

TCPA Response to Barker Review of Land Use Planning

1. The Town & Country Planning Association

The Town and Country Planning Association (TCPA) welcome the opportunity to respond to this consultation. The Town and Country Planning Association (TCPA) is an independent charity working to improve the art and science of town and country planning. The TCPA puts social justice and the environment at the heart of policy debate and inspires government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country
- Empower people and communities to influence decisions that affect them
- Improve the planning system in accordance with the principles of sustainable development

These objectives underpin the TCPA's response to this consultation.

2. Introduction and Summary

The Need for Town and Country Planning

In considering the fundamental need for town and country planning in a generally free market economy it should be noted that planning legislation was first passed as an integral part of Government programmes to deliver housing (the Housing, Town Planning etc. Act 1909 gave local authorities the power to draw up "town planning schemes" and included measures to capture some of the land value gains and to compensate for the losses that it was known such Schemes would deliver). The 1947 Town and Country Planning Act was however the foundation of the present system; key features included nationalisation of the right to develop land and a much more comprehensive system of compensation and betterment. The planning system has therefore long been an instrument for affecting economic

value as well as for creating a successful environment within which business and economic growth can flourish.

Distinction between Policy and Process

The nature of the planning policies pursued and the quality of masterplanning for major development areas, have at least as significant an impact on development and economic growth as the design of the regulatory process. It is impossible to judge English planning solely according to the system set out for determining applications and adopting plans.

The nature of reform that is needed

Planning reform is needed, provided this is targeted, constructive and enabling as set out in this response. Overwhelming new bureaucratic procedures or wholesale attempts to deregulate land uses would be not be welcomed by either the public or the private sector. Despite policies arising from time to time suggesting significant deregulation, planning legislation has received cross party support in most respects since 1947 because it has been seen to be necessary to have some system to regulate the use of land in the public interest.

Importance of planning in its own right

The unprecedented number of public responses generated by the Government's 2002 Green Paper (Planning: Delivering a Fundamental Change) demonstrated that planning is not just a delivery mechanism but a vital and valued part of the democratic system of Government in the UK. The alternative, a non planning approach, would be at best a complex array of municipal bylaws and civil actions between property owners, and at worst environmental degradation throughout town and country that would damage the prospects for economic growth and investment as much as it would damage society and the wider environment.

Key points:

- The economic value that derives from British planning is recognised and exported around the world. Successful places in economic terms are frequently those that have benefited from good planning that has achieved high standards of environmental quality and a vibrant social mix.
- Positive public and private sector planning, backed up in general terms by regulation, which makes it operable, can be a powerful tool in releasing further economic growth.

- Places that need to grow and change, often already designated as growth areas, must be freed up to use positive planning through additional powers and more funding for Local Delivery Vehicles.
- Better management of community involvement could help improve the working of and possibly speed up the planning system.
- Without some sort of overarching framework for development (such as a Sustainable Communities Plan approach) it is unlikely that the optimal opportunities for economic growth will be realised.
- Ultimately directly elected regional authorities (whether based on city regions representing a richer urban and rural mix) provides the right basis for more effective regional planning.
- The new planning system is still bedding down and further process changes will not bring about the necessary change in people's attitudes towards planning.
- The capacity of local authorities to draft and see development plans through to implementation has been weakened over several decades of staffing reductions and loss of a pro-municipal culture.
- Removing disincentives acting against the acceptance of development is important but finance on its own is unlikely to be any substitute to winning the arguments for a development
- Other countries have more effective and less fragmented means of collecting a significant part of the increase in land value consequent on development.
- The decline in house building rates is attributable to the steep decline in the provision of social housing. There are other policy areas in which the planning system should not be held responsible for failure
- Average processing times for applications should replace current targets. Experiences from Europe suggest that the time taken for decision making in the UK is comparable.

Realising positive planning

The TCPA believes in positive planning, which has frequently been shown to deliver high levels of economic growth. The further contribution of planning to economic and sustainable development will depend upon a number of key changes including:

- i. a radical simplification of (particularly minor) application processes to enable the local authority planner to focus upon the promotion and management of development where this is appropriate;
- ii. additional powers and funding for Local Delivery Vehicles;

- iii. the removal of disincentives upon communities and local authorities that act against the acceptance of development

The TCPA has responded below to the detailed questions posed by the review. Some of these have been taken together.

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?

The TCPA believes that effective planning and development focuses growth and development, concentrates and enhances land values, and is key to creating the necessary social and environmental conditions in which economic growth can flourish. Indeed planning can often be at the forefront of facilitating economic growth. The TCPA's 1999 study "The People: Where will they Work?" documented region by region the emerging new geography of jobs and the trend towards counter-urbanisation of much investment to smaller county towns and edge city locations. Planning has had to devise appropriate policies to address such trends, rather than seek to halt them. Planning now accommodates an entirely new geography of economic growth in the UK.

To the extent to which housing development is key to economic growth should not be underestimated. But it is political decision makers, rather than the planning system, who have been less than keen to provide for it in some places. The current Government has now shown a very welcome commitment to providing sufficient homes for those who need them and the TCPA believes that a joined up strategy of the type described by the Sustainable Communities Plan remains the best chance to achieve such development in a genuinely sustainable way. The planning system has been out in front in terms of achieving ambitious housing targets. The 'Crow Report'¹ of 1999 recommended the building of 55,000 homes per year in the southeast in three growth areas. However, in this case, as sometimes happens in policy and development decisions, political priorities overruled a well argued technical planning case. This is as it should be in a democracy but it

¹ Stephen Crow was the inspector for the Examination in Public of RPG 9 for the South East. His report into the EiP is commonly referred to as the 'Crow Report'

would be inaccurate to hold the planning system accountable for political decision made by elected politicians.

Objections to development by elected representatives are in many ways logical given the range of disbenefits obtained by the host community. Very few gains from development accrue directly to the local community, even planning gain payments are often diverted for investment in a different part of the town or taken away by different agencies and organisations. A simpler system would be more comprehensible and more trusted and therefore more effective. In practice many local politicians are adept at using the system e.g. in London to force through more social housing and the 10% renewable energy policy. In terms of Council Tax it can be several years after the provision of extra services that local authorities will benefit from any extra Rate Support Grant and local councils have no control over the business rates that might result from development. The disincentives to local authorities for the acceptance of new development should be removed wherever possible, including for example through retention of a greater proportion of new Council Tax payments.

The TCPA would comment that planning could and should do more to respond to and then shape the pattern of regional economic growth around England and is shortly to publish a cross party report: "Connecting England: A Framework for Regional Development", to suggest ways in which a national planning framework could be taken forward and what it might contain. Such a framework, with clearly established Government policy on the provision of major infrastructure projects, would curtail lengthy planning inquiries which currently must seek to establish the Government's policy before a decision can be reached on any major development.

In addition it should be noted that greatly increased flexibility in planning has been a feature of the new planning system: new development plans are now subject to very frequent reviews. It should be recognised that if plans are totally flexible this could undermine the certainty that they provide.

The planning system has also been held partly accountable for other failings of public policy. The massive decline in funding for social housing over recent decades has left a consequently massive demand which has largely been laid at the door of the planning system to solve through additional planning gain contributions. While some increases in planning gain contributions for housing have been possible, extra

pressure from this need has often been at the expense of other important aspects of a development. Similarly the lack of public funding for infrastructure to support the growth and renewal areas cannot be entirely solved by planning gain contributions. It is crucial therefore that investment programmes by the Department for Transport, the Treasury and ODPM are joined up.

Given the important contribution planning could play in co-ordinating the delivery of such complex physical development objectives it is perhaps surprising that a new Planning Policy Statement on Economic Development (an update of PPG4) has not yet been forthcoming.

In summary, successful places in economic terms are frequently those that have benefited from good planning that has achieved high standards of environmental quality and a vibrant social mix. Positive planning as practised in the private as well as the public sector, backed with the regulation that makes it operable, can be a powerful tool in releasing further economic growth. Places that need to grow and change (many are designated growth areas) must be freed up to use positive planning through additional powers and more funding for Local Delivery Vehicles. A recent paper by Paul Hackett (Tomorrow Series Town & Country Planning March 2006) also calls for more powerful Local Delivery Vehicles (LDV). The TCPA believes this may mean less focus on a partnership approach and more focus on single purpose outcomes in the operation of LDVs in future if development is to come forward.

The economic value that derives from British planning is recognised around the world, and British companies are today exporting planning expertise on the creation of carbon neutral new towns in China (at Dongtan near Shanghai for example) to support the very high levels of economic growth in that country.

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?

14) 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?

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?

The TCPA welcomes incentives to progress plan-making by local and regional authorities (e.g. the draft PPS3 provides that applications for housing development should be treated favourably where no plan has been adopted).

The TCPA believes that better management of community involvement (locally and regionally) could help improve the working of and possibly speed up the planning system. Investment in community involvement techniques, research and capacity will be increasingly important if the new Statements of Community Involvement (SoCI) are to be successful in improving the working of the system (recent research published by Heritage Link casts doubt upon current efforts towards community involvement). The TCPA believes it should be made clear that SoCIs should report the views of those who need homes and jobs as much as those who wish to resist change and development. Poverty is silent.

The TCPA also believes that the lack of an overall national planning framework for England obstructs good planning for economic growth; and that regional planning is faltering due to the lack of proper democratic accountability of the Regional Planning Bodies. The TCPA therefore recommends that more emphasis should be placed on working closely with the elected tiers of local and sub-regional government that do exist in order to make progress at the regional level. Ultimately, directly elected regional authorities (whether based on city regions or some other urban and rural mix) provides the right basis for more effective regional planning.

At the local level the TCPA believes that neighbourhood based planning processes can assist in community involvement and can be just as speedy as traditional planning committee structures, however neighbourhood committees would bring with them a consequent need for more oversight due to their small size and composition.

The TCPA also believes that further alterations to the planning system if wide ranging and comprehensive are likely to add more complications whilst there is strong case for simplification. The new system is still bedding down and further process changes will frustrate this, especially given the fact that addressing process will not bring about the necessary change in people's attitudes towards planning.

The involvement of business in the important forward policy and planning for development is likely to remain limited as long as business has no locus in local taxation decisions by local authorities (Uniform Business Rate is a national tax). Despite every effort to solicit the interest of business, there is a strong attitude that it is not a core interest, particularly at the regional level. (An exception here being businesses with interests in land and property development which are heavily engaged as they have much to gain and lose from forward planning decisions). Planning controls over the use of land can cause land values to rise, these values are often used as security for business operations. A non-planning approach would spell disaster for long-term investments.

Smaller businesses need to be better represented in the many debates on development (classically on housing development) that occur in local town and county halls and in the media. This is in part an issue of the capacity of organisations such as the TCPA to bring to the fore the range of interests in debates about development around the country, it is a priority to build this capacity to ensure SMEs play their rightful part in planning the future development of towns and cities. SoCIs could be required to report the views of business on certain types of development.

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?

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?

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?

Achieving the integration of social, environmental and economic objectives in planning must be the goal, but frequently this triple win is not possible. Elected decision makers are obliged to trade off and/or balance environmental and social and economic factors against each other in order to reach decisions. The TCPA felt that for some time social objectives, particularly in the housing debate, were overlooked in favour of environmental considerations. This may now be changing but the balance here is a matter for political judgement, a debate on which professional planners advise but in which the community generally has the principal stake.

The potential of planning policy can become divorced from the priorities of local leaders in the community and in government. The perception has developed that planning is an administrative hurdle comprising numerous regulations and little else. If planning is to better resolve social, economic and environmental factors it needs to better express - and be seen to deliver - the community's primary objectives at all the various levels of Government.

One area where social factors should be better represented might be in the new emerging Statements of Community Involvement prepared by local authorities in relation to development plans. These are not yet heralding a new era of community involvement – where those without a voice who often need homes and jobs the most are heard as loudly as the vociferous minority.

The TCPA's 'Putting Planning First' initiative launched in 2002 (that fed into the ODPM's culture change work) was aimed at giving planning a higher priority within local authorities for this purpose.

A good example of joined up government and planning exists in the Greater London Authority where uniquely the Regional Economic Strategy (RES) and the Regional Spatial Strategy (the London Plan)

flow from the same political authority. In other regions the RES is prepared by the regional development agency (ultimately by its board) and approved by the Secretary of State for Trade and Industry, while RSS are prepared by the partly elected regional assembly and approved by the Deputy Prime Minister. This lends weight to the TCPA's case in support of directly elected regional scale authorities with powers over planning and economic development. In the meantime, if or where directly elected authorities of this kind are not to be established, there is a strong case for integrating RES and RSS; competing and separately developed regional strategies are unhelpful. Participants in a 2003 TCPA study "Stakeholder Involvement in Regional Planning" (supported by the ODPM) reported that:

"participants from all sectors [in the southwest region] shared concern about the prolific number of regional strategies of one kind or another (local government representatives put the figure at 40)...Participants at the workshop generally wanted one strategy to be primary over all others whether or not this turned out to be the RPG [Regional Planning Guidance]."

The capacity of local authorities to draft and see development plans through to implementation has been weakened over several decades of staffing reductions and through the loss of a pro-municipal culture. Town halls are too much mere branch offices of central government. The Planning Delivery Grant (PDG) can help motivate town halls to follow the wishes of the centre, but at heart the problem is that creative pro-active local planning is much harder when town halls have such limited freedom for manoeuvre.

The tapering from next year of the PDG is a very serious factor that needs to be addressed urgently if delivery under the present centrist model is to continue to improve.

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?

There is a lot to be learned from planning systems in other countries, particularly The Netherlands, Switzerland and Denmark, but also from Germany and France on specific points. The main point emerging from foreign experience is that a locally based planning system, as in the UK where local authorities are responsible in the first instance for plan

making and the control of development, needs local authorities with a high degree of policy and financial autonomy. The alternative highly centralized planning model, which England has moved towards, has also been shown in the light of foreign experience not to work very effectively on the social and environmental fronts, let alone the economic one.

The role of central government in countries from which we can learn (e.g. The Netherlands and Switzerland) is to prepare a national spatial development strategy, which then gives a rational basis for the approval of plans prepared by the regional/metropolitan level of government. The central government also sets the policy framework with the pursuit of sustainable development being an overall constitutional responsibility, rather than mainly the responsibility of spatial planning. Further, central governments do not dabble in the distracting detail of planning appeals and call-in cases. Besides giving a higher priority to strategy, this enhances local support for the planning system rather than it being seen as the vehicle for imposing the national will on localities.

The planning systems in countries with an elected tier of regional government also work better, because the region is available as an honest broker when national economic imperatives require local mitigation of the environmental and social consequences. In an increasingly pluralistic society such as the UK, the gap between national and local government is too large to secure effective coordination between strategy and implementation. This gap cannot be filled if the regional level is seen as predominantly an arm of central government. Also, with strong regional and metropolitan government it is easier to secure a more even distribution of development. This reduces the high land and labour costs associated with a single dominant region and the difficulties for national economic policy when low interest rates are needed to stimulate development in most regions, but high interest rates are needed to contain inflationary pressures in a single dominant region.

Other countries also have more effective means of collecting a significant part of the increase in land value consequent on development. The nature of the system does not appear to matter – tariffs, an effective capital gains tax, etc. – as long as it is a systematic approach. The ad hoc approach of section 106 agreements is a time consuming and expensive process, which distracts spatial planning from its principal tasks of preparing plans and controlling development. It is an example of how the English planning system is made worse by using it to plug gaps in other systems: in this case a rational approach to

ensuring that development contributes significantly to the infrastructure demands it generates. Much of the opposition to development stems from the fact that it gives rise to overburdened infrastructure, as hose-pipe bans and long hospital waiting lists illustrate. Other countries have a better record in ensuring that infrastructure keeps pace with development. This is easier to do when infrastructure provision is not so fragmented as in England.

The major lesson to be learned, in comparison to other countries, is that the continuous tweaking of planning will lead to a worse system. It is being asked to deliver far more than it possibly can, in the absence of changes in closely related systems of government and finance. Turning specifically to housing, the decline in house building rates in England is attributable to the steep decline in the provision of social housing. Other countries more willing to stimulate the market for social housing have not seen housing construction falter. Planning in these countries is more highly respected, because it does not have to be used as a scapegoat for wider systemic failures.

At the local level overseas experience testifies to the effectiveness, in economic development terms, of giving local authorities a vested interest in development and a sufficient degree of autonomy to establish a strong sense of place and social cohesion. Competition also improves quality, particularly in the housing market, as places seek to attract economically active residents. This also applies to businesses and residents for whom the rate of local taxes and the direct link they see between that and local service provision are equally important.

The TCPA however rejects the suggestion that entirely devolving planning to the local level (alongside financial incentives on local planning authorities) has delivered a trouble free planning system. Indeed some of its own members are currently working with the Swiss Government in an international review of their planning policies and system. The Swiss government are concerned with the amount of urban sprawl that is resulting from the high degree of local autonomy. This basically illustrates the point that that any planning system has to trade off different objectives. In the Swiss case, and it could be the same here, a higher number and higher quality of housing provision is being achieved, but in a less compact and possibly less sustainable form. In Germany also a Federal Ministry provides a national planning framework and Länder and local authorities each have their own roles within the system. Planning decisions are likely to remain subject to the checks and balances of both central and local Government in the UK. However

there is a case as the TCPA has long argued for removing the disincentives operating on local authorities considering the acceptance of more development (see below).

Good practice can be drawn from abroad but it is important to remember that good planning does take time, and that experiences from Europe suggest that the time taken in the UK is comparable. The work being carried out as part of the ESPACE (European Spatial Planning: Adapting to Climate Events) should feed in to this work as this considers the role of multi functional environments.

Now is not the best time for further major changes to the English planning system. Each raft of changes disrupts and delays the operation of the system, as new routines are learned and put in place. However, experience from other countries does point out the general directions that should be taken when the opportunities for change arise. This particularly applies to other related systems, most notably the collection of planning gain and the provision of social housing, which the planning system can assist but never fully substitute for.

In particular the Swiss approach seems worthy of further examination. It does not provide, as has recently been suggested, a free for all at the local level. There is a national spatial strategy and control totals for housing provision by Canton, the intermediate level between national and local government. Cantonal structure plans are agreed at the national level. What is different is that, within these parameters, local authorities are free to act and also benefit directly in financial and infrastructure terms from attracting development. This competition leads to high quality housing provision with little house price inflation, as well as local ownership of and hence support for planning decisions. However, this approach only works successfully because the Swiss have a strong tradition of local government and a culture of local democratic debate. This fits in well with the government's recent emphasis on giving more responsibilities to communities.

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?

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?

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?

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

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?

Due to the limited supply of land generally and the general agreement that its use should be subject to regulation through planning, it is inevitable that planning constrains land supply for various uses. This has the negative effect of restricting the possibilities for competition and moves could/should be made to ensure planning encourages a range of suppliers in the various markets in which it engages. Any monopolistic use of land, if it is anywhere found to exist, should be challenged through the granting of planning permissions to smaller competing operators. Development corporations – where the land is owned by the public sector – should be encouraged to extend development opportunities in ways that promote competition and a range of larger and smaller operators instead of simply to the benefit of the largest players.

The co-ordination of land uses, the introduction of development related to a major new railway station or other transport interchange can often realise enormous land value increases and provide a cluster for economic growth. Both garden cities and some new towns were planned with this in mind and have been enormously successful in economic

terms particularly, but also in other terms.

Without some sort of overarching framework for development (such as a the current Sustainable Communities Plan or another similarly strategic plan) it is unlikely that the optimal opportunities for economic growth will be realised. Highly dispersed (unplanned) patterns of growth accommodated anywhere where developers may wish to develop produce neither the high quality environments sought by many business investors, nor the multiplier effects of clustered development in terms of higher land values, greater opportunities for business interaction and the social and cultural offer from an urban centre much valued by many business investors and their employees and managers. The TCPA is currently carrying out more work on the delivery of economic growth by planning activities with Price Waterhouse and hopes to submit this to the Review/Government in the near future.

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?

The issue of speed needs to be clearly defined. A complaint that it is taking a number of years to get permission may be based on a site in a national park for example or where permission was never likely to be granted in the first place.

Speed in planning is most likely to be achieved following the adoption of robust and adequate local development frameworks (or plans) which then enable development control decisions to proceed more effectively. As mentioned above planners were advocating plans for much higher housing levels than those currently being planned in the Southeast of England. Had Ministers agreed to such plans at that stage decisions on particular schemes would have been forthcoming much more quickly.

Advances in project management and a stricter adherence to timetabling are clearly welcome efforts to improve speed and the application of the Planning Delivery Grant has effected an improvement in speed of processing of applications. In this area however there is a concern about

those applications that run unresolved beyond eight weeks and then cease to be subject to any form of incentive for their resolution. Average processing times here may be advisable.

The complexity of many planning controls, such as the General Permitted Development Order (GPDO), generates a very significant and increasing burden of work for applicants and local authorities. The differences between the Sustainability Appraisal (SA) process favoured (for good reasons) by the Government and the Strategic Environmental Assessment (SEA) approach required by law are complex and confusing. Such complex processes interpose the professional planner or consultant between the applicant and the planning system to an increasing degree adding additional layers of reporting and detailed work that previously did not exist.

Simplification of planning should be a major objective and where the recent planning reforms achieved this they are to be welcomed (the new draft PPS3 is as promised a simpler and shorter document). Further opportunities for reform and simplification should be taken forward. In the context of householder development there is scope for radical liberalisation of the planning system by codifying much smaller scale development in the Building Regulations and thus removing it from the planning system altogether. No robust argument has yet been advanced as to why this should not be taken forward. This could be achieved through extended permitted development rights pertaining to dwelling houses in the GPDO and by introducing any necessary Approved Documents / Building Regulations to control development up to a given size. Such a move would necessarily need to be accompanied by a step change in the enforcement of Building Regulations: the recent report of the House of Commons Select Committee on the Office of the Deputy Prime Minister has highlighted failings in the enforcement of Building Regulations. SA and SEA should also be integrated into a single approach as soon as possible.

8) 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?

There is no guarantee that large financial incentives (that might appear as bribes in the eye of the public) to local authorities to accept development would be sufficient to outweigh the political forces that

oppose it in a number of places. On this issue the TCPA suggests a two-part approach:

- First to root out disincentives under which local authorities labour when agreeing to new development (the small proportion of council tax received and the time lag in receiving it; the pressure on local services etc.).
- Second the objective should be to integrate planning more closely with policy / political objectives and ensure that the arguments are better put on both sides.

There is unlikely to be any substitute, with or without a planning system, for winning the arguments for development locally rather than attempting to skew the system one way or the other.

Conclusion

The TCPA believes in positive planning, which has frequently been shown to deliver high levels of economic growth. The further contribution of planning to economic and sustainable development will depend upon a number of key changes outlined above, but including:

- i. a radical simplification of (particularly minor) application processes to enable the local authority planner to focus upon the promotion and management of development where this is appropriate;
- ii. additional powers and funding for Local Delivery Vehicles;
- iii. the removal of disincentives to communities and local authorities accepting development