

## **ADEPT Response to Raynsford Review of Planning**

- 1.0 The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary and metropolitan local authorities, along with Local Enterprise Partnerships (LEPs). ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK.
  
- 2.0 ADEPT welcomes this opportunity to submit evidence to the Raynsford Review. This as an opportunity to demonstrate the value of planning as a building block of a civilised democratic society, vital to ensuring that the public accept, and consent to, more and better homes, and that we create economically successful places.
  
- 3.0 The planning system in England is recognised internationally and is steeped in a history of progressive and creative ideas for shaping the future. Although the planning system retains this positive role in delivering homes, improving quality of life and protecting the environment; at this moment in time it is faced with certain challenges. The planning system is affected by financial constraints, which are occurring at local authority level, and a decline in the number of planners over the past last few years. The system has become more fragmented and complex. At the same time, expectations on what the planning system can, and should, deliver have increased. Community engagement and effective participation have also emerged as key local issues.
  
- 4.0 This review by the Town and Country Planning Association (TCPA) sets out to examine the performance of the English planning system in relation to the key challenges facing the nation; to identify key areas of underperformance; and to offer recommendations for reform. ADEPT believes that growth must be inclusive, sustainable and high quality if it is to be successful. A holistic approach to economic, housing and environmental policy is essential to the overall strategy of delivering sustainable and inclusive place-based growth.

5.0 The Raynsford Review asks for submissions in the following areas:

- The English planning system and sustainable development
- The scope of the planning system
- The spatial structures of the planning system
- Community involvement in planning
- Planning and taxation
- Effective implementation

6.0 The ADEPT response addresses these individual areas but the nature of the response to these areas of interest may be applicable to more than one topic or area.

### **The English planning system and sustainable development**

7.0 The manner in which the planning system operates does not deliver sustainable development in the long-term public interest. ADEPT considers that the government should re-assert the objectives of the planning system to best manage land-use in the public interest in a contemporary way that recognises our reliance on private sector investment and delivery – and how this relates the national objectives for growth. The adversarial nature of the planning process is wasteful and inefficient. A more collaborative approach should be adopted with the focus of effort being put into improving outcomes. Public interest should be the overriding concern of the planning system.

8.0 ADEPT has pointed out in its response to a number of government consultations that it is important to align transport infrastructure and housing delivery more effectively.<sup>1</sup> We have encouraged the government to make sustainable development its priority. The Minister in his forward to the National Planning Policy Framework (NPPF) says that “... sustainable development is about positive growth – making economic, environmental and social progress for this and future generations. The planning system is about helping to make this happen. Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for

every plan, and every decision.”<sup>2</sup> According to the NPPF the purpose of the planning system is to contribute to the achievement of sustainable development.<sup>3</sup> It sets out the role for sustainable development that involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and,
- widening the choice of high quality homes

9.0 The NPPF sets the development plan at the heart of the planning process (paragraphs 11 and 12 page 3) and the cornerstone in the context of achieving sustainable development (paragraph 14 page 4). However, this is not reflected in practice with so many authorities failing to have an up to date plan and decision-makers (including planning inspectors) failing to the appropriate weight to this over-arching principle. Government policy elsewhere seems to contradict this objective. For example, the extensive use of permitted development such as the ability to convert offices to residential or the ability to re-use isolated agricultural buildings in the countryside.

10.0 The NPPF sets out 12 core planning principles for the planning system. However, how often are these adhered to. If they are genuinely core planning principles for the planning system why are they not referred to as the norm in general practice or by government in its publications, consultations or guidance. For example, in the recently published Green Paper: Building our Industrial Strategy (ADEPT has submitted a response to the consultation on the Industrial Strategy<sup>4</sup>), there is not one single mention of the NPPF let alone the core planning principles; a somewhat surprising lacuna given they are core principles. The two recent housing consultations<sup>5</sup> whilst discussing some the issues (i.e. being “genuinely plan-led”) in the text, there is no explicit mention

of the core planning principles as set out in the NPPF. If the NPPF and its core planning principles are not at the heart of policy development it cannot provide an effective framework for the delivery of sustainable development.

11.0 The planning system in England has become too fragmented and complicated. There is the basic planning system which has formed the core of the planning system since 1947. Within this there is the permitted development regime which has been extensively expanded over the last five years. This shadow planning system is predicated on a framework of prior notification. The prior notification framework has grown rapidly adding another layer of complexity to the management and understanding of planning. There is also a separate planning policy framework and legislation for nationally significant infrastructure projects such as power stations and major transport schemes. Apart from the NPPF there is a series of National Policy Statements that set out national policy on different types of nationally significant infrastructure. More recently, the neighbourhood planning system has been introduced. This enables neighbourhoods to prepare plans and can grant planning permission for the development through a Neighbourhood Development Order. If you add to this the appeals and plan inspection/examination regime it adds a further layer of complexity.

12.0 A further variant on the planning system is the Permission in Principle. Introduced by the *Housing and Planning Act 2016* the permission in principle route is an alternative way of obtaining planning permission which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle route has two stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle for residential development and the second ('technical details consent') stage is when the detailed development proposals are assessed.<sup>6</sup> The multiplicity of planning 'systems' is of key significance because they are difficult to comprehend and introduce superfluous complexity. This undermines the public's understanding of, and confidence in, planning and the practice of planning. It has a similar impact in terms of business confidence. This is discussed in more detail later.

13.0 The government's approach to planning tends to be sectoral or issues based. The manner in which the housing crisis<sup>7</sup> has, until recently, been addressed being a prime example. Firstly, how a housing crisis has been allowed to develop in the first place must be questioned in an advanced nation such as the UK with a planning system recognised internationally. The focus on metrics: how many houses are being built rather than focussing on homes in the right places – places with the attributes which people value, such as proximity to employment opportunities and thriving economies, transport accessibility and connectivity, good local amenities and public services, quality of life.<sup>8</sup> Secondly, the fragmented approach to different aspects of growth and development is not conducive to delivering sustainable development. ADEPT's response to the government's recent Green Paper makes this point in its response to the strategy when it states:

*'Other key government strategies that must be aligned with the Industrial Strategy are the recent Housing White Paper and the imminent 25 Year Environment Plan. The interdependence of these three policy areas – economic, housing and environmental – is essential to the overall strategy of delivering sustainable and inclusive place-based growth.'*<sup>9</sup>

14.0 ADEPT considers that the sustainable development goals<sup>10</sup> and the New Urban Agenda provides a blueprint for achieving sustainable development. The 2030 Agenda for Sustainable Development at paragraph 21<sup>11</sup> states:

*"... the importance of the regional and sub-regional dimensions, regional economic integration and interconnectivity in sustainable development. Regional and sub-regional frameworks can facilitate the effective translation of sustainable development policies into concrete action at national level".*

15.0 ADEPT would like to see a planning system that can deliver certainty, where infrastructure, environment and industrial strategies at the local level are aligned with national objectives. Delivered through strategy at national,

regional and local levels. Our vision is for local planning authorities to be not only responsible for providing services now; but for legislation to be in place where they are empowered to design strategies and invest in infrastructure to enable the future, laying the foundations for the communities we need to become.<sup>12</sup> The active engagement of both the public and private sector are important to the achievement of sustainable development. This will be discussed later in this response.

### **The scope of the planning system**

- 16.0 ADEPT supports the Plan led system as the basis for proper planning. However, the complexity that is being regularly introduced into the system under on-going “reforms” is undermining its effectiveness and damaging the reputation of planning as a practice. The increase in scope of permitted development rights and prior notification sets itself outside of the development plan system. In situations where permitted development rights can be exercised it is not possible to consider the impact of the development in the context of the development plan. It also makes it difficult to plan for, and deliver, the infrastructure need to support growth. It also disenfranchises citizens making them suspicious of development. Planning should be the means through which sustainable development is delivered.
- 17.0 Planning is fundamental to achieving growth that meets the needs of the present without compromising those of future generations. To meet this challenge a stable planning system is required. A system that induces confidence from citizens and from the business-world alike. Continual tweaks and changes in emphasis result in an almost obsessive focus on process. Constant changes to process undermine confidence in the planning system and therefore, the perception of planning as a beneficial activity (see the results of a Welsh public poll on planning discussed later). Rather the focus should be on outcomes and the government should support planners with the skills and expertise required to deliver them.

18.0 There has been too much criticism of planning and planning process, often not based on evidence. For example, the Chancellor of the Exchequer criticised the planning system in 2015, based on one academic paper<sup>13</sup> on housing:

*“Previous studies have found that the country’s planning system – where development proposals require individual planning permission and are subject to detailed and discretionary scrutiny – can create the sort of ‘slow, expensive and uncertain process’ that reduces the appetite to build.”<sup>14</sup>*

19.0 Even more recently, there is a similar assertion made in the consultation on the Green Paper on the Industrial Strategy:

*“There have also been problems with the delivery of schemes. Projects have been delayed by years and provided at excessive cost. There has been improvement in recent years, but the local planning and consent system still remains a contributing factor in some instances.”<sup>15</sup>*

20.0 However, research by the Royal Town Planning Institute (RTPI)<sup>16</sup> demonstrates the value of planning. As the research identified:

*“Much recent planning policy has been informed by the view that planning inhibits economic growth. This report ... demonstrates how good planning can deliver sustainable economic growth and housing, but also suggests why in the UK we are not consistently realising the value of planning in practice, especially compared to parts of continental Europe.”<sup>17</sup>*

21.0 Rather than creating a ‘slow and expensive and uncertain process’, planning is vital to providing clarity and confidence for developers and those intending to make investment decisions that underpin growth:

*“Planning is critical to providing clarity and confidence for investments by markets so that they are able to deliver good development. Planning can improve the quantity and quality of land for development, ready land for*

*construction (for example, by treating contaminated land), resolve ownership constraints (where there are many different owners), and bring forward investment by ensuring that the right infrastructure (such as transport and public amenities) are in place. In these and other ways, planning can lower the overall cost of new development, and open-up opportunities for development.”<sup>18</sup>*

- 22.0 There needs to paradigm shift at the heart of government policy. To make planning work and deliver sustainable development it needs to be embraced across government. If members of parliament and government publications criticise planning and continually seek to “reform” the planning system, it should come as no surprise that there is no public confidence in planning (although the public do see the benefits which will be referred to later). There should be a Department for Spatial Planning in government represented at Secretary of State level. The role of Chief Planner should be a senior government role with a status and staff cadre to match. There should be a national Spatial Plan for the country to set the future development of the country in a spatial context and in a comprehensive manner, rather than the piecemeal approach that is all too often adopted now. This should be supported by government research to inform policy development and create an evidence based approach at all levels; national, regional and local. ADEPT consider that this would set the context for proper strategic planning at a regional level. A strategic approach to planning and infrastructure is fundamental to delivering the housing the government wishes to see come forward.<sup>19</sup> Members of ADEPT work to get the balance between social, economic and environmental objectives, and are at the heart of creating vibrant sustainable places for all. We want to see a planning system that delivers that aspiration. Planning needs to be done at National, Regional and Local levels.
- 23.0 In local government, the Chief Planner role, should be protected by statute so as to safeguard against undue influence and pressure.<sup>20</sup> Planning committees should be representative of the area they serve and not solely made up of



elected local politicians. The Planning System's failings are often derived from trying to reconcile political issues or expediencies and less about the actual merits of proposals. The current guidance and legislation offers a great deal more flexibility than we often exploit, we could be far more constructive. Planning in the modern age is about the exercise of professional judgement in a political context, and yet the political context today is in many ways inhospitable to modern planning.<sup>21</sup> A more collaborative and citizen focussed form of planning is necessary.

- 24.0 ADEPT considers that land-use control should apply to all land uses, including agriculture and forestry, in order to achieve sustainable development there needs to be a balance between social, economic and environmental considerations. To properly consider these three aspects a full range of land-use and associated activities needs to be within the purview of the planning system.
- 25.0 The Green Belt is a sensitive subject. However, the role and purposes of the Green Belt are not well understood by the public. Now is that time to seriously consider how Green Belt policy is optimised to protect the countryside whilst delivering the sustainable development (including housing) that the country desperately needs. There should be an independent review of Green Belt policy. The government should look at how the five purposes for Green Belts (paragraph 80 of the NPPF) can be reconfigured in the context of sustainable development and to ensure it is a national policy that is fit for the twenty-first century. This should be done in the context of a National Spatial Plan. For example, social or inclusivity aspects could be factored into the five purposes.
- 26.0 Other nations from the devolved administrations are leading the way on a wider range of planning and sustainability issues. For example, since its inception the National Assembly for Wales has had a legal duty with respect of sustainable development. The latest evolution of this is the *Wellbeing of Future Generations Act 2016*; this places a legal duty on all public bodies to put sustainable development as their central organising principle and will have important implications for the planning system in Wales.

- 27.0 The extensive use of permitted development for the conversion of buildings undermines the objective of sustainable development as it acts as a proxy for a proper planning assessment and therefore, all the relevant considerations cannot be taken into account as would be the case in a planning application. It is difficult to see how the extensive use of permitted development rights is consistent with the objectives of sustainable development.

### **The spatial structures of the planning system**

- 28.0 The structures of the planning system in relation to the national, sub-regional, local and neighbourhood scales are not effective because the planning system is too fragmented. The devolution agenda has led to a disjointed framework of local governance and inter-relationships which has made strategic planning more difficult. This is highlighted Adams *et. al.*, by when they state:

*“Within a wider public policy context the UK Government has pursued devolution to city regions through city, growth and devolution deals. These would seem to offer the opportunity to seek some closer integration of the public sector within ‘places’. However, the links between devolution and urban planning have tended to be less well developed. In effect, despite devolution there has tended to be a continuation of strong central control within English planning – albeit there has been the promotion of planning activity at neighbourhood level.”<sup>22</sup>*

- 29.0 ADEPT welcomes the government’s willingness, of late, to take a broader strategic view of planning for areas greater than individual authorities and to consider how the duty to cooperate has worked in practice. A more holistic and collaborative approach is required to deliver housing and infrastructure than just a statutory duty to cooperate. The timing of infrastructure is also important. Development that requires expensive infrastructure early on (and/or before housing delivery has started) can present significant risks and uncertainty for developers.<sup>23</sup> Professional bodies have been calling for this

strategic approach to planning for housing for a number of years<sup>24</sup> and ADEPT supports this change in emphasis. ADEPT members are drawn from 'Place' Directors in upper tier local authorities, Local Enterprise Partnerships (LEPs) and commercial partners. We work to get the balance between social, economic and environmental objectives, and are uniquely placed to provide advice on strategic planning across a range of contexts. A strategic approach to planning and infrastructure is fundamental to delivering the housing the government wishes to see come forward.

30.0 Changes in planning law removed the scope for national or regional responses to problems, such as meeting housing need (i.e. the abolition of Regional Spatial Strategies). Coupled with this was the demise of the Regional Government Offices which resulted in strong centralisation and no effective means to coordinate between places, for many parts of the UK. Continuous change over the past decade has created confusion and a lack of cohesiveness. In the 2010, coalition agreement, the government committed to establishing local enterprise partnerships (LEPS) to replace the Regional Development Agencies. In June 2010, businesses and councils were invited to come together to form local enterprise partnerships whose geography it was argued properly reflects the natural economic areas of England. This worked in some places but in others were less so. It also created an uncertain relationship with local authorities.

31.0 The LEPs whilst being able to dispense large sums of money to stimulate growth they had no planning powers and did not become involved in planning activity. They have not been given any incentive to plan strategically. With the exception of one or two LEPS only, planning doesn't feature in LEPs decision-making or investment decisions.

32.0 In respect of combined authorities experience has also been varied. As Townsend has pointed out:

*"... the process [of creating combined authorities] has been defective in other ways. Government devotion to 'bottom up' localist approach,*

*together with a sustained refusal to issue guidelines has led to confusion and scope for MPs to exert personal influence.”<sup>25</sup>*

33.0 At the other end of the spectrum experience with neighbourhood forums and neighbourhood plans has been mixed. The government has lavished considerable attention on neighbourhood plans and provided funding to support their spread. Funding and backing that could have helped promote mainstream planning. As Jeff Bishop has pointed out:

*“It is unfortunate that so much emphasis was placed by politicians (but also civil servants) on N[eighbour] D[evelopment] P[ans] as the only way for communities to play a role in local planning. For many communities, especially where key decisions had already been taken about site selection, the next most important issue that could be addressed through planning was design, yet it is this author’s experience that most people gained the impression (and were sometimes actually told) that community-led Design Statements were no longer appropriate or even possible.”<sup>26</sup>*

34.0 ADEPT considers there is an important role for New Towns and settlements. Sustainable communities cannot be created without the appropriate infrastructure and the appropriate support to enable them to grow in an appropriate way over time. One of the best ways to achieve this is by planned settlements supported by the appropriate infrastructure. The scale of these developments is more likely to generate the necessary funding to support a complementary extent of infrastructure provision. The finalists for the 2014 Wolfson Economic Prize to promote the concept of ‘Garden Cities’ all emphasised that land value uplift had to be harnessed more effectively into building infrastructure and long-term maintenance.<sup>27</sup> Land value capture is an issue that will be referred to later.

## Community involvement in planning

35.0 The current approaches to community involvement in planning is not inclusive or effective as they should be. The Conservative party in 2010 in its green paper entitled: Open Source Planning described planning as being broken. It argued that *'if we enable communities to find their own ways of overcoming tensions between development and conservation, local people can become proponents rather than opponents of appropriate economic growth.'* The constant changes to the planning system has done nothing to achieve that aspiration in fact, it has further undermined public confidence in planning as a worthwhile activity.

36.0 Recent "reform" proposals have been analysed by Jones *et. al.*, who have concluded:

*"... The current planning reform proposals Briefing Paper, offer little opportunity to allow people and communities back into the planning process, and that they marginalise sustainable development. As such, the proposals can be seen to herald a major departure from the principles seen to underpin the National Planning Policy Framework established barely four years ago."*<sup>28</sup>

37.0 Engagement and participation is vital to the sustainable development process and to dispelling the misconceptions about planning and its objectives. The concerns identified by Jane Jacobs<sup>29</sup> in the 1960s and others are as relevant now as they were then. In the rush to increase housing numbers we are in danger of engaging in tokenism or even worse. Sir John Egan in his 2004 Review of Skills for Sustainable Communities said:

*"Places where people want to live – and that are sustainable – do not happen by chance. They are the product of visionary thinking and commitment by highly skilled civic and national leaders, developers and professionals, with the full engagement and support of local partners and communities."*<sup>30</sup>

- 38.0 People need to be placed at the heart of place-making (planning).<sup>31</sup> A poll commissioned to mark the centenary of the Royal Town Planning Institute, in 2014, reveals an overwhelming majority of the public (79%) want a bigger say over the development of their communities.<sup>32</sup> The survey identified 59 percent of people feel they don't have enough say in how their local area develops on issues such as housing, transport, shops and amenities. In another finding 79 percent of people think their community needs a stronger voice in planning rather than planning decisions being left more to developers and contrary to the political characterisation. The poll results, shows only 8 percent of people want planning and development decisions to be relaxed and left to developers, rejecting the idea that developers should one day be able to build what they want, where they want.<sup>33</sup>
- 39.0 In another planning survey carried out by the Welsh Government in 2012, respondents expressed the opinion that local citizens' influence on planning was thought to be limited at best. A majority of respondents felt 'local citizens do not have enough say in the way the planning system in Wales works' and only a minority agreed that 'decisions on planning applications are being made by the right people and organisations'. Local citizens' influence on planning was thought to be limited at best. There was a perception of a lack of fairness and public interest being taken into account.<sup>34</sup>
- 40.0 The RSA Commission on inclusive growth argues that social and physical infrastructure should be on a par when it comes to investment appraisal. This, the Commission argues, is one of the central means through which social and economic policy can be brought together.<sup>35</sup> The Commission goes on to say:

*'High quality physical infrastructure – such as railways, roads, local transport, new developments and broadband – is essential in building economic connectivity, maximising the efficiency of productive activity and connecting labour markets to areas of economic opportunity. But the value of physical infrastructure is diminished when particular places or*

*neighbourhoods are unable to connect to its benefits, for example because the skills base is too low to take advantage of job opportunities, or health and complex social issues act as barriers to participation.'*

- 41.0 ADEPT in its response to the Green Paper points out: *"We believe that growth must be inclusive, sustainable and high quality if it is to be successful."*<sup>36</sup> The RSA Commission advocates strongly for the concept of inclusive growth. The Commission has recommended:

*'A whole-system leadership approach to inclusive growth creates space for the private sector to play a key role in transforming the foundations of our economy – at a local and national level. The government has recently set out its new approach to industrial strategies and the Commission welcomes its emphasis on the need to address economic imbalances across the country as well as its emphasis on vocational education and skills. However, the importance of place needs to be central to the implementation of these strategies in practice. Quality jobs or 'inclusive productivity' must be at the heart of this if places are to see a real shift in the extent to which local people are able to contribute to and benefit from growth. It will involve local leaders – from business, trade unions, civil society and other anchor institutions – working to leverage the value of local assets and, in certain cases, play a more active market-making role to stimulate demand and enable progression – particularly in low paid sectors, such as hospitality, care, warehousing and logistics.'*<sup>37</sup>

- 42.0 The NPPF recognises the statutory status of the development plan as the starting point for decision making.<sup>38</sup> ADEPT endorses the role of the development plan and its centrality to the planning system. However, if the importance of the development is diminished in the perception of the development industry and significantly, the local community, it will undermine support for planning generally. Any measures to change the NPPF or the role of plans should strengthen the role of the development plan rather than diminish it. They should be endorsed by communities. Communities need to

play a greater role in the planning process. For example, planning committees need to be more representative of communities they serve including representation from business and amenity groups. LEPs can draw membership for their Boards from a range of interests and there is no reason why planning committees could not do the same. A broader representation of the community is key to gaining support and endorsement for development and the planning process.

- 43.0 There should be an alignment and closer integration of planning with community planning to help improve outcomes for communities. It is important that people have a say in the changes that affect their places and, equally, we must also be able deliver the inclusive growth that our economy requires and the housing that current and future generations need.
  
- 44.0 Planning should be collaborative – by empowering people to inform and influence the places and spaces they live in. Planning relies on the participation of people and communities in developing its plans and strategies. Planning should continue to improve approaches to engagement, avoiding silo working and helping local communities engage without needing to understand plan processes. The use of approaches such as the *Place Standard* tool provides a simple framework to structure conversations about place. It allows a person to think about the physical elements of a place (for example its buildings, spaces, and transport links) as well as the social aspects (for example whether people feel they have a say in decision making).
  
- 44.1 The *place standard* provides prompts for discussions, allowing a person to consider all the elements of a place in a methodical way. The tool pinpoints the assets of a place as well as areas where a place could improve.<sup>39</sup> The use of social media and modern methods of interactions and communications need to be harnessed to drive up participation and encourage engagement.
  
- 45.0 Planning needs to provide a social, economic and environmental framework that makes places work for people. Development should not be about volume



or metrics alone, it should have social value and safeguard the natural environment. For that it must be inclusive and sustainable.

46.0 ADEPT believes we need to see investment in people as an economic value rather than a burden, which is why we believe infrastructure needs to be viewed in the broadest, most inclusive terms - keeping people healthy, skilled, and proactive for longer will be essential to our economic security. Local service provision already requires us to work across traditional boundaries.

47.0 The New Urban Agenda as a blueprint for sustainable development includes a vision for cities and settlements<sup>40</sup> that includes:

- fulfil their social function, including the social and ecological function of land, with a view to progressively achieve the full realization of the right to adequate housing, as a component of the right to an adequate standard of living, without discrimination, universal access to safe and affordable drinking water and sanitation, as well as equal access for all to public goods and quality services in areas such as food security and nutrition, health, education, infrastructure, mobility and transportation, energy, air quality, and livelihoods;
- are participatory, promote civic engagement, engender a sense of belonging and ownership among all their inhabitants, prioritize safe, inclusive, accessible, green, and quality public spaces, friendly for families, enhance social and intergenerational interactions, cultural expressions, and political participation, as appropriate, and foster social cohesion, inclusion, and safety in peaceful and pluralistic societies, where the needs of all inhabitants are met, recognizing the specific needs of those in vulnerable situations;
- achieve gender equality and empower all women and girls, ensuring women's full and effective participation and equal rights in all fields and in leadership at all levels of decision-making, and by ensuring decent work and equal pay for equal work, or work of equal value for all women, as well as

preventing and eliminating all forms of discrimination, violence, and harassment against women and girls in private and public spaces;

- fulfil their territorial functions across administrative boundaries, and act as hubs and drivers for balanced sustainable and integrated urban and territorial development at all levels;
- promote age- and gender-responsive planning and investment for sustainable, safe, and accessible urban mobility for all and resource efficient transport systems for passengers and freight, effectively linking people, places, goods, services, and economic opportunities.

48.0 The vision expressed in the New Urban Agenda should form a new set of core principles for the planning system in England.

### **Planning and taxation**

49.0 The Government's measures designed to boost resources for Local Planning Authorities as proposed in recent consultations (20 percent fee increase)<sup>41</sup> is welcomed by ADEPT given that further changes to national planning policies will place additional burdens on the planners. We also feel that ring fencing of fees sends that right signal that it is important to ensure that planning departments are properly resourced. The full cost of dealing with planning applications should be borne by the applicant. The annual planning survey carried out by GL Hearn and the British Property Federation identified the need to make significant investment and quickly in planning. This they point out hasn't happened.<sup>42</sup> The view expressed in the recent Scottish Government consultation is equally applicable to England. The consultation recognises the importance of investing in the planning service. It says that:

*'The planning service must have the resources it needs to deliver the world-class service our communities deserve and our economy needs.'*<sup>43</sup>

50.0 ADEPT whole heartily encourages and supports continued investment in local authority planning services, the provision of trained planners and the raising

of the status of the profession, we need to attract the best and brightest people to the profession, as our sustainable future depends on it.

- 51.0 In the last five years, net local authority spending on planning and development in London has fallen by 60% from £259m to £148m. This means local authorities are completely under resourced to deliver the range of services required for sustainable development.<sup>44</sup>
- 52.0 Land value capture needs to be properly addressed as part of the planning process. The issue has been considered by the Government Office for Science as part of Future of Cities in a paper from February 2016.<sup>45</sup> However, the government has not grasped the issue. The RTPI has commissioned new research to look at how other countries can offer the UK alternatives to fund infrastructure through capturing the uplift in land value resulting from planning permission being granted or public investment being made on or near a piece of land. The project will compare the current Land Value Capture mechanisms used in the UK; S106 agreements and Community Infrastructure Levy (CIL) with three others: a simple tariff mechanism and two variants of the North American Impact Fee approach. The RTPI argues that the current model will miss capturing a potential £185bn of total land value increase over the next 20 years.<sup>46</sup> This is a major loss of investment for future infrastructure.
- 53.0 ADEPT would point out that it is not only the land value, financing and construction costs that are important but also the costs of maintenance and upkeep of places, assets and infrastructure that needs to be factored in. These are costs that often fall on communities and local authorities. Not enough consideration is given as to how to maintain and preserve the infrastructure assets once created. The liability of maintaining societal assets represent a continuing and growing burden on local authorities without any means of funding it going forward.
- 54.0 Adams *et. al.*, have reached the following conclusion in a recent study carried out for the RTPI:

*“Ultimately, changes that have narrowed the focus of planning and in particular restricted its ability to respond positively to pressures for urban development have served to damage, rather than enhance, long-term economic prosperity, let alone environmental sustainability and social cohesion. It is time to think again from first principles exactly how the benefits of planning can best be realised. If the full benefits of planning are to be realised, we need reforms that exploit its true potential to reconcile economic, social and environmental challenges through positive and collective action, and which confront those sectoral interests that seek only short-term, self-interested solutions.”<sup>47</sup>*

### **Effective implementation**

- 55.0 Local authorities should be able to charge the planning fees they need to properly resource their planning service.<sup>48</sup> Applicants are prepared to pay for an efficient and responsive service. Planning authorities have suffered greater cuts than other local authority functions, it has to stop and be reversed. For example, in London local authorities cover their capacity needs by processing external consultants and over 90 percent by using agency staff.<sup>49</sup>
- 56.0 Latterly, the focus has tended to be on metrics and in particular the number of applications determined. This is not an effective measure of implementation. Adams, *et. al.*, have pointed out the narrow and limited nature of this measure particularly when evaluating the value of planning:

*“In practice, performance management regimes have become a central part of the wider cultural transformation of local government and the public sector, and many public sector planners have come to accept the imposition of various forms of ‘delivery’ targets. However, researchers and professional bodies have also regularly pointed to the limitations of attempts to measure the performance of planning systems purely or largely in terms of the speed of decision-making or the quantity of outputs. As a result there have been recurrent (but perhaps so far largely ineffective) attempts to find more holistic ways of measuring performance ... In Scotland, for example, the Planning Performance Framework developed for the Scottish*

*Government by Heads of Planning Scotland contains a range of qualitative and quantitative data which to some extent creates a broader basis for evaluating performance.”<sup>50</sup>*

57.0 As the recent survey by GL Hearn and the British Property Federation has highlighted the focus on metrics is not necessarily leading to an efficacious planning system;

*“Whilst the planning system is not slowing down, this year’s findings provide further evidence to suggest that the current targets are simply unrealistic for most major planning applications under current conditions. The consistent failure to meet unrealistic targets may therefore be partly to blame for the growing discontent.”<sup>51</sup>*

58.0 The answer is not to introduce further permitted development rights or to tinker with the system again, but to ensure that planning in local government is properly resourced and has all it needs to carry out its functions in the public interest. Increasingly, governments have seen the planning system as being the means to guarantee the delivery of a sufficient supply of land to enable the market to function with minimum distortion or disruption. This fallacious view has driven the endless tweaks and “reforms” of planning in an effort to deal with deficiencies in the market. The approach to the housing crisis being a case in point. Local authorities have now started to become involved directly in housing delivery.<sup>52</sup> In 2015, a survey found that over fifty per cent of local authorities proposed to set up housing companies to directly engage in housing provision. The House of Lords’ Built Environment Committee has recommended that local authorities should return to direct provision of housing.<sup>53</sup> And yet, the Government’s approach has been to make frequent changes to the planning system in order to effect housing delivery.

59.0 The RTPi in looking at the delivery of large scale housing have recommended that local and national politicians and campaigning groups as well as planners need to make the case for large scale housing schemes by emphasising the consequences for current and future generations of failing to build enough

houses, and the opportunities represented by large scale schemes to deliver quality healthy communities. In a 2013 report it also recommends linking together infrastructure expenditure, policies and planning with policies and planning for housing in order to unlock potential sites, for example through budgetary processes or guarantees against future income streams. In total the RTPI report makes fifteen recommendations to promote housing delivery.<sup>54</sup>

- 60.0 There is a shortage of trained planners not only nationally<sup>55</sup> but internationally.<sup>56</sup> The RTPI has identified the skills and expertise for planners in an international context.<sup>57</sup> There are also a number of areas of planning practice which are in short supply. The Welsh Government's consultation paper 'Positive Planning' identified that we need a planning system that can span local planning authority boundaries but there is a lack of such expertise:

*“The evidence also identified that a lack of specialist skills and the small size of planning teams within LPAs contributed towards issues with processing applications within the statutory periods. This resulted in a lack of confidence in the system and impacted on investment. This complexity and delay is particularly highlighted in relation to renewable energy schemes due to a lack of skills and resources.”<sup>58</sup>*

- 61.0 A recent study by the East of England Local Government Association found that local authorities are significantly lacking the capacity and skills to deliver the region's growth agenda.<sup>59</sup>

- 62.0 Kate Barker in her review of planning dealt with the issue of skills as follows:

*“There are many highly skilled and competent professional staff within the planning profession. However, there are a number of concerns about maintaining the skills base. These include: recruitment and retention challenges, measured in part by high vacancy rates; concerns about the training of planners (13 per cent of departments lack a training budget) and council members; the demands for specialist skills (negotiating complex Section 106 agreements, for example, requires some knowledge of*

*development finance that planners have previously never needed); poaching by private sector consultancies; and worries about the high proportion of agency staff and the turnover of these groups.*

*Part of the solution here is addressing supply constraints. Until current training and bursary initiatives take effect, the community of planners will remain limited and the public sector will often find it difficult to compete with the private sector because of the nature of the work and the private sectors greater ability to pay.”<sup>60</sup>*

63.0 Barker expressed the view that skills may be closely bound to broader issues of local authority empowerment. Allowing planning services more autonomy could increase the status of the work she argued, thus making it easier to attract and retain high skilled employees. She made a number of recommendations as follows:<sup>61</sup>

- **incentivising local authorities**

There are currently few financial incentives for local authorities to adopt growth strategies. If incentives could be aligned so that authorities received better returns from growing their tax base, this would raise the status of planning within the authorities, and potentially the attractiveness of planning as a career.

- **improving perception of planning as a career**

For at least the past two decades, the perception of planning as a profession has been relatively low and has slipped down the list of desirable places to work within local authorities. Some progress is being made, at a national level between the Local Government Association, the RTPI, and the Town and Country Planning Association to ensure a continued focus on recruiting new entrants into the profession. At the local level, planning departments need to improve job design and offer more opportunity for progression. Where this is currently happening, it is showing positive outcomes in terms of retention and service quality.

- **encourage or require more business process reviews**

It is also key to ensure that the current available skills are utilised effectively. A number of studies have concluded that non-planners can do more of the basic work. Simple householder applications, for example, could be dealt with by relatively unqualified staff, freeing up resource for use elsewhere.

- **enhance scale economies**

Many local authorities are too small to exploit fully economies of scale. However, this can be addressed by pooling resources between authorities, which is currently not a widespread practice among local planning.

- **Improving the performance of local planning authorities**

New arrangements such as City/Regions or mergers of local planning authorities could help exploit these more fully, although on a more modest basis the development of specialist expertise within larger authorities could be of benefit. An alternative would be to try to incentivise wider-scale sharing service arrangements or a sub-regional Major Projects Team.

- **improved officer training and compulsory member training**

Tackling skills issues among planners involves not just ensuring an adequate flow of highly skilled new entrants, it also requires effective Continuing Professional Development for those who may have received their professional training many decades ago.

- **increased use of alternative service providers**

Providers for whole service (i.e. partnership working, competitive tendering and contracting out). Some local authorities are now contracting out decision-making in certain areas.

- **use of intermediary accredited agents for particular services**

The use accredited agents for technical services. These could be used, for example, to bypass the validation stage.



64.0 Whilst some of these recommendations relate to further tweaks to the system ADEPT would certainly support the recommendations in respect of investing in local authorities, improving the perception of planning as a career, enhancing economies of scale (this also relates to the question of whether current administration boundaries are fit for purpose and whether the range of local authority types and sizes are necessary) and improving the performance of local authorities. The key question to be addressed is not just about the practice of planning which is where the focus has been, but the administration of the local Government and the organisational structures delivering local services. The recent consultation by the Scottish government puts the case well for a properly resourced and trained profession to promote sustainable development:

*“We need to have the leadership, skills, resources, and partnerships to proactively and consistently support development, investment and quality of place across the country.*

*We must keep in view the core purpose of planning. The quality of the places where we live and work can support health and wellbeing, help to overcome inequality, create jobs and stimulate investment whilst ensuring that we minimise and adapt to the long term impacts of climate change.”<sup>62</sup>*

65.0 ADEPT looks forward to seeing the outcome of the review and its recommendations to enable planning to play a vital role to in securing the long-term wellbeing of our communities through the delivery of sustainable development.

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<sup>1</sup> For example, see [http://www.rtpi.org.uk/media/816110/capturing\\_the\\_wider\\_benefits.pdf](http://www.rtpi.org.uk/media/816110/capturing_the_wider_benefits.pdf) and, G. Bramley, J. Morgan, S. Ballantyne Way, L. Cousins, and D. Houston, *The Deliverability and Affordability of Housing in the South West of England*, RTPi Research Report no. 16 (October 2017), p.p. 47-48.

<http://www.rtpi.org.uk/media/2555845/Deliverability-and-Affordability-of-Housing-in-the-South-West-of-England.pdf>

<sup>2</sup> *National Planning Policy Framework*, Department for Communities and Local Government, (March 2012), p. i.

<sup>3</sup> *National Planning Policy Framework*, Department for Communities and Local Government, (March 2012), p. 2.

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<sup>4</sup> ADEPT's response to the Industrial Strategy can be found at:

<http://adeptnet.org.uk/sites/default/files/documents/Industrial%20Strategy%20response.pdf>

<sup>5</sup> Department for Communities and Local Government, *Fixing our broken housing market*, Cm 9352, (February, 2017), and Department for Communities and Local Government, *Planning for the right homes in the right places: consultation proposals*, (September, 2017).

<sup>6</sup> The Town and Country Planning (Permission in Principle) Order 2017, No. 402, 2017.

<sup>7</sup> ADEPT's response to the government's White Paper on Housing can be found at:

[https://www.adeptnet.org.uk/sites/default/files/documents/ADEPT%20response%20to%20Housing%20White%20Paper\\_Final\\_April%202017.pdf](https://www.adeptnet.org.uk/sites/default/files/documents/ADEPT%20response%20to%20Housing%20White%20Paper_Final_April%202017.pdf)

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<sup>9</sup> <https://www.adeptnet.org.uk/sites/default/files/documents/Industrial%20Strategy%20response.pdf>

<sup>10</sup> <http://www.un.org/sustainabledevelopment/news/communications-material/>

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<sup>13</sup> M. Ball, "Planning Delay and Responsiveness of English Housing Supply", (2011) *Urban Studies*, 48 (2), pp. 349-362.

<sup>14</sup> HM Treasury, *Fixing the foundations: Creating a more prosperous nation*, Cm 9098, (July, 2015), p. 45.

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<sup>16</sup> D. Adams and C. Watkins, *The Value of Planning*, RTPI Research Report no.5, (June 2014); available at [http://www.rtpi.org.uk/media/1020792/rtpi\\_research\\_report\\_value\\_of\\_planning\\_full\\_report\\_june\\_2014.pdf](http://www.rtpi.org.uk/media/1020792/rtpi_research_report_value_of_planning_full_report_june_2014.pdf)

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<sup>18</sup> D. Adams, M. O'Sullivan, A. Inch, M. Tait, C. Watkins, and M. Harris, *Delivering the Value of Planning*, RTPI Research Report no. 15 (August, 2016), p. 1.

<sup>19</sup> G. Bramley, J. Morgan, S. Ballantyne Way, L. Cousins, and D. Houston, *The Deliverability and Affordability of Housing in the South West of England*, RTPI Research Report no. 16 (October 2017), p.4 and p.38. See

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