

## South West Policy & Media Officer Update Report

### Introduction

As usual there is much to report on the planning front. This report will only really be able to touch the surface of it all, but will cover the recently published draft National Planning Policy Framework ;the High Street Review; new Nuclear Power in the South West ; the Bishop Design Review ; updates on Core Strategies and Enterprise Zones in the region and on the Localism Bill; and a report on the recent Localism Conference at UWE.

### A national strategic planning strategy for England ?

On 20 May this year the draft of what could form the basis of the Coalition Government's promised National Planning Policy Framework [ NPPF] was published. At first sight, this could be seen as the arrival of a spatial planning strategy for England of the kind the RTPI has long been pressing for, but, is it ? At just 55 pages, this is certainly an impressive exercise in condensing down the thousands of pages of existing PPS's, PPG's and other national planning regulation and guidance [ is précis still taught at school !?]. However, that is essentially all it is : topped off by a new way of expressing the imperative of 'sustainable development'. This apparently was the extent of the brief given by the Government to the four man Practitioners Advisory Group [PAG, circa 1965, lives again ], though we are also told that account has been taken of over 3,000 responses received following the initial call for ideas on the form and content of the NPPF last year. No new policies have been set out.

It is probably not surprising therefore that a spatial dimension is singularly lacking, but also worrying is the lack of any co-ordination with the policies in the National Policy Statements of the 2008 Act 'parallel' planning system, or with the national strategies and plans of the UK's devolved administrations. The first 16 pages of this draft deal with process – essentially all about how the 'crucially important' and newly succinct Local Plans are to work [ I've commented before that the Government appears to have resurrected the term Local Plan and has barely mentioned what is to happen to Core Strategies and all the other documents within the current LDF system ]. We are told that Local Plans, which should be 'aspirational, but realistic' and must set 'strategic priorities', will need to be in conformity with the NPPF. There is also a direction to keep the scale of the reference base 'proportionate' [not defined] which sits rather uncomfortably with the implication, drawn from later parts of the draft, that a substantial body of evidence will still be required.

National policies are grouped under three broad aims for planning – 'planning for prosperity' ; 'planning for people' ; and 'planning for places' – under each of which are a series of objectives [ though the hierarchy of all this is not that easy to follow !] To say that these objectives are briefly set out is an understatement and suggests that a great deal of local interpretation and elaboration will be needed in the Local Plans and of course, the new, but as yet untried Neighbourhood Plans. There are barely three pages devoted to Housing , Design gets two pages and 'Support for the rural economy' gets just eight lines of rather vague sentiments, which is not very reassuring for a region like the South West !

The Institute has immediately expressed concern about the lack of a spatial dimension and is, in addition, addressing five key questions as a basis of its response – Is the presumption in favour of sustainable development workable in its present form? ; does this draft integrate sensibly with the NPS's, with the national plans/policies of the devolved nations [ Northern Ireland, Scotland, Wales ] and with the new marine planning regime in England, Wales and Scotland ? ; what elements of existing national planning policy are missing from or inadequately dealt with in this draft ?; what elements of this draft are unnecessarily included ?; and are there policies that ring particular alarm bells or would have unintended consequences ?.

By the time that this Update is published, the 'actual' draft NPPF may well have appeared [ due 'July 2011'] and it would seem that the PAG draft is but one of a number of 'inputs'. However, the group is said to have worked closely with the Minister [ Greg Clark ]and DCLG and so it is probably unlikely that anything radically different will emerge.

## High Street Review

So, Mary Portas, the media-styled 'Queen of Shops', is to head a review, initiated by the Prime Minister, into how to promote the development of a more prosperous 'high street' [ for which we should probably read 'town centre' ]. This is said to part of the Government's wider 'Growth Review'. Portas certainly has a popular media profile which looks up to the task, though some have questioned her appointment on conflict of interest grounds. She is already a consultant to a number of major retailers, some of whom, most notably Westfield, have interests in the traditional high street which are minimal to say the least. Still, she has shown an ability to get things done !

The review brief is – to examine the case for developing town centres that contribute to promoting economic growth, creating jobs and improving the quality of life in 'local areas' [?] ; to explore new business models for high streets, relevant to the modern consumer ; and to recommend what action government, businesses and other organisations should take to create 'diverse, sustainable high streets'. Stemming from this are short, but complex questions such as – who could or should be involved ; how might it work ; what makes a high street a place [to which] you want to go ?

Planning policy, at both national and local levels, has of course been seeking to promote increased vitality and viability in town centres, if not the high street as such, for many years. There has been a long series of relevant PPG's and PPS's , such as 'PPS 6 :Planning for Town Centres', now replaced as just part of the new 'PPS 4 :Planning for Sustainable Economic Growth', not to mention planning authorities' own town centre development plan policies, as well as endless retail studies. Success has, however, been mixed against a seemingly unstoppable tide of retail change and innovation. Retailing is a fast changing commercial sector in which the scale, nature and preferred location of its outlets are constantly changing. The big retailers, especially the supermarkets, have played fast and loose with local planning authorities [ and with each other !] in their quest for increased local profile and market share. Within this, planners have been caught too often in reactive mode instead of a prescriptive or promotional one, in terms of where and of what kind new retail development should be. What planning can do however, is to provide a regulatory framework, which has local democratic legitimacy, within which retailers' commercial decisions can be made. In this way planning policy can provide opportunities within which new retail investment can take place and particular recent major investments, such as Cabot Circus, Bristol and Princesshay, Exeter, have demonstrated considerable faith in the future of city/town centres, even if not in the form of the traditional high street.

Lessons to be learned from Mary Portas's recent TV series, which looked at charity shops and other small individual businesses within high streets, would suggest that creative merchandising and careful management are the most critical factors in achieving success. Planning can however have an important, strategic co-ordinating role, beyond just 'policy', in bringing new vitality to town centres. The example of the Chard Regeneration Framework, in Somerset, where work is in hand to regenerate a rundown town centre , demonstrates that bringing new vitality and viability requires a co-ordinated approach involving retailers, land and property owners and the local community, as well as urban designers and planners.

The High Street Review is an on-line consultation ,on which the RTPI nationally appears to have decided not to respond and for which no specific deadline has been published, other than a reference to a 'report back' this Autumn.

## New Nuclear Power in the South West

It has now been confirmed by the Government that the region is to play a very significant part in meeting the nation's electricity generation needs in the future. Contained within one of the six finalised Energy National Policy Statements published on 23 June 11, is the news that two of the eight 'sites' now confirmed as suitable for new nuclear power plants by 2025, are in the South West – Hinkley Point in Somerset and Oldbury in South Gloucestershire. The Nuclear Power Generation NPS, [EN6], in which this is set out, confirms that these sites score well against both a set of standard criteria and in terms of other factors – not least of which is that existing nuclear stations have been generating there successfully and safely for over 30 and 40 years respectively ! As the NPS terminology puts it, each of these projects [ by EDF and Horizon Nuclear Power respectively ] is seen to be 'a credible deployment' by the end of 2025. It is either fortuitous or ironic, depending on how one views it, that possible conflicts between these developments and a massive tidal power barrage scheme in the Severn

Estuary, have now been avoided as a result of the recent Government decision not to back a barrage because it did not see a 'strategic case for such public investment at this time' [ see my Update of 3 December 2010 ]

One could be forgiven for suspecting a note of panic in the corridors of DECC in the references in the Energy Minister's press release to the need for ' a surge of investment in new energy sources ' [ £100 billion in electricity generation alone ] and much is made, in EN6, of the 'imperative reasons of overriding public interest' for new nuclear power.

The six NPS's overall are said to 'provide a clear framework for decision making ' using the 'transparency of the IPC system' with the increased democratic accountability ' through returning the final decision to Ministers'.

Meanwhile, Decentralisation Minister Greg Clark, has made a singularly unconvincing attempt to link the arrival of the final Energy NPS's to the Government's wider planning system reforms, whereas they are in fact part of a system introduced by the previous administration !

The NPS's and related reports constitute a huge body of documentation – EN6, the Nuclear Power NPS, alone runs to over 330 pages – and, in total there are over 1700 pages. A more considered evaluation of what this all means for the South West must await my next Update.

### **The Bishop Design Review**

The Design Council and CABE are to be merged as a body to be known as 'Design Council CABE' and the former, supported by DCLG, has commissioned Peter Bishop, Chair of the Architecture Centre Network and former Director of Design for London, to examine the 'Design Review' [DR] process in England. The key question being addressed is, how best to provide design advice to local planning authorities, developers and others, so as to ensure good design, in times of 'reduced resources'. The Government says that, despite cuts in public expenditure, it remains committed to 'good design'. In promoting the Review, Minister Greg Clark has claimed that ' Design and [its] contribution to the economy are at the heart of what we are aiming at .....if there is one outcome [ from the Localism Bill ] that we would all want to see, it is that the built environment is better than it would otherwise be, and that it is beautiful and functional for people to live in' [ not my grammar !]

A literature review and scoping exercise have already been carried out and 'evidence' is now being collected in three main ways – an open invitation to submit written comments ; 'roundtables' by sector [ eg. planners ?] and 'stakeholder engagement' across England involving a series of road shows, including one in Bristol scheduled for 20 June. In inviting comments, the Review has set out six 'key questions' and your Policy Officer has prepared an RTPI South West response based on contributions from members of this Joint Committee with particular experience of the DR process. Amongst the many points made in this is to stress the valuable contribution made by Design South West, part of Creating Excellence, in providing design and enabling advice via its regional panels of experts. This programme of work is overseen by an Advisory Steering Group chaired by Jim Claydon PPRTPI and which includes representatives of the RTPI South West. The response ends by stressing that , above all, national guidance on design and ways in which the planning system and its policies can contribute towards improving standards of design in new development, including DR, should form part of the new National Planning Policy Framework .[ see section above on the published draft NPPF ]. In this respect, it considers that the two pages of text on the subject of design in the PAG draft are both patronising to planning authorities in telling them the obvious and inadequate in content.

### **LDF and Core Strategy progress in the South West**

It would seem that the South West's 40 or so relevant planning authorities , having at one time been in the van nationally as far as LDF work was concerned [ South Hams – Core Strategy in place November 2006 ; Plymouth , April 2007; Mid Devon, May 2007 ] have, between them, made very slow progress of late in getting Core Strategy coverage in place. As of May this year, 'coverage' was just 20%, compared to a not much better 22% nationally. DCLG is being upbeat in reporting faster progress now, with a doubling of the number of authorities with 'sound' Strategies in place between April 2010 and May 2011 and a forecast increase from some 100 in this position currently to 173 this time in 2012. But this still is much slower than was envisaged back in 2004 and has no doubt played into the hands of a new Government gunning for the planning system !

There would seem to be both general issues and particular local circumstances involved here which it is hoped to 'tease out' at a workshop forming part of the Joint Committee meeting on 8 July 11. A wider response has also been invited by means of an article in the Summer 2011 edition of Branchout.

### **New West of England Enterprise Zone**

At the beginning of June the details of the West of England LEP's new Enterprise Zone were released. The Enterprise Zone itself is to be the 173 acre 'Temple Quarter' an area of stalled regeneration centred on Bristol Temple Meads Station, an area similar, but less extensive to that designated in 1989 for the then Bristol Urban Development Corporation. The aim here is said to be to create a thriving area that will attract creative and media companies from across the country. The Urban Development Corporation, which was 'imposed' by the then Conservative Government on to a Labour City Council attracted considerable political controversy during its 10 year life. It did however breath new life into this part of Bristol, with some new commercial investment and a brand new multi-million pound spine road to open up sites. This time, the project, though similar in its aims, is to be driven by a local partnership, which, for the time being at least, has the political backing of all four of the Unitary Councils covering the former Avon area.

In addition, the LEP has identified five other areas to be given enterprise area status, each with its own particular development/regeneration focus – at Filton Airport, north Bristol ; Temple Gate, Bristol ; Avonmouth /Sevenside ; Locking Castle, Western-Super-Mare; and Western Riverside, Bath. It is assumed that, although these areas will not benefit from the significant 'development bonuses' within the Enterprise Zone [ such as discounts on business rates and fewer planning regulations ] , they will benefit through an increased focus on their development and from public sector funding obtained from the business rates which are collected within the Enterprise Zone.

### **Localism Bill update**

The progress of this Bill can be followed on an almost day to day basis on the RTPI national website, as can the Institute's responses and lobbying. Briefly however, the latest version, with over 200 pages of amendments following its passage through the Commons, moved into the Lords at the end of May and was due for its second reading there on 7 June. The next, Committee Stage, was due to begin on or around the week commencing 20 June, though planning matters are not expected to feature until July. On 20 July comes the Summer Recess, until 5 September. The Institute has continued to raise concerns about the need to strengthen the duty to co-operate ; about the over-complex nature of the Neighbourhood Plans system ; about the need for the NPPF to be 'on the face of the Bill' ; and in response to the sudden arrival of a new 'Clause 15 , Financial considerations', which would make central government financial incentives, such as the New Homes Bonus, a material consideration in considering planning applications. It has gone on record that it is appalled at such a measure and appears to have support from the Commons CLG Select Committee in this respect !

### **Localism under the academic spotlight at UWE**

The conference organised by the UWE Department of Planning & Architecture academics Stephen Hall and Adam Sheppard over the two days of 16-17 June 11, provided its 70 or so delegates with a wide-ranging and refreshingly different perspective on 'localism' delivered by 20 different speakers . Under its full title – 'Localism ? The Coalition's emerging agenda for planning : Theory, practice and international perspectives', this event examined the emerging broader agenda for planning, of which 'localism' is just a part ; directions of change as symbolised by ideas such the 'Big Society' ; aspects of planning policy and practice under the new agenda ; and context – both historical and in terms of perspectives and lessons from elsewhere in Europe, the USA and Australia.

A note such as this cannot possibly do justice to the range of things covered, but among the things which your Policy Officer noted were the following. The Blair Government had a good record on decentralisation by devolution in the UK overall, but struggled with this in England. The regional arrangements with Assemblies were starting to work reasonably well, until upset by the Sub National Review. 'City regions' might look sensible from certain perspectives, but what happens to the rural areas in between [ a particular issue in the South West ] ? Many speakers thought that the present Government was actually centralising rather than the opposite. The LGA, for example, has identified hundreds of 'stealth' centralism measures in the Localism Bill and is concerned that

democratic local government is being by-passed and that central government departments don't all have the same understanding of what 'localism' means. Amidst all the change, there is no sign of reform of local government finance and yet more local control of resources, using local income tax and local sales tax, for example, seems fundamental to cities in the USA which get things done because they have considerable local autonomy. The 'Big Society' is a complex concept with quite a long history, but it falls down here due to the problems involved in communities taking over 'public assets'. It will only really work where such communities have social, cultural and economic capital. What is happening in England now is a centralised attempt to co-opt local help, passing on responsibilities without resources. The 'Open Source Planning Green Paper' introduced the idea of 'collaborative democracy', but there are no extra resources to facilitate this and there are expectations of extra power for local communities which are simply not realistic and will have to 'managed' – mainly by planners! Is the average planning professional, as represented by the RTPi, doing enough to object to all of this? It seems that all they are doing is to ask the Government for guidance on the details of proposed new procedures!?

On a more positive note, one of the good things to happen as a result of the new Government's attack on planning is the emergence of a new debate about democracy, social justice and participation. Conferences of this kind offer a platform for such debate, in which lessons from elsewhere, including the devolved UK administrations, need to be noted.

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28.06.11