

Living Streets is the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk.

Living Streets's response to the consultation on the Review of Planning Practice Guidance, February 2013

Introduction

We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with communities, professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy the benefits of walking.

Response to the consultation questions:

1. Do you agree with the recommendations of the Review Group overall?

Living Streets agree with the Taylor Review's recommendation regarding the need for clear, up-to-date, coherent and easily accessible, planning practice guidance. This should be a web-based, live resource, hosted on a single site as a coherent up-to-date suite of guidance (Recommendations 1 & 2). However, it is equally important to retain access to relevant information in previous PPGs, PPSs and recent or standalone best practice guides. These could easily be archived and available as an additional, low maintenance resource.

We agree that the members of the public and interest groups must be able to access the website free of charge (Recommendation 6). Moreover, we agree that a coherent approach must be taken to advice to cross-Government advice, especially in the field of transport (Recommendation 8). It is essential that appropriate links (and communication) are provided to and from other Government Departments concerned with planning issues – for example, the current proposal from DCMS, subject to consultation, that for five years, broadband street cabinets and new poles can be installed under permitted development rights in any location other than a Site of Special Scientific Interest (SSSI) without the need for prior approval from local planning authorities.

2. Do you agree with the proposed recommendations for a much reduced set of essential practice guidance in the format recommended? (Recommendations 1, 2, 3, 5, 6)

As discussed above, we agree with the need for up-to-date, coherent planning guidance which fits with the new National Planning Policy Framework. Whilst we understand the distinctions between guidance and best practice, we do have some reservations outlined below (Recommendation 1). It makes sense to avoid repetition and provide essential information. As a web-based tool, we agree that navigation is key – clear links, menus and a searchable index are needed to make it work. It will also need to be actively managed and improved upon through

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dialogue with users (Recommendations 2 and 3). The adoption of a clear style and format and best practice in document management will simplify and unify delivery of planning guidance.

We agree that guidance should be readily printable and date stamped, to ensure that it is current at the time of use – this would also be an incentive to keep the site up-to-date. As stated above, we agree that the site must be accessible free of charge, as well as the proposed bulletin/alert system. Material which alerts users to changes or notices should be available to all users for a period of time. We question whether it is necessary to create a user account and logon to access guidance. (Recommendations 5 and 6).

3. Do you agree that standards for future Government Planning Practice Guidance should be implemented by the Chief Planner in DCLG, but with decisions on what to include within guidance still taken by Ministers? (Recommendation 4)

We agree that responsibility for the website and standards for future Government Planning Practice Guidance should sit at the top and be led by the Chief Planner. Final decisions on what to include within guidance may sit with Ministers, however, it is not clear what process would be used to determine content. In order to reflect the full scope of planning, the review of content should involve colleagues from relevant Government Departments, such as, DoT, DEC and DCMS, the Planning Inspectorate (PINS), with input from practitioners – for example, professional bodies and other key organisations – depending on the content being discussed.

4. While access to all planning guidance online will be free of charge, do you think it would be appropriate to offer planning professionals an additional service involving immediate notification of every revision to the guidance, and to make a small charge for this service? (Recommendation 6)

No comment

5. Do you agree that the new web based resource should be clearly identified as the unique source of Government Planning Practice Guidance? (Recommendations 7-9)

Given that the aim of this review is to simplify and better explain planning guidance to a wider audience, we agree that planning advice should all be in one place. This includes incorporating PINs guidance into the new website, reviewing advice to inspectors and their formal involvement in the maintenance of the site (Recommendation 7). New guidance which lies equally within the remit of other Government Departments (for instance, relating to transport) should be co-authored in the approved house style, signed-off and made available through this new planning portal – with links to the relevant Department (Recommendation 8).

Given that many organisations develop and disseminate ‘best practice’ material, it is not obvious why the Government should retain or in future produce this material. It could be sector-led. However, we believe that the Taylor Review underestimates the importance of Government endorsement by users, such as, developers, planners, general public and the third sector (Recommendation 9). This fact is recognised by the Taylor Review’s proposal – which we support – that DCLG could work with professional bodies to encourage or sponsor best practice awards. This should be expanded beyond DCLG to include other government departments such as the Department for Transport – for example to support active travel modes such as walking.

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In addition to the potential proliferation and confusion of material labelled 'best practice', there is the issue of resourcing the maintenance and upkeep of this information. For example, *Manual for Streets* is available for free on the Department for Transport website, whereas the updated *Manual for Streets 2* is available from the Chartered Institute of Highways and Transportation website for a charge (£24 for a low resolution PDF or £150 for high resolution, and £43 for a printed copy). This could easily deter community groups from reviewing and accessing best practice. Perhaps the Government should consider commissioning practitioner bodies to showcase up and coming best practice every few years.

6. Do you agree with the recommended timescales for cancellation of guidance and new/revised guidance being put in place? (Recommendations 10-13)

The timescale proposed in Recommendation 10 regarding guidance documents is extremely challenging set against the context of significant cuts in resource at DCLG and stakeholders such as local authorities and third sector organisations. It is important that the timescale is sufficiently challenging but lengthy enough to ensure meaningful consultation can take place regarding existing guidance. This is in addition to giving sufficient time for partnerships between government departments and third sector organisations to review existing best practice guidance to ensure they achieve the high standards called for by the Taylor Review.

7. Do you agree with the recommendations for cancellation of existing guidance documents? Are there specific, essential elements of current guidance material that should in your view be retained and considered for inclusion in the revised guidance set? (Recommendations 14 - 16)

As stated in our response to question 1, previous PPGs, PPSs and recent or standalone best practice guides could and should be archived and available as an additional, low maintenance resource. This is particularly the case for existing documents listed in Annex B, as well as those listed in Annex C, that deal with important subject areas which, where relevant, will be incorporated within new revised guidance.

We welcome the recommendation that *Manual for Streets* (Annex C - 63) is retained for the time being but reviewed. However, we believe that this guidance needs to be linked with *Manual for Streets 2* which is not covered by the Taylor Review in order to create one new set of best practice guidance. Furthermore, we are concerned by the comment asking what within the document is planning advice and what can be provided elsewhere. *Manual for Streets* is key to designing better streets which meets the needs of users, are well connected and help to strengthen communities they serve. It promotes a place-led approach to working between planning, transport and highways which must not be lost. In particular, it highlights the importance of a transport hierarchy which prioritises pedestrians. *Manual for Streets* (and *MfS2*) were developed by a wide group of stakeholders including Department for Transport, other government departments, third sector organisations such as Living Streets and local authorities. The end result is an excellent guide, but this approach takes time, highlighting our concerns regarding the suggested timescale for revisions outlined above.

8. Do you agree with the recommended priority list for new/revised guidance? (Recommendations 17-18)

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We agree with the suggested priority list and would like to see revised guidance on the delivery of sustainable transport. This is an area (alongside neighbourhood design) where the established best practice – moving away from predict and provide to promoting walking and cycling, and public transport – is a long way from being mainstreamed.

9. Are there any further points you would like to make in response to the Review Group's Report? Do you have additional ideas to improve and/or streamline planning practice guidance?

No comment

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