



## **National Planning Policy Framework**

### **Response from the English National Park Authorities Association (ENPAA)**

February 2011

1. The English National Park Authorities Association (ENPAA) supports the policy-making process by co-ordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and follows internal consultation amongst the All Parks Heads of Planning Professional Group. We are happy for our response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.
2. ENPAA welcomes the opportunity to provide some initial comments on the government's initiative to prepare a National Planning Policy Framework (NPPF). We welcome the open spirit within which the consultation is being undertaken. We recognise this as a start of a process of preparing the framework, and clearly much further discussion will be needed as priorities for the framework emerge and the detail is developed.
3. National Park Authorities are special purpose authorities with planning responsibilities. They are the sole planning authority for their area and this covers almost 10% of England by land area, with National Park purposes established through Acts of Parliament. Whilst these areas are of national significance, the way in which spatial planning is undertaken within National Parks is very much in keeping with the localism agenda. Much effort is put into working with local communities, land owners and managers, and working through partnership for the good of the area. This combination of national expectations and local partnership working puts National Park Authorities in a unique position as planning authorities. We believe the NPAs have much expertise that should be valuable to the Government as it develops the NPPF and would welcome opportunities to contribute further through, for example, sitting on sounding boards.
4. We see the establishment of a new NPPF as an opportunity to set out new thinking on a range of areas, for example, seeking to protect and reinvigorate ecosystem services, as well as consolidate established planning policy in a more user-friendly framework. There are some critical issues that we would want to see reflected in the new Framework and these are set out below.

**a) Asserting the Government’s overarching aims with regard to protecting and enhancing the quality of the natural and historic environment in urban and rural areas**

5. A great advantage of the proposed NPPF will be that it will be a lot easier for those involved in the planning process to see the Government’s spatial planning priorities. We welcome the emphasis given to promoting sustainable development and believe that a key part of that should be clearly setting out the Government’s ambitions on the natural and historic environment. Clarity here will help local communities, potential developers and reduce the risk of decisions going to judicial review.

6. We note, and welcome, the comment in *Open Source Planning* that existing PPS and PPG documents will be evaluated and some extracts retained where they provide a useful contribution towards the new framework. Of the various bits of guidance that exist, we attach particular importance to PPS1 (paragraph 17) which sets out general aims for spatial planning. Inclusion of this paragraph would very much be in keeping with *Open Source Planning* where it says “Most importantly, national government has the right and responsibility to determine and define the economic and environmental priorities for the country, and to design a planning system that will help to ensure that the pattern of development matches those priorities.”

7. We also look to the NPPF to spell out that other elements of policy and guidance, as set out in *English National Parks and the Broads UK Government and Vision 2010*, are to be maintained.

**b) Recognising the national significance of National Parks to the economy, quality of life and environment and ensuring this is reflected in spatial planning decisions**

8. The National Parks have been established under successive governments of both political parties in recognition of the significance of these areas for the country as a whole. Their statutory purposes are set out in the *National Parks and Access to the Countryside Act 1949* (as amended); and in the case of the Broads in the *Norfolk and Broads Act 1988*. This does mean that they are different to other areas of the country and this needs to be reflected in policy. We, therefore, welcome the comment in *Open Source Planning* that “the government will remain responsible for establishing and, when necessary, updating, specific rules on those parts of the country to which the normal planning system does not apply”. National Parks are a prime example. We would look to the Government to make clear within the NPPF that where there are national, sub-national or sub-regional requirements to accommodate population and/or built development – that this is not a driver of policy within National Parks.

**c) Retaining the major development test for all developments within National Parks and other designations**

9. The NPPF needs to retain the well established major development test for National Parks and Areas of Outstanding Natural Beauty. This is currently set out in paragraphs 21-23 of PPS7. We believe these are well understood by developers, Government departments,

and the planning profession. We welcome the commitment in the *Conservative Manifesto 2010* to maintain Green Belt, AONBs and National Parks, and note that this was included in the CLG press release that launched the current consultation on the NPPF (*CLG Press release, 21 December 2010, footnote 3*). Retaining the major development test – as currently worded in PPS7 - would be a key way towards supporting this.

**d) Ensuring the setting of protected landscapes is given sufficient protection and is considered in decision making so as to avoid the objectives of the designation being compromised**

10. National Parks and AONBs do not exist in isolation of their surrounding areas, and nor should they. Whilst particular attention is paid to where a boundary for a national designation should be drawn, following extensive consultation with local people, the fact is that a line is drawn on a map. It can be difficult, not to say, baffling for local people to see developments proposed immediately outside of a National Park boundary which do not need to have the same level of attention when it comes to decision making as those inside – even though the development might have a substantial influence on that national designation.

11. The issue has not been addressed adequately in past national guidance and this has necessitated some regions to establish policy themselves within RSSs. Whilst this was a sticking plaster to the problem, it provided an inconsistent approach to what is a national (rather than regional or local) issue. Under the existing planning process NPAs and other planning authorities were to omit policy that was included within an RSS in order to avoid duplication. One side effect of the abolition of the RSSs is that areas which did have policies within their RSS (such as the South East) will no longer have that safeguard, whilst other areas of course receive no treatment at all. It is important to establish that the aim is not to reduce the level of development in surrounding areas, but rather to ensure the decision making process properly considers the implications of development on a designated area. The easiest way to achieve this would be for this to be included within the NPPF.

12. PPS22 on renewable energy does say (para 14) that “the potential impact on designated areas of renewable energy projects close to their boundaries will be a material consideration to be taken into account in determining planning applications”. This is weak, however, and only relates to particular forms of development. We note that more recent Draft National Policy Statements state quite clearly that the aim is to avoid compromising the objectives of the designation. In the absence of more detail on the NPPF we do not set out specific wording on setting, but would welcome working with the Government on drafting this.

**e) Recognition that a strong economy and high levels of well being stem from sustaining a high quality environment**

13. Within National Parks, the NPAs work hard to promote sustainable development within a highly sensitive environment. For us, the aim is to seek to achieve high levels of well being and economic prosperity through sustaining a high quality environment, rather than at the expense of it. Data from 2008 shows, for example, that the 10 English National

Parks support over 54,500 FTE tourism related jobs (the total employed will be a lot higher) and is responsible for an estimated £3.5 billion of spend in deep rural areas. A separate study found that the Peak District National Park contributed around £155 million to the east midlands region in economic output (or Gross Value Added) in 2007 and supported over 14,000 jobs across 2,800 businesses. Entrepreneurial activity was said to be strong in the National Park with VAT registrations considerably higher than the national average (eg. 45 business registrations per 10,000 inhabitants in the National Park, compared to 39 nationally and 35 in the East Midlands).

14. We welcome the comment in Open Source Planning that *“this simple and consolidated framework will set out not only what the government’s economic and environmental priorities are, but how they relate to each other”*. Addressing this in the NPPF would help to reinforce messages in the Government’s forthcoming Natural Environment White Paper; and in the Vision for Sustainable Development set out in recent announcements (28 Feb 2010). The latter includes the statement that “natural capital is an essential part of a productive economy and we need to value appropriately the goods and services it provides. This will be a key theme of the Natural Environment White Paper... the White Paper will set out the state of our natural asset base and will strengthen the Government’s commitment to ensure we properly measure and recognise the value of natural capital in policy decisions” (*Mainstreaming Sustainable Development*, Defra, Feb 2011, page 4). Embedding this within the NPPF would be a logical extension of this.

**f) Ensuring the planning system remains a key vehicle for adapting to climate change and providing a supportive environment for energy efficiency, renewable energy projects, and less carbon intensive travel.**

15. Spatial planning has a pivotal role to play in climate change mitigation and adaptation. The planning system, by recognising the challenges posed by climate change, can ensure that development is adapted to take into account the changes projected to take place over the coming century, such as increased extreme weather events, flooding, higher temperatures and longer dry spells. These changes are all highly relevant to the positioning and design of new development as well as modifications to existing infrastructure. Considerable greenhouse gas emission savings can also be achieved through a holistic approach to new developments that seek to minimise the need to travel by locating services and accommodation near to each other.

16. The planning system also has a clear role in supporting renewable energy and energy efficiency at all scales in order to achieve the UK’s legal emission reduction targets. For example, a requirement for minimum levels of renewable energy and energy efficiency in all new development would set a level playing field for developers. Equally the planning system should provide guidance on how renewable energy can be deployed and what the appropriate scales of development are in different landscapes.

**g) Continuing to recognise the importance of cultural heritage and the historic environment, to local economies, society and people’s connection to their environment and seeing this value integrated into planning decisions.**

17. The planning system has an important role to play in protecting and enhancing cultural heritage and the historic environment. These contribute towards our quality of life, our sense of place, and can be a source of economic prosperity and community pride. National Parks have a particularly well preserved vernacular building heritage and in some Parks the built heritage is a dominant landscape characteristic. We look to see that the principles currently enshrined in PPS5, such as greater emphasis on sustainable adaptive re-use of the built heritage and recognition of the positive contribution that heritage assets make to sense of place, are maintained in the new NPPF.

**h) Continuing the mineral planning hierarchy that aims first to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. And to ensure the national objectives for minerals planning are maintained.**

18. ENPAA would like to see the NPPF continue to support the mineral planning hierarchy, as set out in MPS1 (paragraphs 1, 9 and 14). This adopts a sustainable approach to minerals planning; ensures National Parks are given the protection they need; and that high quality material that is quarried is used for high value uses.

**i) To support the establishment of strategic networks of green infrastructure that link existing and proposed green space with green corridors running through urban, suburban and urban fringe areas to the countryside, thus increasing opportunities for recreation and biodiversity.**

19. ENPAA believes the NPPF should support the retention and establishment of strategic networks of green infrastructure. Green Infrastructure has many uses, not only benefiting wildlife, but also for enhancing recreational and cultural experiences and delivering ecological services such as flood protection. It operates on all spatial scales from urban centres to open countryside. The *Making Space for Nature Report 2010*, prepared following the Lawton Review, highlighted the need for ecological corridors to be better linked. This can only be achieved by taking a strategic, rather than adhoc approach, and is therefore appropriate for inclusion within the NPPF.

**j) To ensure high quality design in all developments, but with particular care to protected areas.**

20. Achieving high quality design is about sustaining pride and distinctiveness within places. It can inspire, and support the transition to a low carbon economy. This is important in all areas, but of particular importance within National Parks and other designations where the landscape, townscape, is recognised as a special quality worthy of protection. We note that Open Source Planning refers to design and architecture. On design it states “we believe that collaboration with the local community in design is crucial”, whilst on architecture it states that the new framework will involve “setting out minimum environmental, architectural, economic and social standards for sustainable development.” (ENPAA emphasis). Given that the Government has decided to abolish CABE, the need for a clear on-going commitment towards high quality design, and for this to be included in the

NPPF seems clear. It should be the role of the NPPF to set the aspiration, and principles, rather than the detail which is better assessed locally.

February 2011