Talk isn’t cheap when it provides results

There’s a saying “Talk is Cheap”, which commonly refers to a meaningless promise to do or provide something, which is never actually achieved.

Historically, developers have tended to be wary of using the pre-application service offered by local authorities for precisely this reason - the promise to provide meaningful advice which sometimes fails to deliver. I’m sure we have all at some point had what seemed like a very positive initial meeting with an officer, where development proposals were floated and discussed, and feedback at the time was encouraging. Then, the letter arrives and indicates that your development will be resisted. Sigh.

The Barton Willmore Landscape team appreciate and advocate the importance of establishing and maintaining a healthy and proactive dialogue with both the determining authority, and their consultees. This ethos is supported by the recent consultation draft of the NPPF released in March 2018, which brings the importance of pre-application engagement and consultation forward in the Framework (now Chapter 4: Decision-making). Whilst still encouraging take up of the pre-application services that are offered by local planning authorities, draft paragraph 41 also encourages liaison with statutory and non-statutory consultees “prior to submitting an application”. This is a minor yet important addition to the Framework text; but how practical is this aspiration in reality? And how deliverable?

The historic issue with pre-application discussions with consultees has always been a reluctance to engage if there is no valid planning application to relate to.

The difficulty here though is that to discuss the potential landscape and visual sensitivities of a proposal, and to agree viewpoints with the Landscape Officer, or relevant AONB Board or National Park Authority, pre-application engagement is absolutely vital!

For an EIA proposal, the screening and scoping processes facilitate, to a degree, early engagement with consultees, and provides them with a tangible reference against which to provide feedback and advice. Indeed, the ‘Bible’ of all Landscape Planners, GLVIA3, also highlights that viewpoints should be, “selected initially through discussions with the competent authority and other interested parties,” (para 6.18). This is sometimes much more of a mountain to climb than it ought to be. It is clearly our responsibility as Landscape Planners to identify the representative views we wish to include, and to suggest these to the determining authority. It is also clear that the more information we can provide at the outset, the more meaningful and comprehensive advice we can expect to receive in return. Is it enough to simply send a red line and suggested viewpoint locations?

Project depending, it is clearly beneficial to submit a site layout design, proposed elevations, identified key views, areas of mitigation proposals, a summary of the key constraints and the opportunities identified on site. However, does this put our client at risk of overexposure by front-loading the fee-paying work, all prior to receiving that coveted advice from the LPA?
Or does it provide the opportunity to build relationships, gain a better understanding at the outset as to whether an application will be well received and successful, and save time and money further down the process? Although this approach could result in a higher up-front cost and be perceived as financially risky, it is surely much more beneficial to all involved, and more cost effective in the long run, to ensure that the application is as strong as it can be at the outset. The time and money spent up front in those initial stages, will just avoid having to go through a more protracted consultation process further down the line, speeding up the application and ultimately the delivery of the project.

So, to achieve a successful marriage between ‘us’ and ‘them’, we need to be actively engaged throughout the process, especially at the beginning. The importance of pre-application engagement is clearly supported nationally and by government, with the NPPF bringing it forward in the new draft Framework. The aspiration is there, but can it be made a reality? Our clients need to be made aware that connection and engagement is key; effective communication can help a great deal. In our increasingly technologically dependent society, we place such weight on fast communication in the form of emails, IMs, DMs, PMs! I’m going to suggest something rather radical here. Why not use the telephone? Rather than emails back and forth, or often just forth and ignored, we should pick up the phone and talk, and I for one will continue picking up the phone and starting that engagement early!

Peta Donkin, Associate Landscape Planner, Barton Willmore, March 2018.