

Alan Scott
DCLG
Eland House
Bressenden Place
London SW1E 5DU

17 October 2011

Dear Mr Scott,

CONSULTATION ON DRAFT NATIONAL PLANNING POLICY FRAMEWORK

I am writing on behalf of the London Forum of Amenity and Civic Societies (London Forum) in response to the consultation on the Draft National Planning Policy Framework.

The London Forum is an umbrella group for some 160 amenity and civic societies in Greater London. Our main roles are to comment on national planning policy, the Mayor's strategies, especially the London Plan, and to advise, support and represent our members.

The London Forum welcomes the opportunity to comment on this draft document. We recognise that this is largely the work of the Planning Practitioner's Group and that there are still a lot of improvements needed.

The draft provides a useful précis of some of the PPGs/PPSs, some almost slavishly (eg Green Belt), but for others, especially PPG13, the material has been lost in translation. Unfortunately the opportunity for real added value that could come from producing an integrated document with a vision of how the cities, towns, villages and countryside of England, let alone London, should develop over the next 20 years or so has not been taken. Most of our suggestions for change relate to trying to capture this added value.

Key Issues

The key issues in our representations relate to:

- **providing a clear, succinct statement of the purpose of the planning system – to achieve sustainable development**
- **providing a vision for how the planning system will deliver a more sustainable pattern of development over the next 20 years – we are**

not suggesting a spatial strategy for which a Strategic Environmental Assessment might be needed, but a clear set of principles for the development of urban areas and the preferred locations for high trip-generating uses;

- **setting out clearly the Government's objectives, principles and priorities for ensuring more sustainable patterns of development and location of growth;**
- **setting clear priorities for choosing sites for new development** by ensuring that appropriately-located, previously-developed land is developed in preference to greenfield sites in order to promote urban regeneration and the best and most efficient use of land – not simply “brownfield first”, but based on access to infrastructure and services
- **recognising the key role of town centres in their local economies and ensure that the policy for focusing economic development – retail, leisure, offices, culture, tourism, etc - in town centres achieves these economic benefits and that the policy is effective in delivering the Government's “town centres first” commitment**
- **providing a clear and unambiguous endorsement that a plan-led system means planning for development** - how much, the most suitable locations and allocated sites – it is not just about compliance with the policies of the plan in line with S38(6)
- **recognising the special needs of London and provide a London - or even an urban - dimension to the document**
- **explaining how the NPPF relates to the localism agenda**
- **mainstreaming those parts of PPG13 that relate to the pattern of development, location of development and accessibility by making them part of vision, the core principles and the guiding principles for the business and economic development and sustainable communities sections of the document.** This will mean being more explicit about preferred locations for major offices, where the principles of reducing the need to travel and maximising the use of sustainable transport modes mean focusing such development in town centres or close to major public transport interchanges as in PPG13 and PPS4
- **improving the front end of the document, reviewing its structure to give it greater clarity of vision, a clearer sense of direction and a stronger narrative**

- **dropping the mineral section, which adds nothing to the overall picture, yet is a specialised area where all practitioners – planners, operators and the Planning Inspectorate - appreciate the detailed Minerals Guidance Notes.**

Summary

The London Forum believes that the NPPF would benefit from improvements that would represent real value added from the shortening of national planning policy guidance. We consider that this can be achieved with only a minor amount of additional material – less than five pages – which would make it a far better document.

At present the document does not paint a picture that easy to understand or to visualise the intended outcomes. It may need restructuring, a stronger narrative and some strong design work to help convey the intended “picture” of the direction of travel. It needs to be about places and issues to which the reader can relate.

An early consultation on a redrafted document would be very welcome, would demonstrate that Ministers have listened and would ensure that the constructive comments from this “early” consultation are able to be taken up to improve the final document.

The London Forum would very much like to participate in any discussions on the next steps and would be happy to expand upon any aspect of these comments.

Yours sincerely,

Michael Bach

Chairman
Planning and Transport Committee