Road
Basingstoke
Hampshire
RG24 8GZ

Carmel Howard
Barker Review Team
4/E1, 1 Horseguard's Road
London SW1A 2HQ

Richard Alden
Planning Manager

By post and email: barkerreview@hm-treasury.gov.uk

Richard.alden@uk.ngrid.com
Direct tel +44 (0)1256 308710
Direct fax +44 (0)1256 308513
Mobile +44 (0)7832 136626

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www.nationalgrid.com/property

Dear Ms Howard

Barker Review of Land use Planning : *"Call for Evidence"* and Response by National Grid Property Holdings Ltd..

We are writing with reference to the above *"Call for Evidence"*, with responses to be submitted by 28 March, 2006.

1.0 Introduction and Background to National Grid Property's response to the *"Call for Evidence"*.

- 1.1 Set out below is our response; by way of background, you should note that National Grid plc is a group of companies which owns, operates and develops a substantial part of the national gas and electricity transportation systems. The other businesses in the Group are NGUK Gas, NGUK Transmission and NGUK Wireless. National Grid Property Holdings Ltd., as part of the National Grid group, manages the Group's extensive estate portfolio. Its main activities are the reclamation and disposal of formerly operational gas and electricity sites and the provision of property services to Group companies, to meet their occupational requirements. In its property management and disposal role, the Company (known as National Grid Property) becomes significantly involved in all aspects of the land use planning system.
- 1.2 Throughout England, National Grid Property has a number of proposals at varying stages in the planning and development process, with some being for operational land where future re-use has yet to be considered, or is beginning to be appraised, and others for sites where planning permission has been applied for. Hence the above review of the land use planning system is of considerable relevance and importance to the Company's land and property interests.

1.3 Our responses to the specific questions posed in Annex 1 of the “*Call for Evidence*” are as follows; these responses have been prepared in consultation with our advisors on planning policy, Nathaniel Lichfield and Partners Ltd..

“1. *Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?*”

1.4 As we see it, a key purpose of the land use planning system is to manage the different views/conflicts that arise from a limited supply of land. The planning system should consider land use as a specific and key element of spatial planning issues. Often, difficulties in the operation of the land use planning system arise from other matters such as the proposed operator of a store or occupier of a development being taken into consideration that are not planning concerns. These factors should not be issues.

1.5 There are inherent limitations to the land use planning system as to what it can and cannot influence. It may be that other Government policies may prove more effective, in certain cases, in bringing about change than trying to use the planning system. In particular, there are problems with trying to use the land use planning system to tackle long term, economic, environmental and social issues. Government policy in Planning Policy Statements (PPSs) should reflect this reality.

1.6 For example, current pressure to reduce car use can be assisted by the location and form of new retail development, but it will not make a major change, due to the majority of choices available relating to accessing existing shopping developments and those developments remaining unchanged. Government policy affecting the cost of a car will be more influential. It is also the case that the policy areas, activities and types of development easiest to target are not the ones that could have the most significant effect in reducing car usage e.g. shopping v. commuting, or school runs.

1.7 The nature of the national and local political systems does not assist in taking a long term view - for example, members at the local level are more likely to be looking towards the end of their elected period and do not always understand broader land use planning issues.

1.8 Land use policy-making is still an important factor in the economy, and not only at national but at all spatial levels. Policies can and should be reviewed

regularly and revised and kept more up to date than in the past, to ensure that there is flexibility in the land use planning system to deal with development control issues arising from and contributing to the changing economy. Such flexibility is not always apparent to us, in the context of the character and nature of National Grid Property sites and viability and feasibility issues relating to redevelopment schemes for contaminated, brownfield land. In development plans and non-statutory policies, it is often the case that where the local planning authority (LPA) is aware that the Company's operational land is to become available for redevelopment, depending on a site's scale and location, it is either entirely allocated for employment e.g. business use, or for mixed uses, including some housing, but still with a significant amount of employment floorspace. If unallocated, it is presumed through policies relating to existing employment land that the industrial use will be replaced by new employment uses.

- 1.9 Where operational industrial land is no longer required, National Grid Property seeks to promote the re-use of such redundant brownfield sites and their regeneration. The type, scale and balance of different uses that can be promoted on any site are all critical to the viability of re-using contaminated brownfield sites. This is not always accepted by LPAs, in terms of what they will be willing to support in the context of, or in any Supplementary Planning Document (SPD), or in existing 'saved' Supplementary Planning Guidance (SPG), in pre-application discussions, in determining any planning application that might follow and in s106 obligation requirements.
- 1.10 The Company's sites are, however, very often adjacent to and surrounded by long-established residential areas and within built-up areas. In such cases, predominately residential re-use is generally the most appropriate. In spite of this, some LPAs still persist in seeking a high proportion of employment uses which is inappropriate or less appropriate to the location, unlikely to be attractive to investors, developers and occupiers alike, and which as a result calls the overall viability of regeneration of the site in question into doubt. Where a National Grid Property site is in or adjacent to an existing employment area, it is not uncommon for its allocation to be as an extension to that area. This type of 'blanket' allocation is inappropriate. The principles underlying the scope for re-use, redevelopment and regeneration of National Grid Property's redundant sites is to provide new uses which benefit the community and fund remediation of the site. This new use will often be residential, and subject to other policy considerations, could be retail and/or leisure uses. It is seldom the case that remediation costs can be met by employment uses. If an LPA will not accept residential and/or mixed uses, National Grid Property has no choice but to let sites remain vacant or remain in temporary use, which is in conflict with Government policy prioritising the

re-use of brownfield urban land and against the Company's objectives for managing their land and property interests.

- 1.11 Because of the difficulties we are seeing for LPAs in keeping those planning policies up to date that are relevant to our sites, there needs to be inbuilt flexibility in the planning system itself, i.e. it should remain the case that out of date policies and development plans can be over overridden by material considerations.
- 1.12 We are also very aware of the impact that our proposed developments can have on the local and wider community. Payments under Section 106 obligations for off-site works should contribute directly to the mitigation of the impact of the development on the local community and its environment. Such contributions in these circumstances therefore have a positive and beneficial effect on the views of the local community towards the development. But it is also our experience that some LPAs, on receipt of a resolution to grant planning permission subject to a s106 obligation being entered into, then seek to impose overly onerous, or unrelated requirements beyond those in primary legislation and in Circular 05/2005, "*Planning Obligations*" and not directly related to any development plan policy. It is for this reason that, in our recent Planning-gain Supplement consultation response, we suggested that instead of introducing this new "*tax*", the "*Necessity Test*" and other elements of s106 advice become statutory and reflected in development plan policies at all levels accordingly.
- 1.13 Despite these problems it remains our view that the current land use planning system could potentially be operated in a sufficiently flexible way to help meet development needs as and when they arise from changing economic circumstances. But if the planning system is to work, LPAs need sufficient resources in order to efficiently prepare and then adequately review their Local Development Documents (LDDs). Thus the principles underlying the more flexible Local Development Frameworks (LDFs) are supported- particularly the intentions that LDDs are shorter and that they are prepared/adopted/reviewed more speedily. However, it has become clear that the initial timescales set out for the production of LDFs are not going to be achieved. This raises questions about how flexible they really are. Furthermore, reports of the unacceptable quality of Statements of Community Involvement (SCIs) and Local Development Schemes (LDSs) which have been submitted call into question the ability of LPAs to produce their LDFs to a sufficient standard of compliance with national guidance.
- 1.14 In short, the new system is considered by National Grid Property to be overly-complicated, with too many documents having to be produced. All these

documents require multiple consultation, creating repetition, delays and frustration on behalf of consultees such as ourselves.

- 1.15 The problem may not necessarily lie with the provisions of the Planning and Compulsory Purchase Act 2004 themselves, but more with its implementation and the volumes of guidance which have been published to explain the system. Not only do stakeholders have to be aware of the existence of all the system's guidance but also, we all have to apply it; the issue of updating all of it will be a further challenge in the future. Thus simplifying the advice on LDF production and associated consultation processes would be a good starting point, to ensure that the intended flexibility of the land use planning system is achieved.
- 1.16 The Planning and Compulsory Purchase Act 2004 and its new system of LDFs should be able to provide policies that respond better to changing economic circumstances, particularly in terms of the scope for Area Action Plans (AAPs) relating to smaller sites/local area regeneration needs. But to ensure that there is sufficient flexibility in their use in development control (and the use of other policy documents), to cater for current and changing economic circumstances, local planning authorities (LPAs) need adequate resources to prepare and review all LDDs, if regular monitoring shows an immediate requirement for their updating. Unfortunately, the resources available to do this are not adequate and the regulations and advice/guidance for administering and implementing the new development planning system are overloading LPAs, Government offices and the Planning Inspectorate alike. Perhaps even worse, stakeholders like ourselves may become weary of so many consultation documents, whilst Committees making development control decisions do not have the time to consider properly the implications of all the emerging policy and advice documents that they should.
- 1.17 Thus in the medium term, the 2004 Act's development planning provisions may need revision, but in the short term, fewer guidance and advice documents should be produced at all levels, with less consultation overall. Otherwise, the Government's original aims of simplifying and speeding up the preparation of planning policy will fail to be achieved. This would be a good starting point, to secure the intended flexibility in development planning in the land use planning system.

"2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive

approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?"

- 1.18 It is National Grid Property's view that plans and policies are becoming noticeably more complex and detailed, including at national level (e.g. as seen in the detailed good practice guides to accompany PPSs). Extra detail does not always add certainty/clarity and decreases the scope for flexibility in the local application and interpretation of policy. In terms of the right balance then between central direction and regional and local discretion, this is not being achieved. There is too much emphasis on central Government policy guidance e.g. PPS6 in relation to retail and all "town centre-type" development. Any deviation from its policy advice is used by objectors to request call-in.
- 1.19 Some PPS policy potentially could be provided at the regional level better, where it could be more focused and its advice would be directly applicable to the particular economic circumstances of that region. This is particularly the case with certain elements of PPS6's detailed advice on town centre-type development.
- 1.20 At the local level, LDF legislation is complicating the development plan (and thereby the development control) process, rather than simplifying it. In spite of the obvious and well documented benefits to the LDF process, particularly the ability to update LDDs much quicker and the ability for stakeholders to inform the process from a much earlier stage, the production of a 'suite' of LDDs is confusing for the whole development industry and certainly must be for the general public. An example of this is the increasingly noticeable problem of the timetables for DPDs etc. set out in LDSs not being adhered to and in some instances, the names of documents are changed completely from those specified in the LDS when the documents are finally put out for consultation. Given the 'front-loaded' nature of their production, there is then often a real risk that consultation deadlines will be missed. There should be an onus placed on LPAs to keep to the timetables they have set out in their LDSs and they should have much less license to rename documents, once they are specified in the LDS.
- 1.21 In each different LPA area, we are also seeing considerable variation in the approaches/issues to be covered in LDDs. By way of example, some authorities almost dismiss retailing as an issue not worthy of carrying out a retail capacity study. This is of concern.

- 1.22 What is then of note is that the vast majority LDDs now being published for consultation are excessively long. There is much repetition in the emerging planning policy documents and recital of national policy. Perhaps this is an inevitable consequence of LPAs having to produce so many separate documents; they have to be shown to comply with the 2004 Act and national policy (or demonstrate why they do not). The Government's advice should focus on encouraging LPAs to focus on each LDD being as short and as simple as possible. Also, many of the thematic policies state the obvious (e.g. design policies which say that development should have regard to local context and economic policies saying that retaining employment is '*a good thing*'). The Government should be encouraging a local policy approach, specific to each local context, with the LDDs following national planning principles. These most fundamental planning "*principles*" should be universally applied and should have statutory force, rather than being '*material considerations*'. At the same time, policies which simply flow from national guidance and advice should be omitted from LDFs. Consideration should be given to a national spatial plan for England which sets out, succinctly, key policies which are to be universally applied and which at present can be found with only minor variations in all current and emerging development plans (whether under the new or old systems).
- 1.23 Under the 2004 Act's transitional arrangements, some LPA's have '*saved*' policies which do not accord with up to date national guidance (i.e. they are '*out of date*'). To address this emerging problem, it might be helpful if the Government Offices for Regions formally reviewed adopted as well as emerging development plans and future DPDs, from time to time and advised if policies were '*out of date*'. Alternatively, this review could be undertaken as part of the determination procedure for major applications. This would add some certainty and act as an incentive for LPAs to regularly review their development plans/DPDs.
- 1.24 Thus overall, there are many positives in the new LDF process and our view is that once the advice and guidance explaining the system has been simplified and had time to '*bed down*', the production and updating of LDDs, and their consultation processes, will become second nature to the development industry. But there are also many problems with it. For the present, the whole system (development planning and development control) is slower and less flexible now than it has ever been, with little to suggest that this will improve without at least modest, short and medium term changes being made.
- 1.25 If there is no simplification of the system, our view will be that the changes to the plan-making process have been misguided. The Government should refer

back to the problems of inflexibility, delay and complexity in the 1970s/80s, when LPAs had to have a plethora of development plans and non-statutory plans and guidance e.g. for their rural areas/individual town centres etc. -the Town and Country Planning Act 1990 addressed these issues and we can foresee a time when there will have to be a return to a simpler local plan/UDP/Structure Plan/regional guidance-based system.

“3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?”

1.26 It is often the case that by the time a policy has been formally adopted/finalised, or a planning permission is granted for a particular development, a reasonable balance has been achieved. But it needs to be recognised more readily that with the *‘think globally, act locally’* sustainability principle, there must be a point where individual development cannot always effectively/appropriately address this principle. There should be scope on a site by site basis, to assess the balance between policy, environmental resources and social considerations, so as to allow the right level of flexibility in that particular location, in the particular circumstances of the proposed development.

“4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?”

1.27 Although we have no direct experiences of other systems, we consider that the policy balance of economic, social and environmental factors in the UK planning system is about right. This view is expressed in the context of the UK planning system being a development plan-led system, where material considerations can override it. The problem however is that even with a reasonable balance of policy factors and material considerations, the outcome of planning applications can still be unpredictable. To address this, new *‘tick box’* planning and prior approval procedures could be introduced in some areas and in relation to minor developments. This would allow greater certainty and delegation of decision-making for more minor schemes. In addition, there could be scope for minor commercial proposals to be the

subject of an expedited procedure/revised permitted development (GPDO) provisions.

“5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?”

- 1.28 The most significant impact of the land use planning system is that it can impede business investment simply by causing delay in development implementation. While a more efficiently run planning system is relevant to improving economic growth, the recent reforms have unfortunately only added huge potential for further delay.
- 1.29 Our own business decisions/requirements for the disposal of contaminated, former operational land do not always tie in conveniently with the development planning process and its timescales. We are already finding it increasingly difficult to reconcile the inherent conflict between the increasing levels of consultation of the new development planning system and Government objectives for increasing the speed in releasing and then achieving the re-use/redevelopment of brownfield land.
- 1.30 Importantly the overall level of transparency, certainty and efficiency for businesses such as ourselves remains unchanged from the old system. Additional and major reforms should however be resisted as they are not considered desirable (or likely) to improve the transparency and effectiveness of the system any further. In particular, we have a grave concern that the 5 December, 2005 announcement and consultation on Planning-gain Supplement (PGS) will bring about further revision of the planning system, without giving the current or revised system of s106 obligations and planning tariffs proper and full consideration. PGS will hinder rather than help the problems. The current system, with enhanced s106 arrangements, should be given a chance to become established before being so quickly brushed aside. Thus, if Government policy and legislative measures were to be simplified but otherwise remain consistent for the foreseeable future, it should be possible for businesses such as ourselves to work within the new policy and legislative framework and participate fully in emerging RSS revision and LDF consultation processes. The only modest changes that should be made at least in the short term should be those that would clarify, simplify and speed up the operation of the new system.

1.31 Lastly, and with reference to transparency, the role of locally elected members in promoting business and other investment in development needs further clarification. Members should be firmly discouraged from using the appeal system as a 'get out' clause for not making difficult local decisions. Members should be required to give evidence at inquiries, where they have refused planning permission against an officer's recommendation, as a disincentive.

"6. Is the planning system sufficiently "joined-up" with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?"

1.32 The varying timescales for the preparation and review of different RDA/Regional planning Bodies' strategies has often been a problem in ensuring consistency between different regional strategies but it would appear that consistency and coordination between such strategies is now being increasingly often achieved in the more recent reviews and revisions. But there is an inherent problem with the more frequent periods of review required for RESs than for RSSs, due to RESs having to be kept up to date, so as to reflect prevailing economic circumstances and the RDAs' responding objectives.

"7. Planning applications for major projects will typically take a considerable time to work through all the necessary stages. Do you consider the system puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?"

1.33 It is not the development control system itself which emphasises speed over quality but the Best Value Performance Indicators (BVPIs) introduced in relation to application determination targets. A whole range of problems in our view arise from these targets. Planning application determination targets are leading to the termination of discussions with applicants and requests for withdrawal on threat of refusal, and applicants having to re-apply. Targets have also been unsuccessful because they put pressure on officers not to register applications or to refuse applications for reasons that could be resolved with a little more time.

- 1.34 Targets also discourage changes to be made during the application determination process by curtailing the time taken for discussions.
- 1.35 Some LPAs even abuse the 12 month resubmission provisions to meet BVPI targets, effectively treating the first application as pre-application discussions if a scheme is considered unacceptable.
- 1.36 A way to help counteract some of these problems would, for example, be for targets for major applications to be staged, to "*front load*" the process.
- 1.37 The PDG assessment should then be changed, so that where applicants agree to specific timescales, LPAs are not penalised in their PDG allocation. The pilot "*Planning Delivery Agreements*" for major applications will address these concerns but only to a limited extent; they need to be introduced expeditiously and widely if the pilot proves to be a success.
- 1.38 Even when an application is eventually taken to Committee, we experience frustration during the committee meetings itself of being unable to respond to simple questions. This can then result in unnecessary deferral/refusal. There should be some limited scope to allow more applicant/member/public discussion in the stage of decision-making, in relation to any unresolved issues and area of uncertainty. Consideration should also be given to setting national rules for participation in Committee meetings. Currently, there is a wide variation in approach.
- 1.39 The development control system, particularly in relation to major schemes, is also being slowed by increasing requirements for small (post-approval) amendments to unimplemented planning permissions to be the subject of entirely new planning applications. The delays in having to re-apply can be considerable; this is further complicated if a scheme requires a Stopping Up Order. Applicants currently have to go through the whole Stopping Up process again, every time a new planning permission is granted for minor amendments. The Government needs to establish a simple procedure for dealing with "*minor post-approval amendments*", based on a streamlined re-determination process. Similarly, there should be scope to amend "*unreserved*" matters at reserved matters approval stage, if the changes are not fundamental to the original outline approval.
- 1.40 The proposed introduction of a single, standardised planning application and other consents form, to simplify the approval processes, is supported.

1.41 However, the worst delays in the planning system remain in the appeal and call-in systems. At present, there is considerable inconsistency in relation to call-ins. Call-in and referral should only apply to applications of national significance or issues of impropriety. If this approach is not supported by Government, then the aim should be to reduce the issues considered at call-in only to those characteristics of a development which have triggered call-in (particularly where the LPA supports the application), or to matters that are of greater than local significance and impropriety. It also needs to be ensured that inquiries are only used to cover land use planning policy issues and that they are not abused by competitors.

1.42 The time taken to be given a date for an inquiry or hearing remains unacceptable. Furthermore, there are often lengthy delays in the issue of an Inspector's or a ministerial decision, with a total lack of communication when an application is being considered for call-in or once the Inspector's Report has been passed to the Secretary of State for issuing the decision.

1.43 There is a desirability for meaningful contact with Government Offices (GO) at pre- and post-application, and post- resolution stages. This would help to secure greater transparency and consistency in advice and guidance given by Government Offices, as at present all take very different approaches to dealing with applicants and applications.

"8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?"

1.44 The need to provide complex supporting information and potentially to resubmit applications may well affect smaller developers/companies more but the direct costs are relevant to ourselves in that it is not always clear what value is added to the decision-making process by having to submit very detailed assessments on peripheral matters.

1.45 The 12 month 'free go' provision for repeat applications should be made more flexible as the development control system at the moment discourages amendments even though these could improve the quality of schemes prior to determination or after a decision.

1.46 The free right of appeal should not be changed but there could also be the opportunity for a 'fast track' appeal on payment of a fee, which could generate revenue and speed up the process.

“9. To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?”

1.47 High occupation costs are due to a lack of sites and labour costs as well as land availability *per se*, rather than planning constraints. High costs do have the beneficial effect of encouraging the more intensive use of development land, so they are not necessarily a disadvantage in all situations.

“10 How does the planning system impact on competition, through influencing barriers to entry and exit and economies or scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?”

1.48 As stated above, the planning system should not be used deliberately to restrict competition. In fact, Government policy guidance in any revision of PPS1 should state explicitly that weight as a material consideration in application determination will be given to the benefits flowing from fair competition. An approach to development control that concentrates on land use and not the proposed operator/ occupier would assist in avoiding some negative impact, although it has to be accepted that any restrictions on development will affect competition; this is unavoidable.

1.49 Overall, it is more likely that political influences affect competition through the land use planning system; a clear example of this is the proposed retail mezzanine controls which were at the outset politically motivated despite LPAs having always been able to apply conditions to restrict them.

“11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?”

1.50 We do not have relevant experiences to answer this question.

“12 Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?”

- 1.51 The turnover and loss of planning staff resources from the public sector is a major issue which is likely to hinder all in meeting the significant demands of the new planning system. LPAs are seriously under-resourced in terms of planning staff with sufficient experience to process and recommend on major applications. This is particularly the case for sites formerly in industrial use where the LPA may be seeking employment development and where data on need/demand etc. is either not available or is out of date, and there is no one to assess the applicant's proposals in that context. It is not always then practical to expect the LPA to outsource development control functions and frequently, conflicts of interest arise. But there should be scope/finances available for outsourcing, with LPAs having powers to recover the costs of doing so from applicants.
- 1.52 Despite PDG addressing some staffing issues, there needs to be a focus from central government on reviewing and raising the remuneration of public sector planners and ensuring that they have the right skill set.

“13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?”

- 1.53 As stated above, the principal barrier to engagement relates to stakeholders such as ourselves having to be aware of and then having to assimilate all of the guidance and advice issued on the new plan-making system-as well as using the new system itself. This does not encourage participation; the excessively complicated LDFs and the processes for formulating them then mean that there are too many consultation documents to comment on, published for consultation for relatively short time periods but mostly at different times.

“14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?”

- 1.54 What is meant by *“the incentive structure”* is unclear but the *“balance”* referred to is a matter for local circumstances and, to an extent, individual LPAs and applicants. S106 obligations are an example of a mechanism that could be used more extensively and effectively for balancing and addressing local and wider interests, by their use to mitigate against the specific development impacts arising from individual proposals.

1.55 A better balance could also be achieved by reducing intervention by regional/central government e.g. through call-in of applications, with proposals of regional or national significance being cited in a National Spatial Strategy or Planning Framework that would establish the principle of e.g. major infrastructure or other development clearly, having taken the interests of the wider community into account. In the context of such a strategy, more major decisions could then be taken more locally, with the scope for appeal/judicial review allowing a more independent view of the decision to be taken, if the locally-made decision had not been reached objectively.

“15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?”

1.56 There is a need for local/ regional discretion with regard to the effect of a particular type of economic development on regeneration, as generalisations are unhelpful. Again, a statutory, national spatial planning strategy could help achieve more widespread regeneration, particularly if providing a policy framework for resolving major infrastructure issues.

2.0 Conclusion

2.1 Our overall concluding comment is that we do not consider that this is particularly the right time for this Review, when the development planning provisions of the Planning and Compulsory Purchase Act are in their infancy and when many of the proposed changes to the development control system in the 2004 Act have not yet been implemented, nor their effects evaluated. A more urgent area of review should be in relation to how resources in the planning system can be boosted in the short and longer term. But if any further reforms to the land use planning system itself are to be considered, we ask that our comments should be taken into account in simplifying, clarifying and speeding up the new system's delivery of LDFs and development.

Should you wish to discuss any of our responses, or seek clarification regarding points made, please do not hesitate to contact me.

Yours sincerely

Richard Alden
Planning Manager
National Grid Property

National Grid is a trading name for
National Grid Property Ltd
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England No 2531489