

# Resourcing a New Planning System: Public Practice's response to the Planning for the Future White Paper

Public Practice is a not-for-profit social enterprise with a mission to improve the quality and equality of everyday places by building the public sector's capacity for proactive planning.

# A response to the Planning White Paper

Public Practice is an independent not-for-profit organisation with the mission to improve the quality, and equality, of everyday places. We do this through building the public sector's capacity for proactive planning. Since launching in 2017 we have placed 123 built environment experts (Associates) within 42 public bodies (Authorities) across London, the South East and East of England. This consultation response has been informed by:

- An online survey shared amongst Public Practice's Associates, Alumni, Authority contacts and social media channels that received 55 responses from officers representing 34 different Authorities (55% within London, 45% outside of London).
- A roundtable discussion gathering qualitative feedback from current Associates and their colleagues.
- Consultation with Public Practice's Board of Directors and cross-sector Advisory Board.
- Evidence and learning drawn from Public Practice's first three years of operation, and the wider network of organisations we collaborate with.

Public Practice's consultation response focuses on skills and resourcing, specifically proposals 12 and 23. This is because, in our experience, it is the people more than the policies that make the biggest difference to what is delivered on the ground. Good planners can work around an imperfect planning system, but a perfect planning system can't work around a shortage of good planners.

We believe the White Paper has the potential to create better outcomes through planning, not necessarily as a result of legislative change, but by helping to transform the role of the public planner. But this will only happen if the new system is matched by a new national programme of investment to level up resourcing and enable planning authorities and communities to plan more proactively. This consultation response sets out seven steps towards building capacity for proactive planning:

1. Create a new national investment programme to level up capacity
2. Resource Authorities to produce design codes at speed and scale
3. Establish a robust framework for public plans to be made in the public interest
4. Present funding with a presumption in favour of building in house capacity
5. Align new funding with new solutions for recruitment
6. Set a mission for public planning to represent the diversity of the communities we serve
7. Support public planners throughout their careers

# 1. Create a new national investment programme to level up capacity

We encourage the Government to reconsider the question of who pays for public planning - as this has fundamental implications for the scope of the planning system, and who it serves. The White Paper proposes that “the cost of operating the new planning system should be principally funded by the beneficiaries of planning gain.” It may seem reasonable to expect landowners and developers to cover the costs of planning rather than national or local taxpayers, but in our view this would have two significant unintended consequences.

Firstly, funding planning through growth would limit the scope of planning to serving those who are paying. Income from development management has gone from funding about a quarter of total spending on planning in 2009/10 to over half in 2018/19<sup>1</sup> - and this has been mirrored by Authorities dedicating a greater proportion of their staff to reactive development management work.<sup>2</sup> The White Paper proposals would only exacerbate this situation by incentivising Authorities to prioritise more reactive services that directly support the development pipeline, and disincentivising resourcing more proactive planning that has wider public benefits - for example drawing up local lists, supporting town centre economies, improving public realm, enabling community-led initiatives or developing climate emergency action plans. The scope of good planning goes beyond managing growth, it is also about creating the conditions for social, economic and environmental sustainability. These wider dimensions do not only benefit landowners and developers, they benefit the public. It is unrealistic to expect landowners and developers alone to subsidise these functions.

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1 [RTPI Resourcing Public Planning, 2019](#)

2 [GLA Placeshaping Capacity Survey, 2020](#)

Secondly, funding planning through growth would exacerbate regional and spatial inequalities. Authorities in the South East already invest over three times more per person on planning than Authorities in the North West, West Midlands and North East.<sup>3</sup> Yet it is Authorities in areas with lower land values and slower rates of growth that are most in need of proactive planning to help level up spatial inequalities, rebuild local economies and reshape markets. Authorities that do not have the major applications or infrastructure levy to cross-subsidise these broader planning activities could face a spiral of under-resourcing. That would be the opposite of levelling up.

It is clear that adopting and delivering a new planning system well is going to require significant additional funding. Public Practice's survey of 55 planning officers shows that none believe they have the existing capacity and skills within their Authority to deliver the proposals set out in the White Paper without additional resourcing.<sup>4</sup> To compound the situation, we are seeing evidence from our six-monthly recruitment rounds that financial uncertainties due to COVID-19 are making Authorities more reticent about creating the kinds of posts that they think they need to deliver the White Paper. The demand for design, digital and engagement skills in Authorities is dipping just when it needs to be going up.

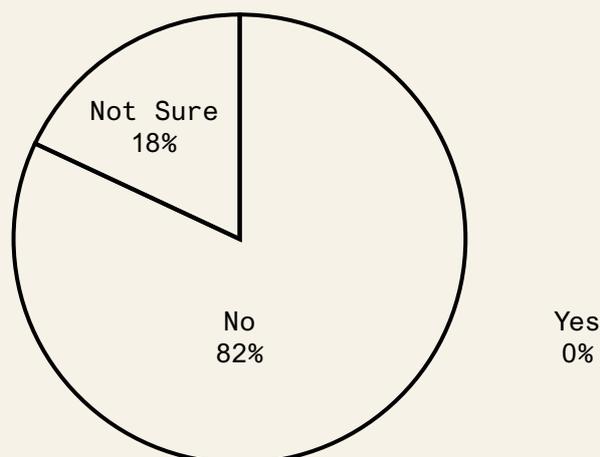
The new planning system should be matched with a new national investment programme in public planning. This investment should recognise planning's wider value as a public service. Funding should be allocated based on the need for proactive planning to support levelling up, not only the demand for growth. This demands a comprehensive resourcing strategy that goes beyond initial time-limited funding for the transition to a settlement that gives Authorities the certainty to commit to longer-term resourcing.

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3 [RTPI Resourcing Public Planning, 2019](#)

4 [Public Practice, Planning Capacity Survey, 2020](#)

Do you believe your Authority has the existing in-house capacity and skills needed to deliver the proposals set out in the White Paper without additional resourcing? <sup>5</sup>



What types of additional resourcing do you anticipate needing most to deliver the White Paper proposals? <sup>6</sup>

Architecture & Design 69%

Digital, Data & Plantech 60%

Community Engagement & Participation 52%

Urban Design & Placemaking 50%

Masterplanning & New Communities 38%

Environmental Sustainability & Decarbonisation 29%

Landscape Architecture & Public Realm 29%

Development, Property, Surveying & Viability 21%

Urban Health & Wellbeing 18%

Conservation & Heritage 16%

Ecology & Biodiversity 16%

Planning & Policy 14%

Project & Programme Management 14%

Infrastructure & Utilities 12%

Arts, Culture & Curation 7%

Civil & Structural Engineering 5%

Regeneration & Economic Development 3%

Transport & Mobility 1%

<sup>5</sup> Public Practice, Planning Capacity Survey, 2020

<sup>6</sup> Public Practice, Planning Capacity Survey, 2020



## 2. Resource Authorities to produce design codes at speed and scale

The White Paper proposals for Authorities to take on the responsibility for locally-produced Design Codes in Growth Areas, as well as tailoring “pattern books” for Renewal Areas, offer significant potential for more proactive planning - but also present the risk of causing delays if they are not adequately resourced.

Public Practice supports the principle of local authority-led Design Codes for all sites suitable for substantial development. There would be major efficiencies and public benefits from Authorities carrying out this work in a strategic, joined-up way that is democratically accountable and open to community participation. It should be recognised that this is equivalent to handing Authorities the responsibility for carrying out outline applications for every strategic site in their area - at the same time as producing their Local Plan. To do it well, Authorities will need to have access to the equivalent resources that the private sector invest in RIBA Stages 1 & 2.

The Design Codes proposed are not dissimilar to the ‘Detailplaner’ (Detail Plans) produced in Sweden. These translate their equivalents of Local Plans - ‘Oversiktsplaner’ - into frameworks for delivery. Once a Detail Plan is in place, planning consent takes no longer than 10 weeks. However, it should be noted that Detail Plans take on average 28 months to produce. Gothenburg, a city equivalent in scale to Sheffield, has a department of over 100 officers working solely on producing Detail Plans. The department produces and adopts 30-40 Detail Plans per year, and has a total annual

running cost of over £9m.<sup>9</sup> For comparison, Sheffield City Council recently reduced the size of its entire Urban and Environmental Design Team from 25 to 1 member of staff.

In the UK context, Public Practice's survey of Authorities gives an estimated median total cost of preparing, consulting on, and adopting a Design Code for an area of c.1,000 homes as £139,000.<sup>10</sup> Assuming approximately two thirds of the 337,000 homes a year required by the Government's new Standard Method will be in Growth Areas, the total national annual cost of producing Design Codes would be £31m.

Proposals for locally-produced Design Codes must be backed up by forward-funding that covers the true costs of Authorities upskilling at speed, and delivering Design Codes at scale. Lessons from Sweden suggest that these costs should be calculated and levied on the basis of actual staff time, not abstract floor area rates.

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9 Interview conducted with Martin Storm, Director of Planning Policy at Gothenburg City Council. [Also see open data on the production of 'Detail Plans' by Local Authorities in Sweden.](#)

10 Public Practice, Planning Capacity Survey, 2020

### 3. Establish a robust framework for public plans to be made in the public interest

If Authorities are unable to produce Design Codes at the speed and scale necessary to keep pace with their development pipeline, there will inevitably be calls to reduce delays by allowing the private sector to take over the production of these frameworks. But at what point might it represent a conflict of interest for developers or their consultants to produce Design Codes themselves?

Again, there are lessons from Sweden. As a result of complaints from developers about the waiting times for the adoption of Design Codes - often in excess of three years - Gothenburg City Council piloted five Detail Plans with greater participation from private sector developers. There were some upfront time savings from this approach, mainly due to developers not having to comply with EU procurement regulations when commissioning technical studies. However the overall costs generally proved higher than producing the plans in house. There were also issues with deliverability and political acceptability at later stages, as developers were not able to coordinate as effectively with different public departments and agencies including highways, health, education, infrastructure and utilities. This cancelled out any upfront time savings. As a result, Gothenburg City Council took the decision to bring the production of all 'Detail Plans' back in house.<sup>11</sup>

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<sup>11</sup> Gothenburg City Council pilot project on Detail Plans with greater developer participation

Making places that stand the test of time takes time. The lesson from equivalent systems abroad is that there are no shortcuts to good placemaking. If the new planning system is to reduce opportunities for democratic scrutiny and negotiation at planning application stage in Growth Areas, then it is vital that the earlier Design Code stage is accountable, consistent and comprehensive enough to prevent poor quality development getting through the door.

The new National Design Body should establish a robust framework to ensure all Design Codes and related master-plans and local pattern books are made in the public interest. This should be based on the safeguard that no element of planmaking should be commissioned or cliented by the private sector, as well as monitoring to ensure Authorities are using funding efficiently and making sufficient progress.

What do you think the impacts will be of proposals for the cost of operating the new planning system to be principally funded by the beneficiaries of planning gain – landowners and developers – rather than the national or local taxpayer? <sup>12</sup>

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Make the planning system less accountable to serving the public interest 50%

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Result in lower levels of resourcing for the planning system as a whole 47%

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Enable a greater emphasis on proactive planmaking 23%

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Result in greater levels of resourcing for the planning system as a whole 23%

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Result in a greater focus on reactive development management 20%

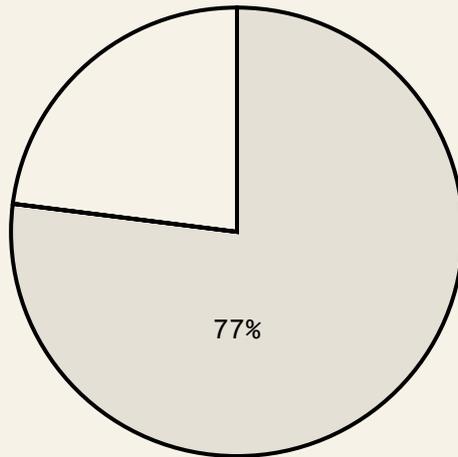
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Make the planning system more accountable to serving the public interest 10%

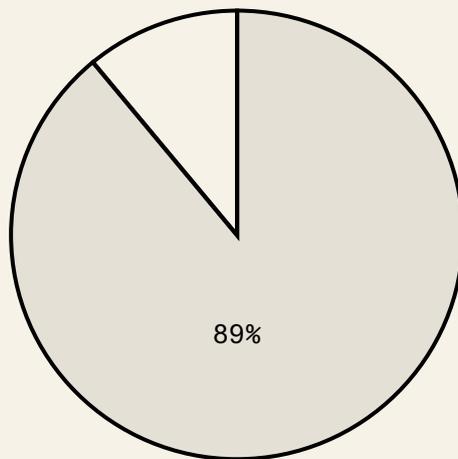
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No significant change 7%

Average annual retention rate in planning departments in London and the wider South East.<sup>13</sup>



Proportion of Public Practice Associates who have continued in the public sector beyond the end of the 12 months programme.<sup>14</sup>



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13 MHCLG & PAS, Survey of Planning Departments, 2019

14 Public Practice impact monitoring data

# 4. Present funding with a presumption in favour of building in house capacity

The White Paper acknowledges that “time limited funding will be made available by the Government in line with the new burdens principle to support local planning authorities to transition to the new planning system.” It is vital that this short-term funding is allocated in a way that leaves Authorities in stronger position to continue to deliver the new planning system on a long-term basis.

There are lessons here from the allocation of time limited funding for planning capacity in the past. Analysis of the use of Planning Delivery Funding in London shows that only 29% of boroughs used it to create new permanent in house posts. Over two thirds used Planning Delivery Funding to bring in external support from external consultants or temporary agency staff.<sup>15</sup> The challenges of creating internal roles and recruiting the right candidates within funding timescales typically lead to Authorities seeking quicker and shorter-term fixes. This will be especially true if every Authority in the country is recruiting for similar areas of expertise at the same time to meet statutory timetables.

The use of temporary staffing solutions offers short-term flexibility, but longer-term costs. Consultants and agency staff generally cost twice as much as their nearest permanent staff counterpart.<sup>16</sup> In our experience an overreliance on external consultants and agency staff also brings other costs in terms of lack of continuity of service, erosion of in house knowledge and accountability, barriers to building trust with communities, in house staff having fewer opportunities for progression, and unstable team structures due to contractors working outside IR35 being unable to perform management responsibilities.

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15 [GLA Placeshaping Capacity Survey, 2018](#)

16 [National Audit Office, Use of Consultants and Agency Staff, 2016](#)

External solutions to increase design capacity such as enabling and design review have similar disadvantages. They offer expert advice relatively affordably on a flexible basis, but there is little evidence that they have a positive impact on Authorities' culture, in house capacity or systemic approach to design over the longer-term. Built environment projects take years to deliver, and in our experience the difference in quality is often made before or after an enabler or design review panel is involved. Their coverage is also patchy. Between 1999 - 2009 CABE reviewed 3,000 schemes - still only 1.7% of major applications during that period.<sup>17</sup> Currently under 1% of planning applications in London are subjected to design review.<sup>18</sup> Making "excellence in planning the rule, rather than the exception" depends on supporting the day-to-day work of planning authorities.

Time limited funding to support Authorities to transition to the new planning system must come with a presumption in favour of building in house capacity first. The National Design Body should not centralise expertise, but ensure that it is embedded sustainably at a local level. Enabling and design review should not be seen as a substitute for in house design capacity, but a way of complementing it.

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<sup>17</sup> Based on analysis of [CABE, Ten Year Review, 2009](#) and [Government Planning Application Statistics](#)

<sup>18</sup> [GLA, Design Review Survey, 2020](#)

# 5. Align new funding with new solutions for recruitment

The new planning system will require Authorities across the country to rapidly build capacity across similar areas of expertise such as design, digital and engagement. Existing capacity in these areas is patchy, with almost half of all Authorities having no dedicated in house design capacity.<sup>19</sup> Recent Public Practice and GLA surveys both show that the biggest barrier to Authorities building their capacity is currently a lack of funding and uncertainties over budgets.<sup>20, 21</sup> Immediate time-limited funding together with a longer-term sustainable resourcing strategy should help.

The second biggest barrier to Authorities building their capacity is difficulties recruiting the right talent.<sup>22</sup> Even when Authorities find the funding, they are struggling to find the people. Local authorities face greater difficulties recruiting planners than any other discipline.<sup>23</sup> Over a quarter of traditional recruitment exercises for senior planners fail.<sup>24</sup> Funding alone will not be enough. Building public planning capacity at a time when there will be even greater competition over staff also requires new solutions to support Authorities with recruitment.

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19 [Place Alliance, Design Skills in Local Authorities, 2017](#)

20 [Public Practice, Planning Capacity Survey, 2020](#)

21 [GLA, Design Review Survey, 2020](#)

22 [Public Practice, Planning Capacity Survey, 2020](#)

23 [LGA, 2017/18 Workforce Survey, 2019](#)

24 [MHCLG & PAS, Survey of Planning Departments, 2019](#)

Public Practice is a proven model that has successfully attracted new talent into the public sector at the scale of London, the South East and East of England. The first five cohorts received 1550 applications from a diverse range of built environment practitioners, 93% of whom applied from outside the public sector. Public Practice also supports Authorities to define and describe new types of roles. The first five cohorts received 270 Expressions of Interest from Authorities to host placements, 83% of which were brand new roles. These placements have facilitated the delivery of many Government funding programmes in the past, including the Planning Delivery Fund, Garden Communities Fund, Housing Infrastructure Fund, Towns Fund, Future High Streets Fund and High Street Heritage Action Zones.

New funding for Authorities must come hand-in-hand with new measures to help them to recruit the right expertise. Public Practice is a proven model that is ready to scale nationally. We would welcome the opportunity to work with the Government to establish a national Public Practice programme that gives Authorities immediate access to the skills they need to implement planning reform.

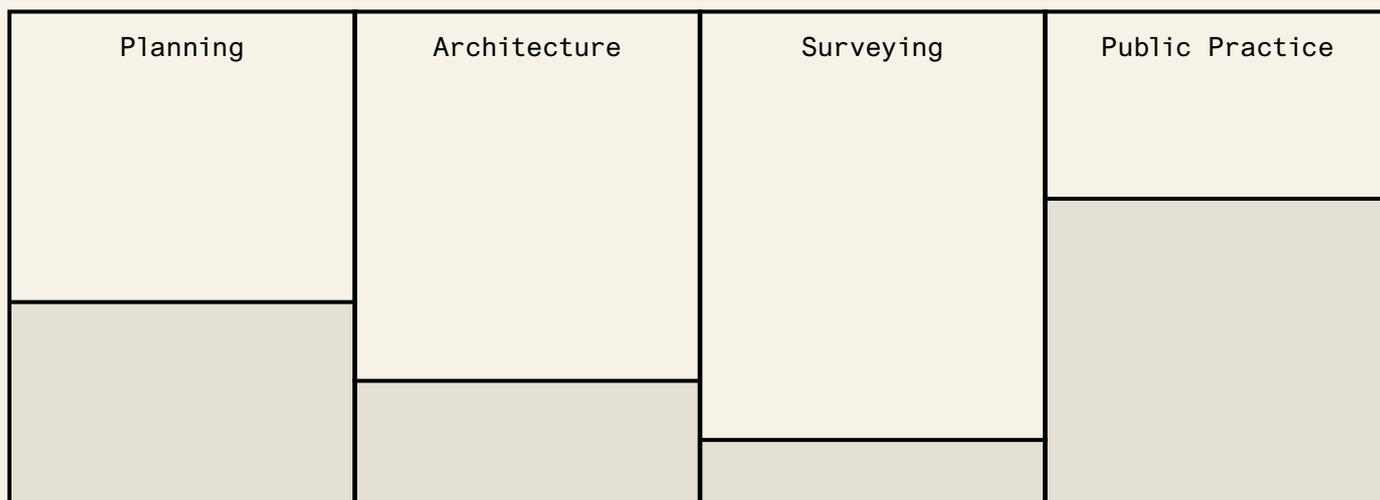
## What do you believe are the main barriers to your Authority building the capacity you anticipate needing to deliver the White Paper proposals? <sup>25</sup>

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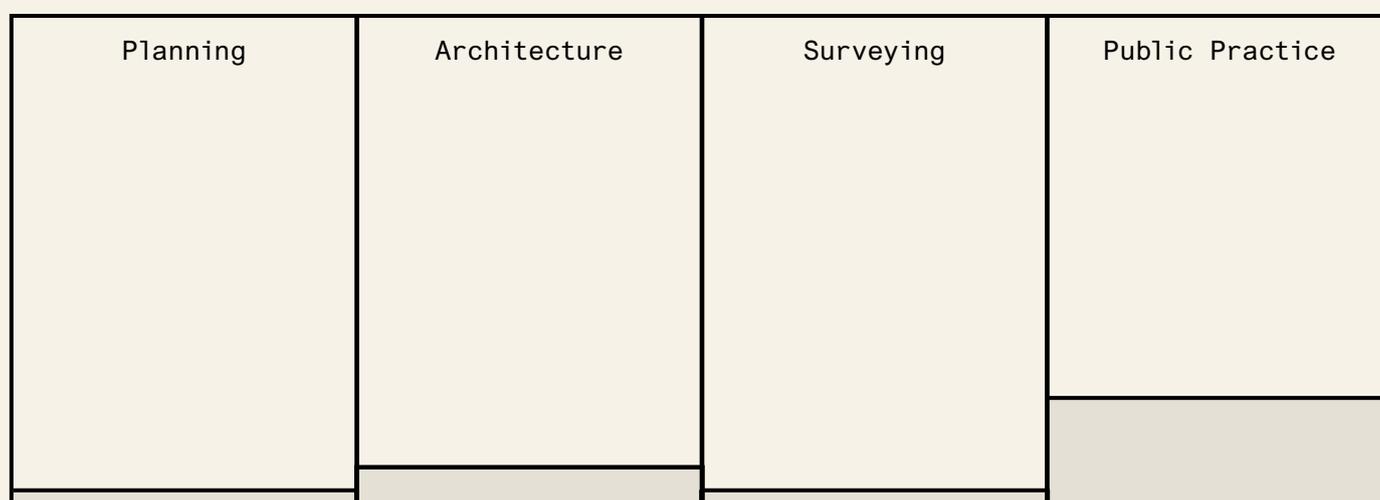
Lack of funding / uncertainties over budgets	85%
Difficulties recruiting the right talent	60%
Restrictions on creating new roles / recruitment freeze	58%
Inadequate hardware / software / systems	50%
Lack of investment in staff training & development	36%
Poor information sharing / knowledge retention	36%
Lack of senior buy-in	29%
Uncertainties over scope and design of new roles	16%
Over-reliance on temporary agency staff / consultants	14%
No barriers	0%

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So far 62% of Public Practice Associates are female (compared to industry averages of 41% of planners, 25% of architects and 13% of surveyors).<sup>26</sup>



23% of Associates are from Black, Asian and minority ethnic backgrounds (compared to industry averages of 4% of planners, 9% of architects and 4% of surveyors).<sup>27</sup>



<sup>26</sup> Public Practice impact monitoring data compared against [RTPI, The UK Planning Profession in 2019](#)

<sup>27</sup> Public Practice impact monitoring data compared against [RTPI, The UK Planning Profession in 2019](#)

# 6. Set a mission for public planning to represent the diversity of the communities we serve

The scale of transformation proposed for the planning system is also an opportunity for the Government to transform the built environment sector for the better. We hope that the “comprehensive resources and skills strategy for the planning sector” is comprehensive enough to look beyond the immediate implementation of reforms at how to underpin employment at a challenging time, how to grow and educate the next generation of built environment experts, and how to improve the diversity of the sector.

Public Practice believes that to have an inclusive built environment we need a sector that embodies the differences and diversity of the communities we serve. We have seen the value of having genuinely diverse cohorts of Associates working within Authorities through our programme - in terms of gender, age and ethnicity as well as less visible but no less important aspects such as lived experience, socioeconomic background, neurodiversity, sexuality or disability. We have been proud to contribute to the GLA Supporting Diversity handbook<sup>28</sup> and Designing a city for all Londoners compendium,<sup>29</sup> and to have recently joined 13 other organisations to launch the Diverse Leaders Pledge.<sup>30</sup>

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28 [GLA, Supporting Diversity Handbook, 2019](#)

29 [GLA, Designing a city for all Londoners, 2020](#)

30 [NLA, Diverse Leaders Pledge, 2020](#)

However, the provision of data and monitoring for diversity across public sector planning is inconsistent, and there is room for far better sharing of practice across Authorities. The recent GLA Placeshaping Capacity Survey found that few respondents were able to respond to questions about the diversity of their staff, only 48% knew if their organisation tracked the gender pay gap and only 32% knew if they tracked the ethnicity pay gap.<sup>31</sup> Further work would be needed to understand the broader spectrum of protected characteristics for example disability, neurodiversity or LGBTQ+ representation.

Government should set Authorities a mission for their planning and placeshaping staff to be representative of the communities they serve by a fixed date, and make monitoring progress on this target a condition of any additional grant funding.

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31 [GLA Placeshaping Capacity Survey, 2020](#)

# 7. Support public planners throughout their careers

A comprehensive resources and skills strategy for the White Paper must address the lack of existing capacity, the need for new specialist skills and challenges around recruitment. But it also needs to include measures to support practitioners already in the public sector and improve retention. The majority of the officers who will be needed to implement the new planning system are already in post. There are talented, committed and knowledgeable built environment experts within Authorities across the country who the Government should be treating as a valuable asset to be celebrated, supported and retained.

The average annual retention rate in planning departments across London and the wider South East is 77%.<sup>32</sup> As competition for staff increases, this rate is likely to decrease. We have seen Public Practice Alumni entering the public sector within the last two years who are already amongst the longest-serving officers in their team. Barriers to retention include lack of opportunities for personal development and career progression, the inflexibility of public sector pay-grades and team structures, and poor quality line-management often as the result of under-resourcing.

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32 MHCLG & PAS, Survey of Planning Departments, 2019

Authorities responding to Public Practice’s recent survey identified additional training and development for existing officers as the top priority for capacity building support to help deliver the changes proposed in the White Paper.<sup>33</sup> The National Design Body should coordinate training provision and standards nationally across the network of local training providers that has emerged in the wake of CABA, for example by establishing agreed sets of learning outcomes. Equivalent training programmes are also necessary for other aspects of the White Paper including digitisation, community engagement and sustainability.

The resources and skills strategy should include measures to tackle barriers to retention, as well as ringfenced funding to support the training and development of existing staff. Government should coordinate training provision and standards across the market of training organisations by setting an overarching curriculum and learning outcomes.

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33 Public Practice, Planning Capacity Survey, 2020

What forms of additional capacity building support do you believe would best help you and your Authority to deliver the changes proposed in the White Paper? <sup>34</sup>

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Additional training & development for existing Authority officers	60%
Additional grant funding from Government / Mayor of London	58%
Easier and more affordable access to skilled staff	50%
Raising more funding through planning fees / borrowing against Infrastructure Levy	47%
Support with the creation of new roles	43%
Greater investment in hardware / software / systems	41%
Affordable alternative to agencies / consultants for short-term project-based work	40%
Better access to information & knowledge sharing across Authorities	40%
Additional training & networking for Authority leadership / Members	23%
No support required	0%

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We believe the White Paper has the potential to create better outcomes through planning, not necessarily as a result of legislative change, but by helping to transform the role of the public planner. But this will only happen if the new system is matched by a new national programme of investment to level up resourcing and enable planning authorities and communities to plan more proactively.

#CapacityBuilding, #PlanningReform, #Resourcing

Practice Notes and other resources are available to download at [www.publicpractice.org.uk/resources](http://www.publicpractice.org.uk/resources)