



# RTPI

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Email response sent to: [info.requirements@communities.gsi.gov.uk](mailto:info.requirements@communities.gsi.gov.uk)

Dear Sir/Madam,

## **RESPONSE TO CONSULTATION PAPER: Streamlining Information Requirements for Planning Applications: Consultation**

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This response was drafted by the RTPI Development Management Network and NAPE following an internal consultation and network event. Thanks are due to members of the networks for their substantial contribution in reviewing the document.

This consultation sets out proposed changes to the information requirements falling under the following three topics:

- Information requirements and validation
- Design and access statements
- Agricultural holdings certificates

General comments are set out below and more detailed responses to the consultation questions are attached.

### Information requirements and validation

The RTPI supports the principle of local lists in the validation of applications; however we are concerned at the inconsistent approach towards local lists and the implementation of those lists in the validation of applications. Neighbouring authorities can have differing lists which can cause problems for developers and others can take a very cautious approach which again is not helpful for applicants. It is vital that planners use their professional judgements in making decisions about the supporting information that should be required to support individual applications, as degree of flexibility is sometimes required in the implementation of local lists.

### Design and access statements (DAS)

The RTPI supports the requirement for DAS to support more complex and major application schemes however we feel

that they are an unnecessary requirement for householder applications.

In the RTPI response to the [Killian & Pretty Call for Solutions](#) (September 2008) we also suggested “user friendly national guidance be prepared to assist applicants that outline the likely requirements of design and access statements for indicative types of proposals.”

Recommendation 6 of the K&P report “[Review of information requirements for the validation of planning applications](#)” (November 2008) states that “existing national guidance on DAS should be updated. In particular, it should:

- Provide advice on how issues of crime, climate change and sustainability should be addressed.”

The RTPI would support DAS as a tool to champion sustainability, as set in the above mentioned K&P report (November 2008).

The opportunity should now be taken to improve as well as streamline the information requirements for planning applications, this will help planners processing applications and assist consultees and the general public in understanding the essence behind any particular scheme. In particular we would support training for agents on DAS and the quality of information required.

#### Agricultural holdings certificates

The RTPI supports the changes set out in relation to the Agricultural Holdings Certificate along with the publication of clear guidance notes on the completion of these forms to clarify the uncertainty around this part of the application process and to help alleviate delays in the system.

If you require any further assistance, please contact Rhian Brimble, RTPI Development Management Network Manager on 01443 229852 or email [rhian.brimble@rtpi.org.uk](mailto:rhian.brimble@rtpi.org.uk)

Yours faithfully,



Matt Thomson  
**Acting Director Policy and Partnerships**

## Information Requirements and Validation

**Q1. Do you agree with the proposed policy principles? If not, what amendments to these principles do you suggest?**

In general the RTPI supports the use of these principles and criteria which should ensure that the process of preparing or reviewing local lists is sound.

**Q2. Do you consider that revising local lists in this manner will encourage a more proportionate approach to information requests by LPAs?**

It will make LPAs think carefully about the information contained within their local lists and better reflect local circumstances. However while the RTPI is supportive of local lists we recognise that the provision of a definitive list will inevitably mean that flexibility is lost. It is not always appropriate to cover every requirement set out in the local list and it is vital that planners use their professional judgements in making decisions about the supporting information that should be required to support individual applications.

**Q3. Do you consider that implementation by December 2010 is a realistic timescale? If not what would be more appropriate?**

Several local authorities have expressed the view to the RTPI that the proposed timescales for implementation are not realistic. We are currently undertaking further discussions with them to understand why they are concerned about this timescale, and what can be done to resolve this. The RTPI will feed the outcome of these discussions back to CLG shortly.

In two-tier authorities districts and the county may be encouraged to work together on a joint list, which could both reduce the workload and provide some consistency for applicants in that area having regard to similar local circumstances.

**Q4. Do you agree that requirements for particular map scales, block plans, floor plans, site sections, floor and site levels, and roof plans should be set out by the local planning authority using a proportionate approach?**

The RTPI agrees that these requirements should be set out by the LPA, however it is vital that common sense and professional judgement is applied in making decisions about the supporting information that should be required to support individual applications. These decisions should be made at an appropriate level to ensure a professional planning input.

An interesting approach towards validation is being taken by Doncaster Metropolitan Borough Council. They operate a fast track approach for accredited agents. The service has been running for three years, and currently only deals with householder applications, although they intend to extend it to new build of not more than one building. Validation is the responsibility of the agent. If the agent fails to get it right on the third occasion their accreditation is removed. The council publish a list of accredited agents but do not recommend agents to applicants.

**Q5. Do you agree with the proposal to summarise major applications? and,  
Q6. Should the proposals for a summary document apply only to applications defined as 'major development'? If not, for what types of schemes might a summary document be useful?**

The RTPI supports the proposal for summary documents to accompany major applications, but Government should not be prescriptive over the number of pages that the summary should contain.

Devon County Council operates a slightly different system. They require an index sheet to accompany applications. The index sheet provides a list of the documents included in the submission, those excluded and why, and brief comments if necessary. This provides planners with a useful summary of the application at the validation stage. This would be helpful for members of the public trying to understand large complex documents.

**Q7. Do you agree that this approach is appropriate? Are there any other measures, apart from the consideration of validation as part of wider performance measurement, that should be taken to ensure improved local lists are developed and used?**

This process needs to be transparent and therefore there needs monitoring associated with it. However the suggestion of monitoring validation times will only work if also linked to National Indicator 157: Processing of Planning Applications. This indicator measures the percentage of planning applications dealt with in a timely manner. We should not lose sight of outcomes – Some LPAs may validate all applications within 1-2 working days however this would only be good if they were high performing on NI157.

**Q8. Do you consider that the proposals described in Section 3 of this consultation paper will effectively support a more proportionate approach to information requirements and validation? If not, what would you propose instead/as well?**

It is vital that planners use professional judgement and common sense to make the process more proportionate. A level of flexibility and discretion is required.

### **Design & Access Statement (DAS)**

**Q9. Do you agree with the changes to DAS proposed in Section 4 and Appendix 2?**

The RTPI supports the requirement for DAS to support more complex schemes. However there are likely to be cases where schemes incorporating design issues are likely to require a DAS. This is where professional judgement and flexibility is necessary.

**Q10. Do you agree with the range of application types and designated areas that would be exempted?**

The RTPI raises the following concerns about the proposed requirements for DAS set out at Table 2 of the consultation document.

- The RTPI is concerned that the proposals make distinctions between protected areas including AONBs, Conservation Areas, National Parks etc. These areas are all important areas, designated for specific reasons and worthy of protection. There should be greater consistency across all designated areas.
- The identification of the 'minor non-residential' category of development in table 2 adds a further layer of complexity to the process.

**Q11. Do you agree that the issue of context should be discussed in relation to the scheme as a whole (rather than specifically related to the sub-headings of amount, layout, scale, landscaping or appearance)?**

Members have not reported concerns about interpreting DAS or applicants having a problem addressing the DAS through these sub-headings, however would support further training of applicants/agents on DAS and the quality of information required.

**Q12. Are there other exemptions/changes that we should also consider?**

The RTPI would support further training for applicants/agents on DAS. This is an opportunity to improve as well as streamline the information requirements for planning applications providing benefits to the planners, consultees and members of the public.

**Q13. Do you have any comments on the draft guidance?**

No comment.