



Consultation on Planning Policy Statement: Planning for a Natural and Healthy Environment

A consultation response by the English National Park Authorities Association (ENPAA)

May 2010

The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the English National Park Authorities. It is governed by the Chairs of the Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area.

The policies set out in this Planning Policy Statement are considered to represent the Government's most direct and specific advice relating to planning within National Parks. As the successor to the original PPG7 and PPS7, there are principles and statements contained in this PPS that represent an important 'cornerstone' for planning and appeal decisions in National Parks. For this reason, this response is focused on those aspects that are most relevant to National Park planning and does not follow the normal format of providing responses to the pro-former questions.

Guidance on Nationally Designated Areas

The inclusion of policies relating to nationally designated areas (National Parks, The Broads and AONBs) is welcomed and overall the contents of the draft PPS are generally supported. Specifically, the confirmation of the 'major development test' which states that major developments in National Parks should be refused except in exceptional circumstances is an important point. Likewise, it is welcomed that it continues to be government policy that the conservation of the natural beauty, wildlife and cultural heritage of National Parks (and The Broads) should be given great weight in planning policies and decisions. ENPAA would also like to see this sentence include appeal decisions specifically.

It is considered however that the reference to nationally designated areas is rather buried within the text of the PPS and it is not an obvious or logical place for the major development test which covers all types of development in protected landscapes. This is a key overarching policy and should be moved to a more general section at the front of the PPS together with a cross reference to the *English National Parks and the Broads– UK Government Vision and Circular 2010*. There could also be a reference here and link to the European Landscape Convention.

The Setting of Nationally Designated Areas

The impact of development proposals close to National Park boundaries is an important consideration as some forms of development can be harmful to National Park purposes even though they are located outside of the designated area. Government advice in relation to the concept of a setting of nationally designated areas, and recognition of the potential impact of development proposed outside of the areas, is needed. Without clear guidance within the PPS, every local planning authority will need to establish a policy on setting which will lead to inefficiencies and inconsistency. Currently national policy is contained within existing PPS22, which is due to be replaced shortly. Worryingly it is not included in its draft replacement. We would be happy to discuss with officials how the issue of settings might best be addressed in the PPS.

Regional Planning

In the light of the recent government decision to abolish regional spatial strategies the draft PPS will need to consider how to address current provision with regard to supporting a healthy and natural environment through regional planning.

Wider rural planning advice

The draft PPS replaces a number of paragraphs in the existing PPS 7, much of which has also been superseded by PPS 4. This leaves only limited guidance in PPS 7 including on housing, design, local landscape designations and agricultural, forestry and other occupational dwellings in Annex A. This latter guidance is particularly important in dealing with applications for agricultural workers dwellings in the Park as many Authorities no longer have an agricultural workers dwelling policy, relying instead upon national policy and guidance. It would be helpful if the position with the remaining guidance in PPS 7 and how it will be carried forward could be clarified. Related to the above point, it is considered that there is now something of a 'policy vacuum' in relation to national planning policy guidance for rural areas. PPS 7 had a clear remit for sustainable development in rural areas but now that large parts of it have been superseded by PPS 4 and will be superseded by this PPS there is concern that there is insufficient national planning framework for rural areas.

Lawton Review

The Coalition Government has indicated that it will want to look closely at the findings of the Lawton Review on wildlife and ecological networks. We believe it will be important that this PPS considers the role of spatial planning in supporting landscape scale adaptation to climate change following the publication of the Review.

Open Spaces and Green Infrastructure

It is not clear whether the guidance expects National Park Authorities to undertake audits of existing and future needs for open space and recreational facilities or whether this should be carried out by the constituent local authorities. Currently there is an inconsistency in the approach taken and clarification on this point would be welcomed.

ENPAA

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