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**2005/28**

28 June 2005

Dear Mr Carnaby

### **LOCAL DEVELOPMENT FRAMEWORK SERVICE LEVEL AGREEMENT**

The Institute is pleased to have the opportunity to comment on the above draft service level agreement. We have consulted our regional Branches in England, and the members of our Development Control Panel, as a result of which I can offer you the following brief comments.

1. The Institute welcomes this initiative in developing the existing service level agreement, between PINS and individual LPAs, so that it relates specifically to the new LDF system. There is ample evidence of the success of the agreement in facilitating the pre-inquiry, inquiry and reporting stages of the outgoing system, and this experience can only be of benefit in dealing with the more flexible arrangements under the new system.
2. *Paragraph 4.2(ii)* refers to a requirement for the database of representations and the LPA's response to be available to PINS within 8 weeks of submission (of the DPD). Taken at face value, this appears to allow only 2 weeks after the closure of the period for making representations for all those representations to have been processed, and the LPA's responses drafted and agreed. This is an extremely tight timescale. A more realistic programme should be considered, with the proviso that the amount of time required will depend on the nature and complexity of the DPD or SCI.
3. This appears to be the correct interpretation of the intention behind *4(ii)*, because *4(iii)* specifically refers to "*within 2 weeks of the end of the representation period*", but it does beg the question why this has been expressed differently.

4. *Paragraph 4.4:* We do not have any problem with the appointment of a team of inspectors/experts where it appears to PINS that this would help ensure “*an efficient and effective examination and reporting process*” – ie this is just good housekeeping. What the draft does not say is the effect this will have on the LPA’s costs. Presumably, this alternative approach would be fairly cost neutral – more inspectors/experts, but for a shorter overall examination/reporting timescale. This should be clarified in the final version of the agreement.
5. A similar comment can be made on *paragraph 4.5*, referring to the use of planning officer(s) to assist the inspector.

If any of the institute’s comments require clarification or elaboration, please do not hesitate to contact me.

Yours sincerely,

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