

Proposed response of Redditch Borough Council to CLG consultation on 'Streamlining information requirements for planning applications'

Criteria-based policy

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

These changes seem to be clear, appropriate and reasonable, and as such they should assist LPAs in their reviews of their current local lists. It is possible to appreciate from this how a review could be carried out and taken forward to the benefit of service users.

Updated local list of information requirements

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

It certainly should do, because it is one of the core requirements of the proposed principles. As an authority that already has a proportionate approach within its current local list, clearly this approach is already supported and therefore is welcomed.

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

This timescale may be realistic in some circumstances. For example, our local list was recently revised using very similar principles, and thus it is anticipated that a further review for this Council should not be too demanding on resources, or attract a significant quantity of debate or objection, and therefore the target is likely to be achievable. However, in cases where an authority may be writing a new list from scratch and consulting, this process is likely to be more resource-heavy and time consuming. Given the present economic climate, LPAs may be experiencing a reduction in workload and consequently have greater capacity for such activities, however the economic situation may have changed sufficiently by next April that this will no longer be the case and therefore a later deadline may be necessary.

National list items and validation

- 4. 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?**

This Council considers that as the local requirements are likely to be very similar, it would be more consistent and simpler for applicants and their agents to have national standards to apply across the board. Such standards should be consulted on prior to their introduction, to ensure that they are well compiled and

clear to implement. A national approach would avoid confusion when people are making applications to a variety of authorities.

In the absence of such requirements, this Council thinks that a national requirement should be that the local authority set out full details of map scales, block plans, sections and levels to be clear. It is considered possible to have standard requirements, which include thresholds, to enable an avoidance of inappropriate requirements. For example, 1:500 site plans for major applications are inappropriate as they show so little, whereas for a householder extension they are appropriate. In this way, thresholds can be used to assist and provide clarity.

Summaries of major applications

5. Do you agree with the proposal to summarise major applications?

This Council welcomes this approach, as it would result in increased clarity for members of the public and Council Members, as well as officers, when dealing with such proposals.

6. 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?

This Council considers the defined threshold of major applications to be an appropriate one in this case, as this could translate into an overly onerous requirement in relation to smaller development proposals.

Further, any local authority who felt it appropriate to require these for smaller schemes could do so through their local list.

Monitoring the use of local lists

7. 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 Council does not consider that being measured for having and implementing a local list is a particularly beneficial performance indicator. Rather than their existence being measured, their content and user-friendliness ought to be considered, however these are clearly more difficult to measure in terms of performance.

Bringing the changes together

- 8. 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?**

Providing that Local Planning Authorities follow the guidance properly, and it is clear how it should be implemented, then through a proper consultation process a thorough and well informed document should emerge that would be clear and easy to use. To assist, this Council considers that thresholds should be required under some of the local list categories, such as for full planning permission, distinctions between major and minor applications, and reflections of national policy thresholds such as that for affordable housing should be acknowledged and reflected.

Design and access statements

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

Receiving, printing and considering details included in DASs relating to minor developments can be quite time consuming and resource intensive, yet make no great positive contribution to the application as a whole and the way in which it is considered. Therefore, removing the requirement for DASs in such cases is considered to be a sensible suggestion and complements the approach of proportionality that is proposed. It is not considered that this would result in any loss of quality or comprehensiveness when considering such applications.

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

Generally, the less sensitive and less important areas are those that have been excluded, and the more important issues to consider are retained as requiring DASs and this is considered to be appropriate and reflects well the way the planning system as a whole operates.

The intermediate non-domestic threshold is welcomed and could also be reflected in the proposed new Permitted Development Rights for such properties.

- 11. 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)?**

The issue of context is a comprehensive one that requires consideration of the development as a whole, and therefore this Council considers that it should be applied as such, and not within confined categories separately.

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

Prior approval applications should be specifically exempted to avoid confusion.

Draft guidance (Appendix 3 of the consultation document)

13. Do you have any comments on the draft guidance?

It is hoped that prior to publication these documents will be thoroughly checked for plain English etc, as in places there appear to be sentences that are not whole, or typing errors. It would be beneficial to all, as well as clearer and easier to understand, if such errors were eliminated at this stage. Further, the documents should be checked to ensure that they do not contradict each other at any stage.

Impact assessment (Appendix 4 of the consultation document)

14. Do you have any comments on the impact assessment, in particular on the assumptions made and the anticipated impact on small businesses?

No comment.