



Prosperous Places: Taking forward the Review of Sub National Economic Development and Regeneration Consultation

A response by the English National Park Authorities Association
June 2008

Summary

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. Individual National Park Authorities (NPAs) are active participants within their Regions and have been working with partners on the SNR. They may submit separate comments, which will draw on the specific issues for their particular region.

2. While NPAs recognise that securing economic prosperity is important, we believe the current focus of the SNR on economic growth and regeneration is too narrow – and risks undermining other Government initiatives. The SNR needs to ensure that sustainable development provides the overarching framework. We strongly believe that a key method of delivering economic prosperity and well being, particularly for sparse rural populations, is the active maintenance and enhancement of high quality environments. This can provide the backbone for a host of businesses. A survey of 400 businesses in Yorkshire and the Humber region, for example, found that 69% believed that the high landscape quality has a positive impact on their business performance.

3. High quality environments are key to the economic success of many of our rural areas and we look to CLG and BERR to reflect this more strongly in the arrangements for implementing the SNR. England's National Parks are important test-beds for such an approach. Furthermore, as sole local planning authorities (with additional statutory roles in the preparation of Regional Spatial Strategies) we believe NPAs have significant expertise and experience which would be valuable in supporting the new arrangements. In this respect we look to be involved in the preparation of legislation and guidance, and to continue to have a statutory role in relation to the proposed Single Integrated Regional Strategies.

5. Our response includes a detailed list of proposals which we believe are necessary to better align the SNR with the objective of sustainable development. Under the headings in the consultation paper, we make the following main points.

Stronger Partnerships for Regional Growth

- We urge the Government to ensure that National Park Authorities have a place on the proposed Leaders Forums as is proposed in the North West.
- NPAs have an excellent track record in managing projects through RDA funding and should not be excluded from accessing funds because of the wording of legislation and/or guidance.
- There should be a clear demarcation (even if within one body) between those responsible for preparing the SIRS and the business-led side of the organisation.
- The RDAs will need new skills sets; understanding of the roles and public benefits of spatial planning; expertise in addressing issues in both urban and rural areas; and commitment to widespread community participation.
- We would welcome discussing with CLG, BERR and Defra how the 'Change Management Programme' might assist RDA Board Members and Staff to better understand the role of National Parks; and their part in rural regeneration.

Integrating regional strategies to promote growth

In terms of content:

- each SIR should include an appropriate climate change target to support those set nationally under the Climate Change Bill;
- reference to 'economic growth' in SIRS should be amended to better reflect the aims of HM Treasury, and be supported by a Quality of Life indicator;
- the SIRS should be holistic, and include policies covering the environmental and heritage assets; challenges to the natural and historic environment; and opportunities for enhancement within the region; and
- the SIRS should include a sub-regional approach in order that distinctiveness of place and sparsely populated areas are properly recognised.

In terms of the process of SIR preparation:

- future guidance needs to clarify that it is Local Planning Authorities which are to be involved in the preparation of the SIR, thereby including NPAs;
- the Government should confirm that National Park Authorities will continue to be formally involved in SIRS preparation as they are now for RSS, under Section 4(4) of the Planning and Compulsory Purchase Act;
- NPAs should have a seat at the table in the preparation of the SIRS, and be consulted early on, on the accompanying Delivery Plans;
- the Government should acknowledge that those responsible for preparing the SIRS will be required to operate fully as a S.62 body under the Environment Act 1995 (eg. they will have regard to National Park Purposes) and discuss with Natural England and ENPAA how this might best be achieved;
- the national core sustainability framework being developed should include an assessment on the effects (positive, negative, and cumulative) on protected areas;
- the legislation and guidance on SIRS preparation should confirm that for the Strategy to be integrated with other regional strategies, RDAs should have regard to the provision of statutory National Park Management Plans;
- the role of Natural England, Environment Agency, and English Heritage in helping define the scope of the SIRS should be clarified;
- CLG should clarify that the Local Development Frameworks produced by NPAs should (as happens in Wales) have regard to, but not be tested to conform with the SIRS since to do so could prejudice the NPAs ability to deliver its statutory purposes; and
- Defra should be formally involved in aligning the SIRS with national/ regional policies and be one of the departments signing off the strategy.

Strengthening sub-regional economies – the role of local authorities

- ENPAA supports option 1 where the duty to undertake an economic assessment is supported by guidance, providing certain criteria are met.
- The assessments should recognise the economic links and inter-dependencies between urban and rural areas, and mainstream rural areas into the overall assessment process.
- National Park Authorities should be consulted as part of the assessment process given their statutory duty to seek to foster the economic and social well-being of local communities within the National Park.
- The Government should provide flexibility in the proposed institutional arrangements for MAAs and sub regional partnerships so they can extend beyond economic development and a wider range of public benefits might be achieved through them.
- We would expect a NPA to be consulted where sub regional issues affect a National Park and for this to be put on a statutory footing.

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1. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. We welcome the opportunity to comment on the consultation on taking forward the proposals contained within the SNR. Our response has been developed following considerable internal discussion amongst the nine NPAs with the main points we wish to make being approved by the Chief Executives and Chairs of the nine NPAs.

2. We wish to make a few overarching points in relation to the SNR and what it seeks to achieve, before responding to the specific questions raised in the consultation paper.

Over-arching comments

Delivering sustainable development through the SNR as a sign of success

3. We recognise the SNR as a very significant initiative with far reaching implications for how decisions are made over spatial planning and investment across the country. In undertaking such a task, it is vital that the new proposals enable a range of Government policies and public benefits to be realised. While NPAs recognise that securing economic prosperity is important, we believe the current focus in the consultation document on economic growth and regeneration is too narrow – and risks undermining other Government initiatives. In particular, the SNR needs to ensure that sustainable development, and the five principles which the Government has adopted to underpin this are built into the core purpose, processes and accountability mechanisms within the new arrangements. While they are mentioned in the consultation, they do not appear to form the heart of the narrative underpinning the SNR, and consequently the proposals that have emanated from it.

4. We note that the proposals include a role for sustainability appraisal. The overarching thrust of the consultation paper, however, is in relation to providing a more focused approach to economic growth – particularly in urban areas. Indeed the consultation opens by saying ‘the Government’s central economic objective is to achieve high and stable rates of economic growth and employment’. This is reinforced by the chapter headings. We believe the proposals for addressing sustainable development are inadequate, as is the attention given to rural areas.

High quality environments can deliver economic prosperity

A key method of delivering economic prosperity and well being, particularly for sparse rural populations, is the active maintenance and enhancement of high quality environments.

5. ENPAA believes that a high quality environment is key to delivering economic prosperity and wider sustainable development. This can provide the backbone for a host of businesses, including tourism.

6. A study undertaken by SQW Consultants demonstrated the importance that businesses attach to high quality environments within the Yorkshire/Humber Region. The Region has three National Parks within it (North York Moors, Yorkshire Dales, and the Peak District). Overall findings of the in-depth study (published in a Council for National Parks report: *Prosperity and Protection*) were:

- sales by businesses in the National Parks in the one region are worth £1.8 billion annually, supporting over 34,000 jobs;
- spend by visitors to the three National Parks amounted to £400 million annually, and a further £260 million elsewhere in the region;
- a survey of 400 businesses within the National Parks, the towns around them, and against a comparator found that 69% of businesses believed that high landscape quality has a positive impact on their business performance; and
- 58% would expect a deterioration in landscape quality to affect their business.

7. Such figures are particularly important when one considers the sparsity of population within the National Parks.

8. High quality environments standards are key to the economic success of many of our rural areas and we look to CLG and BERR to reflect this more strongly in the arrangements for implementing the SNR. We believe this would assist the Government in better aligning the proposals in the SNR with the objectives contained within Planning Policy Statement 1: *Delivering Sustainable Development*.

9. We now address the questions directly posed in the consultation paper. Our response focuses only on those questions where we believe we can draw on our own experience of sub national working.

Stronger Partnerships for Regional Growth

Consultation question 1: How should RDAs satisfy themselves that sufficient capacity exists for programme management and delivery at local or sub-regional level?

10. ENPAA welcomes this question since we believe that the capacity of RDAs to absorb the new planning functions that are envisaged, alongside their more traditional roles in promoting economic development may well be a significant challenge.

11. The consultation paper refers to the RDAs being 'business-led'. Yet the role of spatial planning is to deliver a range of public benefits and to take a longer timeframe than many businesses. We believe there is a serious risk of conflicting interests within the RDA if they are given these dual functions. Indeed, we are aware that some RDAs themselves have expressed concern over the proposal that they absorb spatial planning responsibilities.

12. Whether responsibilities lie with new enhanced RDAs, or with another model, we believe there will be benefits from ensuring a clear demarcation between those responsible for spatial planning, and those who perform the business-led, inward investment aspects of an RDA's work. This is essential for:

- continued public trust in the spatial planning process;
- accountability of the RDA;
- partnership arrangements with other Agencies, including NPAs; and

- reducing the risk of legal challenges caused by conflicts of interest.

13. At the very least, it will be important that the body responsible for preparing a Single Integrated Regional Strategy has the necessary expertise to adopt the holistic approach which is needed when considering spatial planning. This will require a new skills set; understanding of the roles and public benefits that spatial planning is to achieve; expertise in how to address issues in both urban and rural areas; and commitment to widespread community participation. These skills are different to those required to project manage large scale developments or produce more narrowly defined regional economic strategies.

14. We note that the Government intends to work with the RDAs on a 'Change Management Programme'. Should the proposals proceed in their current form, ENPAA believes that an important part of that programme should be increasing the understanding of RDA staff and Board Members in the role of protected areas, National Parks in particular and rural regeneration. We would welcome further discussion on this point with CLG, BERR, and Defra.

Delegation of funding

15. The SNR indicates that RDAs should delegate funds to local authorities where possible. The RDAs and National Park Authorities have benefited from very good partnership working, which has extended to NPAs receiving funds for specific projects. The Community Renewables Project run by the North York Moors National Park Authority is but one example that relies on the ability of the NPA to work closely with local people in two rural villages, but which is generating national lessons regarding the installation of micro-renewables in rural environments, and which is reliant on RDA funding (from Yorkshire Forward) for its continued success. Other NPAs have worked with RDAs successfully in supporting rural regeneration projects.

16. NPAs have an excellent track record in managing projects and we look to the Government to ensure that NPAs are not excluded from accessing funds because of the wording of legislation and/ or guidance. We have no reason to think that RDAs would not wish to continue to work with NPAs successfully as they have done in the past.

Consultation question 2: Do you agree that local authorities should determine how they set up a local authority leaders' forum for their region, and that the Government should only intervene if the required criteria are not met or if it failed to operate effectively? If not, what would you propose instead?

17. We recognise that the Government wishes to provide flexibility to regions to establish their own arrangements. In doing so, however, ENPAA believes there is an important role to ensure certain minimum conditions are achieved across the country. The Government needs to be pro-active in this respect and not wait for a region to fail before intervening. Specifically – we urge the Government to ensure that National Park Authorities have a place on the proposed Leaders Forums. There are a number of reasons for this:

- National Park Authorities can provide a helpful contribution to the discussions that will be needed within the Leaders Forum on reconciling conflicts through spatial planning, environmental assets and delivering public benefits, to proper management of environmental assets;

- National Park Authorities are the sole planning authority for the National Parks which are significant areas within many regions. This role includes local, strategic, minerals and waste planning (a role equivalent to both upper tier county councils and second tier district councils). The NPA therefore has statutory spatial planning responsibilities and should be represented on the Leaders Forum given its key role in the preparation of the Single Integrated Regional Strategy (see below).
- A National Park Authority is a named authority under Section 4(4) of the Planning and Compulsory Purchase Act 2004 and thus, for planning purposes, is equivalent to a county or unitary authority. For this reason, NPAs have a seat on Regional Assemblies which enables them to engage with regional partners and perform a scrutiny role. We look for this representation to be maintained through the new arrangements.
- National Parks cover many administrative boundaries, and in a number of cases cross regional boundaries too. This enables them to take a wider perspective – which is helpful in addressing strategic planning issues. But it also means that it would prove extremely difficult for the National Park's interests to be adequately represented by the local authorities sitting on the Leaders Forums.
- Under Section 62 of the *Environment Act 1995*, public bodies have a duty to have regard to the statutory purposes of National Parks. A way for Government to discharge this duty would be through ensuring proper representation of the National Park, via its NPA, in the legislation and guidance relating to Leaders Forums and the Single Integrated Regional Strategy.

18. Currently, all English NPAs are in discussions with RDAs and the Local Authorities within their region over the new arrangements. There are significant differences in how RDAs and local authorities view future NPA engagement. These range from the Leaders Forum Structure that has been agreed by the North West Regional Assembly Executive Board – which will include the Lake District National Park Authority on it; to no representation for the New Forest in the South East. Whilst the local arrangements for delivering the SNR framework may differ in each region such an inconsistency is unacceptable given that NPAs exist to deliver statutory purposes which are of a national interest; and the statutory planning functions apply to all nine National Park Authorities.

Integrating regional strategies to promote growth

Consultation question 4: Do you agree that the regional strategy needs to cover the elements listed at paragraph 4.13? Are there other matters that should be included in the regional strategy to help in the delivery of key outcomes?

Existing proposed content for the SIRS

Climate Change

19. We welcome reference to climate change adaptation (fourth bullet) since spatial planning will be a key delivery mechanism for the Government's Climate Change Bill. The need for an appropriate climate change target to be set out in the

SIRS would strengthen the strategies role in contributing to reducing climate change emissions as well as addressing adaptation.

20. We note elsewhere in the consultation paper that it says, '*on climate change too, cities and sub-regions have a key role to play. The 56 largest urban areas account for 50% of England's carbon emissions*' (paragraph 4.13). While ENPAA fully supports the need for city regions and urban areas to reduce their emissions, we believe that the statement fails to recognise the importance of rural areas and management of carbon stores found within them. According to the Inter-governmental Panel on Climate Change carbon locked up in soils is twice the amount found in the atmosphere. The carbon stored in peat, lowland mires, woods, forestry, and salt marshes is considerable and if not managed appropriately will add significantly to the UK's emissions. Research on moorland restoration in the Peak District, for example, showed that peat resources across the UK could absorb 400,000 tonnes of carbon every year if well managed, but emit 381,000 tonnes a year if those resources were eroded. We hope that in future the SNR will provide greater recognition of the role of rural areas in tackling climate change, and the inter-dependencies which exist between urban and rural areas.

Economic Growth

21. The second bullet point refers to 'economic growth'. We note that the overall aim of HM Treasury is to '*raise the rate of sustainable growth and achieve rising prosperity and a better quality of life, with economic and employment opportunities for all*' (HM Treasury website 2008). We believe that the bullet point could be amended to better reflect this wider interpretation, and the pursuit of sustainable development. In particular:

- the bullet could be amended to 'sustainable economic growth, prosperity and well being'; and
- be supported by a quality of life indicator to measure progress against, to accompany the others set out in the consultation paper.

Additional content for the SIRS

Natural and Historic Environment

22. While climate change is prominent in the consultation paper, little reference is made to the natural environment. We believe this is an important omission and look to the Government to ensure the SIRS adopts a holistic approach. Specifically, the SIRS should include:

- policies covering the environmental and heritage assets, challenges to the natural and historic environment, and opportunities for enhancement within the region.

23. In order to put meaning to this outcome, we believe the Guidance to RDAs on preparing a SIRS should emphasise that a SIRS should:

- recognise the economic prosperity (in particular to sparse rural populations) that derives from the environmental and heritage assets contained in protected areas;
- recognise the broader 'eco-system services' delivered to the nation by protected areas (eg. attractiveness of region (regional image), carbon

- capture, biodiversity, water management, quality of life, health, cultural benefits etc.);
- ensure the SIRS are required to identify key environmental and rural challenges within the region, including those identified in National Park Management Plans (which cover 8% of England); and
- provide practical guidance on how environmental limits are to be considered in the preparation of SIRS.

24. Reasons for this include:

- the natural environment is already covered by the RSS and its absence from a SIRS would lead to a serious policy vacuum at a strategic level;
- in at least two regions over 30% of the geographic area is protected landscape, often with international designations whose designations include responsibilities which go beyond the region;
- the consultation paper specifically refers to the new PSAs in paragraphs 2.6 and 4.7 but fails to include the natural environment (key to Defra PSA – 28) in the main items in paragraph 4.13 on the content of the SIRS;
- the maintenance and enhancement of the natural environment can contribute to delivering economic prosperity (particularly in sparse rural areas);
- creating a strategic policy framework for the natural environment can ensure that the other various public benefits which it provides can be recognised and supported. By way of example, strategic planning can assist in reducing flood risk (and all the economic impacts associated with it) by adopting a landscape scale approach which recognises that management of upland areas can reduce run-off into river catchments; and
- it is being increasingly recognised that a key part of tackling climate change is protecting the natural environment – including peat bogs, woodland, forestry and other stores of carbon (see above) and this requires an integrated approach.

25. We note that CLG is a formal delivery partner to the achievement of PSA28: Natural Environment. The Treasury paper on PSAs says:

“The Department for Communities and Local Government (CLG) is a formal delivery partner for this PSA and will ensure that the planning system takes full account of the natural environment, while seeking to integrate economic, social and environmental objectives so as to promote sustainable development”

HMT Delivery Strategy for PSA28: Natural Environment (October 2007)

26. ENPAA believes ensuring the SIRS address more fundamentally issues surrounding the natural environment is a key aspect of delivering on this already agreed Delivery Strategy.

Rural Areas and distinctiveness of place

27. It is disappointing to see that the consultation paper is weak in addressing the specific issues facing rural areas. The current Regional Spatial Strategies include Sub Regions and it is at this level that one can begin to strengthen the character of places and the diversity within and between regions.

28. Reference is made in the consultation paper to the SIRS focusing on 'those areas within the region identified as priorities for regeneration investment and intervention'. While it is recognised that this might well be a rural area, the composition of the Leaders Forum is likely to mean that urban areas will dominate. But whether this covers urban or rural areas, it is important that the SIRS provides sufficient policy framework for the entire country – and not just those areas identified as priorities. In a nutshell – what happens to the places in between? To address this, and to be more in keeping with the existing RSS process, we would recommend:

- the SIR should include a sub-regional approach in order that distinctiveness of place is recognised, and sparsely populated or non-growth areas are not marginalised in regional spatial planning.

Consultation question 5: Do you agree with the way in which we propose to simplify the preparation of the regional strategy, as illustrated in the diagram in the consultation paper, in particular allowing flexibility for regions to determine detailed processes? If not what other steps might we take?

29. ENPAA recognises the benefits that will stem from the development of a single integrated strategy for each region. As noted above – the benefits will only arise if the strategy is truly integrated, developed to deliver sustainable development, and involves a wide range of partners who can assist in this task.

30. Under Section 4.4 of the Planning and Compulsory Purchase Act 2004, National Park Authorities have a statutory role in the development of Regional Spatial Strategies. This they take very seriously, and contribute expertise to the process, including on rural socio-economic, environmental, and partnership working. The SNR tends to refer to local authorities rather than their role as local planning authorities. We look to future guidance to clarify that it is Local Planning Authorities which are to be involved in the preparation of the SIR, thereby including NPAs.

31. In relation to the process, we urge the Government to:

- confirm that the role of NPAs in the preparation of the SIRS will continue as now under Section 4(4) of the Planning and Compulsory Purchase Act; that this will mean NPAs having a seat at the table in the preparation of the SIRS, and that this will extend to early consultation on the preparation of the accompanying Delivery Plans;
- acknowledge that the body responsible for preparing the SIRS will be required to operate fully as a S.62 body under the Environment Act 1995 (eg. they will have regard to National Park Purposes) and discuss with Natural England and ENPAA how this might best be achieved;
- the national core sustainability framework that the Government is developing and which will be used to test all SIRS should include an assessment on the effects (positive, negative, and cumulative) on protected areas;
- confirm in legislation and guidance that the requirement in the consultation paper on SIRS to integrate with other regional strategies (paragraph 4.2) means that RDAs should have regard to the provision of National Park Management Plans (as statutory documents) when preparing the SIRS. This would be a practical demonstration of delivering their duty under Section 62 of the Environment Act; and
- clarify the role of Natural England, Environment Agency, and English Heritage in helping define the scope of the SIRS given it is to be a wide ranging holistic document.

32. National Park Authorities prepare Local Development Frameworks. In doing so they need to have regard to other strategies and policies – including policies set regionally. This process also involves extensive public consultation. We urge CLG to clarify that the LDFs produced by NPAs should have regard to, but will not be tested to conform to the SIRS since to do so could prejudice the NPAs ability to deliver its statutory purposes. We understand that a precedent for this already exists in Wales.

33. Finally, the consultation paper refers to the role of Government in aligning the SIRS with national and regional policies (paragraph 4.6). We would urge the Government to ensure that Defra is formally involved in this process and the sign off of the strategy. This would assist the Government given Defra's co-ordinating role on matters such as rural, the natural environment, and climate change – all of which should be critical parts of the SIRS.

Strengthening sub-regional economies – the role of local authorities

Consultation question 7: Which of the options for the local authority economic assessment duty (or any other proposals) is most appropriate?

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Consultation question 9: How should lead local authorities engage partners, including district councils in the preparation of the assessment?

34. We believe that if a duty is to be introduced that it needs to achieve the following:

- be undertaken consistently across the country to provide reliable data that can be compared;
- reflect economic units rather than administrative boundaries;
- be an inclusive process;
- build in consideration of the economic links that exist between urban and rural areas and across regional divides; and consequently
- integrate consideration of rural areas into the mainstream assessment rather than sideline it as a separate exercise.

35. Assuming these criteria can be met, we would advocate Option 1.

36. We note that the Impact Assessment accompanying the consultation paper refers to the complexity and differences that exist within the economies found in rural areas. While we support this statement, we believe that the option to then produce generic guidance for rural areas is an inconsistent response. As mentioned above, we believe rural proofing of the assessments would best be accomplished through mainstreaming it into the overall process.

Consultation question 10: Which partner bodies should be consulted in the preparation of the assessment?

37. We would expect National Park Authorities to be consulted, given their statutory duty to seek to foster the economic and social well-being of local communities within the National Park. The impact assessment also refers to the role of engaging rural representatives in undertaking the assessment – and NPAs are well placed to do this.

Consultation question 12: Do you agree that there is value in creating statutory arrangements for sub-regional collaboration on economic development issues beyond MAAs? What form might any new arrangements take?

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Consultation question 13: What activities would you like a sub-regional partnership to be able to carry out and what are the constraints on them doing this under the current legislation?

38. National Park Authorities have considerable experience of developing partnerships at a sub-regional level. All of the National Parks currently span more than one local authority. And partnership working is a critical part of establishing the framework to help deliver the priorities in the National Park Management Plan – which will extend beyond administrative boundaries and is a Plan for the designated area rather than the NPA. As such we support proposals which enable public bodies to come together to deliver shared priorities.

39. ENPAA believes that the creation of MAAs and other sub-regional partnerships provides real opportunities to strengthen the arrangements for delivering priority actions on a landscape scale that cross artificial administrative boundaries. As well as the focus on economic concerns, this might relate for example to:

- developing strategies for adapting to climate change across more than one administrative unit;
- establishing environmental enhancement schemes that deliver a range of public benefits; or
- Integrated river catchment management schemes that deliver key ecosystem services to the region such as protecting water quality and managing run-off.

40. We urge the Government to provide flexibility in the development of the proposed institutional arrangements in order that a wider range of public benefits might be achieved through them. The legislation should not restrict the use of MAAs to economic development alone.

41. Furthermore, we hope CLG and Defra will actively encourage the development of MAAs that can contribute towards the achievement of PSA 28 and 27 on the natural environment and climate change.

Consultation question 15: Should there be a duty to co-operate at sub-regional level where a statutory partnership exists? To whom should this apply?

42. Where sub regional issues affect a National Park, the National Park Authority should be consulted and this should be on a statutory footing. It should also be noted that Section 62 of the Environment Act 1995 that relates to bodies having regard to National Park Purposes applies to all local authorities and to the partnerships and agencies that have impacts effecting a National Park.

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