

THE NATIONAL RETAIL PLANNING FORUM

Chairman: Mr Chris Brearley CB, DL

Alan Scott
National Planning Policy Framework
Department for Communities and Local Government
Zone 1/H6
Eland House
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Dear Alan,

Consultation comments on the National Planning Policy Framework

1. The National Retail Planning Forum is a cross-sector organisation. Its members include major retail firms, investment institutions and property development companies as well as the Local Government Association. It aims to be a focus for improving understanding between private and public sectors of planning and its impact on retailing, which it does through a programme of research and collaborative events.
2. Consistent with the Government's desire to devolve powers, we recognise that the scale and nature of national planning guidance needs to be fundamentally revised to provide an appropriate framework to support local communities in making plans and development decisions. .
3. In planning for sustainable economic growth, the new National Planning Policy Framework (NPPF) needs to provide developers, business and communities with clarity, certainty and consistency. This is more important than ever in a period of economic recovery which the private sector is expected to lead. To rebuild business confidence to make long-term investments in our towns and cities a strong reaffirmation of the 'town centres first' thrust to the policy is needed.
4. It is, therefore, essential that the 'town centre first' approach currently in PPS4 continues to be strongly and clearly expressed in the new NPPF. If any change is needed in planning policy it should be:
 - to strengthen the policy by underlining the economic rationale for supporting economically-successful town centres, from city centres through town centres to neighbourhood centres;

- to recognise that the economic success of our city and town centres, as drivers of their sub-regional and local economies, is vital to those economies; and
 - to strengthen the role of our high streets both in our national life and in our towns and cities.
5. The new NPPF should therefore reaffirm support for focusing new retail, leisure and office development in town centres, which emphasises the economic importance of town centres as a major focus for local economic growth.
 6. The Framework should encourage positive planning for economic development, by assessing the requirement for and capacity to accommodate growth. By encouraging the right development in the right place, economically-successful town centres and the regeneration of, in particular, medium-sized and smaller towns can be secured. By bringing businesses together in the same market place, retail diversity, choice and competition can be enhanced and innovation stimulated.
 7. Plans should identify sufficient sites for town centre uses, including shopping, using a sequential approach – to plan for development rather than to continue with planning by appeal. Local planning authorities will need to co-operate where the scale of development will affect retail catchments beyond their own boundaries. The Framework should encourage stronger district, neighbourhood and village centres through neighbourhood development plans so that they provide a wider range of services that meet the day-to-day needs of their local communities.
 8. The new NPPF should recognise both the need for the right policies at the national level and the right interpretation at the local level. In this way all the key players – investors, developers, businesses and communities – can be provided with the clarity, certainty and consistency they seek.
 9. More specifically, the policy will need to:
 - provide a clearer economic rationale for supporting spatial planning policy
 - emphasise the need to plan for local economic growth with a strong focus on town centres
 - develop a clear vision and strategy for the development of town centres, through development plans, including neighbourhood plans

- propose a firmly-applied sequential approach both to identifying sites and for testing any sites not in accord with the development plan
 - propose a strong set of evidence-based tests to assess impact of proposed developments outside existing centres on those centres
 - ensure that new developments are proportionate in scale to the centre and catchment it serves
 - provide a mechanism to balance neighbourhood and more strategic concerns so that retail investment, which often serves a much wider community, is not unnecessarily stifled
 - emphasise the need to take a comprehensive approach to town centre accessibility, based on appropriate assessment of need, including the provision and pricing of parking, to ensure their attractiveness to users
10. The current PPS4 is already a tightly-written document, the first 'streamlined' PPS, pared down to the essential policy guidance. Retail and town centre planning policies need to be implemented with consistency and be supported by appropriately robust information. If formal guidance is not provided, bodies such as the NRPF are well placed to work with local and national government to provide guidance on best practice.

Yours sincerely,
Chris Brearley CB, DL
Chairman, NRPF,
28th February 2011