



Chester Civic Trust

Chester Civic Trust
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Carmel Howard
Barker Review Team,
4/E1
1 Horseguard's Road,
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Dear Madam

Barker Review of Land Use Planning

Set out below are the representations of the Chester Civic Trust relating to the Call for Evidence for the above Review.

The Trust has two comments about the terms of reference and the issues to be addressed:

1. Whilst we welcome the comment in the last paragraph of the second page, which states 'it is not the aim of the review to promote economic considerations above social and environmental considerations', the tone of the call for evidence and its questions still appear to be biased and economically-led. Much of the Barker Review on housing was fed directly into the planning system via Regional Strategies and the proposed amendments to PPS3, even though Barker admitted that she had not undertaken any investigations of the environmental consequences of her proposals. Our concern is that the same will occur with this Review despite of the words quoted above. Annex 1 highlights our worries. The whole drift of the issues to be analysed and in the questions posed are far removed from the terms of reference that link economic growth and prosperity alongside other sustainable development goals.
2. The Trust believes that it is premature for the Review to be asked to recommend further reforms when the recent reforms haven't yet had the chance to bed down. It would be much better to answer questions about the efficacy of the new planning system after the new reforms had been running for a few years.

Chester Civic Trust has comments on some of the questions listed in Annex 1. The numbers use below relate to Question number in that annex.

1. **Flexibility and Responsiveness**- The Trust supports the desire for flexibility and responsiveness, but this needs to respect all viewpoints, including those of the community as well as those interests promoting economic development.
2. **Scope of the Plans** - The demise of Structure Plans will remove an intermediate level of statutory planning from the system and, with it, a level of professional expertise that is available and which is also responsible for an element of planning making and of development control that reached towards the local communities. Clearly, the Barker Review is unlikely to recommend the reintroduction of Structure Plans as a means of attracting specialist staff into the planning system. However, we believe that it is essential that the Review recognises the need to provide greater professional expertise at the local level than has resulted from the changes that have been made to Local Government and the planning system over the last 10 - 20 years.
3. **Sustainable Development** - The stated aim that the right balance is to be achieved between economic, social and environmental objectives implies there should be a system of trade-offs between the three objectives. However, environmental, social and economic interests are not necessarily opposed and therefore do not need to be 'balanced' - simply taken into account. More importantly, there is a growing view that some environmental assets as well as certain human rights, are not for trading off. This leads to the view that we need to think more about limits and capacities – drawing lines in the sand beyond which we should not go even in pursuit of economic development . A study of Chester in the 1990s showed that the concept of critical environmental capacity should become increasingly influential in modern planning and it should be considered as part of this review.
5. **Transparency, etc** - If the planning system is to be positive, proactive, transparent and responsible to the communities that it serves, it must have the necessary range of professional staff to be able to deliver those duties.
- 7/12 **Speed of Delivery, Skills and Staff resources** - There is an undoubted shortage of experienced, qualified staff in planning authorities especially in those disciplines requiring a detailed knowledge of the social, economic and environmental issues. Their expertise is essential, not only in preparing and explaining development plans but also in assessing major planning applications and giving evidence at public inquiries. For most local authorities the employment of staff of this calibre increasingly has to be set against the demands to manage and retain other services. The constraints of local government finance are having a detrimental effect on the number and quality of planning staff that can be employed.

We believe that the solution to this problem does not lie in the appointment of outside consultants because theirs is a temporary intervention to address a particular issue. Furthermore, while consultants are willing to prepare a plan, they may be unwilling to commit himself to interpreting it on request, to monitor its performance or to defend it as expert witnesses at inquiries. They are not easily contactable by elected members, nor the public; they often do not have an office in the authority's area. So they can be perceived to be, and actually are, "remote".

Delays in cannot be placed solely on local government since a frequent cause is the failure of the applicant to investigate local planning policies or to provide sufficient detail and supporting technical information with his application. Delays are also caused by the slowness of replies by statutory consultees as well as the need for 106 Agreements.

Generally, delays by the local authority are due to staff shortages, as outlined above, and to a varying degree, the need for specified types of application to be determined by Committee. The Committee system is an essential element of the transparency of the planning system since the meetings are held in public, reports produced and made available and procedures exist for presentations by both the applicant and members of the public. We believe this must be retained.

We hope that this helps with the Review and look forward to seeing the outcome in due course.

Yours sincerely,

Ian Gilfoyle

Chester Civic Trust