

DETR

~~R. Fullerton~~  
7.5.10  
28/04/99

## CONSULTATION PAPER

### PLANNING POLICY GUIDANCE NOTE 12: DEVELOPMENT PLANS

#### COMMENTS FROM THE INSTITUTION OF ENVIRONMENTAL SCIENCES

This note contains the comments of the Institution of Environmental Sciences on the above public consultation paper issued by the Department of the Environment, Transport and the Regions (DETR) in February 1999. The structure of our comments follows the ordering of the public consultation paper. As relevant we have referred to the paragraph numbers in the public consultation paper.

**Improving the process of plan preparation. Better management of the process.** We agree that procedural changes to the plan development process can only be a means of facilitating improvements in this process. Achieving improvements is dependent upon local planning authorities adequately managing the plan development tasks. //endorse speeding up//

**New procedures for local plans and UDPs.** Three proposed new procedures are summarised in paragraph 2.8. In terms of two separate periods of deposit, the period between which negotiations can be carried out, this appears to be sensible. We would support such a change.

The proposal to end the requirement for consultation with statutory consultees prior to finalising local plan proposals is more of a concern, particularly the point made in paragraph 2.11 about "For local plans and UDPs, the new regulations no longer define any statutory consultees" We believe there is a potential for more objections to arise as a result of this proposal.

The requirement for the inspector's report on the local plan inquiry to be published within 8 weeks of receipt by the local planning authority is supported. However, we would urge that a similar standard timetable be applied to the Inspectorate in producing the local plan inquiry report. There is often a considerable gap between the end of a local plan inquiry and submission of the inspector's report to the local planning authority.

**Consultation, negotiation, and public participation. Pre-deposit Consultation.** Allowing local planning authorities flexibility in how to conduct pre-deposit consultations is right. However, it is equally important, as stated in paragraph 2.11, that local planning authority consider representations made by consultees, that they state who they have consulted, how they went about consultation, and the opportunities they have provided for interested parties to make representations.

**Negotiations with objectors.** It is useful to emphasise that objectors should state, as part of any objection, what changes they would see to the plan in order to satisfy their objection.

**Monitoring, review, and the alteration and replacement of plans. Plan review.** We would support the suggestion in paragraph 2.22 that the local plan should have a full review at least once every 5 years, with partial reviews at more frequent intervals if necessary.

**Best practice.** The proposed research on best practice on plan project management, effective consultation techniques, negotiation and monitoring and review will be useful. We encourage the DETR to ensure such research is carried out.

**Chapter 3 - Content of plans: general issues. Plan content and level of detail. Principles.** We fully endorse the point made that plans need to be clear, succinct and easily understood, and would support the DER in discouraging over-elaborate plan making.

**Chapter 4 - Sustainable development. Introduction.** It is vital, as noted in paragraph 4.2, that the land-use planning aspects of sustainable development must be capable of being addressed through the land use planning system. This is a key role for development plans. As such, the iteration between proposed policies (referred to in paragraph 4.3) is critical, and so an holistic approach to policy development is essential. This has implications for how the development plan is 'explained', as a sustainability assessment will need to knit together the various chapters/sections within the development plan (eg housing, employment, transport, etc) to illustrate how the whole supports sustainable development.

**Effective protection of the environment and the prudent use of natural resources.** The items provided under paragraph 4.4 are a useful checklist of issues for review with a development plan.

We strongly support the requirement noted in paragraph 4.6 (and elaborated in paragraphs 4.14 to 4.20), that development plans should be subject to an environmental appraisal. We also endorse the point made in paragraph 4.16 that the appraisal of the plan should have the same level of public consultation as the plan itself, and that it should be an iterative process. It is also important (as stated in paragraphs 4.18 and 4.19) that the appraisal process fits in with those of other plans, be they in a different local authority or covering a different topic/level of coverage.

**Maintenance of high and stable levels of economic growth and employment.** We fully support the point made in paragraph 4.10 that the process of consultation should aim to ensure that economic development proposals are realistic, and that proposals should not artificially constrain land to unrealistic end-uses. It is important to retain flexibility in the land allocation process, given changing needs of residents and industry.

**Chapter 5 - Integration of transport and land use policies. Development plans and local transport plans.** We endorse the comment made that planning and transport

strategies (be they local transport plan or regional transport strategy) need to be consistent. If this is not the case then the achievement of sustainability is severely compromised.

**Transport policies in development plans.** The list of items to consider within local transport plans, and which may have land use implications, is helpful (paragraph 5.16). In due course experience and research should enable good proactive to be built up in these areas. We would suggest that informal forums are developed to explore these areas to ensure best use of resources.

**Assessment of options. Multi-modal appraisal.** The requirement that local planning authorities should undertake a rigorous examination of alternative transport options is welcomed.

**Resources.** The paper states that "Assumptions should be in broad terms and should not attempt an unrealistic degree of precision". This is an easy option for Plans, at all levels, to include general statements of little value, which will do little to improve the viability of Plan proposals. It is essential that all Plans should include a thorough economic analysis of all proposals made and a financial review of capital costs (and life cycle costs where relevant) to as accurate and detailed a level as possible. Economic and financial viability of any Plan should be demonstrated or it will NOT be successful in implementation.

The level of financial detail and accuracy should be greater for Local Plans and possibly of a more economic and strategic nature for Structure Plans.

It is recognised that the expertise to provide this information is extremely limited and has not been encouraged to develop over the past 20 years. This situation should be remedied.