

Planning for Diverse Local Centres

ACS | the voice of
local shops



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Introduction

What is this publication for?

This document has been produced by the Association of Convenience Stores to help local businesses, communities and councils understand how town planning can be used to help support and achieve diverse and healthy local centres, which are at the hearts of their communities.

This document sets out practical guidance on how and when to get involved with shaping and influencing the planning policies and decisions which affect local centres, now and in the future. The document also assists understanding on how the range of 'planning tools' available can be used to positively support centres of all sides. This document is intended to be read alongside Government planning policy and guidance, including the Department for Communities and Local Government (DCLG) 'Parades to be Proud of: Strategies to support local shops' publication.

This document focuses on the development plan process of the English planning system, which by law is the starting point for all planning application decisions made by local councils. The Government expects planning applications which are in accordance with the development plan to be granted planning permission. To ensure the right local centre related development, in the right locations and at the right time is granted planning permission, it is vitally important for all development plans to contain strong centre planning policies which are tailored to individual centres and their local circumstances and needs.

What can be found in this publication?

The document sets out:

- Why it is important to support and properly plan for our centres
- How the planning system can support local centres and diversity
- When and how to get involved with the planning system to support local centres
- How to effectively influence the planning system.

The document is supported by a 'Further Information Booklet' that contains additional supporting information, which can be used and followed when engaging with the different elements and aspects of the planning system.

Association of Convenience Stores

ACS (the Association of Convenience Stores) is the campaigning voice of more than 33,500 local shops. As the convenience store champion ACS supports its members through lobbying, advice on legislation and issues that affect retailers, and through learning and networking events.

The Importance of Diverse Local Centres

What are diverse local centres?

"The high street should be at the very heart of every community, bringing people together, providing essential services and creating jobs and investment; so it is vital that we do all that we can to ensure they thrive."

David Cameron, 2011

Two of the Government's key planning objectives are for the planning system to '*recognise town centres as the heart of communities*' and to '*promote the vitality and viability of town centres*', but what does this mean in practice?

The term 'town centres' does not simply relate to large city and town centres, but all centres irrespective of their size. This document therefore uses the term 'local centres' as smaller district centres, local centres and small parades of shops are equally important components of community life and must be afforded proper planning protection and support.

Local centres should be the focus for community activity. Places where all people can go to easily access their employment, leisure, shopping and even housing needs. For a centre to be genuinely the heart of a community it needs to accommodate as wide a range of activities as possible to cater for different needs, tastes and preferences. These activities need to vary in terms of type, size and mix in order to give people a real choice and encourage competition. In terms of shopping for example,

a diverse centre would have a range of large, medium and small shops; comprising a mix of independent, specialist, generalists, national and international retailers, and a market area or market stalls.

Why are diverse local centres important?

Focusing people's day to day activities within local centres have multiple benefits to both businesses.

Businesses benefit from linked trips where people visit more than one activity as part of a single journey, eg an office worker may during their lunchtime visit the bank, a shop, the dry cleaners, or get a haircut; and after work they may go to the gym, a restaurant or the theatre etc before heading home. The more variety there is the more attractive the centre is to visit and spend time there. Attracting people to stay and spend time in centres increases their potential spend. Diversity therefore benefits individual business viability and the wider economy.

Diverse centres also provide entrepreneurial opportunities for new and smaller businesses to establish themselves as they offer a wide range of premise types and sizes.

The community benefits from having a wide choice of activity within a concentrated area. Concentrating activities together helps to ensure more activities are accessible to more people as centres are able to act as hubs for different transport modes to focus. Locating activities together also helps ensure people do not have to travel far between activities and delivery journeys are shorter. Diverse centres

therefore also help to reduce climate change and greenhouse gas emissions.

What can the planning system do to achieve and support diverse local centres?

Town planning only concerns itself with how land and buildings are used for a particular use. The planning system groups together uses of land and buildings which share the same or similar characteristics into categories known as 'Use Classes'. For town planning the main centre uses are those uses that are described as:

- Shops
- Financial and professional services
- Restaurants and cafes
- Drinking establishments
- Hot food takeaways
- Offices
- Leisure, entertainment facilities, and the more intensive sport and recreation uses
- Hotels
- Residential institutions
- Non-residential institutions
- Assembly and leisure.

It is important to remember that planning does not concern itself with who or which company occupies a particular building or piece of land. However, the planning system can influence the type, size, location and design of new development, which in turn influences the occupier. For example, the provision of small retail units are more likely to attract small independent retailers, as opposed to

national and international chains who's business model generally operate from medium to large premises.

What are the different types of centres?

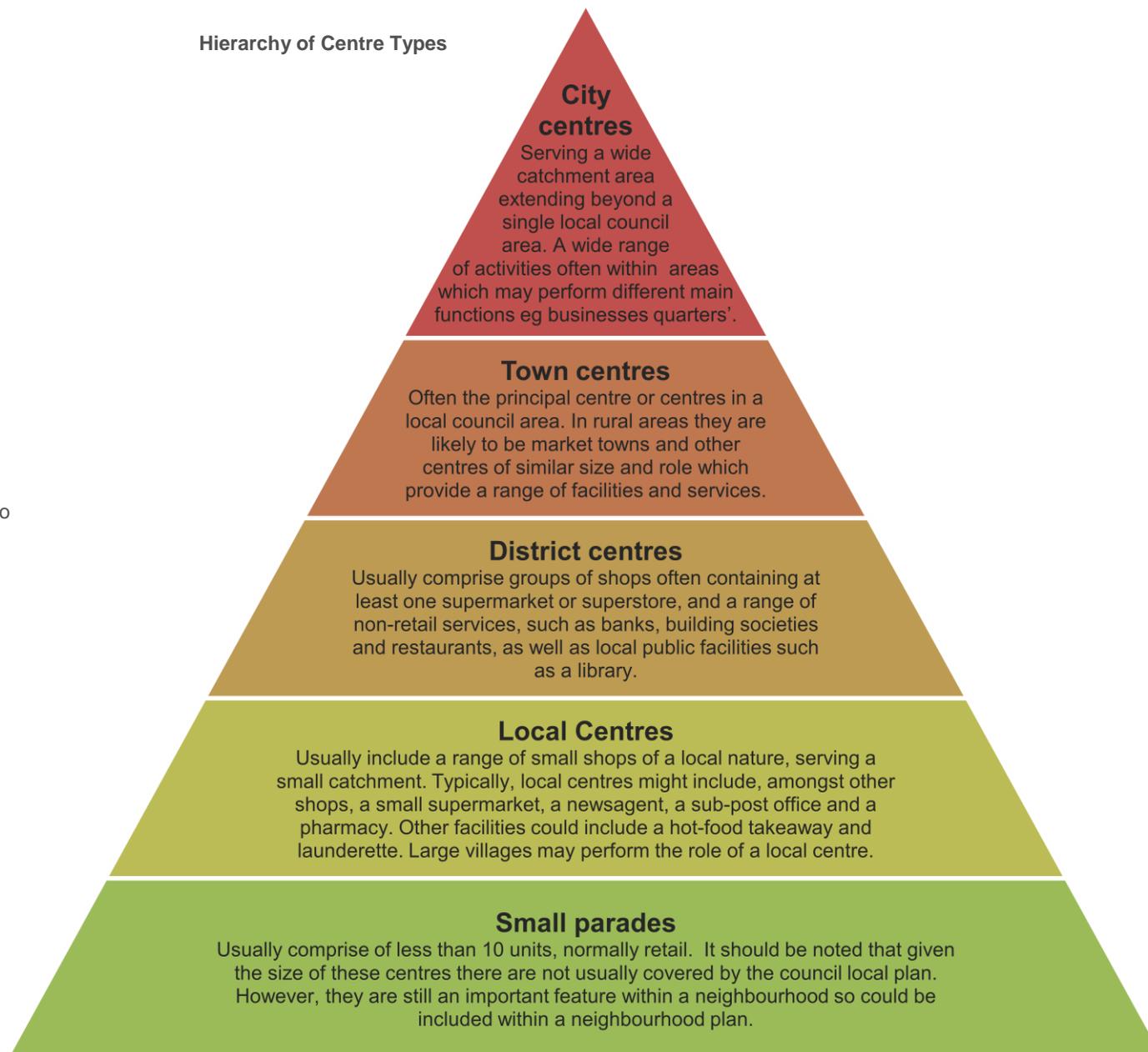
In town planning there are five main size/ function categories of centres. The network of the different centres (pattern of centres) make up what is termed technically as the 'town centre hierarchy'.

Although the majority of future centre growth should be focused at the higher order centres it is also important to distribute growth to middle and lower order centres to create a balanced network, which is not overly dominated by the largest centres. It is therefore important for lower order centres to ensure the planning system allows them to grow and attract new investment. If planned future growth is too focused on higher order centres the health and diversity of lower order centres can suffer.

Every centre within the hierarchy performs a different, but important function according to the community and area it serves. Positively planning for lower order centres is therefore as important as positively planning for higher order centres.

Use the diagram opposite to identify your own centre and consider how closely your current centre meets the centre description.

Hierarchy of Centre Types



How the planning system can support local centres and achieve diversity

	What is it?	Why should I get involved?	When and how should I get involved?
Local Plan	<p>Each local council is required to produce a local plan for its area. Local plans cover a time horizon of 15 years and outlines what the area looks like at the start of the plan period and then sets out a planning vision of what the area will look like in the future – in 15 years time.</p> <p>To deliver the vision the local plan sets out planning policies which guide development coming forward and are used to inform individual planning application decisions.</p>	<p>National planning policy sets out a ‘town centre first’ planning policy which seeks to focus new centre related development within existing centres and asks local councils to refuse planning permission for new development which will have a negative impact on existing centres.</p> <p>It is important for the local plan to set out how this national policy applies to each centre within the local council area. Policies should clearly set out the amount and type of new development needed and what local circumstances, factors and impacts will be taken into account when determining centre related development.</p>	<p>Local councils will undertake formal public consultation at key stages of local plan preparation (at the scoping of local issues and opportunities, and then at the draft plan stage). Register your contact details with the local council planning policy team to be kept informed of local plan preparation, particularly aspects relating to centre development.</p> <p>Provide information about your centre to inform the plan and submit comments as part of the formal (and any informal) consultation stages.</p> <p>See the ‘Influencing the Local Plan’ section for further information and useful tools (page 6)</p>
Neighbourhood Planning	<p>Neighbourhood planning is community-led which allows residents, employees and businesses to come together to decide the future of the places where they live and work. Communities can use neighbourhood planning to:</p> <ul style="list-style-type: none"> - Choose where they want new shops, leisure, community facilities, offices and homes etc to be built - Have a say on what these new buildings should look like - Grant planning permission for development they want to see go ahead. 	<p>Where you feel your council’s local plan does not contain an appropriate planning vision and planning policies for your centre, a neighbourhood plan can be prepared to ensure a locally distinctive vision and supporting planning policies are put in place and used by the local council in their planning application decision-making.</p> <p>Equally, where your centre is being frustrated by excessive planning controls, a neighbourhood development order could be put in place which increases planning flexibility without the need to apply for planning permission from the local council.</p>	<p>Neighbourhood planning can be undertaken at any point in time by a local community. They should be led by the Parish Council or a group consisting of at least 21 members of the community and/or businesses.</p> <p>Neighbourhood planning is designed to be as flexible as possible therefore there are only a few broad regulations that need to be followed to develop a plan or development order.</p> <p>See the ‘Neighbourhood Planning’ section for further information on how to undertake a neighbourhood plan which supports your centre (page 8).</p>
Development Control	<p>Planning law requires that planning applications must be determined in accordance with the development plan (namely the local plan and neighbourhood plan), unless material planning considerations indicate otherwise.</p> <p>Where proposals accord with the development plan local councils are asked by the Government to grant planning permission without delay.</p>	<p>By submitting comments on individual planning application you are able to shape the proposal coming forward and influence the eventual decision-making outcome.</p> <p>You can submit supportive comments for applications which will help centre diversity, or objections to all or part of a proposed development where there are likely to be demonstrable negative impacts on the centres vitality and viability.</p>	<p>Contact your local council to be kept informed of any planning applications which are likely to have an impact on your centre.</p> <p>Submit comments to the local council about planning applications which will have an impact on your centre. Send copies of your comments to your ward Councillor, the members of the local council planning committee and your MP.</p> <p>See the ‘Development Control’ section for further information and useful tools to help maximise your influence (page 10).</p>

Working in Partnership

“High streets are the hearts of town and communities, they have been for centuries. People are passionate about high streets. They may have different views on what’s wrong and what’s right, but I don’t believe anyone can put the hand on their heart and say they don’t care.”

Mary Portas, 2012

If you feel that the planning system could do more to support your local centre, you are probably not alone. The most effective way of influencing the planning system and making positive change is through working in partnership with similar likeminded people within the community. The first thing you should do is to set up a local group. It is up to you what your group is called – you could call it a ‘planning task group’, or a ‘town team’, or a ‘high street forum’ etc.

Who should be involved?

There is no definitive list of who should be part of your group. However, a group would ideally comprise:

- Local town centre businesses including at least one representative from each broad sector (retail, leisure, offices)
- Chambers of Commerce
- Ward Councillors
- Parish or Town Council
- Residence Associations
- Community Group’s
- Local residents – a mix of demographic profile.

Ideally the group will also include or be able to draw on from the community the help of:

- a town planner
- a surveyor
- an architect
- someone with project management experience.

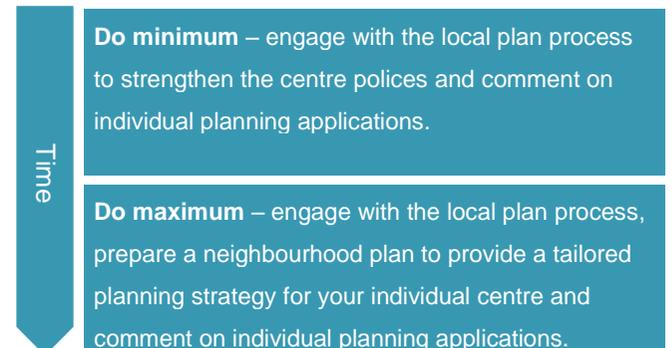
Where do we start?

Register your group’s contact details with the local council planning policy and development control teams. These are usually two separate teams so make sure your details are registered with both. This will make sure you are kept informed of planning issues relating to your local centre.

Using the ‘types of centres’ diagram (page 3) identify which type of centre you are and make an honest assessment of how your centre matches the summary description for that type of centre. This will give an initial indication of the level of planning help your centre may need to maximise its full potential.

Review the ‘How the Planning System can support Local Centres and Achieve Diversity’ table (page 4) as this will also help you understand which parts of the planning system you should focus your attention on. For some centres this may be to target one specific element of the planning system, for others a more comprehensive approach may be required, which seeks to address all aspects of the planning system.

The issues and therefore actions required will vary considerably between centres. The spectrum of actions options are:



Depending on your local circumstances the remainder of this document sets out how through working in partnership you can:

- most effectively engage and influence the local plan
- if required, how to develop a neighbourhood plan which sets out a planning strategy tailored to your individual centre and circumstances
- influence local planning application decisions.

It is important to recognise that not all the issues the group will identify will relate to planning. Planning only concerns itself with how land and buildings are used for a particular use. However, alongside the planning aspects the group, working together, will also be able to find ways of addressing the non-planning aspects. Many of the non-planning actions which can be taken are set out within the DCLG’s ‘Parades to be Proud of’ publication.

Influencing the Local Plan

If you can relate to any of the statements below, getting actively involved with your area's local plan is something worth considering:

“There are no policies within the local plan which relate to my centre?”

“The planning vision and policies within the local plan are so vague they could relate to any centre in the country.”

“The local plan contains individual policies for retail, leisure, offices, transport etc, but it does not draw these policies together in a coherent strategy for my centre – this is frustrating as it's hard to understand what is and what is not, appropriate development.”

By registering your contact details with your local planning policy team will ensure that you are kept informed of their progress with preparing or updating the local plan. There are two key aspects of a local plan process which you should focus on making sure properly reflect the needs of your individual centre:

Local plan evidence base – what information does this contain that is specific to your centre?

Local plan vision (what the area will look like in 15 plus years) – is your vision for how your local centre will look in the future captured within the local plan? Is the centres vision supported by appropriate planning policies

Local Plan Evidence Base

All local plan supporting evidence documents are published on the local council's planning policy webpages or should be available to look at, at the council offices. The key pieces of evidence you should critically review are the:

Retail Assessment – sets out what the existing retail situation is and how much and of what type of new retail development is needed within your area.

Leisure Assessment – sets out what the existing leisure situation is and how much and of what type of new leisure development is needed within your area.

Employment Land Review – sets out what the existing office space provision is and how much new office floorspace is needed within your area.

The information within these documents will be used to inform the content of the local plan, so it is important to make sure they contain information relating to individual centres (all levels of centres and not just the higher order centres).

This is important as where there is no specific information relating to an individual centre, it will not be possible for the council to develop an appropriate planning vision or planning policies for that centre. Individual centre planning circumstances will be unknown so the issues cannot be addressed, nor the opportunities maximised. Similarly without individual centre information the negative impacts of planning applications on individual centres cannot

properly be understood as part of the local council's decision-making process!

Alert the local council of any information gaps you identify within their evidence base. In the worst case situation where your local council is not proposing to further evidence in relation to your local centre you could proactively fill the information gap by gathering your own local centre information and submit it to the council.

Gathering your own local centres characteristics, issues, opportunities etc information is also a good way of critically reviewing and testing the local council's evidence base as it will provide a firm basis on which to draw comparisons. The only cost of doing this to a large extent will be time.

Use the following tool to review the local plan evidence base and develop your own evidence if required:

Useful Tool - Local Plan Evidence Base

Does the local plan evidence base contain information about your local centre's existing situation in relation to:	✓
Transport, accessibility and parking	
Local population and demographics (age, affluence, crime or fear of crime etc)	
Economic issues	
Environment and public realm	

Does the evidence base set out how much new development is needed within your local centre over the Local Plan period for:	✓
Convenience retail?	
Comparison retail?	
Office space?	
Leisure uses?	
Community uses?	

If any of the above characteristics are not present, incomplete, or you feel do not accurately reflect your centre's situation, use the schedule within Section C of the 'Further Information Booklet' for further ideas about how to gather and present the information to inform the local plan.

However, when gathering information keep in mind the following questions:

- *Why is this information/ characteristic being looked at – what are you trying to understand, what is it going to tell me?*
- *How is this information going to inform the local plan?*
- *How does this information/ characteristic relate to other information/ characteristics?*
- *What are the causes of this issue/ weakness? To what extent can the planning system resolve these issues (in whole, or part?)*
- *How reliant is the local centre on these strengths and what can be done to further support them?*

SWOT Analysis

Has the local council drawn together all the different strands of evidence and information about your centre into a single and coherent statement or summary? If not use all available information (local plan evidence base and any information you have gathered about your centre) and prepare a SWOT analysis for your centre.

Strengths	Weaknesses
Opportunities	Threats

Submit this information your local council to inform the local plan process. This information can also be used to support any comments you submit regarding an individual planning application.

Articulating your local centre vision

The planning vision within a local plan is important as the planning policies which are used to determine planning applications are included within the plan to deliver and achieve the vision. Without an appropriate planning vision for your centre, it is unlikely the local plan will contain appropriate planning policies for your centre. This will clearly have implications for planning application decisions relating to your centre.

The local plan should contain a planning vision for your individual centre, whether as part of the overarching local

plan vision, or as a sub-vision tailored specifically for smaller community areas or centres. In partnership with your community use the following tool to develop a local planning vision for your centre:

Useful Tool – Local Centre Vision

Step One: Develop your vision

Your local centre vision should be a concise statement (a paragraph or two) setting out how the centre will look in the future. Aspects of the vision might include:

- sustaining your local centres success
- regenerating specific parts of your centre
- improving diversity by attracting particular types of new development.

Step Two: Test your vision

Review your vision against your local centre SWOT analysis to make sure it is seeking to address the issues identified and realises the opportunities. Revise the vision as necessary. Visions need to be aspirational but realistic. Do a reality check, remembering your position within the wider centre hierarchy.

Step Three: Review the local plan vision

Submit your centre vision and supporting information to the local council to inform the local plan. As part of the formal local plan consultation stages, review the vision contained within the local plan and submit comments and suggest changes as necessary.

Neighbourhood Planning

If you can relate to any of the statements below, neighbourhood planning is something worth considering:

“I have tried influencing the local plan, but the local plan still does not contain any specific policies, which support my local centre.”

“There is an adopted local plan, but planning applications are still being granted for developments which have a negative impact on my local centre and my business. The local council’s planning application decisions do not take account of my local centre’s circumstances.”

“The planning system is too rigid and prevents me from adapting my business quickly to respond to changing circumstances.”

What is Neighbourhood Planning?

Neighbourhood planning is a new community-led level of planning which allows residents, employees and businesses to come together to decide the future of the places where they live and work.

There are two types of neighbourhood planning tools which can be used to varying degrees depending on your local circumstances.

- **Neighbourhood Plan**
- **Neighbourhood Development Order**

A **neighbourhood plan** establishes a planning vision for how the neighbourhood will look in the future and sets out planning policies to deliver the vision and guide new development coming forward.

Once the community has prepared the plan and it has been agreed through a referendum, the local council must formally adopt the plan. Planning law requires that planning applications must be determined in accordance with the development plan (this includes any adopted neighbourhood plans), unless material planning considerations indicate otherwise. This means that neighbourhood plans have significant planning decision weight and are therefore a potentially powerful planning tool to help support your local centre.

A **neighbourhood development order**, goes a step further by enabling the community to grant planning permission for new buildings they want to see go ahead. They can also be used to increase planning flexibility by permitting any development specified within the order without the need to obtain planning permission from the local council. These orders can therefore give the community a very strong say over what gets built and when.

The Government has deliberately left the scope of neighbourhood planning very open as no two communities have exactly the same issues, circumstances and aspirations. However, a few basic rules have been provided which do need to be followed.

How much does it cost?

As they are community led and not produced by the local council the time and resources (including costs) need to be largely provided by the community. However, the greatest cost of preparing a neighbourhood plan is likely to be time.

Businesses, developers, parish and town councils, and landowners may all be interested in sponsoring and taking a leading role in neighbourhood planning. The Government has also committed some funding to until March 2015 to support neighbourhood planning. This funding is available through either:

- The Prince’s Foundation for the Built Environment
- CPRE in partnership with NALC (rural areas)
- Locality
- Royal Town Planning Institute.

How do I prepare a plan or order?

The following neighbourhood planning tool provides a step by step overview of how a neighbourhood plan or order can be prepared. For each broad stage the tool sets out what needs to be done and how it can be undertaken.

If a neighbourhood plan is being prepared in your community, but you are not specifically part of the team preparing it you should look to engage and influence the content of the plan to make sure it addresses your town centre planning needs and requirements. To do this simply follow the same broad process outlined within the local plan section of this document (page 6).

Useful Tool – Neighbourhood Planning

	What needs to be done?	How can this be done?	
Define the area	The community needs to come together and decide how they want to work together – what is the scope of the neighbourhood, where is the neighbourhood boundary? In areas with parish or town councils these should be used. Where not, a group needs to be formed which comprises of at least 21 people, and must be open to new members.	See the ‘Working in Partnership’ section for further information on how to set up a partnership working group. Apply to the local council to designate your area as a ‘neighbourhood’ for neighbourhood planning purposes. The local council will check that your proposal meets the necessary requirements to do neighbourhood planning.	Support Local councils are obliged by law to help people draw up their neighbourhood plans. The main areas of assistance will be: <ul style="list-style-type: none"> • Sharing evidence and information eg local plan • Helping organise consultation events • Advice on assessment and evidence • Advice on national and local planning policy • Communication with external bodies eg Highways Agency, public transport providers etc
Prepare the plan/ order	<p>Gather as much relevant information about the centre as appropriate which can be used to inform and justify the plan/ order.</p> <p>The plan/ order needs to</p> <ul style="list-style-type: none"> • Set out what the current situation is – what are the centres planning strengths, weaknesses, opportunities and treats ? • Develop a vision setting out what the centre will look at in the future • Develop planning policies to assess the appropriateness of new centre related development coming forward. <p>The community and local businesses within the neighbourhood boundary need to be involved with preparing the plan/ order. This can be done informally throughout the process but before the plan is submitted for ‘independent check’ there needs to be a more formal period of public consultation.</p>	<p>Use the Council's evidence base and the gathering information about your local centre schedule within Section C of the Further Information Booklet.</p> <p>Use the ‘Articulating your local centre vision’ tool within the Local Plan section as the basis for developing the neighbourhood plan vision. Use this vision to develop a number of focused objectives that the plan is seeking to achieve.</p> <p>See Section G of the Further Information Booklet for ideas on the type of planning policies and measures that could be used to achieve the neighbourhood vision. The local council will also be able to provide technical planning advice.</p>	
Independent check	The plan needs to be checked by an independent examiner to make sure it meet the right basic standards.	Once a neighbourhood is happy with the draft plan or order it needs to be submitted to the local council who appoint an independent examiner to check the Plan/ Order. The examiner will recommend changes, as appropriate, to ensure it meets the basic standards.	Legal Compliance Neighbourhood plans must comply with a number of European Directives eg the Environmental Impact Assessment and Human Rights obligations. The local council will be able to provide advice on this aspects.
Referendum	To ensure the community and businesses have the final say on whether a neighbourhood plan/ order comes into force, a local referendum needs to be held. It passes if more than 50 per cent of people voting support the plan/ order.	<p>The local council will organise the referendum.</p> <p>You should canvass support for the plan/ order and ask as many people as possible (who are eligible to vote in the referendum) to vote in favour of the plan/ order.</p>	Impacts beyond the Neighbourhood Referendum area can be wider than a single neighbourhood if proposals impact on others. This may be an issue for centres which are larger than local centres.
Adopting the Plan	Once a plan/ order has passed the referendum it comes into force and the local council must adopt it as part of the development plan.	The local council will publish the neighbourhood plan or details of the order on their website.	

Development Control

From time to time planning applications will be submitted to the local council for new centre related development which you feel compelled to comment on – either in support, if the proposed development helps support your centre, or to object, where the proposed development is likely to have a negative impact. This section looks at how you can most effectively influence the outcome of the planning application decision-making process.

How do I make my views heard?

Tell as many people as possible about the proposed development. Remember many voices are louder than one. Work in partnership with your community to form a strong and united local centre/ community view.

Submit comments to the local council about the planning application. Send copies of your comments to your ward councillors, the members of the local council planning committee and Member of Parliament.

When commenting on a planning application it is important to remember that all comments need to be justified and supported by evidence. The more evidence you can provide the stronger your argument. You cannot for example simply say the development should not go ahead because it will have a negative impact on the local centre. Such a statement needs to be quantified and supported by information showing what the impact is and how big the impact is etc. Set out specifically what is going to happen if the proposed development goes ahead.

Use the Council's local plan evidence base to support your comments. Quote sections of the council's evidence within your response. Where appropriate supplement the council's evidence with your own supporting information. See Section C of the 'Further Information Booklet' for a schedule of the types of town centre characteristics and information which could be collected and used to support your comments. A suggested 'commenting on a planning application' letter structure has also been included at the end of this section of the document. This template sets out a basic structure which could be used to clearly set out your planning case.

The Government asks local councils to look for solutions rather than problems and asks for local decision-makers to approve applications where possible. When raising issues also try and identify measures/ changes to the proposed development which could help to overcome or at least reduce the impact of the development if it is granted planning permission.

How long have I got?

All planning applications have at least a 21-day consultation period within which you can submit comments to the local council. In some instances, if you contact the case officer who is dealing with the application you can seek to agree an extension to this 21 day period.

Although you have 21 days to comment, do not wait until a planning application is submitted before you begin to take action. In the majority of cases you will have heard a planning application is being prepared well before it is submitted to the local council. For large schemes in particular, developers are required to undertake public consultation early in the design and concept stages to inform and shape the proposed development prior to submission. The following action plan timeline will help you organise your approach for influencing the development:

Pre application submission

Three Months to One Year

- Build intelligence
 - Organise opposition
 - Publicise concerns
-

Application submitted

1 to 21 days post submission

- Submit formal opposition
 - Co-ordinate letter writing campaign
 - Attend planning committee meeting
-

Up to three months post submission

- Write to planning committee members
 - Intensify media campaign
 - More local awareness raising
-

Up to two years post local council decision

- Consider appeal/ prepare for next inappropriate development attempt

How does the development plan help?

The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan (namely the local plan and neighbourhood plan), unless material considerations indicate otherwise. Where proposals accord with the development plan local councils are asked by Government to grant planning permission without delay.

The primary focus when commenting on a planning application should therefore always be to what extent the proposed development satisfies the planning policies set out within the local plan (and neighbourhood plan if available). The local plan and its supporting evidence base will be available on the local council website under the planning policy section. A hard copy of the local plan is also available to view at the local council offices and libraries within the local council area.

What are material planning considerations?

Material considerations include all issues that are considered relevant to town planning decision-making. Key local centre issues include:

- Compliance with the development plan (principally the local plan and neighbourhood plans)
- Compliance with the National Planning Policy Framework
- Compliance with the town centre first sequential approach (See Section E of this 'Further Information Booklet')

- Economic impact on the centre, including existing, committed and planned centre developments (eg job creation compared to job losses)
- Highways, traffic generation and car parking
- Adequacy of parking/loading/turning
- Smells, noise and disturbance resulting from use
- Loss of light or overshadowing
- Overlooking/loss of privacy
- Visual amenity (but not loss of private view)
- Loss of trees
- Effect on listed building and conservation area
- Layout, density and design
- Disabled persons' access.

What are not material planning considerations?

- Who the building/ land owner/ occupier is eg a specific company
- Personal morals or views about the applicant
- The perceived loss of property value
- Private disputes between neighbours
- The loss of a view
- The impact of construction work or competition between individual firms
- Restrictive covenants
- Ownerships disputes over rights of way
- Fence lines etc.

Try and link all comments made to a planning policy within either the development plan (namely the local plan and/or neighbourhood plan) or the National Planning Policy Framework. Set out how the proposal meets and fails to comply with the policies.

Useful Tool – Commenting on a planning application suggested letter structure

Your name
Address
Contact details etc

Case Officer
Local Council Address

Dear [Insert name of Case Officer]

[Insert planning application reference number and address/ proposal details]

Introduction

Set out who you are/ representing and why you are submitting comments (either in support or objecting to all or part of the proposed development).

It might be helpful to provide a short bullet point summary of your key planning issues, particularly if your submission is lengthy.

Planning Policy Context

Set out how the proposed development satisfies or fails to comply with the policies contained within the local plan and/or neighbourhood plan. Remember to include supporting information and evidence to justify your comments. Reflect on the following questions:

Does the development fit with the planning vision for the centre and wider area – if not, why?

Will the development help to achieve the planning objectives for the centre and wider area – if not what are the likely consequences?

Does the development satisfy the planning policies for the centre and wider area?

Other Material Considerations

In addition to the National Planning Policy Framework and the local plan policies, local councils will consider other material planning considerations eg highways, car-parking, design. Where these have not been referred to within the planning policy context section, include comments addressing how the proposed development relates to these other considerations. Again remember to include supporting information and evidence.

Suggest Changes

The Government asks local councils to look for solutions rather than problems and asks for local decision-makers to seek to approve applications where possible. When raising issues about a proposed development also try and identify measures/ changes which could help to overcome or help to reduce the impact of the development. These changes could also include asking the local council to attach planning conditions which mitigate or limit the impact of the development eg limiting the operating hours..

Conclusion

Set out a short summary conclusion of your key points and overall recommendation on how the local council should determine the application.

Yours sincerely/ faithfully

CC Ward Councillor
 Members of the Planning Committee
 Member of Parliament.



