



## **CONSULTATION ON PLANNING POLICY STATEMENT 4**

### **A response by the English National Park Authorities Association March 2008**

#### **1. Summary**

1.1 The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine 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. We are happy for our response to be made public.

1.2 We welcome the opportunity to comment on the draft PPS4. In responding, the main issues we would like to highlight are the need for the final PPS to:

- refer to the need for economic development in or affecting National Parks to not harm their special qualities given their importance in sustaining important economic activity in rural areas;
- omit reference to housing in the definition of economic development;
- ensure that economic data is available at a National Park level;
- promote the need for scrutiny and testing of data to ensure it genuinely helps inform decision making;
- the need to continue to protect potential employment sites in rural areas; and
- be clearer in ensuring a relaxation in accessibility requirements does not lead to unsustainable developments in the countryside.

#### **2. General**

2.1 We welcome this draft policy statement and support the aim of creating a vibrant economy that is environmentally sustainable. National Park Authorities have two statutory purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Parks and promoting opportunities for the understanding and enjoyment of their special qualities by the public. In furthering these purposes they have a duty to 'foster

the economic and social wellbeing of local communities' and so we welcome advice and opportunities which will help us to achieve this important duty.

2.2 The National Parks are conscious of the importance of their role as Local Planning Authorities in securing the delivery of their duty and statutory purposes and this is reflected in their planning policies and decisions. However, it should also be noted that the majority of National Park Authorities are also actively involved in promoting and undertaking projects that help deliver economic development on the ground which respects and depends on the unique, special qualities of these nationally protected landscapes.

2.3 We recognise and support the need for evidence based decision making in planning, and therefore welcome the emphasis given in the Draft PPS to provision of robust economic data to support decisions. We believe it is important, however, that such information (as with that on social and environmental issues) is open to scrutiny and found to be sound. We would welcome reference to the need for this in the final PPS.

2.4 We also note the welcome recognition in the draft PPS to the role that the planning system can play in providing certainty for economic investment decisions. This is an important benefit, and should be maintained. References in paragraph 9-10, however, would appear to signal a shift towards a planning system which is more flexible to short term market signals. Greater uncertainty is inherent in such an approach, and we look to the final PPS to ensure such conflicts do not arise which could undermine the benefits of the plan-led system. This is to the benefit of local businesses as much as communities and planning authorities.

***Question 1 Do the policies set out in draft Planning Policy Statement on Economic Development achieve the right balance between economic, social and environmental considerations? Will they help to deliver sustainable development?***

2.5 **Yes** – overall the PPS achieves a good balance between economic, social and environmental considerations and sets out the important role of economic development in the delivery of sustainable communities. Whilst rural areas are referred to there is no specific mention of National Parks where the majority of economic development relies on the long term conservation of the special qualities of these areas. The PPS should refer to this and the need to ensure new economic development does not harm those unique qualities which underpin the majority of existing economic activity and which provide real opportunities for future economic development. Good evidence of the links is available in the report, *Prosperity and Protection – the economic impact of National Parks in the Yorkshire and Humber Region* (2007). This study found, for example, that:

- businesses in the National Parks and in the towns nearby benefited from both the quality of the protected landscapes and from the National Park designation itself;

- businesses within the three National Parks generated £1.8 billion in sales annually, supporting over 34,000 jobs;
- spend by visitors to the National Parks amounted to £400 million annually, and a £260m beyond the Park boundaries, supporting approximately 12,000 jobs;
- 69% of businesses in a survey of 400 businesses in the National Park believe that the high landscape quality has a positive effect on their business performance;
- 26% of businesses think a deterioration in landscape quality would seriously affect their businesses; and
- National Park designation appears to have played a role in attracting about 100 businesses to the three National Parks.

2.6 We do believe that reference to economic growth in paragraph 12 should be amended. It would be more consistent with Government policy, and the rest of the draft PPS if it instead read “*Regional Planning Bodies and local planning authorities should plan to encourage economic prosperity and opportunity in keeping with sustainable development*”.

2.7 It is considered that housing should be omitted from the definition of economic development set out in Para 13. Government policy relating to housing is set out in other PPSs and it is not considered that the advice set out in this PPS is relevant to housing development. The inclusion of housing in the definition of economic development could lead to confusion in both policy formulation and development control decisions.

***Question 2 – The draft Planning Policy Statement proposes a stronger emphasis on the need for evidence, including economic evidence for plan making and decision making. Do you agree that this is the correct approach?***

2.8 **Yes** – This approach is supported in principle although much of the data referred to in Annex A is not available at a National Park level. This lack of data would make it difficult for National Park Authorities to assess economic conditions robustly. It would be helpful if the role of National Park Authorities as sole Local Planning Authorities could be recognised by ensuring the necessary data is available at a National Park level.

***Question 3 – If you agree that there should be a stronger emphasis on the need for evidence what are your views on the following:***

2.9 *The need for final Planning Policy Statement to include a suggested list of data as at Annex A?* We consider that this would be helpful.

2.10 *Are there any data/forecasts that should be excluded or added to the proposed list?* The data needs to be available to all LPAs to assist them in formulating their economic development policy. Provision of data at a National Park level would really assist National Park Authorities in this respect.

2.11 *Could the proposed data and forecasts also help to form part of the proposed new economic assessment that, subject to separate consultation, Local Authorities would be required to carry out?* Yes, provided it is relevant and appropriate.

2.12 *What is the most appropriate level at which data should best be collected: regional, sub-regional or local level?* This depends on the data in question. However, it would be helpful in most rural areas to have locally based data so that the often small scale but important issues and developments do not 'get lost' by a concentration on the macro scale. Recent experience from National Parks and their partners in the development of proposals for the New Leader approach as part of the Rural Development Programme for England may provide good experience of the needs of an appropriate economic evidence base in rural areas.

***Question 5 - Do you agree that the methodology used to determine sub-regional housing markets provide an appropriate proxy for determining economic markets?***

2.13 This could form a good starting point for work on economic matters but it would be helpful to have guidance as to the best way of undertaking these assessments so there is some compatibility between LPAs.

***Question 6 - Is the approach to the location and development of B1 offices suitably flexible to meet the needs of business, whilst delivering sustainable development?***

2.14 **Yes.** Overall the strategy of concentrating office development in or on the edge of urban areas is supported as a means of creating a more sustainable form of development. However, it is important that the PPS retains the flexibility to allow smaller scale office development to be located elsewhere taking account of local circumstances. There are rural and village locations where appropriate small scale office development can diversify local employment opportunities without compromising overall sustainable development aims. This will be particularly relevant in the case of live-work development.

***Question 7 - Is the less prescriptive approach to non-residential car parking suitably responsive to the needs of business in the context of the objectives in Paragraph 4 of PPG13 Transport?***

2.15 **Yes.** The pragmatic and flexible approach advocated in Para 25 appears to take account of the wide range of travel needs for economic developments.

***Question 8 - Do you agree that employment sites should not be retained as such if there is no reasonable prospect of them coming forward for development during the plan period?***

2.16 **No.** Whilst the approach advocated is understood and may well be appropriate in urban areas where larger areas of land are involved, the amount of land in rural areas suitable for economic development is often very limited. This, together with the real difficulties often experienced in finding suitable businesses who wish to develop these sites, means allocated sites may remain unoccupied for longer than the plan period. If an economic market assessment shows a future need for land it is considered that its re-allocation to another use should be resisted. To re-allocate could lead to pressure for the release of less appropriate land in less sustainable locations in the countryside and lead to less balanced and sustainable communities in the long term.

***Question 9 - Does this draft Planning Policy Statement deal adequately with the particular needs of rural areas?***

2.17 **No.** As stated in our response to Question 1 above, the importance of the landscape and special qualities of the National Parks as an economic asset and the need to give priority to the conservation of these in National Parks should be recognised in the final PPS.

2.18 One example of where the draft PPS fails to properly appreciate the situation in National Parks (which after all cover 8% of England) is paragraph 24. The second bullet point would imply that National Parks should be catering for a broad range of business types, including industrial units. While NPAs seek to promote economic opportunities, they need to be in keeping with the special qualities of the National Park.

2.19 Whilst the need to be flexible in terms of accessibility (Para 32) is welcomed, this section needs to be carefully worded so as not to suggest that long-term sustainability of economic development in the countryside is not an important issue. Whilst accessibility by public transport may not be paramount for certain types of economic development in rural areas, all proposals for economic development should be looked at on their individual merits in terms of their long-term sustainability and policies should direct the majority of development to the most sustainable locations. Proposals for economic development located outside such areas should be accompanied by a full justification explaining the reasons for the choice of location.

2.20 The encouragement to find new economic uses for existing buildings in the countryside is welcomed. However, it should be stressed that the new uses should be appropriate for their location. This will enable LPAs to resist large scale, noisy or otherwise inappropriate or unsustainable new uses for existing buildings – especially where such uses would harm interests of acknowledged importance such as the special qualities of National Parks. It is also recommended that the PPS should require farm diversification projects

to use existing buildings on the holding wherever possible before considering the need for new buildings.

2.21 The need to safeguard existing employment sites in rural areas should be stressed so as to avoid additional pressure for new green field development, or to avoid existing employment sites being lost to more profitable uses such as housing.

2.22 Access to local labour markets should be a factor in determining the location of economic development, as should access to skills and training, so as not to encourage unsustainable practices such as reverse commuting in to rural areas.

2.23 The opportunity for the location and design of economic development to contribute to the Government's response to climate change is supported and should be emphasised. Such development should be required wherever possible, to be carbon neutral. It should be recognised that there may be situations in low lying areas, such as the Broads, where it may be appropriate to allow the re-development of existing employment brown field sites, at risk of flooding, so as to create more flood resilient development.

2.24 The need to protect and promote biodiversity should be added to the criteria needed to secure a high quality and sustainable environment.

ENPAA  
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