

THE ROYAL TOWN PLANNING INSTITUTE

STANDARD APPLICATION FORM

A response to the Office of the Deputy Prime Minister on its consultation on proposals relating to the introduction of electronic and paper-based standard application form for planning applications and associated consent regimes

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INTRODUCTION

1. The current consultation paper, about proposals for the introduction of electronic and paper-based standard application forms for planning applications and associated consent regimes (see www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_036838/hcsp), forms part of an extensive consultation package, issued by ODPM over past months, relating to the development control measures included in Part 4 of the Planning and Compulsory Purchase Act 2004. Other parts of the package have been –
 - *Changes to the Development Control System* (issued on 30 November 2004) covering the power to decline to determine applications; duration of permission and consent; duty to respond to consultation; regional planning bodies as consultees; and economic impact reports in connection with major infrastructure projects;
 - *Planning Control of Mezzanine and Other Internal Floorspace* (3 March 2005); and
 - *Changes to the Development Control System: Second Consultation* (published concurrently with this consultation) covering local development orders; outline planning permission; reserved matters; design and access statements; electronic payment of planning fees; decision periods for major applications; and validity.
2. The Institute has submitted comments in response to each of the above consultations. These are available at www.rtpi.org.uk/resources/policy-statements/2005/index.html.
3. The current consultation paper proposes introduction of a standard (England-wide) paper-based application form and introduction of an interactive electronic application. It also provides the opportunity to evaluate an electronic prototype form for householder applications that can also be used to obtain listed building and conservation area consents.

GENERAL COMMENTS

4. The Institute is supportive, in principle, of a standard planning application form in both paper-based and electronic formats. This will encourage common standards across the country, reduce inconsistencies, and have a positive effect on LPAs meeting BVPI targets by creating a

more “level playing field”. A standard application form also has the potential to reduce the amount of resources that need to be channelled into planning administration and allow more staff time to be devoted to the planning issues themselves.

5. ODPM must recognise that not all prospective applicants for planning permission will have ready access to a computer. It is important, therefore, in terms of equity and accessibility, to maintain a paper-based application system alongside the electronic format. The Institute believes it is discriminatory to consider reductions in application fees for those making online submissions, and feels that a common fee scale, for all methods of submissions, is more appropriate. We made this point in response to the consultations on planning application fees, earlier in the year.
6. The introduction of a standard application form has the potential to improve what has long been one of the weakest elements of an LPA’s activities - policy monitoring. By requiring an appropriate level of information - in a common format - as part of the application process, the standard application form could be of considerable assistance to the monitoring process.
7. The Institute supports the concept of a user friendly checklist. However, to be of real value, this must be designed in a comprehensive, but truly “user friendly”, manner. This raises the broader issue of user friendliness. It is unlikely that any respondent to this consultation has read every word in the 128-page document. In a bid to cover every eventuality, the standard application form, itself, but also the guidance notes, are too lengthy and too complicated. The Institute would be happy to work with ODPM to try and remedy this important defect.
8. The draft electronic version of the standard application illustrates many of the problems. It is not user-friendly, and there is an excessive number of boxes to tick. This is not in tune with the Government’s overall ambition of simplifying the planning system. For the electronic system to be widely adopted, it will need to be simple, easy to follow, and accessible. Perhaps it could be modelled on the planning appeal form template, which is easier to use, and is accompanied by advice notes to appellants on what needs to be submitted in support of their appeal.

DETAILED COMMENTS

9. *Page 8* refers to the Government’s intention to revoke the Town and Country Planning (Applications) Regulations 1988, and yet there are references to these Regulations on some of the model forms. Presumably, these anomalies will be removed.
10. *Pages 35-37: Guidance Notes:* As proposed, these cover both householder and listed building/conservation area applications, in one document. In practice, there are many more householder applications than either of the other categories. In these circumstances, it is suggested that the guidance notes should be separated. This would mean a lesser volume of potentially confusing detail for applicants, and a reduction in paper and printing costs.
11. *Pages 38 and 58:* These ask the applicant to decide whether the council needs to check the measurements and facts set out in the application. Surely this is decision for the LPA, rather than the applicant?
12. *Page 84:* The information required to support a planning application for land filling is substantially greater than the draft guidance suggests. This requires considerable expansion. For example, the draft does not make clear that the planning regime regulates the physical form of landfill, and associated equipment and structures for the management of leachate and

landfill gas, etc. Further, we are concerned that there is no reference to *PPG/PPS 10*, or any other policy guidance relating to waste, or to the requirements for environmental impact assessment.

13. The consultation form provides generic guidance on minerals and waste issues. However the characteristics of minerals and waste development can vary significantly from site to site, and there is a need to tailor guidance to reflect these differences. The Institute feels that the provision of generic guidance notes, linked to the checklists, may limit the scope/flexibility to tailor the guidance notes to local circumstances. There is probably the need for an additional application form, specifically for waste management sites, accompanied by guidance notes that are flexible enough to allow for specific local circumstances.

ADB/CS/response/standard app form/doc
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