

Dear Councillors Selleck and Randolph,

We have recently become aware of proposals by Elmbridge Borough Planning Officers, supported by some senior councillors, to change the way planning applications are decided. As Chair of the Triangle Residents Group (TRG), I am writing to express on behalf of the approximately 400 households in the area bounded by Hanger Hill, Queens Road and the London-Portsmouth railway line our serious concerns about what appears to be the thrust of these proposals and their implications both for local democracy and for the involvement of local communities and individual households in influencing local planning decisions.

The proposals appears were set out in a paper discussed by the Planning Committee on 11 June (Agenda item 5/19) and we believe a further discussion is planned for 23 July. It is unfortunate that there appears to have been no attempt to consult those directly affected by the changes, namely the residents. The draft minutes of the discussion rightly draw attention to the need to consult all councillors, not just those directly involved on the planning committees. However, no public consultation or discussion is proposed before a final decision is made. This appears to us to be wrong in principle and counter-productive in practice if the Council wishes to encourage public engagement in the planning process and to prevent further erosion of already fragile public confidence in the system.

The paper presented to the June meeting has a number of flaws that make it an unsound foundation on which to build changes to the current system. In particular:

- There is no clear statement of what officers are seeking to achieve. Is it to increase efficiency? Is it to improve the quality of decision-making by officials and/or councillors? Is it to reduce the scope for objectors to raise their concerns about proposed developments? Is it to reduce an accumulated backlog of cases, in which case councillors might wish to ask for some analysis of why this has occurred? There are other potential reasons for a backlog to occur other than the operation of the system as such, including increases in volume as a result of Government policy changes or the limited availability of planning official resource both in terms of quantity and quality to deal with applications.
- There is no proper cost-benefit analysis. We are left with a section headed Financial Implications with a judgement that there are “None”. If that is the case and no improvements or cost savings are made, why would we want to do it?
- There is no proper assessment of risks. Again, we have a heading but an entry of “None”. Risks that need to be exposed include the potential impact on the workload of the full Planning Committee (note that it is envisaged that public speaking would apply under the new arrangements); pressure to increase the size of that committee to ensure individual wards are not disadvantaged; additional pressures on ward councillors as ‘new’ householder and single applicants press them to take up cases; an increase in public concern about the fairness of the system; and over-reliance on the recommendations of planning officials on delegated applications as the scope for scrutiny and challenge both by applicants or councillors is reduced.

- There is a suggestion that the reasons for a referral should be strictly confined. On the surface, this might appear uncontroversial but there are several areas in current Supplementary planning Documents that are open to a significant differences in interpretation that can be evaluated more effectively through the sub-committees, on which ward councillors with an intimate knowledge of their areas sit, rather than left to the ‘professionals’. The interpretation of local character is a classic example. There are several cases where planning officers have recommended acceptance only for the application to be rejected by a sub-committee and for the Inspector to support that decision. Clive House in TRG’s area is a case in point.
- The statistical comparisons with other Surrey Councils are interesting but not particularly valuable in looking at the system in Elmbridge. Our aim should not be to boost our position in a particular league table but to ensure that we have a system that serves the needs of Elmbridge and its residents. What the tables do show is that most boroughs comparable in size in terms of the number of applications (Runnymede 935, Mole Valley 1,155, Reigate and Banstead 1,349, Waverley 1,712 and Elmbridge 1,904) delegations fall in the range 90-92%. Guildford (1,962) and Tandridge (1028) do fall in the 96-97% range but no details are given about resources, performance in terms of officials’ recommendations being overturned or of appeals upheld/rejected etc.
- Last, but not least, the report notes that the primary role of councillors sitting on a planning committee is “not to represent local community views”. This sends a message about the culture in the Planning Department that, when taken in conjunction with the tendency in individual reports simply to dismiss views of residents has having been dealt with, continues to be worrying. Of course planning considerations are the prime focus but residents are mainly non-experts in planning jargon or may not articulate their views clearly. That does not mean that they should not look to their local representatives or officials whose salaries they pay to reflect the local perspective.

TRG concerns about the draft proposals as they stand are very clear. There are flaws in the current system but the proposals on the table scarcely appear to address them. They can be summarised as follows:

- *The democratic deficit:* These proposals threaten to disempower both local ward councillors and residents across Elmbridge and result in less well considered decisions and more unsuitable or inappropriate developments. It is vital to securing public confidence in the planning system that there is no weakening of the already limited mechanisms for enabling residents to challenge effectively the recommendations made by planning officers. The sub-committees, with councillors have played a vital role in scrutinising and rejecting officials’ recommendations based on their intimate knowledge of their wards and their willingness to weigh the evidence and arguments put forward by their constituents. In several cases their decisions have been upheld when developers have appealed to the Inspector. This engagement is essential if residents are to retain confidence in the system and have assurance that there is something in place to redress its current perceived biases, as for example, the close

engagement of officials with developers in shaping proposals before anything goes out to the public.

- The proposals effectively mean an increased centralisation of decision making, whether in the hands of officials or at full Planning Committee level where not all wards will be represented. This is hardly consistent with any localism agenda. It also seems perverse when Government guidance indicates that “all councillors will have a role to play in representing the views and aspirations of residents in plan-making and when planning applications affecting their ward are being considered” that EBC should be seeking to water down the role of the area planning sub-committees. The guidance also stresses that “planning is more effective when the people it affects are an integral part of the process”.
- *The strategic deficit:* The full planning Committee would understandably tend to focus on strategic implications across the borough, e.g. housing need, the green belt etc. Strategies of course can operate at many levels. Our concern is with planning in Weybridge generally and in the Triangle in particular. There is already great concern locally about the size and mass of developments, the very real issue of parking stress and the constant threat to the character of the area posed by recent over-development particularly in the Queens Road local centre, much of which has been supported by officials. We refer, for example to such developments as Landmark House (formerly the Honda site), Clive House, Salisbury House and the St Georges House site currently under development. There is little evidence from their recommendations to suggest that officials thought through the cumulative strategic impact on this area of such development. It was effectively left to residents, ward councillors and the sub-committee with varying degrees of success to secure at least some changes. Diminishing that role will not enhance effective decision-making.
- *The efficiency deficit:* No analysis has yet been presented public of the potential impact on the workload of the full Planning Committee. At present it can be assured that proposals reaching it will have already been considered by the sub-committee in which local concerns will have been discussed and evaluated against members’ own experience and knowledge of their area. It is difficult to see that the full committee will be able to devote the time to discussion, visits, considering local representations etc. that will guarantee the same level of scrutiny and challenge. It should be noted that Government guidance describes the planning system generally as one which should “enable planning decisions to be taken at the lowest possible level with the involvement of local people”. How is the centralising of decision-making at official and Planning Committee consistent with that principle?
- Has any assessment been made – perhaps by comparing the last 12 months of activity using the ‘new’ rules as a template – to assess the potential workload? There is a real fear that even with the best will in the world on the part of committee members, time pressures will mean that insufficient time is given to local factors and undue weight will be given to what officials recommend. TRG’s experience is that detailed scrutiny

of such reports, which often appear to provide lip-service to local concerns or are factually incorrect, is essential. In this context, the facility to present arguments and evidence to the sub-committee for proper scrutiny is essential.

TRG's conclusion is that the implications of these proposals as currently understood are such that there needs to be a proper consultation with residents followed by full discussion with all councillors. It should not be an issue that is simply left to officials and the Planning Committee itself to decide. That consultation would need to be informed by a clear statement of the objectives of the proposed changes, the evidence that the changes are needed, an analysis of their potential impact on the interests of the local communities across the borough and how the issues of the democratic, strategic and efficiency deficits will be addressed.

Yours sincerely,

Nick Thripp  
Chair,  
Triangle Residents' Group.



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