

**RESPONSE TO THE CONSULTATION ON
REFORM OF THE PLANNING SYSTEM
IN NORTHERN IRELAND**

02 OCTOBER 2009

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Reform of the Planning System in Northern Ireland:

Your chance to influence change

Consultation Paper, July 2009

1.0 Introduction:

Vision for a Reformed Planning System - A Brand New Model

1.01 The Architecture and Built Environment Policy

The Architecture and Built Environment Policy of the Northern Ireland Government states that "Government is committed to good design in all publicly funded construction."

This commitment also applies to "capital expenditure by Government departments and their agencies, non-departmental public bodies and other public bodies for which they are accountable and includes grant aided work"

The policy also states that the "Government aims to demonstrate commitment to 'Architecture and the Built Environment for Northern Ireland' policy objectives through the delivery of exemplar publicly-funded projects." The Ministerial Advisory Group [MAG] is a 'key element 'of the implementation strategy for the A+BE Policy.

1.02 Conservation Areas

The Planning Reform Proposal quite rightly emphasises the significance and need to protect Conservation Areas.

1.03 Place Making

The Planning Reform Proposal does not however give any mention to:

- The importance of controlling the making of new places;
- The repairing of badly formed existing places;
- The vital role that architectural form and language plays in the making, repair and maintenance of places;
- The need for the planning system to pre-plan [or more importantly pre-design] places so that buildings to be inserted obey a pre determined order;

- The need for such pre-designed three dimensional frameworks to be legislatively robust with firm community support at the local level [i.e. to stop applicants exploiting planning policy loopholes]; and
- The importance of showing that such control is not negative but very positive insofar that good places and commercially prime and sustainable spaces will result.

The new system should enable planning management officers to relate more closely to local place making and place management groups to ensure that we achieve in future more prime spaces because in essence that means sustainable places.

There is a need to staff up with "design planners" such as Architects, Urban Designers and landscape architects to provide appropriate resources for implementing the new system. Interestingly the Planning Service has consultant 'Conservation Architects' but no such other consultant designers. By this deficiency the legacy that will be provided is very poor urban places. [One, if not the only, good urban places in Belfast is Royal Avenue which was a new street, prescriptively designed as a place with the buildings inserted obeying the aims so prescribed]

Make 'Sustainability' a firm Planning Policy requirement which will influence all development plans.

Address the actions [which are all allocated to the role of Planning Service] as set out in the A+BE Policy / Annex A / Action Plan / Objective 2 [page 34]

1.04 Design Quality

There is nothing proposed relating to the determination of design quality. Whilst MAG Design Reviews adjudicate quality there is no way of knowing what effect that process has. Planning policy should firm up on that. MAG is different from the Commission for Architecture and the Built Environment [CABE] and the rest because it is affiliated to a Government Department whereby therein lies its prospective strength and power to influence. MAG Reviews should be more statutorily robust by including them within Planning Reform.

2.00 Vision Statement

A document which seeks to consult on the reform of the planning system in Northern Ireland would be expected to commence with a statement of the vision regarding the ambitions, intents and core principles of a planning system. Northern Ireland has an opportunity to design a brand new planning system – not to merely re-hash the old system by assembling bits and pieces from other UK/Irish systems.

In the absence of any vision statement in the Planning Reform Consultation document, the MAG offers the following:

1. A good planning system will operate in the public interest to create quality places (ie. planning is more than 'land use' - place is a factor of community value);
2. A good planning system enables creative design;
3. successful planning is proactive not reactive;
4. A good planning system is a management process which is continuously responsive.

3.0 Beyond the Formal 82 Questions

The 82 questions set by the consultation document are mostly procedural variations of current planning practices, and do not attempt to tackle fundamental planning reform. It is not by answering those particular questions that appropriate reform to the planning systems will be devised, but rather by including options outside current planning practice. The MAG offers the following suggestions regarding matters capable of meeting responsible and far-reaching reform.

4.00 Local Landscape & Townscape Management Capacity

Landscape and townscape are the resultant interaction of society and place together: a living process which is always undergoing change. By meeting the requirements of 'landscape and townscape', all other planning objectives can be met. The *Northern Ireland Landscape Character Assessment* [NILEA] (2000 ERM) recognises this process in its 130 Landscape Character Areas [LCAs], which take into account landscape condition, value, and need for enhancement, and includes guidelines for management in terms of development. The identification of LCAs has enabled management guidelines for development to be specific to landscape characteristics. In its response to draft PPS21 consultation, the MAG has already advised the use of the NI LCA capacity for sustainable development. As the planning system exists to serve and create quality places, the MAG requests that this alternative approach to the current planning structure, already in existence, be harnessed now for real planning reform.

However, to be relevant, the NI LCA must be continually reviewed and updated, as the landscape of each local landscape character area (community place) has evolved and is still changing due to development (and impact from development in neighbouring LCAs) since its inception in 2000. The 130 LCAs are broadly defined and

it is readily evident that there are several layers of even more local landscape character areas identifiable within each LCA. The built environment of some of these LCAs is already assessed through the planning system and identified as Areas of Townscape Character (ATC) or Areas of Village Character (AVC). However, these only represent areas identified as 'quality' whereas the NI LCA addresses all landscapes. MAG suggests that this holistic NI LCA approach be adopted for all townscapes. MAG recommends that resources are made available to ensure the currency of the NI LCA as the principal guidance source on which sustainable development in Northern Ireland should be embedded.

Population distribution and place development relate to landscape type and location. Thus local **landscape and townscape management guidelines** can be prepared specific to each local landscape character area (and each place and people identity). The development management guidelines prepared for each local landscape and townscape character area in this manner may in turn inform and feed into the preparation of a **strategic plan for the District area**. The District area strategies thus agreed can then be applied to the local level to enable, design and benefit the creation of quality place, drawn up in **Local Development Masterplans**. These are place-specific proposals (not site-specific proposals: planning operates to create quality places, and quality places are not created by the individual consideration of sites). Planning application decisions will then be made against the Local Development Masterplan in the framework of the District Area Strategy. The system of Planning Policy Statements (PPS) will be used to guide preparation of the District Area strategy only, not in the determination of planning decisions regarding individual applications for development.

5.0 Design Requirements of a good planning system.

To sufficiently enable a responsible planning system, it is essential that those responsible for such consultation advice, development and management, have design skills. The planning process requires implicit design creativity in order to create successful, valuable places. Specifically after the Reform of Public Administration [RPA], this will mean that the Planning department of each Council *must* include sufficient Design and Landscape capacity. Current processes within DOE seek in-house training to increase the design and landscape architectural competence of planners, but the MAG believes this is insufficient and requests DOE require of RTPI and Universities a review of the necessary training of planners to ensure significant design competence. All planners in the local plan system should be **'design planners'**: experts with appropriate design expertise in the spatial organisation of social and environmental benefit and well-being. The Rural Design Guide for Northern Ireland should also be reviewed and updated to tie into, respond to and reflect the continuously updated Landscape Character Areas.

The document relates to how the planning system in Northern Ireland will be managed following the Review of Public Administration through which Planning functions are to be undertaken by the new District Councils. Its contents do not, per se, represent an actual reform of those planning procedures themselves.

Essentially, the document states that there will remain two branches of planning: development planning and development control / management. With regard to development planning, 'regional planning' will continue to be undertaken by DRD (by means of the Regional Development Strategy) and DOE (by streamlined Planning Policy Statements), whilst 'local planning' (currently the remit of DOE Planning Service by means of Area Plans etc) will transfer to District Councils (by means of local plans). The principal reforms in planning culture sought by the document are offered in development management by seeking a less regulatory, more proportionate, more participatory system of control, and many processes are stated in the document in order to achieve this. However, whilst some of these are very important alterations which are essential in the name of creating quality places, many of these proposals are just formalisations of processes which should be inherent.

In all, the opportunity which has been offered by the RPA, for a fundamental step change in the culture of the planning system, appears to have been significantly missed. This would be achieved by real engagement of *community* and *place* in the process, and a real aptitude, care, awareness, capacity and ability for *design* on the part of the planning system.

In Paragraph 2.00 above, the MAG offered the following:

1. A good planning system will operate in the public interest to create quality places (ie. more than 'land use' - place is a factor of community value);
2. A good planning system enables creative design;
3. Successful planning must be proactive not reactive; and
4. A good planning system is a continuously responsive management process.

6.0 The Community – Place System of Planning

With reference to these four principles, an alternative means of reaching planning reform is offered below ("the Community Place system of planning").

1. The *planning process should be firmly based in the places and communities* for which it exists. It is not sufficient for communities to be kept at arm's length from the process, and only 'consulted' or given the opportunity to submit 'objections' to development proposals which impact upon them and their place, and are decided by planners who do not have to experience the outcome of their decisions on a daily

basis. People are tired of being "consulted" when they should be "involved". Even the keenest community organisations are complaining of "Consultation Fatigue". Northern Ireland's greatest resource is the people who live, work and play here; good governance would appreciate and develop this resource to ensure that society benefits from the voluntary involvement of local people, in the public interest, sustainably and in the long term.

It would be possible to start the process in the Community Place. For example, the electoral Ward (about 40 in each District Area) constitutes a place and a community living within it which cares about that place. Many of these places have community groups already meeting to discuss matters concerning the quality of their community place (eg. maintenance and cleanliness, community safety, housing issues, development changes, moving businesses, community facilities and events). These are all planning issues.

The consultation document states that Community Involvement (Statement of Community Involvement or SCI) will be required before plans are made. An alternative approach would require a planner from the District Council plan team to be allocated to each community place and to attend the meetings of the elected community group in that place¹. Thus the plan team continually receives community raised concerns about their locality. The allocated planner would accordingly prepare a (short) *Community Place Issues Paper* for the community place on a yearly basis. The Community Place Issues Papers prepared in this manner for each Ward area, by the communities and for the places, would then inform and feed into the preparation of the *District Area Planning Strategy* by the District Council Plan team. Once the District Area Planning Strategy (which takes the issues from each Community Place into account) is agreed, a second meeting between the allocated design planner and the community group would take place to apply these strategies to the local level to create place through *Place-Specific Proposals*. Place-Specific Proposals could be reviewed annually alongside the Community Place Issues (see 4 below).

By this means, the amendments and additions to the current planning procedures detailed in the consultation document are unnecessary. The communities are the forum for identifying issues to inform the District Area Planning Strategy, and the overseer of the Place-Specific Proposals. Planning practice and community concern for their place are integrated.

¹ Voluntary community groups of interested individuals already receive funding / grants and this could be enhanced to facilitate interest in these matters. Each Ward would be recommended to have at least one community group or forum of voluntary interested persons, and to hold at least one meeting a year regarding planning issues in the community area, in the presence of a planner from the District Council plan team. Funding would be granted for the operation of community groups, commensurate with the number of meetings and attendees. Where a locality does not have a community group, the planning process can resort to SCI in gathering information for the District Plan and Place-Specific Proposals. As it becomes apparent in neighbouring areas that the community feeds the planning process rather than being outside it, it is anticipated that community groups, with support, would be self-instigating.

The process of *planning application* for development would likewise start with the Community Place. The developer's initial approach to the planning system regarding a development proposal would be discussed with both the District Council Area Development Management Team and the Place-Community, in order to appreciate all relevant issues before application.

2. The *planning process requires implicit design creativity* in order to create successful value places. Few planners at present have design skill – many come from backgrounds which are analytical and some find difficulty in reading three dimensional qualities of space from two dimensional drawings and maps as evidenced by the Continuing Professional Development Courses offered by the Royal Town Planning Institute in "Plan Reading" which not all members or planners have completed. Others lack the understanding of design to recognise that good design simplifies complexity and does it delightfully. In future, if there is to be the required culture change, the change must be more than cultural, it must be skills-based. Not all planners need design skills – some may remain unskilled in this area and their analytical and regulatory talents can be put to good use in supporting design planners. Place-making planners must have design skill, and the new planning system should depend on 'design planners', and the MAG considers that the RTPI and Universities should be asked to review required training of planners to ensure the necessary design competence.

3. A front-loaded planning system ensures it is *pro-active rather than reactive* by requesting that developers intending to make an application inform both the Place-Community and the District Development Management Team, so that any issues regarding the proposal can be considered and taken into account before the application becomes formalised.

4. To improve the position of development management as a *continually responsive system*, if any development which is ascertained on discussion between place-community, developer and planner to deviate from the Place-Specific Proposals but yet be acceptable to the place-community and the District Area Planning Strategy, the Place-Specific Proposals can be quickly amended accordingly at District Council under a "change management procedure" (according with Quality Assured Management System ISO 9000)² and reported to the subsequent annual review, rather than exceptions to the Plan being permitted.

² **Quality Assured Change Management:** Development Management in association with local Community-Place planning and management units (called Place-Community groups) would allow for proposals which are not included in a local plan (ie. the Local Development Plan / Place-Specific Proposals and the District Area strategy) but are considered to be in the public interest to be favourably considered. Any proposal considered as a potential change to the Local Development Masterplan would cause the Local Development Masterplan to be reviewed in the light of the new proposal, which might be seen to be in the public interest. A change to the plan, if merited, would be made under an internationally recognised "change management procedure" within a Quality Assured Management System to ISO 9000. This procedure would be written to ensure that any local change which could affect the wider District Council area - or the Region as a whole – would also be considered at the wider level before implementation.

7.00 Grouped Responses to Formal 82 Questions

It is the opinion of the MAG that to pose 82 questions in a consultation is inefficient (too time-consuming for respondents) and restrictive (there are matters worthy of discussion for which no question is posed), however please find responses below.

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| | REGIONAL LEVEL OF PLANNING |
| 1 & 2 | PPSs should be the strategic guidance for Development Planning. This means that they will no longer be used in determination of planning applications, but only in advising plan teams of regional strategy, and in this case, it is imperative that the two tier local planning system is robust. |
| | LOCAL LEVEL OF PLANNING - DEVELOPMENT PLAN |
| 3 | A <u>plan-led</u> system is essential. It is essential that this is not just an administrative procedure ('material consideration of the development plan'), but a whole proactive (rather than reactive) process to which the entire reform must adhere. |
| 4 | The <u>objectives</u> listed for local development plans do not clarify the relationship between its 'strategic plan' and local development masterplan ('place-specific proposals'). This relationship is core, as the objectives and the process become inseparable: the objectives are fulfilled in and not just by the process. Local Community-Place issues and "place-specific" proposals should inform the creative process of designing development plans. Negotiation between the Community-Place issues and proposals and the district wide proposals will invariably be necessary, but in this manner it will be well-informed and creative, not mere "consultation". |
| 5 | The <u>functions</u> listed for local development plans likewise should clarify the two part process of District Area Planning Strategy and Place-Specific Proposals (the PSP reviewing on a shorter timescale than the DAPS). |
| 6 | The proposal for a <u>Statement of Community Involvement</u> (SCI) is avoidable. If the public / community are the source of information for the plan, then community involvement is implicit. |
| 7 | The proposed <u>Programme Management Scheme</u> is likewise a procedure that should be implicit in the necessary process, not something additional. |
| 8 | The <u>Preferred Options</u> (and issues) for each place should be received from the community, not presented to them for consultation. All the place-community options / issues papers would then feed into the District Area Planning Strategy preparation. |
| 9, 18, 19 | The <u>two-part plan</u> must comprise <ul style="list-style-type: none"> • District Area Planning Strategy (reviewed every 5 years) and • Place-Specific Proposals (not Site-specific proposals. Planning operates to create places, and places are not created by the individual consideration of sites separately) to be reviewed annually, and feed into the 5 year Local Area Strategy review. |
| 10 | <u>Exceptions to the plan</u> must not be permitted. If a proposal is worth permitting, the plan should be amended to reflect that. |

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| 11, 12, 13, 14 & 16 | Any <u>objections to the plan</u> should undertake to demonstrate that the proposed alteration to the plan makes the plan more robust and the outcome more sustainable. The planning authority should select the most appropriate level of hearing the representation, at either community-place level, or strategic level, and be open to considering representations according to the review schedule of these two tiers of plan. |
| 15 17 | Counter representations should take place at the appropriate level – in public debates during the preparation of the Community-Place issues and proposals, and at annual reviews when the Community-Place issues and proposals are again being debated. Nobody is excluded therefore, and the public interest is safeguarded. Private interests are made secondary, not excluded and can be listened to again next year when circumstances may have changed. It is recommended that instead of waiting until the local plan is complete to assess its alignment with the regional strategy and Planning Policy Statements, that an independent District Plan Monitor be appointed by the Department to join the District Council planning team as part of programme management at monthly progress meetings. At any stage when the plan or the plan process appears to be diverging from regional strategy or other central government guidance, immediate advice can be given and a remedial solution found before valuable time and resources are wasted. |
| 20 & 21 | The <u>plan contents</u> must consider place-design and place-community, sustainability, quality, heritage, creativity and innovation... A <u>plan appraisal</u> should be integral with its formulation, and must include sustainability in place-quality, heritage, creativity & innovation, place-making, place-community etc. |
| 22 | As <u>planning authority</u> , District Councils are required to fulfil their planning functions. The Department should not be prepared to carry these out for them. |
| 23 | For planning to effectively carry out its function in creating quality place, District Area Planning Strategies should be prepared for the ' <u>landscape/townscape</u> ' unit that is appropriate. This is a function of place-community and may not necessarily equate to the administrative boundaries. eg. Planning capacity carried out according to National Park or AONB boundaries in England. |
| 24 | The process of Place-Specific proposals can be instigated at once, and feed into the District Area Planning Strategy when that plan level is up for review. There is no need to restrict the capacity for District Councils to start the District Area Planning Strategy <u>preparation process</u> early. |
| | DEVELOPMENT MANAGEMENT |
| 25 & 26 | The three level <u>planning hierarchy</u> for planning applications must be according to the scale of <i>impact</i> of the proposal (not necessarily the scale of the proposal). The MAG notes also that the impact of applications will relate to landscape or townscape character areas, which might not equate to the Council Area. The MAG insists that the process of 'front loading' should take place at all levels of impact (ie. including the local level). The MAG advises that the current Building Control system within councils operates successfully without |

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| | requirement for thresholds, and thus the division of applications into a hierarchy for planning consideration purposes might not be required at all. |
| 27 | Only category (a) of the listed <u>categories of regionally significant impact</u> is necessary, categories (b) and (d) equate to 'call-in' criteria at any hierarchy of impact level, and (c) is covered by (a). It is for the planning authority to ascertain the hierarchy level of impact, and thus how it should be considered, not the applicant, and notify the Department accordingly. |
| 28 & 29 | It is awkward to produce <u>thresholds for major impact proposals</u> , as impacts will vary according to different landscape contexts. It is not sufficient to classify impact according to urban or rural, and it is certainly not appropriate to declare that greenfield housing will have less impact than brownfield housing. Fortunately, the District Council is not only a planning authority, and the potential level of impact in many aspects can be discussed with other expertise in the Council. If, in processing the application, the Planning Authority decrees it to have regionally significant impact; it can notify the Department at that stage. This happens with Building Control which is entirely administered by each District Council which seeks assistance from other councils in a group when needed and relates to the Building Regulations Panel in central government when appropriate and necessary. |
| 30, 31 & 32 | A <u>performance agreement</u> is an unnecessary bureaucratic formalisation of a procedure that must be an implicit requirement (not voluntary) for all planning considerations of the process, and there is no need state this additionally (just putting the processes of the system before the needs of the public and place it aims to serve). It is self-evident that not all stages will be necessary for each application. |
| 33, 34, 35 & 36 | <u>Community consultation</u> should not be an add-on to the planning process. Community involvement should instead be a means of undertaking the process. As an implicit (and not additional) requirement of the process, applicants at all levels of impact should discuss proposals and their impacts with community and planner together at place level, such that all parties are informed of issues before an application is submitted. If this requirement is not met, the reasons for (and principles of) the planning system are not being respected and the developer is not acting responsibly. The MAG suggests that, in the interest of transparency and efficiency, Pre Application Discussions (PADs) should become Public Pre Application Discussions (PPADs) so that interested parties can participate at the earliest opportunities. Members of the MAG and other interested groups could attend, of course, when they consider it to be relevant to their special interests, as well as members of the public. The notion that for all applications, if PADs are taking place, the public should be invited does address the community's local issues at the earliest possible moment. Let's debate long and hard locally, efficiently and effectively, whether for example, "the factory should be allowed beside the school" (in principle) before we start to think about the size, shape, access details, etc. of "the factory". Integrating "pre-application community involvement" with "pre-application |

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| | discussions" also solves the problem often raised by local communities who feel that planning officers and applicants/agents meet privately and agree things (even accusing them of bribery and corruption...). |
| 37, 38, 39 & 40 | All planning applications should be <u>submitted to the District Council</u> , who must notify (or be called in by) the Department if deemed (eg. by screening) to be regionally significant. All District Councils should be <u>statutory consultees</u> in all regionally significant applications. |
| 41 & 42 | If the Department is unable to make a decision without inquiry, that <u>inquiry should consistently be heard by the PAC</u> . It is not equitable to enlist independent hearers in some cases. |
| 43, 44 & 47 | (For major developments, see response to 30-36 above). For all planning applications, performance agreements, community consultation, statement of design intent, and landscape and environmental impact assessment, must just be ordinary required parts of the process without needing to be additionally stated and required. If not met, the <u>application is void</u> and cannot be determined, and there should be <u>no allowance for appeal</u> in this case. |
| 48 | District Councils may <u>delegate non-contentious applications</u> (those which have fulfilled planning application requirements, accord with plan and have no objections) for decision by officers. |
| 49, 50 & 51 | There are many skilled bodies that do not have the opportunity to provide advice to Planning Service. This knowledge could be usefully incorporated with the introduction of categories whereby certain <u>consultees are statutory for certain proposals</u> . The body can decide whether or not to comment, and must be given a timeframe which assists the planning system. Similarly, on pre-application awareness of an upcoming application, the place-community should be assisted by the planner to be appraised of the facts by the same consultee expertise. |
| 52 | <u>Partial demolition of listed buildings</u> and building in conservation areas, ATC and AVC, must require consent and this 'loophole' must be rectified as soon as possible. |
| 53 | Planning authorities <i>must</i> require that <u>proposed development enhances the character of place-community in all cases</u> . |
| 54 | The <u>duration of planning permissions</u> should be reduced, unless the place-community requests an extension. |
| 55, 56 & 57 | <u>Minor amendments to planning permissions</u> should be able to be made by planning authority, applicant or community on agreement between all parties. <u>Errors in decision documents</u> may be corrected by planning authorities, and the applicant and place-community notified. |
| 58, 59, 60, 63 & 64 | Time limit for <u>submission of all appeals</u> should be reduced to appropriate and equal duration to ensure continuation of participation in the process. The PAC may recommend the most appropriate method of appeal but the right to a hearing should never be removed, and new information should not be permissible (or it becomes a revised application). The PAC should award costs when appeal is withdrawn by either applicant or planning authority without good reason. |
| 61 & 62 | Where an <u>appeal against enforcement</u> has been made to (or refused by) the PAC, the planning authority must refuse to consider a |

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| | retrospective or repeat planning application for the same development. |
| 65 & 66 | For equity, <u>the PAC is the appropriate body in all cases</u> , and especially ensures impartiality when the decision is made by the District Council. |
| 67, 68 & 69 | <u>Third party appeals</u> should be considered as a human right and since any planning system exists to manage development in the public interest, the MAG believes they should be permitted. Delays arising from enabling third party appeals will be balanced by increased speed in the whole planning process arising from 'front loading' and community involvement which in itself reduces the likelihood for appeals anyway. To avoid serial appeals by one "personality" or the potential vexatious commercial use of a new system, the MAG suggests that third party appeals be available to recognised groups only (for example, registered Civic Trusts). The MAG proposal is to include means of community management with recognised groups and there is logic in making third party appeals available to these local groups. In this case, any individual wanting to construct a third party appeal would have to bring the proposal to the relevant local recognised community group first for support and then ask the group to take it forward formally. |
| 70 | It is more important to <u>strengthen enforcement procedures</u> to discourage development occurring without permission, than to discourage retrospective planning applications. |
| 71 | <u>Commencement and completion of development</u> already exists in building control in District Councils, and will not need to be replicated when planning also operates within the District Council. |
| 72 | It is for the legal system, not the planning system, to make decisions regarding <u>fixed or other penalties</u> . |
| 73 | Strengthening enforcement procedures should be a priority. <u>Criminalisation for wilful acts of destruction or development</u> may be an option in future if enforcement has proved not to be workable. |
| 74, 75, 76, 77, 78 & 79 | <u>Developer contributions</u> for general infrastructure and place creation requirements arising from development and proportionate according to level of impact are a reasonable requirement from the planning system in the public interest. They should include social housing consideration, and should be systematically planned on a place-based system according to the District Area Planning Strategy rather than dealt with on a case by case basis. |
| | PLANNER CAPACITY etc |
| 80 | All planners leading the district plan and development management processes must be <u>design planners</u> , creative, proactive, not merely regulatory. This requires a change in the education of these planners and the aspiration of the RTPI for planners. |
| 81 & 82 | The <u>Department should set fees centrally</u> , (similar to Building Control – centrally set and locally administered: a working system). |

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02 October 2009