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Your ref:

Dear Ms Howard

**BARKER REVIEW OF LAND USE PLANNING : RESPONSE BY BOURNE LEISURE LTD. TO
"CALL FOR EVIDENCE".**

We are writing, on behalf of our client Bourne Leisure Ltd., with reference to the above "Call for Evidence", for responses to be submitted by 28 March, 2006.

1.0 Introduction and Background to Bourne Leisure Ltd.'s response to the "Call for Evidence".

1.1 Set out below is our response on behalf of our client; by way of background, you should note that Bourne Leisure Ltd. is a significant contributor to Great Britain's tourism economy, operating a total of more than 50 holiday sites, in the form of hotels and holiday resorts; family entertainment resorts; holiday villages; and holiday parks. At least 40 of their sites are within England. Many of these sites are within rural areas and often on the coast. The hotels usually occupy Grade I listed buildings, often with historic parks or gardens, in such locations. It will therefore be appreciated that Bourne Leisure has wide experience, knowledge and expertise of the holiday and tourism industry and of how to cater for the needs and expectations of holidaymakers, within the accepted constraints imposed by the rural and coastal locations of almost all its sites and properties. Bourne Leisure operates subsidiary companies which include Butlins, Warner, British Holidays and Haven. All have active development programmes for the maintenance and enhancement of their property and site interests throughout England and it is through these activities that Bourne Leisure becomes significantly involved in all plan-making and development control aspects of the land use planning system.

1.2 Nationally, the importance of the tourism industry should not be underestimated. It is one of the largest industries in the UK, accounting for 4.7% of GDP and employing approximately 2.1 million people (i.e. over 7% of the working population). 88% of England's tourism income comes from domestic visitors. In 2000, the tourism industry was worth a total of approximately £75 billion.¹

¹ Source: Department for Culture Media and Sport. Press release 'Funding announced for Britain's Biggest Ever Tourism Campaign', 25 February 2004.



- 1.3 At the regional level and more locally, Bourne Leisure's use of regionally-based local services and suppliers, and the multiplier effects of salaries paid to staff and visitor spending in the local area, all contribute to the respective local economies.
- 1.4 For Bourne Leisure to continue to draw customers, the Company has to invest regularly to maintain a product that meets customers' expectations. Thus significant investment is required to maintain and enhance the viability and attractiveness of existing operations as destinations. A lack of investment results in a stagnating facility attracting fewer visitors and, therefore, falling income. This, in turn, results in less money to invest. It is a clear example of why existing tourist accommodation, holiday destinations and attractions must continually refresh and improve their 'offer'.
- 1.5 In order to achieve this, planning applications are submitted by Bourne Leisure or its subsidiaries on a regular basis for development at different locations, with planning briefs also being prepared in consultation with local planning authorities (LPAs) to take forward comprehensive schemes. These schemes often involve additional landscaping and the enhancement of existing sites, as well as the expansion of the sites themselves. Carefully designed schemes can benefit the local economy without resulting in adverse impacts on the surrounding coastal and/or rural areas. But even with such carefully designed schemes, when they propose a change in type (e.g. from blocks of chalets to static caravans) but no net increase in accommodation (and often, a decrease so as to achieve lower on-site densities and an overall improvement to the environment), Bourne Leisure often encounters significant policy objections to their proposals. This occurs, regardless of the economic context in which they are set and the very considerable benefits they would bring to local economies.
- 1.6 Given the importance of the tourism industry at the macro and micro-levels, it is necessary to strike a balance between conservation, protection and enhancement of the environment and the need for existing tourism facilities to be improved regularly, to respond positively to competition and changing markets in the tourism sector.

2.0 ***"Call for Evidence"*** questions and our client's responses

"1. Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?"

- 2.1 A key purpose of the land use planning system is to manage the different views/conflicts that arise from a limited supply of land. Other than this role, there are inherent limitations to the land use planning system in terms of what it can and cannot influence. Other Government policies are more effective, in certain cases, in bringing about change than trying to use the planning system. In particular, there can be problems in trying to use the land use planning system to tackle long term, economic, environmental and social issues.
- 2.2 Within its constraints, it should be the aim of planning authorities to ensure that policy-making at all spatial levels provides flexibility in the land use planning system, to deal with development control issues arising from and contributing to the changing economy. The more flexible Local Development Frameworks (LDFs) are therefore supported in principle



but it has become clear to our client already that the initial timescales set out for the production of LDFs are not being achieved - which raises questions about how flexible they really are. Furthermore, reports of the unacceptable quality of some of the Statements of Community Involvement (SCIs) and Local Development Schemes (LDSs) which have been submitted calls into question the quality of the work.

- 2.3 The new system could be considered to be overly-complicated, with too many documents having to be produced. All these documents require multiple consultation, creating repetition and delays and potentially, frustration on behalf of consultees.
- 2.4 The problem is not with the provisions of the Planning and Compulsory Purchase Act 2004. The problem lies with its implementation and the volume of guidance that has had to be issued to explain the system. Simplifying the LDF production and associated consultation processes would be a good starting point to ensure the intended flexibility of the land use planning system.
- 2.5 In essence, the pressures on various developers and operators, such as Bourne Leisure, require them to review their facilities on a regular basis and, often, the timescales for the preparation and adoption of development plans/ LDFs are considerably slower and hence can delay investment.
- 2.6 Despite these problems, it is our client's view that the current land use planning system could potentially be operated in a sufficiently flexible way to help meet their development needs, as and when they arise from changing economic circumstances. But if the planning system is to work, LPAs need: (i) sufficient resources in order to prepare LDFs efficiently and adequately review their Local Development Documents (LDDs); and (ii) consideration to be given by Government to simplifying the whole LDF process.

“2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?”

- 2.7 The right balance between central direction and local discretion is not being achieved. PPG21, 'Tourism' (1992) is in urgent need of review and replacement with a PPS, notwithstanding our client's acceptance that some PPS policy on tourism development could better be provided at the regional level where it would be more applicable to the particular economic circumstances of that region. Through a new PPS on tourism development, the planning system throughout would have guidance on how to recognise the significance of tourism to England's economy and its scope for helping to achieve regeneration. Policies at all levels could then positively promote both a wide range of new tourism facilities and accommodation and the retention, enhancement and expansion of existing facilities and visitor accommodation. Bourne Leisure considers that it is vitally important that LPAs can follow national policy advice on: how to lengthen the English tourism season; expand the visitor profile; provide more "year round" attractions; provide a larger accommodation base; renew outmoded accommodation and facilities; use historic buildings to ensure their long term maintenance and conservation; promote and enable



tourism to diversify into new areas; and exploit the tourism potential of water and habitat-based attractions. All this policy advice should be given in the context of broader aims to consolidate and upgrade existing tourism facilities. The approach is reflected in paragraph 3.9 of PPG21 which notes that, *“to realise its potential, and to cater for changing patterns of tourism, rising standards and expectations, the industry needs to maintain a continuous programme of investment and reinvestment, and constant improvements in the quality and value for money of the services and facilities offered”*. This policy advice remains sound but needs to be elaborated on in a new PPS, at the earliest opportunity.

- 2.8 The promotion of tourism throughout all of the plans and strategies prepared at the various spatial levels in the planning system would then encourage a more diversified tourism sector and the retention, enhancement and development of a variety of tourism destinations, both existing and new. This would in turn support the goal of diversifying the tourism base and providing a greater range of tourism accommodation and attractions.
- 2.9 Bourne Leisure considers that in view of the often poor quality and range of accommodation in tourism/visitor destinations in England, and a general lack of investment in tourist accommodation in some areas, the Government should use a new PPS specifically on tourism development to help regional bodies and LPAs to recognise the need to provide positively in policies at all levels for a variety of tourism accommodation to cater for a broader cross section of visitors. This ‘*variety*’ should include hotels, chalets, time share apartments and caravan parks. At present, specific support for holiday/caravan parks is only provided in paragraph 3 of Annex B of PPG21 (1992), which states:

“Holiday and touring caravan parks will remain an important part of the self-catering holiday sector, and can contribute as much to the local tourism economy as would conventional holiday accommodation, while using less land for the purpose.”

- 2.10 Paragraph 8 notes that:

“Planning authorities should examine the scope for encouraging holiday caravan site operators to improve the quality of their sites ... in some cases, to facilitate improvement ... local planning authorities may need to consider whether some expansion of the area covered by a site should be allowed, so that improved layouts and better landscaping can be implemented”.

- 2.11 To ensure that the tourism industry can provide appropriate development to attract and retain visitors, the Government needs to draft guidance that is up to date and applicable to new forms of attractions, facilities and accommodation. Thus the review of the PPG, **not** its replacement with only Good Practice Guidance, is in no doubt long overdue.
- 2.12 The new PPS’s policies should support and encourage the retention, consolidation, enhancement, diversification and intensification/expansion of existing tourism facilities (such as hotels, leisure resorts, and chalet and holiday caravan parks), subject to any necessary environmental/ other development control criteria, particularly where proposals improve the range and quality of accommodation and facilities on a site and they result in permanent and significant improvements to the layout and appearance of the site and its setting in the surrounding landscape.



- 2.13 In order for existing tourism facilities to remain attractive and competitive, it is often necessary to undertake a phased approach to consolidation or improvement, upgrading or extension over several years, ensuring that the existing visitor operation is not disrupted and that each proposal caters appropriately for current and forecast needs and demands. Such phased proposals should be capable at all policy levels-but particularly at the local level-of being judged on their individual merits on a site by site basis, against a criteria-based, positively worded policy approach that takes into account and balances environmental constraints and development control factors with the aim of maintaining and enhancing tourist facilities.
- 2.14 Specifically then at the local level, it is our client's clear observation that the production of a 'suite' of LDDs is a confusing procedure both for those with experience of the planning industry and for the general public. A further problem with Development Plan Documents (DPDs) listed in LDSs is that proposed timings and documents to be produced are, in some cases, being changed and they are already out of date.
- 2.15 There can then be seen to be considerable variation in the approaches/issues different LPAs intend to cover in their LDDs. The fact, for example, that some authorities do not distinguish tourism as an issue is a concern, particularly given the potential economic and regeneration benefits. Despite obvious omissions such as this, the LDD documents which are then being produced are generally excessively long and there is a tendency for repetition within them, with recitals from national policies.
- 2.16 The process under the 2004 Act by which some LPAs have followed transitional arrangements has meant that there have been situations whereby policies have been 'saved' which do not necessarily accord with national guidance. Furthermore, it is our client's observation that there are cases where substandard draft plans from the old system have proceeded to adoption on the basis that there is not time for updating changes to be made.
- 2.17 A useful mechanism to ensure a better balance between plans which are up to date at different spatial levels might be for the regions or Government Offices to review development plans and future DPDs formally, from time to time, and advise the LPAs if policies are 'out of date'.
- 2.18 The new LDF process, given time and with some revision, might prove positive. The fact remains however that at the moment, the whole system (development planning and development control) is slower and less flexible now than it has ever been.
- “3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?”**
- 2.19 It needs to be recognised that in applying the principle of sustainable development, there must be a point where individual developments cannot always effectively/appropriately address the principle of sustainability.



- 2.20 Bourne Leisure accepts the need for a careful balance between its proposals for additional development and protecting and enhancing the environment. However, this balance should not preclude individual proposals for new tourism development/the expansion or upgrading of existing facilities, which will help to attract more visitors to an area, generate more employment and boost the economy. Although tourism-related uses, by their nature, often require a location in a very specific area, for example, on the coast or in a rural area, careful management can prevent adverse impacts.
- 2.21 Specifically, Bourne Leisure considers that it is very important for an appropriate balance to be sought between the protection of the coast and countryside, and the use of the coast and shoreline and the countryside for public amenity, recreation, business, transportation and nature conservation purposes. With particular reference to coastal developments, Bourne Leisure welcomes specific policies at all spatial levels which have as their core principle ensuring that risks from coastal erosion and instability are minimised and that appropriate coastal defence works can be implemented.
- 2.22 In terms of sustainable development and flood risk, Bourne Leisure considers that the fundamental policy approach should be one which minimises flood risk and gives priority to development in areas not considered to be at risk of flooding or coastal erosion. However, in certain circumstances, a development may already be located and/ or approved in a flood risk area and as such this needs to inform the planning process. In such situations, the general aim should be to seek better mitigation measures and improvements to managing the risk than currently exist. It is important, however, that policy at all levels should not preclude appropriate new development *per se*, but regard should be had to the proposed use.
- 2.23 With reference to improving the urban environment, Bourne Leisure considers that recognition should be given to the importance of a high quality built environment specifically to encouraging tourists/visitors to an area. The opportunities for tourism attractions and activities to be located in historic buildings should be recognised and also the significance of an area's heritage to the perception of the area and to encouraging visitors. Policies to protect the built environment should not, however, preclude appropriate new development in historic areas or in relation to historic buildings, particularly where it helps to support a more diversified and strengthened tourism base.
- 2.24 On transport, accessibility and sustainability in relation to tourism, policies at all spatial levels need to acknowledge that there is a reliance on the car for many leisure journeys, due to the often rural and coastal nature of tourism facilities. Whilst Bourne Leisure supports the promotion of public transport use, walking and cycling, and the use of these modes as a source of recreation/ tourism, it should be noted that often there is no feasible alternative option available other than the private car for reaching more remote areas. Unlike '*regular*' trips, for example, to work, where alternative modes of travel often exist, a leisure trip is relatively '*unusual*' and infrequent and the car is the only realistic means of travel. From research, it has been shown that leisure trips often result in higher car occupancy ("*a family day out*") and this seems to be a most appropriate use of a private car. Policies for transport should therefore promote non-car modes of transport where possible, but recognise the reality of car-based access.
- 2.25 With reference to the natural environment, Bourne Leisure constantly encounters objections in principle at the outset, or detailed objections at application stage, to its



proposals for existing site expansion/on-site enhancement, from the Environment Agency and from English Nature. The issue is usually one of development to retain/enhance the business operation (to the wider benefit of the local economy) versus environmental concerns. In the recent case of Bembridge Coast Hotel, on the Isle of Wight, the issue related to whether in connection with proposals to expand the hotel, boulders could be placed on the beach as sea defences (Bourne Leisure's proposal), or whether sand (that had to be annually recharged) should be used (EA's/EN's proposals) instead, so as to preserve certain microscopic sea life. In this example, Bourne Leisure could only conclude that the impact of the sea defences proposed on the microbes was given undue weight, when considered against the economic benefits or the proposals.

“4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?”

2.26 The policy balance of economic, social and environmental factors in the UK planning system is about right in our client's view, subject to the comments made above regarding the disproportionate weight sometimes given to environmental factors when determining proposals that provide very significant benefits to a local economy.

2.27 Even if a framework of policies as set out above were to be in place and reflected in development plans, and even with a plan-led system such as in England where material considerations can also be taken into account, the problem is that the outcome of seemingly 'routine' planning applications can be unpredictable.

2.28 To address this, new 'tick box' planning and prior approval procedures in some areas and in relation to minor developments could be introduced, to allow greater certainty and delegation of decision-making. In addition, there could be scope for more minor e.g. commercial proposals to be the subject of an expedited procedure/revised GPDO provisions.

“5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?”

2.29 The planning system often impedes our client's business investment by causing delay in implementation. While a more efficiently run planning system is relevant in improving economic growth, the recent reforms unfortunately have added huge potential for further delay. For example, Bourne Leisure's investment and business decisions/requirements may not tie in conveniently with the development planning process and its stages and timescales; our client is finding it increasingly difficult to reconcile the inherent conflict between the increasing levels of consultation of the new system required of the Company and Government statements promoting the LDF system as increasing speed in achieving development.



- 2.30 At present, the overall level of certainty and efficiency for businesses such as Bourne Leisure remains unchanged from the old system. Additional reforms should seek to simplify the new system.
- 2.31 Bourne Leisure has a further concern that the 5 December, 2005 announcement and consultation on Planning-gain Supplement (PGS) will bring about further revision of the planning system without giving the current system a chance. It is considered that this tax would exacerbate rather than help solve the problems (Nathaniel Lichfield and Partners Ltd. submitted a response to the Government's Consultation for Bourne Leisure Ltd. to this effect).
- 2.32 The current land use planning system should either be rapidly simplified- perhaps closer to the previous system- or be given a chance to become established before being so quickly brushed aside. If Government policy and legislative provisions were then to remain consistent for the foreseeable future, it should be possible for businesses such as Bourne Leisure to work within the new framework.
- 2.33 Lastly and more specifically, the role of locally elected members in promoting business investment needs to be the subject of further clarification in specific advice for them. Members should be firmly discouraged from using the appeal system as a 'get out' clause for not making locally contentious or difficult decisions, particularly where there will be significant economic consequences to the decision. Members should be required to give evidence at inquiries, where they have refused planning permission against an officer's recommendation, as a disincentive.
- "6. Is the planning system sufficiently "joined-up" with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?"**
- 2.34 Bourne Leisure do not wish to make detailed comments in response to this question as the Company has limited knowledge of RDA activities, although the Company does comment on emerging RSSs above.
- "7. Planning applications for major projects will typically take a considerable time to work through all the necessary stages. Do you consider the system puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?"**
- 2.35 The development control system does not emphasise speed over quality, but Best Value Performance Indicators (BVPIs) do.
- 2.36 A way to counteract this would be for targets for major applications to be staged to "front load" the process, e.g. in relation to sending out consultation letters, receiving observations, report drafting by case officers and s106 terms being outlined etc..



- 2.37 Planning application determination targets are leading to the termination of discussions with applicants and requests for withdrawal on threat of refusal, and applicants having to re-apply. Some LPAs even abuse the 12 month resubmission provisions to meet BVPI targets, effectively treating the first application as pre-application discussions if a scheme is considered unacceptable. Targets have also been unsuccessful because they put pressure on officers not to register applications, or to refuse applications for reasons that could be resolved with a little more time.
- 2.38 Targets also discourage changes to be made during the application determination process, by curtailing the time taken for discussions.
- 2.39 Planning Development Grant (PDG) assessment methods should therefore be changed, so that where applicants agree to specific timescales, LPAs are not penalised in their PDG allocation. The pilot "*Planning Delivery Agreements*" for major applications will address these concerns to a limited extent, but need to be introduced expeditiously and widely if the pilot proves to be a success.
- 2.40 Even once an application has reached Committee for determination, there is frustration during committee meetings as applicants are unable to respond to simple questions, which then results in deferral/refusal. There should be scope to allow more applicant/public/officer and member discussion during the stage of decision-making on a specific application.
- 2.41 The development control system, particularly in relation to more major schemes, is also now being slowed down by the increasing problems arising with the extent to which some, but not all LPAs now require small (post-approval) amendments to unimplemented planning permissions to be the subject of entirely new planning applications-even with revised Environmental Statements. While this is a (perhaps temporary) consequence of case law established in *Sage* (and therefore new case law may be made at any time), it is currently a significant problem for those wishing to implement major development, as schemes are subject to minor alterations pre-and post implementation. The delays in having to re-apply can be considerable and there are always risks associated with having once more to obtain planning permission, even if there is an almost identical, recent approval in existence at the time. This current position seems to favour inertia, and is not promoting the implementation of major development (and in particular, it is having unacceptable consequences for job creation in the tourism industry). The lack of consistency between how different LPAs interpret or ignore *Sage* (in terms of pre-commencement and post-decision minor amendments) requires urgent consideration by ODPM. Primary/secondary legislation should be changed, to establish a formal procedure for dealing with "*minor post-approval amendments*", based on a streamlined re-determination process. Again, this point should be considered in the context of the implications for delivering a "*speedier*" planning system - which the Government has promised.
- 2.42 Similarly, there should be scope to amend "*unreserved*" matters (e.g. siting, access etc.), i.e. those determined at outline planning permission stage, at reserved matters stage. There should be scope for changing all but the most major amendments to all unreserved matters (i.e. not those affecting the scope/scale/principles of the outline scheme approved) e.g. changes should be acceptable if within defined parameters or a more formalised test of "*materiality*" could be applied by LPAs as a possible safeguard.



- 2.43 The proposed introduction of a single, standardised planning application and other consents form later this year, to simplify the various approval processes, is supported.
- 2.44 The worst delays in the planning system however still remain in the appeal and call-in systems. At present, there is considerable inconsistency in relation to call-ins. Call-in and referral should only apply to applications of national significance or issues of impropriety. If this approach is not supported by Government, then the aim should be to reduce the issues considered at call-in only to matters that are of greater than local significance and then ensure that inquiries are only used to cover land use planning policy issues and that they are not abused by competitors or third parties.
- 2.45 The time taken to be given a date for an inquiry remains unacceptable. Furthermore, there is often lengthy delays in the issue of a decision, with there being an unacceptable lack of information made available to applicants and appellants, once the Inspector's Report for a ministerial decision has been passed to the Secretary of State. More transparency needs to be introduced to such processes, at all stages.
- “8. *Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?*”**
- 2.46 The need to provide ever increasing types and amount of material in support of a planning application is an issue for Bourne Leisure, but only in terms of the Company questioning whether it always adds information that is used or that will help in determination. Yet at the same time, the development control system discourages pre-determination amendments, even though these could improve the quality of schemes. There is a clear need for more flexible procedures prior to a decision. In the present circumstances, the 12 month 'free go' provision for repeat applications should be made more flexible.
- 2.47 The opportunity for a 'fast track' appeal on payment of a fee could generate revenue and streamline the process.
- “9. *To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?*”**
- 2.48 The question is not of direct relevance to our client's interests.
- “10. *How does the planning system impact on competition, through influencing barriers to entry and exit and economies or scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?*”**
- 2.49 The planning system should not be used deliberately to restrict competition. An approach to development control that concentrates on land use and not operator/ occupier could assist in avoiding this.



“11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?”

2.50 This question is not of direct relevance to our client’s interests.

“12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?”

2.51 The turnover and loss of planning staff resources from the public sector is a major issue for meeting the significant demands of the new planning system. Our client considers that LPAs are seriously under-resourced in terms of planning staff with sufficient experience to process and recommend, particularly on major applications which raise economic issues. It is not always practical to expect the LPA to outsource development control functions and frequently, conflicts of interest arise. But there should be scope/finances available for outsourcing, with LPAs having powers to recover the costs of doing so from applicants.

2.52 There needs to be a focus from central government on reviewing and raising the remuneration of public sector planners.

“13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?”

2.53 As referred to above, the new plan-making system quite simply does not encourage participation. Our client is at present responding to consultation documents where relevant to individual sites, but this involves a complex monitoring system which requires monthly updating, particularly as consultation periods change/ LDDs are delayed. Bourne Leisure is having to shift its focus from actively pursuing development proposals, more towards simultaneously trying to engage fully with the LDF/LDD process.

“14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?”

2.54 Bourne Leisure is unclear as to what is meant by “the incentive structure”. Their only comment is that in reaching decisions on applications, LA members are usually able to balance local and wider community interests - and s106 obligations can be used to ensure that the direct and indirect impacts of a development on the local and wider community are mitigated.

“15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?”

2.55 Please see our comments above in relation to question 2, where we comment on the importance of a positive planning policy framework for tourism developments. Many of



Bourne Leisure's sites do have an important role in supporting local economies, being located in areas where regeneration/ growth is a key concern. A positive planning framework that operates in a timely manner would assist development and hence result in economic growth.

- 2.56 A statutory, national spatial strategy could potentially help to achieve more widespread regeneration, particularly if providing a policy framework for resolving major infrastructure issues.

3.0 Conclusion

- 3.1 Bourne Leisure trusts that these responses will be helpful to the Barker Review team in drafting their Report. In conclusion, our client wishes us to question, however, whether this is the right time for this fundamental review, when the development planning provisions of the 2004 Act are only at an early stage and many of the proposed changes to the development control system in the Act have not even yet been implemented, nor their effects evaluated. The effect of the changes should, however, all be monitored (as is currently occurring for development planning) and where there is scope to reform processes and guidance to simplify, clarify and speed up the operation of the system this should be positively considered.
- 3.2 A more urgent area for review would be how to meet the immediate need for providing additional resources in the planning system, as referred to above.

Please do not hesitate to contact Nicholas Thompson or myself if any of the responses above require clarification or if you wish to discuss any aspect further.

Yours sincerely

MARGARET BADDELEY
SENIOR ASSOCIATE