The National Retail Planning Forum
Chairman: Mr Chris Brearley CB DL

Richard Canovan,
Planning for Business Team,
DCLG,
Zone 1/J3 Eland House,
Bressenden Place,
London SW1.

Dear Richard,

Consultation comments on DRAFT PPS4

1. NRPF is a membership organisation comprising both private sector and public sector organisations with an interest in retail planning matters. The individual members of NRPF have various views about the proposed changes to the policy content of PPS4 and they will be responding individually on these matters. NRPF is restricting its comments to some general observations based on a special meeting of its Research Group held on the 30th June. These are;

2. The change in style of the draft PPS is welcomed, and should assist policy interpretation in implementation. However, there is a consequent lack of content about the policy intent of some of the draft policies, and some elaboration of this would be beneficial. The convention from Development Plans which separate policy from supporting written justification could be used.

3. The emphasis on a plan-led approach, and particularly a strengthening of regional guidance is generally welcomed, although there is some scepticism about the extent to which the system will be sufficiently proactive to cater for changing retail requirements.

4. A sound information base will be required both to support the plan-led approach and the application of the new impact test approach. NRPF is concerned about the unavailability of timely and consistent data to support policy-making, and will be making proposals about the intervention needed from government to ensure that better information is made available.

5. Effective roll-out of the new policy will be essential, and NRPF welcomes CLG’s recognition of the need for this. NRPF will be willing to play an active part in the roll-out process. There is also a need to embed the new approach into formal planning education, and NRPF has drawn attention to the lack of effective coverage of retail planning issues within current planning courses. Concerted action is needed to re-invigorate teaching on retail planning issues.

Yours sincerely,

George Nicholson,
Secretary, NRPF,
27th July 2009