

BARKER REVIEW

CHRIS'S REVISE

1. Formed in 1996, the National Retail Planning Forum (NRPF) is a cross-sector organisation. Its members include major retail firms, investment institutions and property development companies as well as the Local Government Association. Its aim is to be a focus for improving understanding between private and public sectors on planning and its impact on retailing, which it does through a programme of research and collaborative events.
2. It is most important to us that the outcome of this review is constructive. We believe it is too soon to judge the effectiveness of a lot of recent changes to the system (e.g. as regards Local Development Frameworks). The planning system is already suffering from over-review with too little gap between reviews. Our comments are limited to a few points of interpretation of the current situation, and to flagging up a few – but significant – areas for change.

Competition

3. It is inevitable and appropriate that the planning system both assists and hinders development. Competition for land in our densely developed urban situations cannot be resolved by market processes alone, and has to involve a wide range of uses – not just retail. Many of these competing uses are themselves not wholly within the market process and have as many unintended impacts on the retail scene by virtue of their place in the land market as the planning process itself. Those who view planning as having unintended impacts on retail competition and productivity need to consider land markets more realistically and distinguish between the legitimate role of planning and the unavoidable compromises between competing players. The planning process is not a discriminating process between different companies, formats or communities. It is not intrinsically anti-competitive and we do not generally see it as such. In any case, in our view, the Review needs to concentrate on policy not yet another review of process.

Productivity

4. We note that IFS are currently doing work to illuminate this issue. Current planning policy for retailing mirrors the economic case for “clustering” (a shopping or town centre is probably the archetypal cluster) and the drive for economies of scale and efficiency of service provision, including transport. Accordingly, emphasis on “Town Centres first” as policy is soundly based and should continue. This approach enables multi-use agglomeration and the efficient delivery of services. New retail formats of a very large scale can be hindered by this approach – but only as long as policy seeks to confine such development to town centres. Alternative “clusters” (not one-off sites) can readily accommodate the new. We want to emphasise that, in our view, transport is crucial in this. Re-ordering the scale of uses – including retail – can deliver major increases in productivity, but that reordering requires a commensurate increase in services such as transport. At £25 million per mile for major transport works, the discrepancies between intended development in new clusters and current transport practice are too great to be met by local transport plans or the general run of developer contributions. Something has to change - at the national scale.

Integration

5. At the heart of the difference between planning policy and planning process is the question of political space. The regulatory process (ie local plans – now local development frameworks - and the associated development control) operates within the fixed area of the local planning authority. But the local authority area is not usually relevant as such to most land uses. In particular, in the case of retail, the customer catchment of a shop or shopping area may be bigger or smaller but will usually not be the same as the local authority. The associated warehousing and distribution networks will usually be on a much larger scale. For retail, therefore, consideration of issues beyond the boundaries is often essential and for retail companies operating large formats it is fundamental. The planning process will only be enabled to achieve its policy objectives by identifying and using catchments that are relatively stable in the longer term – at a large level these catchments are often otherwise known as sub-regions and city-regions. The national structure of regions (9 in England), and the now emerging Regional Spatial Strategies, have some potential to help develop thinking in the right direction, but they are mostly too large to be appropriate and the professional capacity is not there. A strengthening of local authorities' cross boundary obligations at a sub-regional level is urgently required.

Resources

6. Two resource aspects of the planning process at the local level need to be addressed.
7. The first is the deployment of qualified planning manpower and its availability to local planning authorities in particular. There is both a quantity and a quality problem. There has for several years been an overall shortage of planners in local government. Furthermore, what there is is seldom adequately skilled and experienced to handle the complex process of planning for business in general and retail in particular. This could be remedied by a shift in the use of existing manpower to focus on major planning issues and development projects while using other approaches to deal with the mass of minor applications which take up most of the time and effort in most local planning authorities.. Many years ago (in 1975), the Dobry report on Development Control¹ so advised. The approach set out there should be revisited.
8. The second issue under this heading is the education and training of planners. Planning agencies have been significantly de-skilled over the past two decades. This needs to be reversed. There are still no undergraduate courses in retail planning, and not a great deal at postgraduate level. Retail specialisms, property skills, economic evaluation, etc, are all essential for an effective and relevant planning process that understands local communities and economic, social and environmental considerations, and has an ability to deliver joined up government.
9. A different though related issue concerns the collection, analysis and availability of suitably independent data about retail. Progress is being made but it is painfully slow.

¹ Review of the Development Control System, Final Report by George Dobry, QC, February 1975 published by HMSO, London,

Process

10. There are two points we would like to make on process.
11. First, the drive for speed has to some extent been counter-productive. It would be more sensible to allow local authorities up to six months to process larger applications.
12. Secondly, too many retail proposals that are not of national significance seem to have to be referred to the Government Office (for the region). Only a small number actually lead to call-ins by the Secretary of State and it might well lead to a better system in the longer run if responsibility began and ended with the local authority.

Conclusion

13. We believe the Review could achieve its aims by;
 - a) Concentrating on planning policy and framework rather than another detailed review of process;
 - b) Strengthening cross-boundary obligations on local authorities, to overcome the frequent mismatch between their boundaries and those that are economically useful;
 - c) Enabling planning resources to be concentrated on significant policy objectives (rather than community policing) and improving their quality;
 - d) Emphasising the efficiency of town centres and equivalent new clusters as a stronger component of strategy and infrastructure (especially transport infrastructure) funding.