

# THE NATIONAL RETAIL PLANNING FORUM

**Chairman: Mr Chris Brearley CB, DL**

Sangeeta Sofat  
Review of Planning Practice Guidance  
Department for Communities and Local Government  
1/J1 Eland House  
Bressenden Place  
London  
SW1E 5DU

Dear Sangeeta,

## **Consultation comments on the recommendations of the Lord Taylor Review of Planning Practice Guidance**

1. The National Retail Planning Forum (NRPF) is a cross-sector organisation, involving major retail firms, investment institutions, property development companies and planning consultants along with local government, professional institutions and the academic and research sector. It aims to be a focus for improving understanding between private and public sectors of the planning system and its impact on retailing, which it does through a collaborative programme of research, workshops and events.
2. We welcome the general approach of the Review Group and the overall recommendations that Government Planning Guidance should be radically overhauled so that it is clear, coherent, timely, well-managed and without unnecessary or duplicative material.
3. We welcome the recommendations for the nature of the guidance to be clearly defined and for the medium of the guidance to be a live resource hosted on a single website as a coherent, up-to-date suite. We also welcome the recommendation that the guidance should take an appropriate short form, providing that this is not at the expense of an appropriate level of detail. We do believe that examples of best practice may be appropriate in certain circumstances and should not be excluded out of hand.
4. We welcome the recommendations for active management of guidance so that it remains up-to-date and relevant, with clear standards and protocols.
5. It is important that the planning process is open and transparent and that guidance is freely accessible to all. The guidance should be intended for those such as planning officers who may not have specific experience of technical areas such as retail planning, as well as those planning professionals who do. While a service notifying of updates would be welcome, this should not be charged for.

6. We welcome the recommendations to integrate Planning Inspectorate and Cross-Government guidance into a single, coherent, well-managed resource.
7. With guidance being greatly streamlined, signposts to external organisations providing best practice and other advice will be of value. However great care will need to be taken that the Government is not perceived to be endorsing the views of particular sectoral interests; guidance should be about how policy is to be interpreted. In the past retail planning cases have often been side-tracked by disagreements over issues such as basic definitions of statistics; it is essential that there is clear guidance on such matters. There may well therefore be a place for best practice case studies in guidance on technical areas such as town centres and retail.
8. We broadly agree with the recommendations concerning the timetable for the transition to the new guidance and format. It is important that the transitional arrangements make it clear that studies carried out in line with the existing guidance need not be replaced or overhauled as a result of the changes, providing that they are up-to-date.
9. Regarding existing guidance documents, our particular interests relate to the *Practice Guidance on Need, Impact and the Sequential Approach* (Annex C, Document 38). It is widely recognised that the NPPF alone does not provide sufficient detail on these topics and it is imperative that clear, consistent guidance is provided if the planning system is to operate effectively and fairly here. We therefore strongly agree with the Review Group's comments that guidance is needed on this technical area, and also agree that the existing guidance should be extensively revised. Specific topics that should be covered in the new guidance include:
  - ⌚ The sequential test
  - ⌚ Assessing retail need
  - ⌚ Viability tests, including the proper assessment of impact on the viability of existing town centre businesses
  - ⌚ Conducting impact tests
  - ⌚ The Duty to Co-operate and cross-boundary issues
  - ⌚ Plan-led evidence bases
  - ⌚ Technical definitions
10. We broadly agree with the recommended priority list for new and revised guidance, especially the importance of creating guidance on the Duty to Co-operate and on Viability, both of which are particularly relevant to retail and town centre planning.
11. We would be pleased to discuss which elements of *Practice Guidance on Need, Impact and the Sequential Approach* should be retained and which are no longer relevant in more detail with your colleagues.

Yours sincerely,

Chris Brearley CB, DL  
Chairman, NRPF,  
15<sup>th</sup> February 2013