



Rural Planning Review: Call for Evidence

Response by National Parks England

April 2016

1. National Parks England (NPE) supports the policy-making process by co-ordinating the views of the nine English National Park Authorities (NPAs) and the Broads Authority. It is governed by the Chairs of the ten authorities. We welcome the opportunity to respond to this joint CLG and Defra call for evidence. Our response represents the collective view of officers who are working within the policies established by the NPAs and Broads Authority and follows internal consultation amongst the officers. *It should be noted that all references to 'National Parks' in this response refer to the nine National Parks and the Broads.*

2. 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. Individual NPAs may have also submitted responses to the Annex B questions.

3. As distinct and often deeply rural areas, National Parks are well placed to illustrate rural planning issues, sometimes at their most extreme. The below describes briefly 5 key messages which the experience in National Parks brings to light. These are:

- Acknowledging that rural is different
- The high quality rural environment has significant value, and far beyond its boundaries
- National Parks have a broad economic base
- Rural Communities want and expect to be involved in decision making
- The Planning system adds value

4. A key priority for National Park Authorities is therefore linking the above breadth of economic activity with the high quality landscape and unaccounted value described above. The planning system provides a key tool in doing this, ensuring businesses which thrive in the National Parks respect and value the environment in which they operate and trade. We now address each key message below.

1. Rural is different

5. Robust rural proofing is required of planning policy at a national¹ and local level. A particular example being housing policy, where there is more limited capacity for growth in protected landscapes, a greater reliance on smaller sites, and a need to tailor development to best meet the identified needs of that community. Recent government policy proposals have had a significant impact upon delivery and have led in some areas to a significant slow-down in housing development. Proactive local plans seek to deliver the right types of new homes in the right places. The danger of increased use of permitted development rights are the negative impacts upon sustainable development, and the unintended consequences of impact upon farm viability given alternative use values. For example, the planning system plays an important role in sustaining viable farm holdings by protecting them from the promise of residential uses or conversions which may have greater value than their current use. A greater flexibility around residential conversion risks skewing land values in favour of conversion to residential use for short term gain, prejudicing the ability for the farm unit to operate sustainably into the future and thus undermining the viability of critical land management practice.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400695/rural-proofing-imp-review-2015.pdf

6. Continuing policy change has had a particular impact upon rural delivery through the affordable housing threshold, right to buy impacts upon landowner and community confidence, and rent compression of Registered Providers. Local Planning Authorities, developers, landowners and communities would all benefit significantly from a period of stability and testing.

7. As an example, Dartmoor National Park has demonstrated clear positive planning, but struggled significantly with delivery in the last 12 months. The 2013 adopted Local Plan allocated 22.6 hectares of land for housing and mixed use development across 14 sites. On this allocated land only 90 units have been progressed to planning permission, and of that only 55 are currently under construction. There is extant planning permission for well in excess of 100 dwellings in the National Park at this point in time, and it is estimated that there are around 230 units stalled or slowed significantly before reaching the planning process, as a result of recent and pending government policy changes. Taking these in turn:

- Registered Providers (RP) rent compression – this has resulted in stalled and reviewed offers from RPs, and renegotiation between developers and RPs on scheme mix, and consequently altered plans.
- Affordable Housing Threshold – a number of sites are stalled either because the owners are awaiting a government policy change, or because land value/expectations have altered significantly as a result of this.
- Right to Buy – two exception site schemes have stalled because landowners are concerned about the Right to Buy. This is not around land value per se, but around their assurance land released is for community benefit in perpetuity. Parish Councils have also expressed a lack of support for potential schemes as a result of the threat of Right to Buy in the National Park.
- Starter Homes, and the changing definition of affordable housing – concerns around starter homes are also stalling schemes where there is uncertainty around scheme mix and land/development values.

8. There is clear evidence that the planning system and rural areas in particular need a period of stability.

9. The English National Park Authorities would be concerned that further alterations to Permitted Development (PD) Rights risk further stalling progress, impacting upon confidence and causing confusion. Anecdotally, the Park Authorities find that landowners can find PD Rights complex, confusing, and open to interpretation. Feedback from applicants is that it can be simpler and quicker to make an application through the planning process rather than risking the uncertainty of permitted development.

2. The high quality rural environment has significant value, and far beyond its boundaries

10. The call for evidence refers to reviewing the “*planning and regulatory constraint facing rural business*”. The term ‘constraint’ needs to be carefully considered in the context of protected landscapes, where the planning system balances the support for growth and opportunity, with the protection of the rural environment that is a significant asset to those very businesses. The planning system also allows public engagement in a process which directly affects their lives and livelihoods. Taking more and more out of the planning system is not consistent with the concept of localism and local empowerment. The planning system protects “public interest” and it is this which should be given greater recognition rather than over emphasising the pre-eminence of applicants.

11. In our experience and those of others that have researched the subject, a high quality rural environment is good:

- for business
- for providing wider natural capital that benefits society.

12. Unconstrained development or greater relaxation of planning control risks eroding the special environmental qualities; planning plays a key role in protecting the environmental capital rural businesses trade off. The Peak District National Park Authority has a scheme which supports

businesses which make that link to the environment. The Environmental Quality Mark² was established by the NPA and is now a stand-alone business in itself.

13. This direct value also goes beyond those boundaries to nearby thriving cities, as described by Karime Hassan, Chief Executive, Exeter City Council:

“Exeter has consistently, and for a long period, marketed the area for inward investment by presenting a lifestyle package of city, sea and countryside. Presently, a lifestyle package that provides a USP...The world class environment is a powerful attractor for CEO’s and directors. We found that when we were seeking to convince the Met Office to locate to Exeter, taking directors and staff to Dartmoor and the rural villages sold the benefits of living in this part of the world. Our countryside is the jewel in the crown and provides a powerful overall package to compliment the city business offer.”

14. The Government has already commissioned a detailed examination of the synergy between the environment and economic activity. The final report, The Economic Contribution of Protected Landscapes 2014³, provides instructive reading. It states:

“Protected landscapes benefit the wider economy by providing attractive places to live, visit and recreate, and by delivering essential ecosystem services on which the wider economy depends. For example, evidence demonstrates that a high proportion of the residents of protected landscape areas work in professional, managerial and scientific occupations, many commuting to neighbouring towns and cities. Many protected areas are highly accessible from major conurbations, providing important places for recreation for urban residents. They provide essential ecosystem services, helping to enhance the quality of air and water and to regulate flooding, thus benefiting companies and individuals beyond their boundaries.

Protected landscapes positively impact the areas around them in terms of employment and expenditure (the ‘halo’ effect). In Northumberland and the Yorkshire Dales, it is estimated that the NPs support nearly three times as many jobs in these areas of influence, than in the NPs themselves. Tourism supports an estimated 68,000 Full Time Equivalent (FTE) jobs in and around NPs, of which 20,000 FTEs are in the wider areas of influence; other data suggests that this could be a very conservative estimate. One study⁴ focused on Yorkshire and Humberside found that NPs compared favourably with undesignated areas in the same region, with a slightly higher economic activity rate, lower employment rate, a high proportion of self-employed and higher house prices.

Three surveys of businesses located in protected landscapes, undertaken as part of the above studies, have shown similar results: 50-60% of respondents considered that the quality of the landscape and environment impacted positively upon their business performance (Yorkshire & Humberside, North East); 65% of respondents indicated that the business activity depends directly or indirectly on the quality of the environment (Yorkshire & Humberside, Peak District); and 60% or more stated that a deterioration of the landscape and environment would have a serious or some impact on the business (Peak District, North East).

A similar study in the Cotswolds AONB showed that 73% of respondents to a business survey indicated that a deterioration of the landscape and environment would have a serious (22%) or some (51%) impact on the business.”

15. National Parks are rich with natural capital; development of the ecosystem services approach aims to recognise the value of natural assets. A study on Loch Lomond and the Trossachs National Park⁵ concluded that “the majority of the value created by the Park does not pass through the

² <http://www.peakdistrict.gov.uk/looking-after/living-and-working/business>

³ The Economic Contribution of Protected Landscapes – Final Report for Defra 2014

⁴ Prosperity and Protection ((Council for National Parks 2006)

⁵ <http://www.lochlomond-trossachs.org/images/stories/Looking%20After/PDF/NP%20Plan/ValuingTheParkweb.pdf>

marketplace, and, indeed, is not counted in conventional accounting systems". The example below from Exmoor National Park shows how a partnership project is recognising benefits which are currently unaccounted for.

Exmoor Mires Project

Worldwide peatlands are huge carbon stores, but damaged areas release carbon dioxide into the atmosphere through oxidation processes. Blocking up drainage ditches on the moorland will help to re-wet the peat and promote the bog grasses and mosses once again. There are many benefits to this work:

- Reducing the fluctuation of river flows (making downstream flooding less likely)
- More water storage in upland catchments (this is good for water customers as more storage in the uplands means a steady supply and less expensive pumping or reservoir building)
- Better water quality (this is good for water customers as it requires less treatment and good for wildlife in the river such as Salmon)
- More carbon storage in the peat
- More wildlife on the moors
- More for animals to eat and drink
- Fewer pests and problems for stock

Partners include, Historic England, Environment Agency, Exmoor Farmers, Exmoor National Park Authority, Natural England, South West Water, Local Universities.

The project won partner initiative of the year, and data project of the year at the 2012 and 2015 Water Industry Awards respectively.

<http://www.exmoormires.org.uk/>

3. National Parks have a broad economic base

16. The perception that National Parks are all about tourism and farming is in most cases inaccurate. Whilst these are key sectors in all national parks, and inherently linked, evidence shows that national park economies are broad ranging.

The Economic Contribution of Protected Landscapes 2014¹ describes:

- *NPs have a relatively high concentration of small and micro businesses. 91% of local businesses in the NPs employed fewer than ten people (i.e. micro-businesses) in 2012 compared to 89% at the national level.*
- *Businesses in the English NPs are relatively concentrated in the 'agriculture, forestry and fishing' and 'accommodation and food services' sectors, although other key sectors include 'professional, scientific and technical' and 'construction'. There is significant variation between NPs. For example, the local business stock in some NPs, such as the New Forest and South Downs, is more similar to the national average than other NPs.*
- *The sectors with the largest turnover in NPs are 'wholesale and retail' (17% of the total) followed by 'production' (10%).*
- *Employees in English NPs are relatively likely to be employed within small businesses. More than one in three employees (35%) are employed in small and micro businesses employing fewer than ten people, compared to just 14% of employment across the whole of the UK.*
- *The sectors with the most employment in NPs include 'accommodation and food services', 'wholesale and retail', 'health' and 'agriculture, forestry and fishing'. The 'education' sector is also significant; this is inflated by particularly high employment in the South Downs.*

17. This is particularly important in the agricultural sector. National Park Authorities work closely with the farming and forestry sectors to support their growth. Most NPAs seek to achieve this in a way which enables the core farm business to thrive, supporting diversification into production, finishing and retail, tourism and other enterprise which support the sustainability of the land management operation. However this occurs in an environment where there is significant value in residential development. Whilst barn conversions, for example, could support a farm enterprise, they can also threaten it by presenting alternative short term value, unintended amenity issues, and breaking up farm holdings undermining the viability of farming practices and impacting upon environmental quality.

18. NPAs and rural planning authorities understand the value of agriculture, and are positive towards development or diversification which might include farm shops, polytunnels and tourism activities. However the planning system plays a critical role in ensuring that these activities, or other alternative uses do not undermine the very enterprise and environment they seek to support.

19. The NPAs have a good track record in supporting a broad range of rural businesses and are working proactively with Local Enterprise Partnerships. Lord Heseltine, speaking in 2015 at the launch of National Park England's collective offer to Local Enterprise Partnerships, said:

"National Parks are huge national assets that the public value. They are beautiful places where the environment underpins large swathes of the rural economy. I welcome the lead being taken by National Parks in working alongside Local Enterprise Partnerships and local businesses to enhance the nation's wealth. Delivering high quality jobs, prosperity, and a high quality environment together is a Government priority. So I welcome this closer working to support our rural communities."

4. Rural communities want and expect to be involved in decision making

20. The call for evidence refers to the planning system providing "an important control on the use of land, balancing the rights of the individual landowner with those of the community". Whilst people are clearly embedded within the purpose of planning, the dis-connect between people and the environment inferred by this statement is of concern. People value, receive benefit from, and shape the environment and it is important this is properly acknowledged and incorporated into how policy and decisions are made. We would reiterate the three pillars of sustainable development, social, economic and environmental that are described in the National Planning Policy Framework [para 7].

21. Our experience is that National Park communities are very keen to be involved in the planning process. The Government would appear to recognise this through its promotion of the localism agenda and the importance it attaches to community involvement in decision making. Yet, an extension to PD rights risks further disenfranchising communities through exclusion from the decision making process creating an imbalance between the rights of individual landowners with those of the public who live and work in the area where development will take place and impact upon them.

Christow Community Land Trust Housing, Dartmoor

A £3.6million project led by the Christow Community Land Trust (CCLT). A unique development that will provide 18 affordable highly energy efficient homes on Dartmoor, with most of the properties being built to full PassivHaus standards. Almost no heating is required and it is believed that the total energy bills for these properties will be just £100 a year. This will be the first PassivHaus development for Teign Housing and it is believed to be the first PassivHaus development to be built in a National Park anywhere in the world.

The community led this scheme, and played a key role in shaping how the properties are allocated to local people in affordable need. Dartmoor National Park Authority worked closely with the CLT to develop a formal allocations plan which reflected the community's priorities around meeting the local housing need.

22. It should not be assumed that the operation of the Planning system is holding back opportunity. The approval rates for rural planning applications are already higher than urban areas. Across the National Parks, CLG data⁶ confirms that National Park Authorities approved 90% of all planning applications; higher than the average across England. The English National Parks also approve slightly more minor residential applications compared to the English average, even in such sensitive landscapes. In the Yorkshire Dales the NPA consistently approves more than 90% of planning applications and often 100% of proposals for agricultural development. These approval rates are achieved through a proactive development management service that prioritises pre-application discussion and problem solving. It would not be possible to improve on that performance without detrimental consequences for the special qualities of the national park and the delivery of national park purposes. The high approval rates suggest that the barriers to development no longer lie within the local planning system.

5. The Planning systems adds value

23. The built heritage of England's National Parks is one of their principle special qualities. NPAs are well acquainted with a pragmatic approach through the planning system which aims to carefully balance the need to conserve and find a viable use for a building, whilst recognising its setting, the sustainability of its location and the function of the building in land management or for local business.

24. Any change of use will have a range of impacts in an area, such as amenity, access, parking, lighting, landscape, noise, highways and environmental issues which need to be taken into account in deciding whether the new use is appropriate for the location. Even small changes can have a significant individual or cumulative impact in rural areas, and further relaxation to PD rights risks inappropriate development coming forward which can undermine neighbouring amenity, business productivity or value, and the special qualities of the national park.

25. In delivering positive change through the planning system NPAs rely on a range of expert advice both within and outside organisations, and through partnership working. This can include archaeologists, landscape officers, ecologists, historic building experts, agricultural advisers.

Permitted Development in Northumberland National Park

Northumberland NPA receives prior notifications for agricultural sheds, and forestry and agricultural tracks in very remote locations in the National Park. Whilst dealing with these might be a simple process for the LPA the prior notification process does not allow negotiation when better sites on the landholdings may be more appropriate from a landscape perspective. Proposals therefore can come forward which do not take into account national park purposes or benefit from appropriate professional advice.

By comparison tracks and infrastructure associated with shooting do not fall as agriculture or forestry, so the quality of the development can be negotiated and improved through the planning system. The ability to have constructive pre-application discussions with the shooting estates has led to more appropriately positioned and designed development being approved. Planning permission can also control run-off from tracks through maintenance conditions which could not otherwise be controlled through permitted development.

26. NPE is grateful for the opportunity to respond to this call for evidence. It is keen in particular that a close working relationship is fostered between CLG and Defra. Currently, aspects of policy emerging from government recently might be perceived to be pulling in different directions. It is important for example that CLG reflects upon Defra's Plan for National Parks⁷ and ensures the planning system is capable of delivering its aims and objectives. Whilst equally that Defra engages with potential planning policy change in order to ensure that it is consistent with government's wider rural and environmental vision.

NPE

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⁶ [DCLG live table 122](#), 2015 including major and minor applications

⁷ See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509916/national-parks-8-point-plan-for-england-2016-to-2020.pdf