



The Review of Planning Practice Guidance: Civic Voice response

Civic Voice is the national charity for the civic movement. We work to make the places where everyone lives more attractive, enjoyable and distinctive. We promote civic pride and we talk civic sense. Civic Voice speaks up for civic societies and local communities across England. We believe everyone has the right to live somewhere they can be proud of. We know how people feel about places because we feel the same way. Civic Voice has been joined by over 290 civic societies, with over 75,000 members between them. Among other things civic volunteers are the most numerous participants in the land use planning system.

Consultation questions

Do you agree with the recommendations of the Review Group overall?

Broadly Civic Voice welcomes the review of planning guidance as a valuable contribution to identifying an effective and transparent policy and practice framework for spatial planning. The Taylor Review correctly identifies the lack of coherence and clarity in much of the current guidance, but improvement cannot be achieved solely by a radical reduction in the amount of guidance. Given the lack of detail in the NPPF itself, guidance becomes even more important.

The NPPF was a welcome move to reduce the complexity of the planning system and to allow more communities and non-experts to participate. Whilst some guidance is out of date and unnecessary, carefully targeted guidance that helps deliver growth and supports activities such as neighbourhood planning will be central in ensuring the delivery of a workable planning system that operates in the public interest. Guidance is required to provide clarity and interpretation, giving communities, developers and local authorities' great certainty. All new guidance should be written in a more community-friendly way than the previous PPS documents.

2. Do you agree with the proposed recommendations for a much reduced set of essential practice guidance in the format recommended? (Recommendations 1, 2, 3, 5, 6)

We agree with the Taylor Review's recommendation regarding the need for clear, up-to-date, coherent and easily accessible planning practice guidance which is a web-based, live resource, hosted on a single site as a coherent up-to-date guidance suite.

3. Do you agree that standards for future Government Planning Practice Guidance should be implemented by the Chief Planner in DCLG, but with decisions on what to include within guidance still taken by Ministers? (Recommendation 4)

No. We do not think that Ministers should decide what to include in guidance. We believe that if Government wishes to go down this route it would cause resentment as Ministers are not necessarily the experts in this area.

If Ministers do decide to make the decisions they should be required to justify them against published criteria that are consulted on. We could support a "coordinating body" making recommendations to the Minister, but not the Minister alone. We urge DCLG to support and use a working group made up of relevant professional organisations and industry experts to help it draft consolidated design related planning guidance to support the NPPF policies

We do agree that the standards should be implemented by a single person – the Chief Planner seems a sensible option.

4. While access to all planning guidance online will be free of charge, do you think it would be appropriate to offer planning professionals an additional service involving immediate notification of every revision to the guidance, and to make a small charge for this service? (Recommendation 6)

We do not agree that there should be any system of charges. The principle of free access should apply to all information. Surely this is a public service for the public good which should be paid for out of taxation.

The new web-based resource will be the only definitive source of official Government planning guidance. It is therefore essential that access to the site is freely available. Placing the information behind a pay wall would unfairly discriminate against voluntary groups and individuals with limited budgets.

5. Do you agree that the new web based resource should be clearly identified as the unique source of Government Planning Practice Guidance? (Recommendations 7-9)

A single source for all guidance is highly desirable, especially if the website recommended by the Review Group can be achieved. When all the information is finally online in a single website, it is important that the guidance is kept regularly up to date. If online, the guidance could be annotated where it has been revised or updated. For example, when each document is signed-off by the Chief Planner and added to the website, it should have a date of issue. When amendments to the document have been signed-off by the Chief Planner, they should be added to the website, with a revision number, date and brief reasons for the revisions (e.g. new primary legislation or a revision to the NPPF). A further refinement would be for each page of the document to include both the date of original issue and the date and revision number of any amendments affecting the content of that page.

6. Do you agree with the recommended timescales for cancellation of guidance and new/revised guidance being put in place? (Recommendations 10-13)

The process of transition to the proposed new regime will be critical to its success. A key issue will be to ensure a seamless transition from the old system to the new, to ensure that problems are not caused either by important guidance being cancelled before there is something to take its place or by new contradictions or confusion being introduced. Unless this transition is carefully handled it could lead to problems at examinations and inquiries, not to mention scope for legal debate.

The transition to the proposed new system will require considerable resources in terms of quantity and expertise both to implement and, equally importantly, to keep up to date. Given the resources available within DCLG the timetable proposed by the review appears optimistic. The review's proposals for keeping the website up to date, which cite legal websites as an example that would be appropriate to follow, appear sensible. However, the resources and discipline required to achieve this should not be underestimated.

The Government does not appear to have responded to the review's recommendation that there should be a second formal consultation. Given the scale of the change proposed such a consultation should be included as an essential part of the process. The Minister also appeared to discount this second round at consultation when pressed at the CLG Select Committee.

The proposed 28 March 2013 deadline to cancel out of date guidance is an ambitious target.

7. Do you agree with the recommendations for cancellation of existing guidance documents? Are there specific, essential elements of current guidance material that should in your view be retained and considered for inclusion in the revised guidance set? (Recommendations 14 - 16)

The justification that guidance is not needed because its content is now common practice seems counter intuitive – surely as others will say in their own responses, this shows that the guidance is working well. There is no guarantee that it will remain common practice if the guidance is withdrawn.

Our experience of working within the sector and local government demonstrates to us that local government officials rely heavily on this central government guidance because as many are general practitioners they often do not have the specialist knowledge that the review assumes people have. Guidance is also very useful when negotiating with developers to give weight to an argument, particularly on matters of design and to persuade reluctant councillors to support officers in negotiations and to support recommendations to planning committees.

Recent cuts to local authority budgets mean that planners are less likely to have access to specialist advice in house such as architects and transport engineers. Planning teams have also been stripped of older more experienced planners with deep knowledge of the system and where to find specialist advice. Well founded planning guidance should only be abandoned where it's well past its 'sell by date' and not discarded on the naive assumption that all this knowledge is somehow embedded in the 'no frills' planning departments of this era of austerity.

The proposal to withdraw the PPS5 Practice Guide in July 2013 should only be implemented if an adequate replacement, supported by English Heritage and the Historic Environment Forum (of which we are a member), has been produced.

8. Do you agree with the recommended priority list for new/revised guidance? (Recommendations 17-18)

The principle should be to keep all guidance that is still relevant, but keep it under regular review to monitor if it is slipping out of date.

Guidance needs to be accessible in language – for use by communities in addition to professionals and guidance needs to provide clarity and interpretation of NPPF policy.

9. Are there any further points you would like to make in response to the Review Group's Report? Do you have additional ideas to improve and/or streamline planning practice guidance?

The Review Group has insisted that in future planning practice guidance must be related to and support the NPPF. Civic Voice supports that recommendation. The Review Group is to be congratulated for sifting 50 years of Government planning practice guidance to identify those items that can be cancelled, those that can be incorporated into revised guidance and that which needs to be retained until replaced by revised guidance.

Nevertheless, if the website can provide better access to guidance, the usefulness and relevance can be left to the reader. Wholesale removal of advice from the website is not helpful if as a result practitioners end up with little or no planning guidance,

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