

PPS4 event (London, 1 February) – Breakout Group Notes

Group 1: Rural economy

Facilitator: Nick Ward (CLG)

Rapporteur: Matthew Randall (GOSE)

- It was remarked that in many rural areas the political will is to preserve rather than adapt to change. This seemed to emphasise the increased role that place shaping plays in the new PPS4 as a mechanism of understanding the character and the opportunities that an area may offer. In many ways the new PPS advocates or encourages the need for job creation but in a context that respects the best of a place
- There was a general recognition that the new PPS4 acknowledged the changing role of the rural economy and the closer relationship or at least the opportunity to exploit the similarities between the rural and urban economies. This did not mean that the new PPS was and is intended in any shape or form to denude existing controls or protection placed on rural areas such as protection of the Green Belt
- It was recognised that the new PPS is also a tool in changing an anti growth mindset that may be prevalent in rural communities
- One query surrounded the positive advocacy of new forms of employment or land use in rural areas. For example if live work units were permitted in a village what happens when these business expand and start to detrimentally affect a villages character through the generation of more traffic etc. The answer in essence was two fold. Firstly, that locational drivers would encourage expanding business to relocate towards an urban area and secondly, the role of place shaping within a Core Strategy would protect the intrinsic character of a place and therefore mediate what could turn out to be an unwelcome precedent in an area sensitive to change.
- It was acknowledged that PPS4 advocates the role of smaller centres in so far that a centres impact on a community is not commensurate on its size. This ethos also translates down to the role of small shops.
- It was also felt that the PPS4 was predicated on councils being proactive in rural areas and the need to create jobs especially in deprived areas.

Group 2: Town centres good practice guidance

Facilitator: Chris Goddard (GVA Grimley)

Rapporteur: Jennie Gilks (GOSE)

- Concern that the GPG concentrates purely on retail – it would be helpful if guidance was available that extends beyond retail. Chris Goddard said that more guidance would be published [NB – this relates to the SEERA guidance on employment land reviews that has just been published and which other regions may find useful as a model]
- In relation to the sequential test, concern that there may be potential for conflict where PPS4 requires applicants to demonstrate flexibility in terms of disaggregation, but also states that LPAs shouldn't require developers to change their format. It is up to developers to show why they cannot disaggregate. It is not sufficient for developers just to state that they cannot change format of their proposed store.
- If LPA accepts that a large store cannot be disaggregated and cannot be located on a more central site, then the applicant may have satisfied the sequential test. However, impact must still be considered.
- Question about the 'availability' part of the sequential test and what timescale is appropriate when considering other sites. Developers should look at growth projections/needs – if need supports growth out of centre there is no real problem about out of town first, but in the current climate, there is a less urgent need and it is therefore not unreasonable to await sites within the town centre over a currently available out of town site = all this depends on the evidence of need, jobs and when the site will become available
- Business/private sector to assist LPAs in plan making – question about whether developers will engage in the plan-making process, or whether they will submit applications instead. Perception that developers may think it will be easier to get permission on the basis of demonstrating compliance with the sequential and impact tests, rather than having to engage in the plan-making process where they would have to satisfy other tests (eg need)
- Concern that LPAs may not want to go to the expense of fully testing every site allocation so could allocate sites with the proviso that need/impact should be demonstrated at the application stage. However, LPAs may have to include some provisos as LDFs go so far ahead and any retail assessment done now would be worthless in 15+ years.
- Question about why LPAs should do site specific development plans – is this too prescriptive?
- Concern that approach to need is inconsistent as PPS4 requires a need test at the plan-making stage but not at the development management stage.
- In terms of retail planning, concentrating on impact is a good model for plan-making. However, there is a concern that the impact test may mean that TCs will not be improved because of impact elsewhere = possible that

the impact of development of a town that has had no development for 30 years would be greater than the impact caused by development in towns that have had continual small improvements.

- Concern about the lack of definition of terms such as 'significant'. Question about whether the guidance will evolve as decisions on appeals are made – this is unlikely as decisions/appeals will be considered as they are now. Guidance cannot be specific on the term 'significant' as this will depend on individual circumstances.
- Request for clarification of EC17.1 and 17.2– says that proposals that would have a significant adverse impact against any one of the impacts listed under EC10 or EC16 should be refused. If the proposal doesn't fail individually, need to look at cumulative effect of recent permissions.
- Concern that where a development plan defines character of a part of town and a planning application doesn't fit that character, there is a risk that developers will still meet the sequential and impact tests – suggestion that effect on character of an area be included as part of the impact test [NB this is already covered in EC10.2.c)

Group 3: Economic Regeneration

Facilitator: Bill Boler (BiTC)

Rapporteur: Ian Dunsford (GOSE)

Key question posed - Does PPS4 and the guidance provide adequate tools to support economic regeneration?

- Initial thoughts considered that PPS4 provided adequate tools. Many authorities were particularly attracted to the toolbox approach with an element of discretion. However a number of local issues that needed consideration
 - a). Challenge of sites with permission not being developed – especially with current market - Harlow
 - b). Conflicting regeneration objectives i.e. in Kensington and Chelsea need to balance retail regeneration with estate renewal programme.
- Biggest fear was achieving regeneration which benefits local people in terms of jobs and housing – K&C admitted that there had been pressure to accept some regeneration though doubts about whether it benefited local communities – how could PPS4 help?
- Noted that different local priorities need to be reflected in LDFs – Plan Led approach part of the solution.

- Concerns that broadening of employment definition would be resource challenge but acknowledged that A1 retailing was significant contributor to employment pathways.
- Issue from Milton Keynes related to scale of regeneration and retailing. Eight large supermarkets being considered but would be there to meet regeneration but concerns as to timing and scale of retailing in relation to finally delivered regeneration.
- Question regarding how do you sort out what is good or bad for a location in regeneration terms. Retailing only one issue, sustainable transport may be key consideration.
- Noted that Members have distinct views and whilst PPS4 is clearer, concerns that local views could affect outcomes.
- The group were generally satisfied with the economic development definition but concerned how this would be sustained. Commented that Economic Assessment Duty could provide useful mechanism to assess situation as it would be refreshed every 3 years.
- Concern by the GLA that the jobs forecasting could be highly prescriptive. Use of employment numbers could result in poor decision making especially if figures spread over number of LPAs in a sub region – who will get the growth?
- Question regarding what is regeneration trying to achieve – jobs/ training packages / part time working. Group considered that housing was relatively straight forward to monitor but doubts surrounded maintaining robust employment numbers. It was noted that a number of part time jobs might better meet the needs of some sectors of communities' i.e. single parents rather than full time employment. Key question what is the regeneration trying to achieve? Also matter of office jobs not meeting the needs of a blue collar workforce in a regeneration area – often what happens is that people from outside the area will take the jobs and not the communities who the regeneration was intended. Issue of quality of jobs matching local skills or providing local skills to match new jobs. Another concern related to loss of benefits for people accepting low paid jobs.
- Much discussed about mixed uses but in current market very difficult to deliver. i.e. in Harlow would like to get offices but demand very low so having to look at housing to make scheme viable. Question where are the employment benefits in such major regeneration schemes? Significant concern over community facilities being dropped from regeneration schemes i.e. new libraries in Harlow.
- Question should we be supporting regeneration schemes in a recession or wait when the numbers start to stack up in supporting more beneficial regeneration for local communities. Potential soundness issue at DPD Examination in Public on deliverability.

- There was a discussion whether a regeneration list would be helpful with some supporting guidance – generally supported but concern that local evidence base should be identifying key issues. Some guidance on site assembly, mixed use development and CPO old sites would be supported but not new regeneration PPS.
- Mixed use development in Lewisham had been a particular challenge with some old industrial sites turning into mixed use developments. Particular concern with regard to new retailing competing with already struggling local centres. Doubts cast over Live/Work units as causes challenges with rating system and enforcement.
- Interesting point made about new regeneration schemes don't allow room to fail – Liverpool One is very much Cheshire's centre but doesn't serve Toxeth with its retail offer. Similarly the proposed Elephant and Castle regeneration – depends what you are trying to achieve.
- If best practice regeneration guidance prepared not only should it cover best practice cases but it would be helpful if regeneration failures were identified to show what could go wrong and tips on how to avoid. Such guidance would be supported.

Group 4: Town Centre Strategy and Vision

Facilitator: George Nicholson (National Retail Planning Forum)

Rapporteur: Jonathan Price (GOE)

- PPS4 generally felt to raise the bar in promoting a plan-led, place-making approach to town centre development
- Pursuing a long-term vision can bring rewards for a centre – success stories were Coin Street and Borough Market. Rejuvenating traditional markets can often be the best place to start thinking about regenerating a centre.
- Important focus on planning for qualitative needs – e.g. Redbridge Council's focus for Ilford Action Plan was more on improving public realm recognising that it was not going to compete with nearby Stratford in terms of retail floorspace growth.
- Need to recognise the natural hierarchy of need for certain levels of centre, of dynamic change (some places will have 'had their day') and the need to exploit new, niche opportunities for declining or lower-order centres – Berkhamstead and Hebden Bridge examples of centres re-inventing their centres on a specialist attraction role.

- Different roles for different centres not always easy to sell politically – each authority tending to want the most for their towns. Planners' role to manage expectation and change.
- Evidence requirements for economic planning and LDF was stretching staff time and budgets – strong case for local authority joint-working to better resource evidence needs as in south Worcestershire.

Group 5: Evidence Base

Facilitator: Caroline Geary/Suzanne Walpole

Rapporteur: Lucy Hargreaves (GOL)

- Proportionality – are PINS always signed up to proportional evidence base? Some concern that Inspectors are nervous of accepting anything other than maximum evidence (no examples given)
- Resources – Question over whether LPAs will continue to have resources to fund and update extensive studies. Resource limitations must be recognised by PINS – LAs have numerous conflicting priorities and evidence collection may not be top of the list.
 - Using resources more efficiently through sub-regional working is an option. Have to be aware of conflicting political priorities and how timescales don't always coincide for neighbouring authorities (Stevenage and St Albans given as example)
 - Need for stronger links between regional and local level. LDF system has shifted evidence responsibilities to local level. PPS4 may help rebalance this by defining responsibilities at regional level.
- Job targets – Need to get this right at regional level and will need to be balanced with housing targets. Health, education and tourism jobs all relevant. Less prescriptive than floorspace requirements so welcomed. Will require sharing of information between tiers of government.
- Leisure Needs Assessment – Not a new requirement but uncertainty as to what level of sophistication required for such a study. Difficulty in making assumptions about characteristics of future population in an area.
- SHLAA and Employment land Review – Gravesham BC have conducted a Strategic Land Review. Found it allowed for better consideration of mixed use sites. Needed a clear, up front methodology to ensure highest value doesn't take precedence in the review. Seemed logical to carry out single land review rather than separate SHLAA and Employment Land Review.