

## **CONSULTATION PAPER: PLANNING POLICY GUIDANCE NOTE 1 (REVISED): GENERAL POLICY AND PRINCIPLES**

We have made our comments under the various headings as laid out in the Planning Policy Guidance Note. We trust this is helpful.

### **INTRODUCTION**

It is helpful to have indicated the importance attached to the development plan in the development process. However, given this importance we feel it is important to address the issue of complete national coverage of such plans (cf our comment on paragraph 54 below).

### **THE GOVERNMENT'S APPROACH TO PLANNING**

#### **Sustainable Development**

We approve of the inclusion of this new section to the Planning Policy Guidance note.

Under bullet point 1 of paragraph 5, the phrase "while respecting environmental objectives" is used. This is a carefully phrased statement and is clearly attempting to balance the potential conflicts between economic and environmental considerations. It will be important, we believe, that appropriate guidance is developed to assist in this area. A range of possible techniques exist that may meet this need, such as Best Practicable Environmental Option (BPEO). Whilst it is not necessarily the place of Planning Policy Guidance Notes to address such matters of detail, the general principles relating to them may need to be developed in order to minimise the likelihood for confusion.

We endorse the point made in bullet point 2 under paragraph 5.

#### **Mixed Uses**

We welcome the inclusion of this element into the Planning Policy Guidance Note.

It is important, as stated in paragraph 7, that mixed use development should be promoted in *appropriate places* (our italics). A blanket mixed use approach would be both impractical and undesirable.

In paragraph 8 reference is made to 'urban villages'. We endorse the proposal that local planning authorities should have a responsibility to consider whether they are appropriate for a particular area.

#### **Design**

In paragraph 11 it is noted that design considerations apply to all development. We agree with this point.

We also endorse the reference in paragraph 12 to the fact that the spaces between and around buildings should be considered as an integral part of urban design.

## **KEY POLICY OBJECTIVES**

### **Planning for industry and commerce**

We have no comments on this section, but we welcome the separate inclusion of this topic in the Guidance.

### **Land use and transport**

We agree with the general tenor of this section.

### **Planning for housing**

We have no comments on this section.

### **The importance of town centres**

We are in general agreement with the points raised in this section. We particularly welcome the stress in bullet point 2 of paragraph 19, which indicates that the maximum housing allocation should be made in existing larger urban areas.

### **Rural areas**

No major comments on this section.

### **Conserving the historic environment**

We have no comments on this section.

### **Access for disabled people**

We welcome the inclusion of this section, but have no comments on the points made.

## **OPERATIONAL PRINCIPLES**

### **Conditions and planning obligations**

We have no comments on this section.

### **The plan led system**

We have no comments on this section.

## **Determining planning applications and appeals**

We have no comments on this section.

## **Prematurity**

We have no comments on this section.

## **Other material considerations**

We have no comments on this section.

## **Standards in the planning system**

### ***Citizen's Charter***

In paragraph 54 it is mentioned that the Government has set local planning authorities the target of *substantially complete coverage* (our italics) of area-wide local plans by the end of 1996. We believe that a target should be set for complete coverage. Without such coverage there is a danger of inappropriate development, or uncertainty over development possibilities, in areas not covered by a development plan. In addition, incomplete coverage reduces the emphasis given to the development plan in the Guidance as being at the heart of the (development) framework.

### ***Propriety***

We have no comments on this section.

### ***Private interests***

We have no comments on this section.

## **General Comments**

The 'boxes' are useful but it is unclear why they are separated out from the text. In terms of the first box (entitled Economic considerations in development plans), it is stated that:

"A flexible approach with a range of sites available to business should be provided in plans,..."

We believe this should read as follows:

"A flexible approach with a range of *suitable* sites available to business should be provided in plans,..."

It is important that the sites that are to be made available are suitable to the needs of business.