



Dartmoor National Park Authority

Parke, Bovey Tracey, Newton Abbot, Devon, TQ13 9JQ

Tel: (01626) 832093

Fax: (01626) 834684

E-mail: hq@dartmoor-npa.gov.uk

Website: www.dartmoor-npa.gov.uk



Ms C Howard
Barker Review Team
4/E1 1 Horse Guards Road
LONDON
SW1A 2HQ

Your ref:

Please quote: GW/AH

Direct line: 01626 831017

28 March 2006

Dear Ms Howard

Barker Review of Land Use Planning : Call for Evidence

With reference to the letter from Kate Barker, dated 24 January, I would like to respond to the Call for Evidence by referring to the 15 questions in Annex 1. In doing so, I hope that my comments will particularly relate to the situation in rural areas and the needs of rural communities, something which I find is often lacking when the planning system is looked at nationally. The views contained in this letter are my own, but I am confident that they would be supported by the Members of my Authority. I also hope that they will, to a degree, reflect the views held by colleagues working for other National Park Authorities in England and Wales and also those concerned with the management of other nationally protected landscapes.

Responses to the 15 questions:

- 1 The planning system, at its best, can be very responsive, but the matters referred to in question 1 seem somewhat distant and of limited relevance to those who generally only encounter the planning system at the very local level. One of the intentions in establishing the new planning system was that planning policy statements would be brief and would refer to issues of national significance, such as major infrastructure projects, setting out clear statements of Government policy in respect of such matters and thus reducing the need for long drawn out public inquiries. That has not happened and planning policy statements now seem more cumbersome and prescriptive than their predecessors and the whole process of producing Regional Spatial Strategies and Local Development Frameworks is far less responsive than the previous system.
- 2 One of the intentions of the new system was to secure a greater community involvement in the plan making process and thus a greater sense of ownership of the outcome. However, the very concept of a Regional Spatial Strategy, as part of the Development Plan, runs entirely counter to that aim. A region such as the south west, which contains such starkly different places as Swindon and Lands End, cannot hope to achieve a sense of ownership of a spatial strategy which is prepared by an unelected and distant organisation. The 'democratic deficit' in the RSS is a serious political issue and one which will continue to blight the new system.

1

Nigel Hoskin Chairman **Nick Atkinson PhD** Chief Executive (National Park Officer)

The purposes of the Dartmoor National Park Authority are to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and to promote opportunities for the understanding and enjoyment of the area's special qualities.

In pursuing these purposes the Authority has a duty to seek to foster the economic and social well-being of the community.

A Member of the Association of National Park Authorities

The structure of the Local Development Framework and the way in which it has to be prepared implies that Central Government does not trust Local Planning Authorities and needs to scrutinise their work at every stage. The result is 'consultation overload' on the part of the general public, excessive workload for the Planning Inspectorate and excessive and unnecessary involvement on the part of the Government Office. The statement of Community Involvement and, in particular, its examination by the Inspectorate, seems unnecessary when public consultation is so deeply embedded in the planning system. The omission of the SCI and the combination of the Core Strategy and the more detailed policies into one document would greatly reduce the bureaucracy in the system and speed up the process.

Subjecting supplementary planning documents to the full rigour of the system also seems excessive and unnecessary. It inevitably delays their production and review, thus reducing flexibility.

- 3 There is a danger that the RSS will be over-prescriptive and will limit the ability of Planning Authorities dealing with rural areas to create more sustainable settlements. Locally identifying the need for such things as housing, employment opportunities, transport infrastructure or social facilities is the only sensible way to proceed and can potentially be restricted by a RSS which does not acknowledge the needs of rural areas and concentrates its attention on the principal urban areas. Nationally, references to sustainable communities appear always to relate to major urban expansions and do not acknowledge the complexity of rural areas and the difficulties encountered by rural communities.
- 4 No experience of other countries systems.
- 5 From my experience, there is nothing about the new system that makes it more transparent than the previous and the over-complexity is as much a hindrance to business as it is to private individuals. Good practice by planning professionals should ensure that there is an understanding of the importance of healthy local economies and, in a rural context, SMEs, including agricultural businesses, are of particular importance.
- 6 The experience in the south west is that the various strategies are 'joined up', with close working between the regional assembly and the RDA.
- 7 Currently, there is an over emphasis on speed in dealing with planning applications which clearly leads to a reduction in the quality of service provided to applicants and, potentially, a reduction in the quality of the outcome. In an ideal world, pre-application discussions would ensure that all necessary information and documentation was submitted with the application, so that there was no delay during its formal consideration. However, in practice, that is almost impossible to achieve, with consequential delays after submission. The idea of planning authorities 'adding

value' through the consideration of a planning application appears to have been abandoned at the national level, whereas local experience shows that applicants are very happy to wait a little longer for their decision if they can see that negotiation is likely to result in a better outcome.

It should also be remembered that the planning system, and particularly, development control, is a service to the community and not just to the applicant. A speedy decision is often seen by the community at large as an ill-considered decision and the current pressure to make quick decisions, through the award of Planning Delivery Grant, can often be seen by local communities as indicating that planning authorities are motivated by issues other than their wellbeing, ie quick decisions to ensure an award of PDG are better than 'good' decisions. The system whereby Planning Delivery Grant is awarded appears to ignore the fact that applicants are, in law, able to agree to an extension of time to deal with a planning application. If an extension of time is agreed then the planning authority should not be penalised for exceeding the eight or thirteen week target. It is well known that some applications are refused simply to meet a deadline and that must inevitably have a knock on effect at the Planning Inspectorate, increasing its workload and thus reducing speed and efficiency.

- 8 The amount of information which can now be required to be submitted with a planning application can be onerous. For example, a relatively simple application in a rural area may necessitate the carrying out of a flood risk assessment, detailed surveys to establish whether or not there are protected species using the site and an archaeological evaluation. The list of such matters can be very long in respect of a major development and ways need to be found to identify the priorities and deal with them more concisely.
- 9 The high cost of housing in National Parks and other protected landscapes results from the attraction of those areas and the high degree of mobility that now exists. Where a landscape is protected, the problem cannot be dealt with simply by increasing the supply of housing and other measures, particularly subsidising the provision of housing and controlling its future occupancy, are necessary.
- 10 No comment to make.
- 11 No experience of this.
- 12 Planning authorities do not work in isolation and must work with their housing authority colleagues and those who are primarily concerned with socio-economic development to ensure that there is sustainable economic development. The current emphasis on speed and the priority which is given to job creation suggests that there is no need to further increase the efficiency of the process. Indeed, there is a strong

feeling that there is an over emphasis on process, to the detriment of service and quality of outcome (already referred to above).

- 13 As already suggested, public engagement in the plan making process, especially the RSS, is difficult. So far, there is little experience of engagement in the LDF process, but there is a perceptible weariness on the part of the public in respect of the amount of consultation being undertaken.
- 14 It is very difficult to convince local communities, particularly in a rural context, that a significant economic development is of benefit. Contributions to facilities or services, through planning obligations, can, if they are not related to acknowledged local needs, be seen as 'bribes' to the planning authority. In protected landscapes it is particularly difficult to accommodate new economic development and whatever does take place must be of the highest possible quality, thus reducing the planning authority's ability to persuade developers to contribute to local services and facilities.
- 15 This question has largely been dealt with in various ways above, but it is worth repeating that a simplification of the new plan making processes would be helpful, not only to developers and investors, but also to the wider community which the planning system is intended to serve.

Yours sincerely

A handwritten signature in black ink that reads "Graham Wall". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Graham Wall
Director of Planning and Community
E-mail: gwall@dartmoor-npa.gov.uk