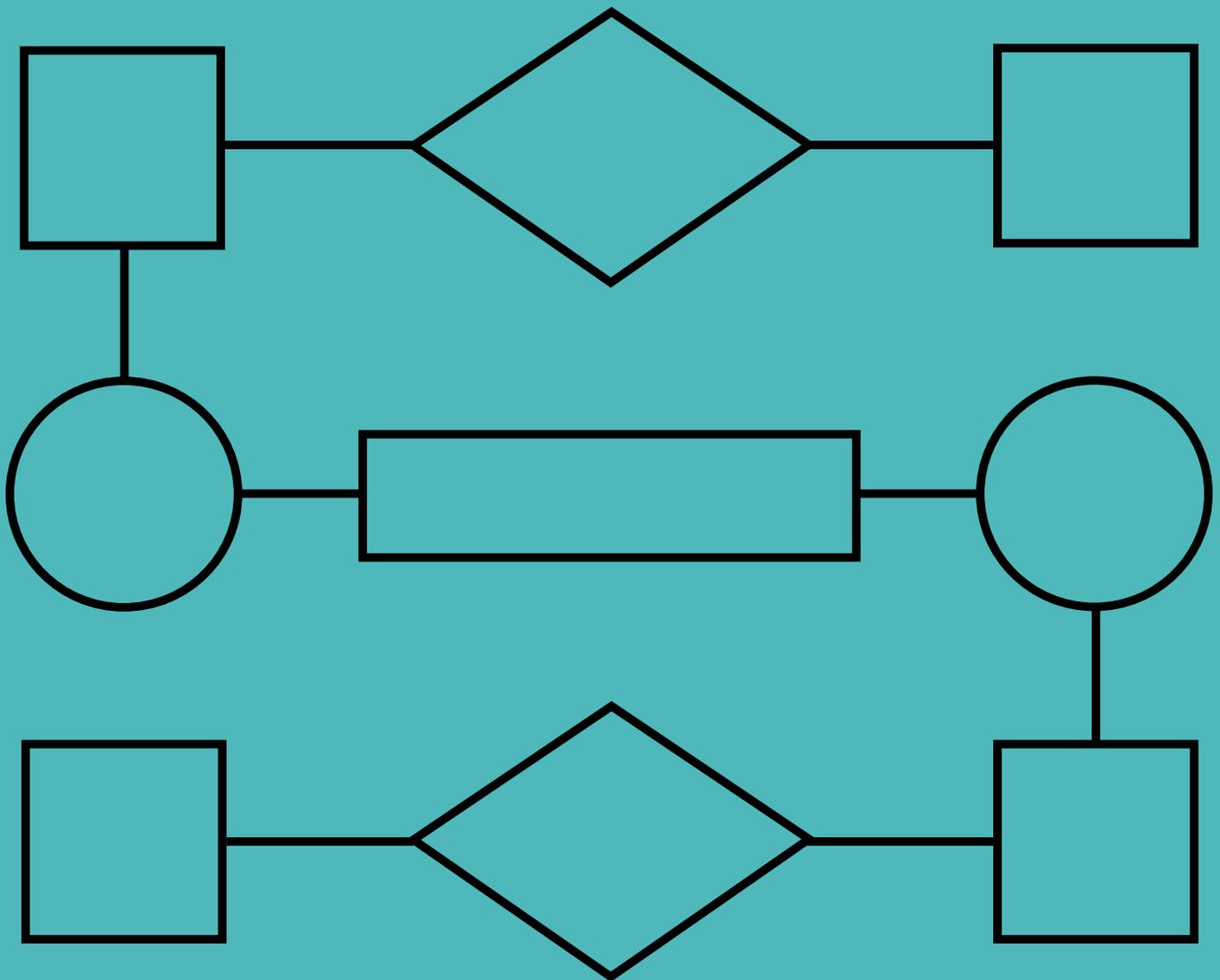# Planning Ahead:
What are the best ways
to deliver design-led
pre-applications?

Rachel Hearn

Public Practice is a not-for-profit social enterprise that places outstanding built environment experts within forward-thinking public authorities to build the public sector's capacity for proactive planning.

10% of the year-long placements is dedicated to a Research & Development programme to share new knowledge and practice across authorities. This Practice Note is one of the outputs of this programme.

PLANNING AHEAD
What are the best ways to deliver a design-led pre-application service?

INTRODUCTION
This Practice Note is based on research carried out as part of a year-long placement in the London Borough of Havering. It explores ways of improving design quality through the pre-application process, and has informed Havering's review of its own pre-application service. The research took place between April 2018 and March 2019 and was focused on London Boroughs, given the common policy context. Findings and recommendations may nevertheless be useful for planning authorities beyond London, who are invited to help test, develop and improve the resources put forward in this Practice Note.

CONTEXT
Pre-application (pre-app) is a fundamental part of the planning process. When successful, it can contribute significantly to achieving design quality in larger schemes by working collaboratively to address issues earlier upstream – or planning ahead. The new National Planning Policy Framework[1] and draft London Plan[2] place increasing importance on achieving design quality through tools such as design review. However, design review is unlikely to achieve universal design quality alone, given its costs, limited coverage, and external nature. A design-led approach also needs to be integrated into planning process, particularly at pre-app stage where many of the most fundamental aspects of design are shaped.

There is no one standard approach to pre-apps. As this Practice Note shows, the service and associated fees vary dramatically across Local Planning Authorities (Authorities), leaving many applicants, officers and communities frustrated with the process. There is a significant body of existing guidance on the pre-app process produced by cross-sector collaboration[3], Planning Advisory Service[4], RTPI[5], Planning Officers Society[6] and the Welsh Government[7], but relatively little recent guidance on using pre-app to

1   gov.uk/government/publications/national-planning-policy-framework--2
2   london.gov.uk/what-we-do/planning/london-plan/new-london-plan
3   hbf.co.uk/documents/4652/Constructive_talk_-_pre-application_discussions.pdf
4   local.gov.uk/pas/pas-topics/planning-applications/pre-application-suite
5   rtpi.org.uk/media/844002/10%20commitments%20for%20effective%20pre-application%20engagement.pdf
6   planningofficers.org.uk/publications/good-practice-publication/good-practice-pre-planning-application-consultation &
    planningofficers.org.uk/publications/good-practice-publication/good-practice-councillor-involvement-in-pre-application-discussions
7   gov.wales/sites/default/files/publications/2018-09/pre-application-discussions.pdf

secure design quality. This Practice Note sets out some ways in which this can be achieved.

CHALLENGES & OPPORTUNITIES
Authorities face a number of challenges to delivering pre-app services, which in turn can limit their ability to secure good design outcomes. Common challenges raised by Authorities and applicants include:

- Workloads: High caseloads and time pressures can have a negative impact on officers' capacity for scrutiny, negotiation, or innovation to implement new ways of working.
- Churn: High staff turnover affects consistency of advice and risks reducing the benefits of officer continuity from pre-app through to application.
- Transparency: A lack of transparency in the pre-app service, due to confidentiality, risks generating a lack of trust between stakeholders.
- Skills: A perceived lack of specialist skills within some Authorities, such as design expertise or commercial awareness, can increase uncertainty or risk for applicants.
- Standards: A lack of benchmarking across Authorities in terms of fees, resourcing or applicant feedback can result in variable standards of service.

Despite these challenges, there are a number of important new drivers for Authorities to place increasing emphasis on design quality through pre-app:

- Income Generation: Authorities continue to face cuts in government funding, and a limit to planning fee increases, but the pre-app planning service is one area where Authorities can set their own fees.
- Increasing Design Capacity: Capacity funding including the Planning Delivery Fund, Garden Communities funding, and Homebuilding Capacity Fund (in London), together with new initiatives like Public Practice, are enabling Authorities to build their in house design expertise.
- Council-led Housing Delivery: 72% of Authorities are now directly engaged in delivering their own homes[8], and now have an added incentive to ensure design quality.
- Staff Retention: With recruitment and retention being increasingly critical challenges for Authorities[9], a well-run pre-app process can make life more enjoyable for officers and help boost staff retention.

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[8] rtpi.org.uk/knowledge/better-planning/better-planning-housing-affordability/local-authority-direct-provision-of-housing
[9] london.gov.uk/what-we-do/regeneration/advice-and-guidance/helping-london-local-authorities-deliver-good-growth

APPROACH

The research for this Practice Note was carried out in three steps. First, information on the websites of all London Boroughs relating to the pre-app service was logged and reviewed. Second, face-to-face or telephone interviews were conducted with a cross-section of Boroughs and Development Corporations across inner and outer London. Third, an online questionnaire was used to collect additional information. Ultimately, 24 out of 32 London Boroughs and one of two Development Corporations provided input into the findings of this Practice Note. The GLA Placemaking Capacity Survey[10] and the London Development Database[11] have been used to put findings into context.
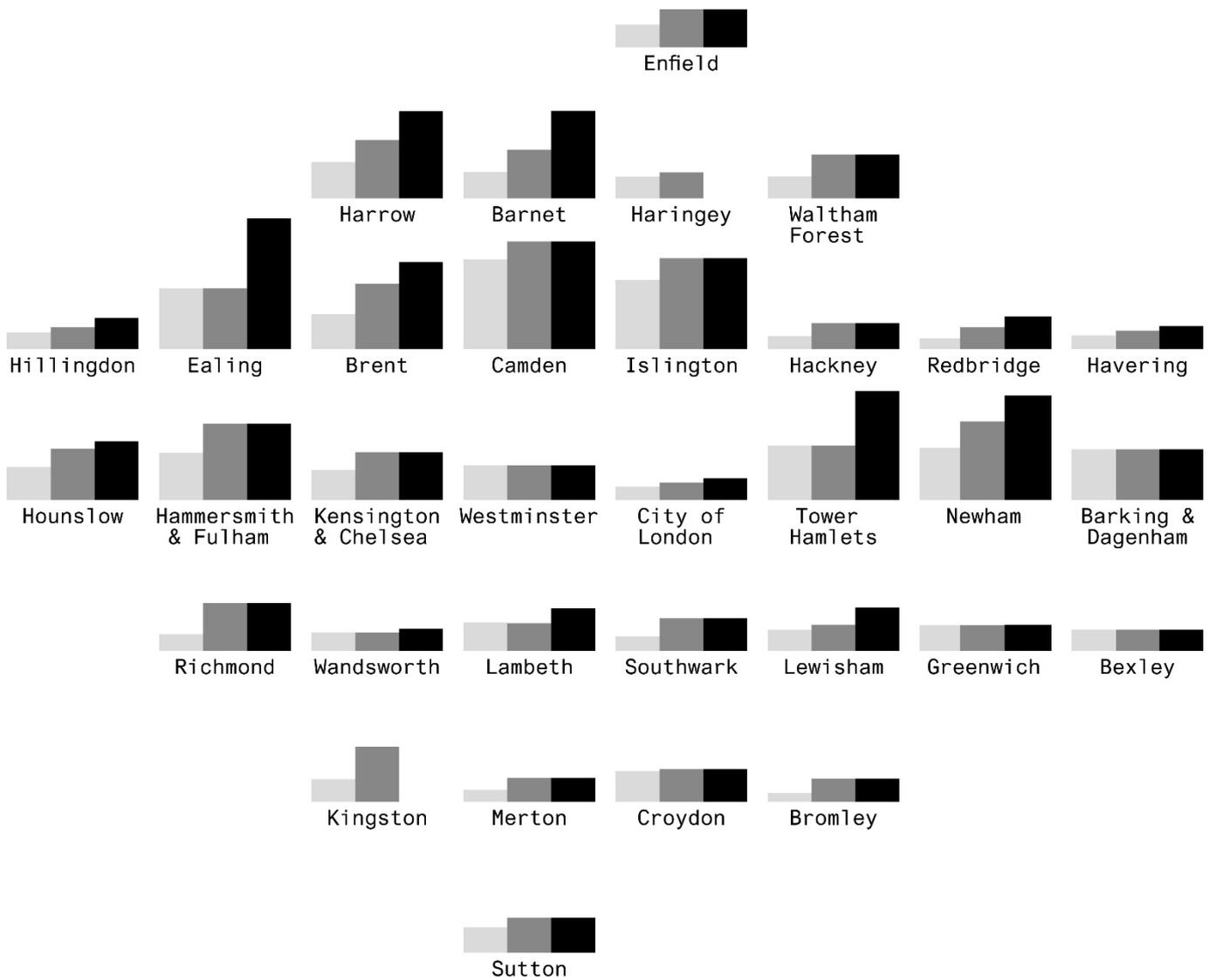
FINDINGS

The research revealed significant variation in the service and costs of the pre-app across participating Authorities. Broken down into the different stages of the pre-app process, the research showed the following:

Initial Contact
- Costs vary by magnitudes of over ten between Boroughs for seemingly the 'same' pre-app.
- For a first meeting on a new build 50-unit pre-app, not in a conservation area, costs range from £2,400 to £14,853.
- For the same meeting on a 150-unit scheme there is a difference of over £15,000 between the cheapest Authority and the most expensive.
- How this translates to time spent by officers or level of quality is unknown.
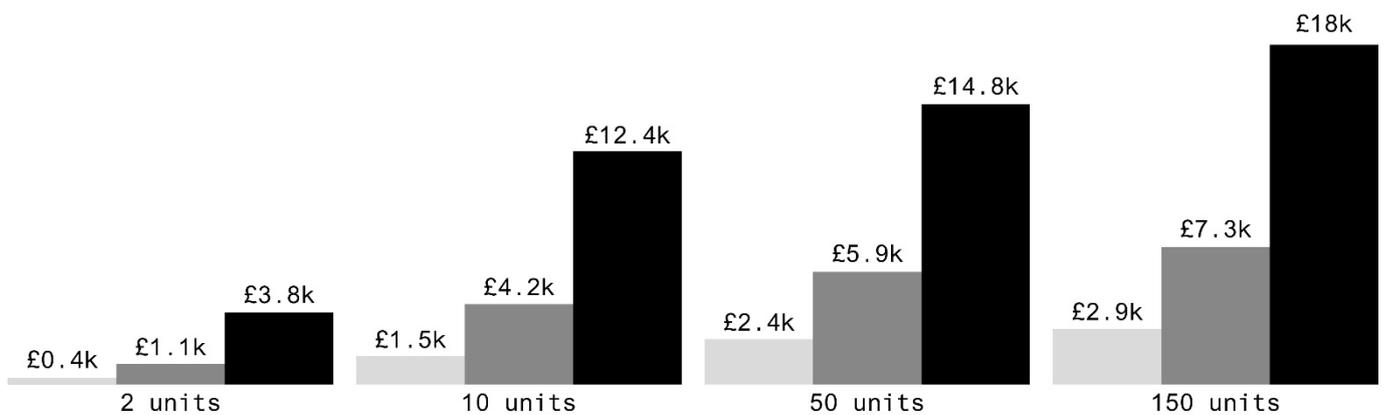
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[10] london.gov.uk/what-we-do/regeneration/advice-and-guidance/helping-london-local-authorities-deliver-good-growth
[11] london.gov.uk/what-we-do/planning/london-plan/london-development-database

Enfield

Harrow   Barnet   Haringey   Waltham
                                Forest

Hillingdon   Ealing   Brent   Camden   Islington   Hackney   Redbridge   Havering

Hounslow   Hammersmith   Kensington   Westminster   City of   Tower   Newham   Barking &
            & Fulham   & Chelsea   London   Hamlets   Dagenham

Richmond   Wandsworth   Lambeth   Southwark   Lewisham   Greenwich   Bexley

Kingston   Merton   Croydon   Bromley

Sutton

Cost of first pre-application meeting for different scales of new build schemes (not listed,
not in a conservation area) across Authorities:
  Small major, 10 units
  Medium major, 50 units
  Large referable, 150 units

£18k

£14.8k

£12.4k

£7.3k
£5.9k

£4.2k
£3.8k

£2.4k   £2.9k
£1.5k
£1.1k
£0.4k

2 units   10 units   50 units   150 units

Variation in cost of first pre-application meeting for different scales of new build schemes
(not listed, not in a conservation area):
  Minimum
  Average
  Maximum

Application Process
- In over 75% of Authorities there is no indication from their website of how long it will take from submitting an application to getting the first meeting.
- Of the Authorities which give a timescale for how long after the meeting the written response will be issued, the shortest is five working days and the longest is 40 working days. The average is 17 working days.
- Around 50% of Authorities have access to 3D modelling software (e.g. VU.CITY), but the majority do not have clearly defined ways of working with it.
- Only three Authorities keep mapped and/or geotagged records of pre-app advice given.


76%
No
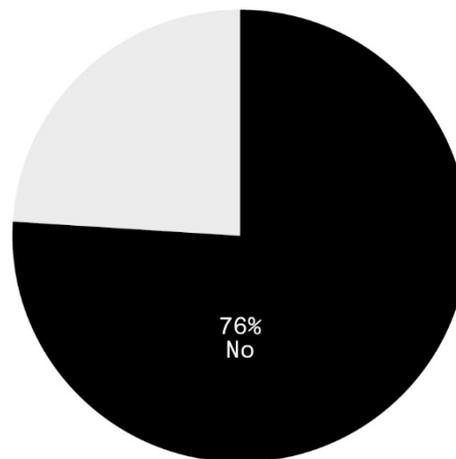
Is the time from application to first pre-app meeting shown on the Authority website?

84%
No
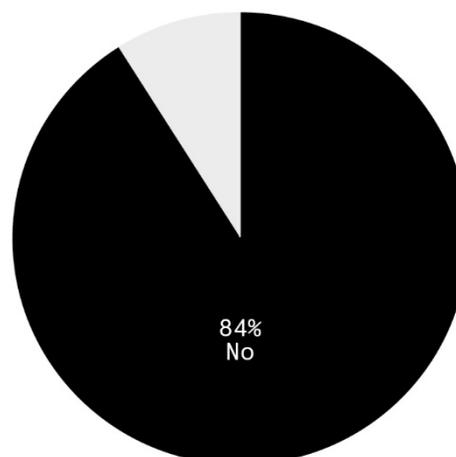
Does the Authority keep geo-tagged records of their pre-apps?

Volume
- A third of Authorities did not know how many major pre-apps they processed last year.
- The majority cannot easily tell if they have a 100% capture rate; i.e. all major applications started life as major pre-applications.
- Across Authorities the number of major pre-apps processed in the 2016+2017 calendar years was:
  o Minimum 13
  o Maximum 87
  o Average 40
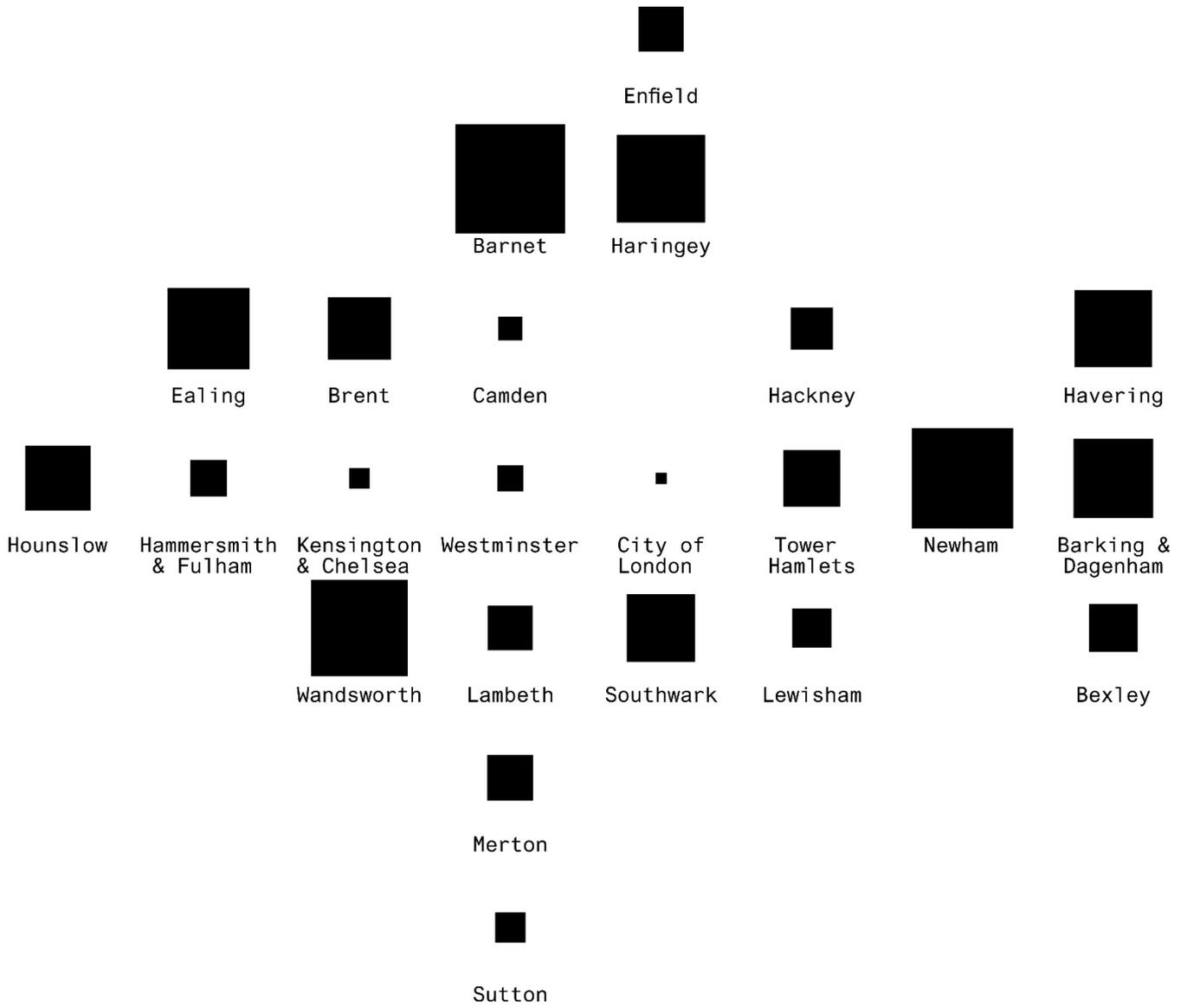- The number of homes each design officer is expected to oversee to meet their housing target varies significantly.

66%
No
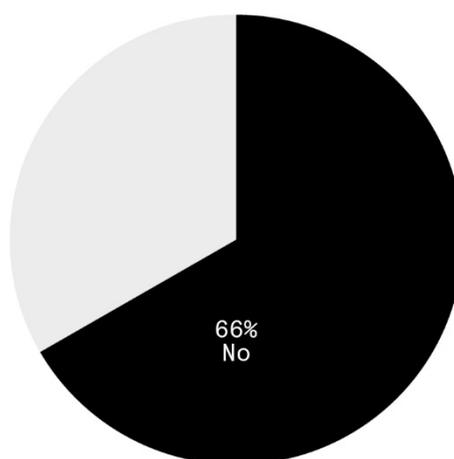
Do you know how many pre-apps your Authority processed last year?

87

40

13
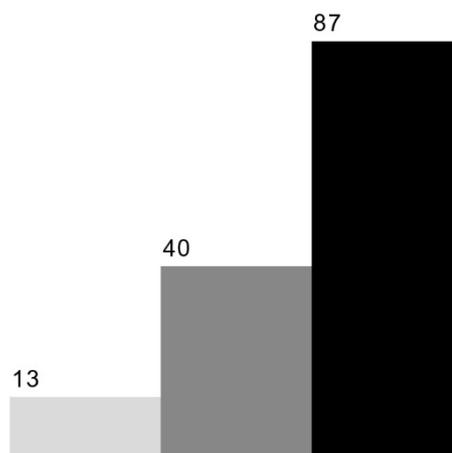
Where recorded, how many major pre-apps did your Authority process in the calendar years 2016 & 2017?

Minimum
Average
Maximum

Enfield

Barnet   Haringey

Ealing   Brent   Camden   Hackney   Havering

Hounslow   Hammersmith
& Fulham   Kensington
& Chelsea   Westminster   City of
London   Tower
Hamlets   Newham   Barking &
Dagenham

Wandsworth   Lambeth   Southwark   Lewisham   Bexley

Merton

Sutton

Annual Housing Target per Design Officer (where recorded)

RECOMMENDATIONS

The main outcome of the research is a Pre-Application Checklist which provides guidance for integrating a design-led approach into the different stages of the pre-app service: before a pre-app process is received; during the pre-app process; and after the pre-app process has concluded. The Checklist and other resources including Pre-Application Information Benchmarking can be downloaded at publicpractice.org.uk/resources. The overarching recommendations from the Checklist can be summarised as:

- Communicate clearly with applicants and communities. Set out the benefits and timescales of your pre-app service up front, and explain how it works from the perspective of your stakeholders.
- Use new technologies intelligently. Consider integrating digital tools, such as 3D modelling or geo-tagged records, into your pre-app service to support officers.
- Record and review the pre-app service continuously. Track the pipeline of major pre-apps you process, and develop a feedback mechanism to help improve your service.

Public Practice welcome feedback on the findings and recommendations set out in this Practice Note to help update current resources and inform future research. Please contact us at info@publicpractice.org.uk.

NEXT STEPS

This Practice Note has investigated the delivery of design quality through pre-app across London Boroughs, and suggested ways Authorities can improve and learn from their pre-app service. To take these findings further, there are a number of areas of research that would benefit from further development:

- Establishing what kinds of additional training should be provided to planning officers working with pre-app.
- Developing a matrix of in house skills required to deliver a high quality design-led pre-app service, to help identify where training, recruitment or additional support may be required.
- Exploring the feasibility of developing a Pre-Application Charter similar to the London Design Quality Charter.
- Developing digital tools specifically to support the pre-app process, such as a user-centred pre-app interface, internal project management and tracking, integration with GIS mapping and 3D modelling, and alignment with emerging public engagement platforms.
- Aligning policy-making with GIS mapping and 3D modelling used in the planning process.
- Identifying ways to gather evidence / case studies from Authorities that are starting to make improvements to the pre-app service.

Pre-application plays a fundamental role in the planning process. When successful, it can achieve better quality development by collaboratively addressing issues upfront – or planning ahead. However there are currently significant variances in pre-application services and fees across Authorities.

This Practice Note explores ways of improving quality by building a design-led approach into the pre-application process. Drawing on research carried out during a year-long placement in the London Borough of Havering, it sets out a series of simple steps that Authorities can take to make pre-applications deliver better results for officers, applicants, communities and councillors.

The Practice Note is accompanied by an easy-to-use checklist for Authorities, and a benchmarking review of publicly available information on pre-application services in London.

#DevelopmentManagement #PreApplication #PlanningProcess #Design #Digital

Practice Notes and other resources are available to download at www.publicpractice.org.uk/resources