



National Planning Policy Framework

A response by Civic Voice to DCLG's
review
February 2011

1. Civic Voice welcomes the opportunity to shape the framework of national planning policies as part of wider reforms to the planning system. As the new national charity for the civic movement, Civic Voice is excited by the prospect of reforming the planning system to help people shape their surroundings more effectively. We work to make the places where everyone lives more attractive, enjoyable and distinctive and to promote civic pride and we know how important effective planning is to these goals. Given this role it is no surprise that civic volunteers are the most numerous participants in the planning system and this response is informed by their practical experience and local outlook. As part of our own debate on the review we have also conducted an online poll and discussion forum.

2. Civic Voice believes the planning system has untapped potential to engage people in becoming more actively involved in their community as well as managing land use change and development for the widest public good. It combines vision with necessary regulation and already has a critical part to play in protecting and improving the quality of our cities, towns and villages. We believe this needs to be strengthened and supported through improved opportunities for public engagement, selective extension of planning controls (not deregulation) and stronger safeguards against abuse. This needs to be further supported by action to remove the mystique, jargon and complexity of planning vocabulary and processes which act as a deterrent to community engagement. The value of effective planning in the public interest also needs strong defence against vested interests who seek to weaken safeguards or promote exceptions to bypass the system.

3. The review of national planning policies has an important role to play in achieving this potential for planning. We share the ambition for a more localist and user friendly approach which only addresses those issues which need to be included. A clear and effective national planning policy framework is fundamental to the overall effectiveness of spatial planning, providing certainty for both developers and communities. It needs to both establish a favourable policy direction and be written in accessible language. It also needs to provide a clear foundation of preparing development plans. We address these issues in our submission.

(a) Policy direction

4. We have reviewed the current suite of PPSs to identify the most critical aspects of the current policy framework which need to be retained and/or strengthened. PPSs currently perform at least three different functions – setting a policy direction; providing

guidance on the content of development plans & development control and explaining the processes of planning. We would encourage the new Framework to focus on desired planning outcomes, provide a clear policy direction and take the opportunity to consolidate national policy in a manner that aids policy integration. We have identified the following policies as being among the most critical to retain:

(1) Those which fundamentally shape the geography and location of housing, economic and other development:

- Town centre first policy for retail, leisure, offices, culture, public administration and other town-centre uses; including retention of the sequential test and impact test and a positive approach to mixed use (PPS4)
- Making best use of previously developed land; including the sequential approach to the location of new housing; a positive approach to density and design; avoidance of the loss of gardens and urban green space; and a fresh emphasis on such development enhancing the historic fabric of urban areas (PPS3)
- Green Belt and Metropolitan Open Land (PPG2)
- Reducing the need to travel; encouraged in particular through compact, mixed use and accessible development and services focused on walking, cycling and public transport (PPG13)

(2) Those which recognise and protect the qualities that make places attractive, enjoyable and distinctive by sensitively managing change:

- Historic environment (PPS5, Policies HE1-12), emphasising its finite and irreplaceable nature
- Design (PPS1)
- Conservation, restoration, enhancement and enjoyment of the natural environment (draft PPS natural environment)
- Local character and distinctiveness and the importance of sense of place (PPS5, draft PPS natural environment)
- Local green space (draft PPS natural environment)
- Open space; including through the sequential approach to disposal which requires the needs of all other open space uses to be considered before disposal for development (PPG17)
- Local designations; including local listing, character areas and areas of landscape value (PPS5, draft PPS natural environment)

(3) Those which promote sustainability and adapt to and mitigate the effects of climate change

- Sustainable development; including the prudent use of natural resources (PPS1)
- Climate change (PPS1 Annex)
- Reducing the need to travel (PPG13).

5. There are two areas where we would welcome a stronger emphasis in the new Framework. First, the power shift to local communities needs to be much more clearly recognised, building on the guidance in PPS1 on community involvement. This should include explicit recognition of the benefits of the planning process itself in supporting community cohesion and engagement. Second, we are keen, particularly in

the context of the Government's emphasis on economic growth, to see clearer recognition of the economic role of vibrant town centres as a focus for employment, shopping, leisure, culture and public administration and promotion of a strengthened role for town centres in our national life. This should be linked to clearer recognition of the economic value of high quality public realm and urban design and a well managed historic environment. This wider role is far more important economically as well as socially and environmentally than the perceived benefits of promoting particular forms of economic development (such as large-format retail stores).

6. We support the intention substantially to reduce the length and complexity of the current range of national planning policies. It is important, however, to recognise that there have been significant recent reviews which have already achieved this on some key issues, notably PPS4 on sustainable economic growth and PPS5 on the historic environment. We note, for example, that PPS5 has achieved a 92% reduction in word count on the length of its predecessors (PPGs 15 and 16). Consequently we would not encourage any significant redrafting of the guidance contained in these PPS4 or PPS5. We are also encouraged by the shortened guidance on the natural environment which is currently a draft PPS.

7. In addition to providing a clear policy direction, it remains important that the Government "holds the ring" in explaining the principles of planning and how the system works and in providing guidance on various issues and aspects. We recognise the value of much of this information being provided by others and being tailored to particular users but there remains a key role for central Government in providing an overview and also offering guidance on emerging, technical or contentious issues (e.g. renewable energy).

8. One area where there is a continuing need for clear Government guidance relates to key risks, such as flooding, unstable land and coastal change, and these might be consolidated into a single risk-based approach in guidance, supported by technical information.

(b) Language and accessibility

9. The current suite of Planning Policy Statements and other guidance and circulars plays a vital role but it has become increasingly difficult to navigate and grown incrementally in an often uncoordinated way. It is also written for planning practitioners in local government, business and the professions and much remains obtuse or impenetrable to lay participants. The language is too often jargon-ridden and exclusive and it deters community participation.

10. We see considerable merit in shorter, clearer guidance that is easy to navigate, drafted for a lay audience and written in Plain English. It is important that the guidance is legally robust and we believe this clarity should also help minimise the potential for different interpretations which can give rise to wasteful litigation. We would encourage the Department to draft the new Framework in collaboration with a community sounding board of lay participants.

(c) Development plans

11. We strongly support the emphasis being placed by the Coalition Government on the sovereignty of development plans and the provisions in the Localism Bill for neighbourhood plans to become part of the development plan. It will be important to provide clear guidance on the desired approach to the content of plans. It will also be helpful for the new Framework to confirm the expected use of the term Local Plan to describe the main development plan prepared by local planning authorities, and the end of the term Local Development Framework. This is a small but important step towards use of more accessible language.

12. There are two important issues relating to neighbourhood planning which need to be addressed:

- ▀ Further clarity of the strategic elements of Local Plans within which neighbourhood plans will need to be prepared, whilst recognising that there can be no precise national definition and this will vary depending on the planning context and, ultimately, be a matter for the Independent Examiner
- ▀ Any Local Plan being prepared after a neighbourhood plan should be required to adopt its approach unless there is a significant change in circumstances. Local Plans need to do more than “have regard to” pre-existing neighbourhood plans which have been through an important process and secured community support for their area.