

## **Communities and Local Government consultation: Development management – Proactive planning from pre-application to delivery**

Landscape Institute consultation response, March 2010

### **Introduction**

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

### **Consultation questions on Part 2**

*1. Do you agree with the objectives we have identified for development management? If not, what amendments to these objectives would you suggest?*

The LI agrees with the objectives identified for development management.

*2. Do you consider that the seven key elements identified for development management suitably reflect the objectives and the role of development management in the local authority context? If not, what amendments to these elements would you suggest?*

DM1a should specifically include green infrastructure (GI). This should be explicitly stated as current references to 'infrastructure' do not always include GI.

With regards DM1c, the LI recommends strongly the addition of "including non-statutory local visions such as market town initiatives, village design statements and parish plans." (Or include reference to these sorts of documents elsewhere).

With regards DM1h, the LI recommends strongly the addition of the need to engage with local, regional and national design review panels to provide expert input to design quality for place-shaping.

With regards DM2.3d, the LI recommends strongly the use of tools such as Building for Life for assessment of housing quality and embrace design review comments. Explicit reference to such tools would be helpful in the revised document.

With regards DM5, it would be helpful to spell out good practice arrangements for two tier authorities and where town councils exist.

*3. Do you agree that we should give each authority the discretion to tailor their development management service to local circumstances? If not, what alternative would you suggest? For example, should we provide a more prescriptive national policy?*

No response.

*4. Do you consider that the proposed development management policies provide a suitable overarching national policy framework within which local working practices can be framed?*

The LI considers that they are suitable within the current framework of core strategies and LDFs. However the would not be appropriate under some of the proposals in the Conservative Party's Green Paper on planning reform.

*5. Are any of the proposed policies too prescriptive? If yes, please indicate which ones, and suggest alternative wording or approaches.*

No answer.

*6. Are there any topics relevant to development management which you would like to see in covered in:  
(a) the detailed policy annexes to this PPS?  
(b) guidance?*

The LI wishes to see clarification on use of the term infrastructure and whether this in fact includes or excludes green infrastructure (GI).

*7. Overall, does the proposed new planning policy statement on development management provide an effective way of supporting existing local planning authority good practice in development management, and of guiding improvements where they are needed? If not what amendments or additional/alternative approaches should be considered?*

The LI is concerned about the implications on the resources for local authorities, whether all local planning authorities (LPAs) have the resources and the skills necessary to undertake development management. The LI emphasises the need for LPAs to have adequate resources in terms of both quantity and skills to be able to deliver the requirements for pre-app discussions and community consultation. In particular, landscape, green infrastructure, trees, biodiversity, urban design, energy and water management will all be increasingly important in the light of other government policy, for example the current draft PPSs relating to climate change and natural environment. These all need high standards of specialised and technical knowledge to prepare design briefs, liaise with developers and provide peer level understanding and critical responses to development proposals. These will apply especially where a developer does not address such issues or where the arguments/solutions advanced are viewed as controversial or unrealistic.

Many LPAs do not have access to the necessary skills in-house and other agencies such as Natural England, Environment Agency and CABE are already stretched. If the aspirations of the new approach to development management are to be realised, LPAs will need assistance. This might come via extending the CABE enabling scheme, making broader use of Design Review Panels, developing the role of regional architecture centres or other mechanisms but allowance should be made for this as a resource implication.

### **Consultation questions on Part 3**

*8. Do you agree with the pre-application principles? If not, what amendments to these principles would you suggest? Are there any additional principles which should guide local planning authorities to ensure a good quality and effective pre-application service?*

No answer.

*9. Do you agree with the draft policy (PA1) on pre-application planning services? If not, what amendments would you suggest?*

No answer.

*10. Do you agree with the draft policy (PA2) on the approach to be taken to pre-application advice for small scale development? If not, what amendments would you suggest?*

The LI agrees with the approach however we question if LPAs will need guidance on proportionality. Currently there are practices which seem to be based on income generation rather than common sense.

*11. Do you agree with the draft policy (PA3) on the need for clear LPA guidance on pre-application advice and discussions? If not, what amendments would you suggest?*

The LI agrees with the identified need.

*12. Do you agree with the draft policy (PA4) on the proposed scope for involvement of key participants at the pre-application stage?*

The LI considers this might need to go further than the stakeholders listed in the SCI, for example, parish plan groups, where parish plans have been adopted by local communities. There are SCIs which mention parish planning, but only in the context of development of a parish plan and not in terms of the implementation phases of the plan.

*13. Do you agree that the extra resources spent by applicants at the pre-application stage will be compensated by savings at the post-application stage? If not, please explain.*

This will depend on the robustness and clarity of advice given by the LPA during the development management process.

*14. Should specific fees for pre-application engagement be established in planning legislation, or do the current powers under the Local Government Act 2003 make adequate provision?*

No answer.

#### **Consultation questions on Part 4**

*15. Do you consider that the draft policy on determining planning applications is a good replacement for The Planning System: General Principles? If not, what amendments would you suggest?*

The LI recommends that DE6.2 should include GI.

*16. Will the draft policy on determining planning applications be useful to LPAs in terms of applying a development management approach when making planning decisions? If not, what amendments would you suggest?*

No answer.