



## EVALUATING QUALITY DELIVERY AND COMPETENCY OF PLANNING PERMISSION SUBMISSION BY PROFESSIONAL BUILT ENVIRONMENT PROFESSION IN SELANGOR

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Received: 29 September 2022 • Accepted: 27 October 2022 • Published: 31 October 2022

### *Abstract*

*The arising issues pertaining to the professional practice in planning permission submission are non-compliance issues to the standard requirements and problems occurring at local authorities during planning permission submission. This research aims to investigate the quality delivery and competency in planning permission submission among professionally built environment professionals in Selangor. This research aims to understand the current perception and challenges in delivering quality planning permission submissions. This study was conducted on 24 Practicing Professional Built Environments through purposive sampling. Data were collected by an online questionnaire survey, consisting of professional built environment characteristics, perception of quality planning delivery criteria, current performance on the selected measures, and challenges during the preparation and submission of planning permission. Findings show that the Professionals in the Built Environment highly value knowledge for preparing planning permission material, auditing, and monitoring activities. Lack of pre-consultation is ranked first in the challenge of designing the document. Findings also highlight the need for local authorities to improve the way of doing things, such as unstandardized procedures from one local authority to another and the usage of a manual system instead of the online system. This is significant for improving the ease-of-doing-business.*

**Keywords:** Competency; Planning Permission; Professional Practice; Quality Delivery

**Cite as:** Ismail, N.N., Abdullah, A., Ab Rahman, S.S. (2022). Evaluating Quality Delivery and Competency of Planning Permission Submission by Profesional Environment Profesion in Selangor. *Asian People Journal*, 5(2), 137-150.

## INTRODUCTION

Built environment profession, namely Architects governed under the Architect Acts 1967, Act 117, Surveyor with Act 458, Licensed Land Surveyor Act 1958 and Engineers with Act 138, Registration of Engineers Act 1976 as well as Town Planner that Town Planners Act governs 1995, Act 538 have its own set and parcel of responsibility for them to practice their profession. Coordination of profession and competency is highly dependent on the act and selected bodies to govern the profession. Professionals with the recognition title of TPr. and Ar., have the privilege to prepare and submit planning permission applications to the local authorities in Malaysia according to their respective Acts. While the submission of planning permission is still done according to Act 172 in Selangor to this date, it is still a concern on how well the planning permission application is prepared. Particularly in preparation of the Development Proposal Report and Layout Plan. This is because issues arise from various parties including local authorities stating that applicants do not comply with the requirement, causing delays in planning approval which then lead to poor submission. The delay then affects the local authorities' key performance index as well as the rating of ease of doing business.

Exploring criteria that contribute to quality planning delivery may contribute to a broader understanding of quality in preparing the Development Proposal Report and Layout Plan. Hence, this study is done to understand and investigate the quality of planning delivery services among consultants, particularly during planning permission submission material preparation and planning permission submission.

### *Malaysia planning development system*

According to (Chua & Deguchi, 2008), Act 172 has established three fundamentals mechanism which are development plan system (part III of Act 172), planning control system (part IV of Act 172) and Appeal Board System (part VI). Further subsection will include how the development plan system are inseparable from the planning control system.

In the context of planning control systems, Thomas (1997, as cited in Ponrahono Zakiah et al., 2012) stated among few major purposes of development plans are given clear guidance to development control decisions. These are to "to provide some certainty to those seeking planning permission and those seeking to maintain their local environment and amenity as well as to devise policies at an appropriate level of detail" (Thomas 1997 as cited in Ponrahono, Z., 2012, p.3). This is reflected in the objectives of the development plan. Planning permission as stated through the subsection 2(1) of Act 172 refers as permission granted, with or without condition, to carry out development. ("Planning Permission", n.d.) added that planning permission is written permission made by the local authority. Under section 19 of Act 172, there's prohibition for any development to be carried out without the grant of planning permission obtained from the local authority.

This suggests that every development should go through the process of application for planning permission and mandatory approval for development to take place. Failure to do so will be subjected to enforcement described in section 27 of Act 172. Plus, section 20 of Act 172 described the need for development to be in conformity with the planning permission granted. However, there are also non-compliance issues of planning control specifically non-compliance to the planning permission granted as described by (Chua & Deguchi, 2008). Planning permission is indeed important to ensure the development in an area is properly controlled as well as in conformity with the development plan. Table 1 depicts the procedure for planning permission as described by the Town and Country Planning Act 1976, Act 172.

Table 1: Content subsection 21(1) and 21(3) of Act 172

Section	Provision / Important Things
<b>Subsection 21(1)</b>	Application for planning permission Application for planning permission in respect of a development as stated in Form A of the First Schedule
<b>Subsection 21(3)</b>	The application shall contain particulars, documents, plans set A written instructions given to the applicant to amend the plan. Form A (1) of Schedule 1 A written instructions given to the applicant requesting an amendment to the proposal returned to the local planning authority within 1 week or determined by the Local Planning Authority

### ***Best practices of planning permission submission***

Ease of doing business is one of the comparisons of business regulation among 190 countries evaluate by the world bank group. Singapore and New Zealand are one of the tops in the ease of doing business ranking index. Malaysia on the other hand, had recently soar to achieve outstanding ranks as Malaysia started to adopt the OSC 3.0 Plus procedure.

Singapore is a small island nation which have adapted electronic system in their planning permission application process. Construction and Real Estate NETwork or known as CORENET has been planned and developed in 1995 and 2001 respectively (Sing, 2001). CORENET is established to achieve a “seamless and expedient exchange of information between relevant government agencies and parties involved in the construction and real estate industry” (Sing & Zhong, 2001, p. 419). Through CORENET, it is aimed to compress time and process, giving knowledge content and unlock potential to new business models. However, the most important part is that CORENET functions as a virtual platform of One-Stop Access to Construction Information (OACIS) and One Stop Submission Center (OSSC) (Sing, 2001). In other words, CORENET emphasized on the ease to access construction information and ease for submission process. According to (Marzukhi et al., 2019), the Qualified Person (QP) can check the status of the planning permission submission during 20 working days. Complex cases on the other hand, may need more time for application evaluation.

New Zealand on the other hand use MultiProof as a system for building plan submission (Marzukhi et al., 2019). MultiProof is applicable if the “applicant has the intent and ability to build an approved MultiProof design at least 10 times over 2 years” (Toni, 2019, p. 76). The Ministry of Business, Inovation and Employment (2018) explains a MultiProof Certificate is a statement by the minister that the set of building plans are submitted and complies with the Building Code. This exercise expediate the building consent process with authority need to process the application within 10 working days instead of 20 days. However, the MultiProof only approve design rather than construction methods, separate and specific construction drawing are still needed to be send for each site (Ministry of Business, 2018; Toni, 2019).

Other than that, there are few other countries that realized the importance to reform and modernise their planning law, among them are Scotland, Australia and Wales, United Kingdom as reported by Salleh Buang (2018). Australia submitted for modernizing planning law to “to enable the country’s planning system to increase efficiency, certainty and transparency, to improve the speed and quality of decision making, and to facilitate the transition to electronic planning system” (Salleh Buang, 2018, p.1). The main aim of the changes is not just

attracting investment but also to enhance their built and natural environment. Approaches that are taken by these countries should be seen as exemplary as Australia specifically is also a Commonwealth country that used to adopt British's planning legal system. In Wales for example, the planning law are reformed because the previous law is described as complex and overlapping law. The laws outlined in 2017 are meant to make "the law clearer, simpler and more effective for everybody" (Salleh Buang, 2018).

In the case of Malaysia, before the adoption of OSC 3.0 Plus, most of the local authorities in Malaysia are depending heavily on manual submission which requires 15 hardcopy of planning permission submission material (Siew, 2006). Local authority has the right to adopt federal's decision to apply OSC 3.0 Plus or to maintain way of doing business as planning is a concurrent matter between federal and states. In this case, Penang City Council maintained to use their own system which are Integrated Local Council Solution (ILCS). According to Siew (2006), Penang Municipal Council back then was among the earliest council to adopt the electronic system for planning permission submission. ILCS is said to be efficient as the authority seek for .*dwg* formatted file digital submission and non-editable pdf file of plans directly to be submitted into the system. Other than that, ILCS is a system that which all development fees are calculated automatically as the applicant checked the checklist online. This is said to tremendously increase the ease of doing business at Penang City Council as authority can digitally inspect and access the plan submitted. This process hence has proven the efficiency of the authorities to inspect plan as the council kept on receiving a rise in numbers of planning permission without jeopardizing their key performance index (KPI).

## METHODOLOGY

This study adopts the combination of qualitative and quantitative research to provide better insights into the current perception, performance, and factors affecting the quality of planning permission. This is supported by Goundar (2012) and Amir, et al. (2017) who states primary research should encompass both qualitative and quantitative. It is important to note that this study aims to investigate and measure the quality delivery and competency of planning permission submission. The title itself will imply the perception that this study will be contextualizing and framing a few subjective matters. This is because quality is often viewed subjectively from one individual to another. Hence, the choice of the researcher to adopt the qualitative research is to capture as many possible ways as possible of measuring, contextualizing, and defining a quality delivery and competencies of planning permission submission. Thus, this study adopted simple qualitative research as one of the designs of the research. Literature extraction of the theoretical framework came from secondary data but is matched to the tacit knowledge provided by experts who are involved in planning permission in Malaysia.

Questionnaire survey are done among 24 respondents of private town planners holding the positions of Principals of town planning ( $n = 9$ ), Assistant Principal ( $n = 1$ ) and practicing experienced town planners that are involved in the preparation of planning permission submission ( $n=14$ ). Some of them are corporate members of the Malaysian Institute of Planners (MIP) and registered as Professional Town Planners under Lembaga Perancang Bandar Malaysia (LPBM). These respondents were identified after an analysis of data from the respondent's profiles collected during the questionnaire survey.

For the Likert scale questionnaire, the items are adopted from Baer (1997) that outlined criteria for evaluation of plans in planning. The items are then adapted through the context of planning permission submission

content in order to achieve the research objectives. The researcher prepared the survey containing questions that are framed into several themes identified to be the contributing to challenges in delivering quality and competent planning permission submission.

Preliminary data was collected through two means which are semi-structured interviews and questionnaire surveys. Both primary data collection serves two different stages of the study. The former is used to develop the Quality criteria framework; meanwhile, the latter is used to analyse the understanding among the development consultants.

### ***RII Analysis***

The study adopts Relative Important Index (RII) Analysis. The formula is as follows:

$$RII = \frac{\sum y_a x_a}{Y \times N}$$

Where:  $y_a$  = constant expressing the weight of the  $a^{th}$  response  
 $x_a$  = frequency of the  $a^{th}$  response  
 $Y$  = the highest weight  
 $N$  = total number of respondents

Where  $W$  is the weighting given to each factor by the respondents (ranging from 1 to 4),  $Y$  is the highest weight (i.e. 4 in this case), and  $N$  is the total number of respondents. The higher the value of RII, the more important the quality and competent criteria as well as the higher degree of challenges faced by the Professional Built Environment. The values are summarized and presented through a table. In this study, challenges in delivering quality and competent planning permission submission will be analysed from the questionnaire using thematic analysis method.

### ***Thematic Analysis***

The thematic analysis will be used for open-ended questions in the questionnaire survey. Thematic analysis is one of the ways to analyse qualitative data. It involves classifying data into themes suggested as “patterned response or meaning” (Braun and Clarke 2006 as cited in Kiger & Varpio, 2020). After the classification of themes, then the analysis will then show the severity of the issues by seeing the frequency of responds according to the themes.

## **RESULTS AND DISCUSSION**

### ***Professional Built Environment’s perception on the Quality Delivery and Competency of Planning Permission Submission***

Based on the RII analysis, it can be observed that the respondent perceived comply with the standard requirement checklist and the material submitted is in accordance with Act 172 as the most important criteria in delivering quality submission. This is mainly because Act 172 is the source of power for the practice of planning permission and compliance with the standard requirement checklist will ensure a higher chance of approval for the planning permission application submitted. Other than that, it can be said that the provision of planning permission in the first place is from the Town and Country Planning Act 1976, Act 172. Compliance with the requirement increases the chances for planning permission approval (see Table 2).

Based on the analysis, the next criteria that are ranked as second and third most important by the respondent are site suitability for proposed development and consistency or coherence in the report by providing proposals/ recommendations/ conclusions that are consistent with the concepts. This highlights the importance of having solid spatial planning knowledge and coherence in report writing including qualitative analysis as highlighted by a scholar and two experienced practitioners (Alithamby,2005; Tpr. Dato' Mohd Jaafar Mohd Atan, personal communication, 2021, Tpr. Dato' Dr. Dolbani Mijan, personal communication, 2021).

Table 2: Importance of the criteria to Quality Delivery (RII)

Criteria	Frequency				RII Importance Index (RII)	Rank
	1	2	3	4		
Comply with the standard requirement checklist and material submitted is in accordance with Act 172	2	4	10	8	0.875	1
Site suitability for the proposed development	2	2	3	17	0.8646	2
The proposals/ recommendations/ conclusions are consistent with the concepts	1	2	9	12	0.8333	3
An overview/summary provision in planning permission material	1	2	10	4	0.8229	4
The rationales behind the decisions effectively presented	2	-	11	11	0.8229	4
The data, goals, and pertinent information recommend mitigation action	4	1	5	14	0.8020	5
Planning permission material consider the state or district government context	1	3	10	10	0.8020	5
The plan is attractively laid out	1	3	11	9	0.7917	6
The capacity or adequacy of existing infrastructure and organizational systems described	2	1	12	9	0.7917	6
Problems specifically identified or implied	3	1	9	11	0.7917	6
The ideas are convincingly presented, given the nature of the audience	2	3	9	10	0.7812	7
Goals and concepts clearly identified	2	4	9	9	0.7604	8
Graphics are used to best advantage	3	3	9	9	0.75	9
Provision of the table of content	2	4	10	8	0.75	9
The data and methodology sources are cited	5	2	13	4	0.6667	10

Table 3 show the Importance Index view by the respondent in regards to competency criteria in delivering quality planning permission submission. Finding show that respondents highly value the criteria of knowledgeable, analytical, and creative, as well as auditing and monitoring the submission material before submitting it to the local authority, where two of these criteria are ranked as the most important (1st and 2nd rank). The third ranked criteria are professionals in built environment should be well-articulated, where they can defend their plan. From the findings, respondent felt that avoiding working in si-lo and the need to have at least a diploma and above staff recruitment in their company as less important compared to the three main criteria. Both are ranked in fourth and fifth place respectively.

Table 3: Competency criteria

Criteria	Frequency				Relative Important Index (RII)	Rank
	1	2	3	4		
Professionals in built environment should be knowledgeable, analytical, and creative	-	1	11	12	0.90625	1
Professionals in built environment should audit and monitor all submission material before submitting it to the local authority	1	1	5	17	0.8958	2
Professionals in built environment should be well-articulated, where they can defend their plan	-	1	11	12	0.8646	3
Professionals in built environment should avoid working in si-lo	1	3	11	9	0.7917	4
The need for at least a diploma and above staff recruitment in the professional built environment company	2	4	9	9	0.7604	5

### *The Current Performance of Profesional Built Environment in Planning Permission Submission*

Based on the findings, most Professional Built Environments practiced all the criteria mentioned in the questionnaire. There are also respondents who answered not practicing the criteria as well as rare practice. For non-practising criteria, only 1 to 3 respondents choose the criteria as not practice. The criteria are the rationales behind the decisions effectively presented, the data, goals, and pertinent information recommend mitigation action, goals and concepts clearly identified, graphics are used to best advantage, provision of the table of content, and the data and methodology sources are cited, professionals in the built environment should avoid working in si-lo, and the need for at least a diploma and above staff recruitment in the professional built environment company.

For rarely practised criteria, the frequency of respondents that answered it as rarely practised ranged from 3 to 7 respondents. 7 respondents choose site suitability for the proposed development, the plan is attractively laid out and problems are specifically identified or implied. While it is understandable for respondents to choose the second later criteria, the first criteria which is site suitability for the proposed development is somehow questionable. This is because this criteria is already ranked as the second most important criteria by the Professional Built Environment but there's still a small percentage (29.17%) of respondents who said that the criteria are rarely practised. For the second later criteria, it is understandable as logically small-scale and straightforward development usually received the least amount of payment. Since the development is straightforward hence there's less need to make the graphic attractive given that the development is not complex. Next, problems specifically identified or implied are considered as rarely practised as most of the predictable problems are solved first before any application is sent, according to Respondent 10, to make sure development or construction will be able to carry out once approval is attained.

Based on the interview, Respondent 10 admit that there's a rare practice of auditing and monitoring all planning permission submissions. This is because there are high numbers of projects and with competent staff, the submission usually could be handled by them. The high number of projects that need to be accommodated by the Professional Built Environment, especially town planners, may stem from the small scale of fee for town planners to sustain the running cost of the consultancy business. Overall, there's a corresponding between the criteria ranked as important by the Professional Built Environment and the frequency of practice.

Based on My LCP Score Card (PLANMalaysia,2021), there are a few criteria that are marked as red, in which the applicants could attain full marks without complying with the criteria. These are environmental quality analysis, building details, and development impact on the natural environment. Other criteria, on the other hand, are considered as important with few criteria having more weightage than the others. According to My LCP Score Card type 1A DPR, C5: Compliance to Development Plan possesses the highest weightage with 35 out of 100 marks followed by development impact from the proposed development weighing 25 marks. Compliance with the district local plan criteria is the highest mark (10) followed by the layout plan. While the other criteria possess only 1 to 4 marks.

4 documents type 1A DPR are attained from Majlis Bandaraya Subang Jaya (MBSJ). This document is then analysed to better understand the current performance of Professional Built Environment in planning permission submission. From the document, it can be observed that there's a case where the layout plan submitted and the layout plan attached in DPR for the same projects are not identical. There are also analyses that are not clearly spelt out as requested in MyLCP Score Card, shown in the appendix. Other than that, the unstandardized format in terms of the sequence of content as shown in the Manual Laporan Cadangan Pemajuan (LCP) may prompt difficulty for officers to check efficiently.

Based on observation, all documents complied in providing important information in the DPR. Factual basis such as plot ratio, plinth area, and layout plan for the proposed development is seen to be provided clearly from the document attained.

### ***The challenges the Professional Built Environment face in preparing and submitting the planning permission submission material***

The questions contained 6 factors of challenges face by Professional Built Environment in preparing planning permission material. Respondents were required to rate of contributing factors to the challenges faced by them. The likert scale is as follows: 1- No contribution 2- Low contribution 3- Contribute 4- High contribution (Table 4).

Table 4: Challenges during the preparation of planning permission material (RII)

Factors that Contribute to challenges during the preparation of planning permission material	Frequency of respondent				Relative Important Index	Rank
	1	2	3	4		
Lack of pre-consultation prior to document preparation	2	-	12	10	0.813	1
Staff understand and are well-versed in planning permission requirements set by local planning authorities	3	3	7	11	0.770	2
Time given by developer or client to prepare the document commensurate with the request	4	4	7	9	0.719	3
Staff are not familiar with the process at Land Office	4	7	9	4	0.635	4
Not being familiar with the requirement	5	8	6	5	0.615	5
Frequent change of staff at professional built environment offices	5	8	8	3	0.594	6

Based on the RII analysis, lack of pre-consultation prior to document preparation is ranked as the first factor out of six listed factors that contribute to the challenges in delivering quality planning permission submission. This is followed by staff understanding of planning permission requirements set by local planning authorities. Next,



the time given by the client to prepare the document commensurate with the request is also among the top three challenges the consultant faces in delivering quality and competent planning permission submission.

At the fourth rank, staff familiarity with the process at Land Office, 13 out of 24 (54.54%) respondents responds it as contributing factor. Next, Frequent change of staff at a professionally built environment office and not being familiar with the requirement are the least contributing factors to the challenges in delivering quality as most respondents 11 out of 24 (45.83%) and 5 out of 24 (20.83%) respectively choose the item as fewer contribution factors to the challenges in delivering quality and competent planning permission submission (Table 5).

Table 5: Response received on challenges during the preparation of planning permission material

Response
“man power and their competent of preparing the document submission” (Respondent 2)
“Client budget concern” (Respondent 11)
“Convincing the client” (Respondent 8)
“Client pushing too hard” (Respondent 12)
“Time and skill” (Respondent 22)
“Time” (Respondent 24)

From the analysis, it can be deduced that staff knowledge is one of the crucial drivers of quality and competent planning permission submission. A respondent through an interview also adds that he would not give any planning permission-related task to his subordinates unless he is ensured the staff understand planning permission in nature. This is also supported by the response laid above from Respondent 2 and Respondent 22. Other factors such as lack of pre-consultation and time given by the client contribute highly to the challenges in delivering quality and competent planning permission submission.

Other than that, the respondent also lay a few other challenges which are client budget concerns, convincing the client and client that give pressure. These challenges highlight the need of better communication aspect with clients. Time is also crucial factor as highlighted by Respondent 22 and Respondent 24.

### ***The Challenges the Professional Built Environment Face in Planning Permission Submission Stage***

The questions contained 4 factors of challenges face by Professional Built Environment in submitting planning permission material. Respondents were required to rate of contributing factors to the challenges faced by them. The likert scale is as follows: 1- No contribution 2- Low contribution 3- Contribute 4- High contribution (Table 6).

Table 6: Challenges during planning permission submission (RII)

Factors that Contribute to challenges during planning permission submission	Frequency of respondent				Relative Important Index	Rank
	1	2	3	4		
Delay feedback from officers	-	1	5	18	0.927	1
Unrealistic time given to amend the document	1	3	8	12	0.823	2
Tedious process (policy and process that keep on changing)	2	2	10	10	0.792	3
Frequent change of human resources at local authorities	2	6	10	6	0.708	4

Based on the RII analysis, delayed feedback is ranked as the most contributing factor to the challenges during planning permission submission. This is then followed by the unrealistic time given to amend the document. For the third place, tedious process with referral to policy and procedures that keep on changing, respondents start to answer the little to no contribution factors to challenges in planning permission submission. However, it can be said that these factors give a contribution to the challenges as most respondents, 20 out of 24 respondents (83.33%) respond to the tedious process from 3 to 4 accounts to contribute to mostly contribute. The same cases were applied to frequent changes in human resources at the local authorities, even though it is ranked last, most of the respondents, 16 out of 24 (66.67%) choose these factors as contributing to mostly contribute. From the findings, it can be deduced that all the listed factors are the contributing factors in delivering quality delivery. However, the rank shows the arising issues that have been hugely contributing to quality delivery in planning permission. Few other related challenges in the process preparation as laid by respondents are as follow in Table 7.

Table 7: Response received on challenges during planning permission submission

<b>Response</b>
“Inconsistent comments given by technical agencies - depends on processing officers” (Respondent 1)
“Planning Submission should be done with 100% digital submission. This includes from the submission by the PSP, comments from Technical Departments and until the approval process” (Respondent 3)
“Authority issue letter later than the letter’s date and they will ask to resubmit 2 weeks based on the date of the letter so if we get the letter later than the date we have wasted time” (Respondent 13)
“Plan and document pass to multiple layers of officer for checking and evaluation” (Respondent 7)
“Gap of knowledge between officers and PSP which results to inability to accept new design and ideas even if the ideas towards creating sustainable and liveable township” (Respondent 9)
“Some local authorities responded to queries pertaining to applications depending on their mood” (Respondent 10)
“Officer attitude” (Respondent 14)
“Different submission guidelines from each local authority in the same state” (Respondent 5)
“Late official reply” (Respondent 16)
“Feedback from technical department take too long” (Respondent 15)
“Late feedback from authority” (Respondent 12)
“Requirements by PBT change and different” (Respondent 19)

Based on the analysis, all the factors laid out can be said as contributing to challenges in the planning permission submission stage, however, delay feedback from officers and unrealistic time given to amend are the most experienced challenges among the respondent.

Respondents feel that there are other challenges during planning permission submission which could be categorized into a few themes. Firstly, based on the human resources theme, respondents feel challenged by inconsistent comments given by technical agencies which depend on officers that are in charge. Respondents also feel that plans and documents are passed to multiple layers of officers for checking and evaluation. For this scenario, if the multiple layers were just dissemination of documents through a few internal departments of the local authority it is then a matter of expert knowledge and technicalities experienced that is much needed from one internal department to another. However, if this statement refers to multiple layers of an officer in the internal department

itself, then it shows that the staff hired does not have the capacity to handle the evaluation. Comment made on the gap of knowledge between officers and PSP also shows the staff hired does not have the capacity to handle the evaluation. Next, the respondent also highlights how some local authorities responded to queries pertaining to applications depending on their mood. This is also supported by Respondent 14, which highlights officers' attitudes. If this is the case, it is understandable why some applicants face inconsistent comments throughout their application.

Next, there are also highlights made regarding the system, in which respondents highlight the need to fully do submission online. This includes the submission by the PSP, comments from Technical Departments and the approval process. This statement is highly dependent on the local authorities themselves and their way of doing things. Although there is a new system developed by the Ministry of Local Government and Housing which is the OSC 3.0 Plus, there are still local authorities in Selangor that do not fully adopt the online system suggested and made by the federal government. According to the interview, Respondent 10 and Respondent 11 agree that the weakness lies when there is still a hard copy that needed to be submitted. Although the plan highlighted in the manual is small compared to the submission made previously at OSC that does not adopt OSC 3.0 Plus, there is still a hard copy that needs to be submitted. R10 also responded that there are still local authorities that do not yet adopt online submission hence needing more hardcopy submissions than what is stated in the manual OSC 3.0 Plus. Online submission, especially the one that adopted OSC 3.0 Plus can be said as a convenient medium for PSP. This is because local authorities that adopt fully OSC 3.0 Plus must submit comments for amendments through the OSC 3.0 Plus portal which eases the PSP affairs in manually contacting and receiving comments from all the officers in charge of their application.

There is also a response received on different submission guidelines from the different local authorities. This, however, is not something that could be reversible as the local authority is able to set the requirement according to what deem necessary. The differences in submission guidelines also show that different local authorities have different ways of doing things, which shows also the uniqueness of culture, physical and landform.

Based on the analysis, the human capital of the local authorities plays a major role in ensuring better planning delivery during the planning permission submission stage. Delay in feedback from officers, and inconsistent comments that could stem from lack of knowledge or not following the local authorities' client charter in delivering their service could be the root cause of it. Next, the system that the local authorities adopt is also one of the major contributors to the challenges faced during planning permission submission. Online submission through the results and discussion is convenient and smoothens the process if adopted in the correct manner. Meanwhile, unrealistic time given for amendments could possibly stem from the method of giving comments. Physically sent letters that contain feedback took a much longer time to be received rather than online feedback that could be accessed right after the submission of the feedback through the portal. This is supported by Respondent 13 when the respondent particularly commented on-time waste when receiving the hardcopy letter.

Most practitioners perceived the quality criteria as important, though there are a few criteria that are seen as less important. Professional Built Environment valued strongly knowledge with action on recruiting staff with level of education diploma and above as well as sending their staff frequently for knowledge upgradation. The professionals also highly valued auditing and monitoring the submission material before submitting it to the local authority as the second most important competency criteria. The analysis also showed the current performance made by the Professional Built Environment is at a satisfactory level with pertinent qualities that are frequently and adequately practised. Documents attained from the local authorities also show that all applicants comply with the

requirements set in MyLCP Score Card. Non-compliance issues on the other hand are subject to interpretation from local authorities' officers as they are the ones who set the requirements.

However, based on the analysis, there are a few practices that need to be frequently practised by the Professional Built Environment to improve their quality delivery and competencies namely site suitability to the proposed development and practice of auditing and monitoring all planning permission submissions. This will improve quality planning delivery in Malaysia. There are also analyses that are not clearly spelt out as requested in MyLCP Score Card. A clear written analysis spelling out the suitability of the proposed development to the surrounding area and the impact of development to the surrounding should be done to ease the officers' task as well as showing the results of the analysis.

The analysis proved that unserious application from PSP which defeat the purpose of pre-consultation and the session could be regarded as an ineffective session provided that the officers need to entertain the unserious application. This was proven when there was a respondent who did not highlight the need to prepare the material beforehand pre-consultation. There are a few challenges identified and ranked from the Professional Built Environment side in preparing the planning permission material. The challenges are namely staff understanding on planning permission requirements set by local planning authorities, clients' budgets and concerns as well as time.

From the analysis, it can be proofed the statement from respondent on pre-consultation matters. This is based on the RII analysis, lack of pre-consultation is ranked as the first factor out of six listed factors that contribute to the challenges in delivering quality planning permission submission during the preparation planning permission material. The analysis also showed that some local authorities did not follow the guidelines imposed by the ministry in the manual OSC 3.0 Plus with the variation of answers to number of hardcopies plans to be submitted to the local authorities. The analysis also highlights several challenges that have been faced by the Professional Built Environment during planning permission submission regarding the staff capability in handling planning permission at local authorities including their service, attitude, and competency in delivering quality service. Other than that, comments on the manual system by local authorities also raised concerns by Professional Built Environment as challenges and could be regarded as inefficient way of doing things.

## **CONCLUSION**

For better improvement of quality delivery, there are few recommendation which are improving the current planning system, highlighting the need of pre-consultation, refining OSC roles, and improving the setting at local authorities especially on recruitment of competent staff, adoption of full online approach submission, and make data available and more transparent.

One of the keywords for a good working environment would be good cooperation between town planners at the local authority, consultants, and clients. This includes flexibility in standard requirements and guidelines outlined. Flexibility here means the standard requires guidelines shall be made negotiable and able to compromise. Although certain requirements are non-negotiable as they can affect safety, livelihood and the public's quality of life, certain requirements shall be made negotiable with solid justification. If only the proposal made can ensure a better quality of life for the public either in the short term or long term, regardless of what the guidelines have outlined. It shall serve solely as a guide for the town planners, the true decision and intelligence, in any case, shall

depend on the town planners' point of view together with the support from other parties involved at the OSC meeting. Condition set that includes following guidelines at the use class order section in district local plan then changed into a legally-bind once the local plan is gazetted. These systems then disallow any negotiation for development unless guidelines were to follow exactly as outlined. This way of doing things shall change for more investment and better living environment to be created.

Based on Salleh Buang (2021), there's a need to modernize planning law. Few other commonwealth countries that initially adopted the planning law from British has go through several modernization to their law. Malaysia on other hand, should go through the same process in ensuring our competitiveness and compatibility for business to take place. Based on the analysis and findings, there's a solid need to continue pre-consultation as before the introduction of OSC 3.0 Plus, it is also supported by World Bank (as cited in Marzukhi et al., 2019). However, amendment can be made with the terms that technically highlights encouragement for applicants to consult after compiling planning permission content and materials according to general requirement checklist. Professional Built Environment should be prepared beforehand attending any pre-consultation and discussion with officers. Next, local authorities should come out with a systematic approach to entertain pre-consultation from applicants. An online system that lists out the important details or notes from the local authorities will serve as record of minute meeting, proof of discussion and consistent comments. If deem necessary, an appointment system to book time to meet the local authorities may expediate the local authorities' task when the staff could plan their day to ensure effective time and work management. This is to ensure an effective and efficient way of doing things. An efficient and effective pre-consultation will encourage applicants to choose pre-consultation for most of their projects, whenever necessary.

Based on findings and analysis, current OSC setting only serve for planning permission submission and document checking. OSC should bring improvement to the current setting at the local authorities, ensuring related agencies to be more competent and follow the timeline, making data available online. Ministry of Local Government and Housing should be able to not just harmonize the relationship between the local authorities, Professional Built Environment and client but also refining the OSC roles in which OSC should be a center for efficient submission, an enabler for better data access and effective system for planning permission. This includes upgradation of current system, well-diverse staff and engagement with various parties. From the findings and analysis, it can be said that all respondents showcase ability of competency to conduct planning permission submission. However, there are several challenges highlighted for both practicing private companies and local authorities. There are also practices that could be done for better improvement to the system as well as improvement of quality planning delivery. Lastly, collective improvement by all parties should be made in order to ensure the planning permission submission are progressive in nature accordingly responding towards the rapid changes of development's needs.

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