



Consultation on a new Planning Policy Statement 4: Planning for Prosperous Economies

A response by the English National Park Authorities Association July 2009

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, and our response represents the collective view of the Authorities. It has been prepared by officers, working within the policies established by the National Park Authorities (NPAs) and follows consultation within the National Parks Heads of Planning Group. Individual NPAs may submit separate comments, which will draw on the specific issues for their particular region.

General Comments

2. The English National Park Authorities are planning authorities. They collectively cover 8% of the land area of England (London covers less than 1.5%), and have a resident population of over 200,000 people. The English National Parks receive 75 million visits a year and the parks in Yorkshire and the Humber Region alone support more than 34,000 jobs and bring over £1.8 billion into the region's economy. National Park Authorities therefore have a significant interest in planning for prosperous communities since, in pursuing their statutory objectives; they have a duty to contribute to the social and economic wellbeing of their resident communities.
3. ENPAA and individual NPAs supported the Taylor Review with evidence sessions and a detailed submission. We have a place on the CLG Implementation Panel for the Taylor Review, and take a keen interest in this area.
4. It is not clear from the draft PPS whether or not the only policies which will apply to the National Parks are those that specifically refer to rural areas or whether the policy approach to local planning for town centres will also apply. For instance for identified Local Service Centres would the National Parks need to obtain robust evidence on land availability and land need and use this information as the basis of decisions? Or in rural areas is it necessary to only apply policy EC9 (for example neither the Broads, Northumberland National Park or the North York Moors National Park have a settlement greater than 3,000 people in size)? ENPAA would like clarification of this point in writing and would be happy to meet to discuss the implications for National Park Authorities if that would be helpful.
5. Although we welcome the inclusion of Policy EC16 "Nationally designated areas" this only refers to major development. ENPAA feels that the importance of taking into account the impact of all economic development proposals not just major development within designated areas needs to be included. We believe the policy should be placed in another part of the statement as it appears at the moment as a last thought rather than a major consideration. The statement should also recognise the importance of high quality landscape itself as an economic resource and stress the need to maintain and conserve such landscapes as the basis of the economy of many remoter rural areas.

6. On the whole ENPAA is concerned that Planning Policy Statements are no longer broad guidance as intended but specific planning policies with limited scope for local interpretation. There is a lot of repetition throughout the document and sometimes statements between policies are contradictory. For instance policy EC9.1 says that “economic development in open countryside away from existing settlements or outside areas allocated for development in development plans should be strictly controlled” whereas policy EC12 paragraph 5 says that “support should be given for small scale economic development where it provides the most sustainable option in villages or other locations that are remote from local service centres, recognising that a site may be an acceptable location for development even though it may not be readily accessible by public transport”. This could imply that generally any economic development in isolated countryside locations would be acceptable, leading to unsustainable forms of development that generate travel by private car. Where there are instances where such development is in the interests of an area this is best delivered through local policies rather than through national policy.
7. ENPAA supports Policy EC3 which stipulates that Local Authorities must ensure that site allocations for economic development are not carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period.
8. Overall, ENPAA is concerned that the wording on protected landscapes in the draft PPS is weaker than that contained within PPS7. While we welcome the integration of the PPS7 policies with those from PPS6 and 4, care should be taken in this process not to undermine the protection afforded by PPS7 to National Parks from inappropriate and damaging developments. The main remedies for this would be to transpose all of paragraphs 21, 22 and 23 of PPS7 into the new document and to include planning for protected areas in the plan making section of the new PPS. Currently protected areas are only mentioned in the decision making section and as plan making bodies the NPAs find this a curious omission and hope to see this put right in the final version.

Response to Consultation Questions

Question 1 Do you support the consolidation and streamlining of national policy on economic development into a single policy statement? What do you think are the costs and benefits of the approach?

9. Yes, in principle the proposal of bringing all economic policies into one document is a good concept. However the economic policies are still effectively separated from the retail policies and therefore it may be clearer if the two sets of policies were kept completely separate in two different documents, because reading both sets in conjunction is rather confusing. Replacing a large part of PPS7 and adding to the policies in PPS4 and PPS6 has led to a muddled policy statement. As the statement proposes to replace much of PPS7 there needs to be much more emphasis in the document about the special challenges and considerations facing rural areas.
10. ENPAA has concerns that as a result of the combined approach very little content will be left in PPS7 and it may consequently be deleted. However, PPS7 is a key document for rural local planning authorities and National Park Authorities in particular as it clearly states the Government’s commitment to National Park purposes and includes advice on agricultural development, including workers dwellings, that most local planning authorities rely on in their Local Development Frameworks. Retention of these policies is crucial, preferably within the new PPS4 but a revised PPS7 would suffice. However, if the policies are to be retained in a revised PPS7, we would like to see a published commitment to its revision and timetable for this work as soon as possible so that it is clear that the ‘rump’ PPS7 will not simply be deleted.

11. Paragraph 28 of PPS7 (Best and most versatile agricultural land) is also an important part of policy, which for example is not included in NPA's adopted Core Strategies and Development Policies to avoid duplication of policy that exists at national level. The absence of this text in national planning policy could lead to development on the highest quality grades of land if the national restrictions are removed and none can be put in place at local level until the next LDF review. Also, a local policy, even if adopted, will not carry the weight of a national planning policy and so it will become very difficult to refuse development proposals on high grade agricultural land. This is significant given the debates that are currently taking place regarding how to ensure food security.

Question 2 Does the draft Statement include all that you understand to be policy from draft PPS4, PPG5, PPS6 and PPS7? If not, please be specific about what paragraphs in any of these documents you feel should be included in this document? Please can you explain why this should be the case?

12. Section 21 of PPS7 has not been incorporated into the draft PPS4. This Section outlines policy making advice with regard to Local Development Documents for National Parks. As there is no mention of National Parks in the Plan making policy part of draft PPS4, there is a lack of clarity in this document about how economic policy making should be approached in National Parks. Section 21 of PPS7 suggests that planning policies in Local Development Documents reflect the priorities of National Park purposes as well as supporting suitably located development to facilitate the National Park Authority's duty to foster the economic and social well-being of local communities. A key element of a National Park Authority's duty to 'seek to foster the economic and social well being of the local communities' is that this should be carried out whilst pursuing the two statutory Park purposes, but not separate from them. This sets a different framework for formulating economic development policies than elsewhere in the country, even in other rural areas. ENPAA would like to see this key element of PPS7 retained in the new PPS4. In particular, the sentences from section 21: *Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. The conservation of wildlife and the cultural heritage are important considerations in all these areas. They are a specific purpose for National Parks, where they should also be given great weight in planning policies and development control decisions.* (Clearly, this paragraph should be updated to reflect the designation of the New Forest as a National Park and the forthcoming designation of the South Downs).

13. Policy EC16 appears in a section specifically relating to decision making policies. If the intention is that this policy is to be used in the control of development then the omission of the following from Section 22 of PPS7 does not give adequate protection to protected landscapes. Specifically, Section 22 says '*This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination*'. These sentences should be included in Policy EC16 of the new PPS4.

14. Paragraph EC9 sets out the Local planning approach to rural areas yet does not mention the provision of tourism and leisure facilities other than holiday and touring caravan sites in terms of what should be included in the LDF. However, in policy EC15 the provision of tourist and visitor facilities in rural areas is discussed in paragraph 2 with regards to how planning applications for proposals of this kind should be considered. There should be

consistency with regards to the content of policies on what should be contained in LDFs and how proposals should be determined. It is considered that more emphasis should be placed on the contribution that tourism makes to the economies of many rural areas, as it is the largest employment sector in many of the English National Parks. Emphasis also needs to be placed on evidence from research (*'Prosperity and Protection – the Economic Impact of National Parks in the Yorkshire and Humber Region'* Council for National Parks 2006 and *'Contribution of the Peak District National Park to the Economy of the East Midlands report 2008'* by SQW Consultants), which show that most businesses, not just the tourism sector, benefit greatly from sustaining a high quality natural environment. Further information on the importance of the tourism sector in rural areas should be included throughout the statement, particularly the introduction.

15. We would also like to see the inclusion of section 23 of PPS7 in the new document. This sentence, "*Planning authorities should ensure that any planning permission granted for major developments in these designated areas should be carried out to high environmental standards through the application of appropriate conditions where necessary.*", gives decision making bodies a clear steer on the quality of development that should be sought in protected landscapes. While there has been other guidance and policy on design quality and environmental standards issued by Government since PPS7 was published, we feel that emphasising that higher standards are expected in protected areas is still necessary and this sentence should be retained.

Question 3 Other than where specifically highlighted, the process of streamlining policy text previously in draft PPS4, PPS6 and PPS7 to focus on policy rather than guidance is not intended to result in a change in policy. Are there any policies which you feel have changed in this process? Please tell us what you think has changed and provide alternative wording that addresses your concerns.

16. Policy EC14.1 provides more support for the conversion of existing buildings within the countryside than PPS7, which specifies that re-use for economic development purposes will usually be preferable. This change in emphasis is likely to lead to greater pressure on authorities to grant permission for the re-use of traditional buildings for residential use rather than economic use and this would result in fewer opportunities for economic development in the countryside and less sustainable patterns of residential development in open countryside. It would be better if wording along the lines of what is contained in PPS 7 is used in reference to the re-use of traditional buildings. An example of how this policy can be implemented more flexibly can be found in the North York Moors where the National Park Authority has included a policy in its adopted Core Strategy and Development Policies plan that allows traditional buildings in the countryside to be developed for residential letting as an alternative source of income for farms and other types of rural businesses, rather than permanent residential units. After the first point of sale permanent residential use provides little contribution to the local economy but a residential let has a continuing contribution.
17. It is also considered that reference to the desirability of preserving buildings, '*which otherwise contribute to local character*' will help sustain the full complement of local heritage assets and conserve local distinctiveness.

Question 4 Does the structure of the draft Statement make it easier to understand what is required at different stages in the planning process? Are there any improvements you would like to see made?

18. The statement makes it very clear what is required at different stages in the planning process. However because of the way the guidance is set out overall it appears repetitive and over prescriptive. It may be more useful to present the information in a more concise manner.

19. It is not clear how the statement in *policy EC9.2: Local planning approach to rural areas* that 'the policies for economic development in this statement apply to rural areas as they do to urban areas' should be regarded in plan-making terms. The Government's response to the Rural Advocate's Report (*Resilience and Opportunity*, February 2009, BERR, DWP, CLG, Defra, HM Treasury) recognises that determining the economic potential of urban and rural areas is a very complex business best addressed through a regional policy focus with local delivery mechanisms. That response also accepts that there are significant variations in economic vitality across rural England and that the national policy framework should be designed to give local areas the flexibility to respond to local circumstances.

Question 5 Do you think the restructuring of the impact test from the consultation draft of PPS6 achieves the right balance and is robust enough to thoroughly test the positive and negative impacts of development outside town centres?

20. Yes the impact test is flexible enough that it can be tailored to be appropriate to the size and nature of the retail centre, although '*impact on trade/turnover and on trade in the wider area*' (criterion (f), policy EC20) is still insufficiently detailed as an impact criterion.

Question 6 Should more be done to give priority in forward planning and development management to strategically important sectors such as those that support a move to a low carbon economy, and if so, what should this be?

21. ENPAA welcomes the Government's commitment to move to a low carbon economy. English NPAs are working, as a family and with partner organisations, to contribute to this move. The NPAs are strong supporters of energy efficiency and renewable energy projects that respect the special qualities of National Parks and are working to protect and enhance natural carbon stores within the parks. We welcome and promote small scale community schemes, and many NPAs are demonstrating how energy efficiency and the use of renewable energy can be achieved without damaging the special qualities of National Parks through their own patterns of energy use. The English NPAs aspire to be exemplars in this respect. They will, however, also object with equal vigour to those developments that threaten the qualities of the National Parks or the experience of them-whether inside or outside the boundary of the designated area. An effective process for handling controversial development proposals in highly sensitive landscapes is essential.

22. Planning has an important role to play in moving to a low carbon economy but planning policy, conditions and enforcement should be the same for all sectors with clear national, regional and local policy and guidance given as to the type and quality of development that would be preferred. Preference should not be given to particular sectors where this amounts to side-stepping established planning policy. National planning policy sets a framework that cascades to the local level and will facilitate the move to a low carbon economy. This is already being done, particularly via PPS22 and PPS1. For example, commitments in the Low Carbon Transition Plan white paper will set planning guidelines that require new-build homes to higher standards, reaching 'zero-carbon' homes from 2016, and require new developments to be located and designed to reduce emissions. Changes resulting from the *Planning Act* should also help with the move to a low carbon economy but have yet to take effect.

Question 7 Is the approach to the determination of planning applications set out in policy EC21 proportionate?

23. It seems overly prescriptive to explicitly set out how Local Planning Authorities should determine applications for town centre uses not in a centre or in an up to date development plan.

Question 8 Do you think the requirement for regional spatial strategies to set targets for employment land targets for each district in their area should be imposed? Please give reasons for your view.

24. We have doubts as to whether such an approach would be sufficiently flexible to adapt to changes such as the credit crunch or local circumstances that change rapidly, for example because of severe flooding or changes in demographics. It would take time for the regional authority to carry out a review of need and of the RSS before any changes could be incorporated into LDFs by Local Planning Authorities. A bank of employment land should be identified by Local Planning Authorities based on current evidence, and brought forward for development when both opportunity and need exist. Such an assessment of need and availability can be reviewed more frequently by LPAs.

Question 9 Do you agree the policies do enough to protect small or rural shops and services, including public houses? If no, please explain what changes you would like to see.

25. Policy EC13 does set out robust criteria for the protection of rural shops and services. However it is unlikely that this policy would have prevented the closure of several rural post offices, which followed the national consultation on the Post Office Network. Therefore it may be helpful to include further details on how to protect existing facilities e.g. by reference to the need for evidence on viability and vitality when considering change of use proposals. Such an approach would support the policies contained in LDF core strategies for rural areas such as the Northumberland National Park LDF.

Question 10 In response to Matthew Taylor, we have altered the approach to issues such as farm diversification. What do you consider are the pros and cons of this approach?

26. The policies contained within PPS7 and those suggested in the consultation draft are broadly the same. However Policy EC9 paragraph 3 does not make reference to the fact that farm diversification schemes should help to sustain the agricultural enterprise and this may lead to more footloose, freestanding proposals for schemes which are inappropriate in a rural setting. This approach could exacerbate reverse commuting thereby adversely impacting the sustainable approach to development in rural areas.

27. Policy EC9 makes specific references to equine enterprises, whereas the other paragraphs are more general. ENPAA believes that the more general wording currently found in paragraph 32 of PPS7 is more appropriate for a national planning statement and it is not clear why horse training and breeding businesses have a specific mention in the PPS compared with other types of rural businesses. The way the policy is worded in the draft PPS may lead to increased pressure for equine developments in areas inaccessible by an adequate network of safe equestrian routes, which may adversely impact other users of rural areas.

Question 11 Do you think that the proposals in this draft PPS will have a differential impact either positive or negative on people because of their gender, race or disability? If so how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.

28. No.