



Taylor Review on Rural Economy and Affordable Housing – planning and land use to support sustainable rural communities

A submission by the English National Park Authorities Association

Introduction

1. ENPAA welcomes the opportunity to submit comments on the important questions posed by the Review. Our submission falls into two parts: a response to the specific questions posed by the Review on the rural economy, and our detailed policy position statement on affordable housing. In considering these, however, it is important to note that National Park Authorities see strong linkages between the two and believe this should be reflected in policy.

Rural Economy

General:

A1) How is the application of planning policies to develop and support rural business practically taking place on the ground: What is working well? What are the barriers and blockages? How might the barriers and blockages be overcome?

A1:

National Park Authorities (NPAs) have a duty to “foster the economic and social well being of local communities” whilst carrying out their 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.

The main barrier appears to be one of ‘perception’ that new economic development will not be supported even where this is not the case in reality. Assumptions are made that because such areas are both rural (sparse and very sparse) and covered by a “protected landscape designation” economic development will be resisted and should be directed to urban areas. Funding regimes exacerbate this ‘perception’ as they are inevitably urban focussed. This is despite NPAs, as Local Planning Authorities, being actively involved in promoting and undertaking projects that help deliver economic development on the ground.

National Park Authorities are working hard to change this perception. The Lake District NPA and partners, for example, have adopted a Vision for the National Park to be an “inspirational example of sustainable development in

action...where a prosperous economy, vibrant communities, world class visitor experiences all sustain a spectacular landscape, wildlife and cultural heritage". As part of a new partnership approach the Regional Development Agency have jointly commissioned with the NPA a comprehensive employment land study for the National Park (Atkins study published December 2007). This will feed into a study of the feasibility of an economic clusters approach being applied to the allocation of employment sites in the National Park in the Local Development Framework (LDF).

A more sustainable approach for sparse rural areas and very sparse areas has also been advocated through the regional planning process in the North West. Draft policy RDF 3 advocates a more innovative and flexible approach. Such an approach empowers the NPA to support development that reinforces the sense of place, rather than a national standard approach.

The allocation of sites in certain LDFs being produced by National Park Authorities shows a seriousness about encouraging appropriate economic development and helps in addressing these negative preconceptions.

Specific:

A2) Are there specific issues in the planning system (at national, regional, or local level – see Annex B) unnecessarily restricting business start-ups or expansion in rural communities? If possible give examples.

A2:

The interpretation of current planning policy guidance on 'sustainable locations' being linked closely to the provision of public transport, can lead to an over concentration on urban locations for employment developments. Emerging guidance in draft RSS and draft PPS4, however, is more encouraging of rural developments. Draft PPS4 clearly states that rural sites for farm diversification schemes may be an acceptable location for development even though they may not be readily accessible by public transport. In addition, small scale economic developments in villages that are remote and have poor transport links with local service centres may in some cases provide the most sustainable option. The key is to ensure these are:

- appropriate in scale and design;
- reinforce a sense of place; and
- meet local needs.

Sustainable locations for development should include those developments which are needed to sustain rural communities, not just those located on a public transport route. It can be tempting to establish generic definitions of 'sustainable communities'. We believe, however, that often these are likely to be inappropriate in some circumstances. Definitions based on what a community needs to have to be sustainable (i.e. service points, public transport, physical assets etc) cannot be equitably applied, and in any sense deal with an assessment of a community as a snapshot of time, without making any provision for the way that the community may develop in the future.

No single definition of a sustainable community which deals with what a community does and does not have in a physical sense can be applied equitably to a range of different settlements. Equally any judgement about a community's sustainability (now or in the future) based on social assets (people, culture, approach) cannot be divorced from context and local conditions. A small village in Devon, North Yorkshire or Cumbria will clearly not meet the same sustainability standards as a London borough.

A lack of data available at National Park level makes it difficult for NPAs to assess economic conditions robustly. It would be helpful if the role of National Parks as sole Local Planning Authorities could be recognised by ensuring the necessary data is available at a National Park level. 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 macro scale analysis.

A3) What scale and type of business should be encouraged or discouraged in rural communities, and is the planning system effective in doing so appropriately?

A3:

A range of economic sectors are suitable for location in rural areas. We would particularly wish to target high value economic sectors to ensure a broadening of the economic bases of National Parks from an over reliance on tourist related jobs, whilst still sustaining more traditional economic activities such as agriculture. Many of these high value economic sectors are ideally suited to home working/ remote working and therefore to locating in a more diverse rural settlement pattern e.g. in live work units or in farm diversification schemes. Once again, ensuring the scale is appropriate and in keeping with the environmental sensitivity of the area must be paramount.

Economic development which would generate significant amounts of new traffic should continue to be directed to the most sustainable locations.

A4) Some suggest there is ongoing loss of workspace and employment in some rural communities, often to housing, or because expanding businesses are forced to relocate to industrial and business space in larger communities. What do you believe is working, or not working, in the planning system to facilitate and promote suitable rural economic development? Should rural workspace and employment be more strongly protected by the planning system to maintain and encourage appropriate employment and business opportunities in rural communities – and if so how?

A4:

It is essential that existing rural employment and business workspace should be protected from change of use to other uses. We agree that the take up of such sites should be closely monitored to ensure that sites continue to be suitable/marketable for employment use. But the number of sites is often so small that they should only be lost if it can be shown that there are

alternative sites available. By their very nature rural employment sites may take longer to be developed than urban sites and the same criteria to permit regarding use for other types of development should not be applied.

CLG have recently consulted on Draft PPS4 "Planning for Sustainable Development". Whilst we strongly agree with the aim to foster new business opportunities throughout rural areas (not just in 'key service centres or market towns') we would like to see reference to protecting existing employment sites. Within National Parks existing employment sites are valuable given the scarcity of developable land.

Inevitably some businesses which wish to expand may have to move outside the area to obtain larger premises due to a lack of larger sites or where there are no opportunities for expansion at their existing site. This is accepted. However their existing premises should be protected for use by other businesses in the area, when they leave.

A5) What is the potential for more live/work units, and mixed use schemes including housing and employment space, to support rural business and housing needs in rural communities?

A5:

Applications for live/ work units are increasing. In the Lake District, for example there are a range of planning applications for a variety of live/ work schemes from single units to the development of a whole site for such premises. Such applications may appear to be ideally suited to a rural location, providing local jobs for local people. A considerable concern, however, is with regard to how to retain the 'work space' in perpetuity. The 'work element' needs to stay tied to the 'live' unit and changes of use should not be permitted. The experience of other National Parks suggests this is a problem. Conditions may be placed on permissions, but how easy will these be to monitor and enforce in practice?

A6) What impact is regional and local planning having on the supply of land and premises for employment in rural areas? Is there a need for provision of new sites for business in rural communities to be increased – and if so, how could this be done?

A6:

Any new provision should be based on the need to sustain local communities and backed up by a strong evidence base.

A7) Is the balance right in the planning system at present when considering the use of public transport/private car usage in relation to economic development in rural areas? Is there a need for greater flexibility to allow appropriate scale growth of rural business in communities with limited access to public transport

A7:

It must be accepted that rural areas due to their dispersed nature have

more limited access to alternative modes of transport to the private car. Investment in rural public transport is much less than in urban areas so this situation is likely to continue for the foreseeable future. However rural residents still need to be able to access employment opportunities and if these are not provided locally they will travel to where jobs are available and these journeys will inevitably be by car. We question whether this is sustainable? The aim should be to work to sustain our rural communities and accommodate the need for local employment opportunities of an appropriate scale. If we are to achieve this a certain amount of flexibility is required. Draft PPS4 seems to recognise this point and is welcomed.

The term 'sustainability' is currently interpreted in Government policy to mean 'sustainable access to key service centres'. We believe there is a need to ensure this definition includes considering the viability of rural communities to remain as places that mixed communities can 'sustain' themselves. Despite the limited availability of public transport in many rural locations, communities should be able to sustain themselves over the long-term by having the opportunity to create additional facilities: be it schooling; housing; employment sites; improved IT communications; community health facilities; shops and post offices, etc. It is important, therefore, that planning policies do allow for a degree of growth in rural locations to support a range of activities within communities. The level of development could be focused around a cluster of small hamlets centred upon their relationship with a defined, higher order Local Service Centre.

A8) Do you think planning policies support the conversion of redundant properties, including agricultural buildings, into premises for employment? If not, is there scope to increase the number and type of properties/sites that could be used in this way?

A8:

An issue which often stands in the way of the conversion of former farm buildings to employment use is the cost of the conversion, which can make schemes unviable. Conversion to residential use is in many cases, more attractive financially. Given that potential end users in rural areas tend to require cheaper accommodation for their particular types of activities, the costs of conversion generally mean that an employment use is not usually a viable end use. So whilst planning policies may be in place to support conversions, the take up in rural areas tends to be small for these commercial reasons. The provision of grant funding for conversions to employment use could be explored in order to help make more of these schemes a viable option for businesses and investors.

At a District level, Local Plan planning policies have been in place for many years now and these reflect national and regional planning guidance. These support the conversion of redundant properties into premises for employment.

Affordable Housing

2. The nine National Park Authorities are not housing authorities, but are both strategic and local planning authorities and take a keen interest in addressing the need for affordable housing to meet local needs.
3. Annex I is ENPAA's recently adopted Position Statement on Affordable Housing. This has been agreed by the Chairs of the nine Authorities. It sets out:
 - highlights the specific issues facing National Parks that make them different to other rural areas;
 - the role that NPAs play in relation to affordable housing;
 - explains what NPAs are already doing to deliver affordable housing through planning, facilitation and involvement of the community;
 - describes the obstacles that NPAs currently face to delivery; and
 - sets out a range of practical proposals for Government, the new Homes and Communities Agency and others that would assist NPAs in providing more affordable housing.
4. Annex II is a presentation given by the Lead National Park Officer, Jim Dixon, to an All Party Parliamentary Group (APPG) meeting on National Parks. This was specifically focused on the topic of affordable housing.
5. We would stress that while we see the planning system as performing a critical role in relation to affordable housing, much is also achieved through working in partnership with other bodies, building up the evidence base, and facilitating community planning projects.
6. As explained in the Position Statement, providing affordable housing within Protected Areas can be more expensive due to:
 - the fact that often plots and unit numbers are small, and involve sparse communities;
 - there are higher land values in designated areas; and
 - there can be higher costs of complying with complex sites and design standards.
7. The changes proposed by CLG to the Housing and Planning Delivery Grant (HPDG) reflect changing Government priorities. They will, however, also have the effect of disadvantaging National Park Authorities since NPAs do not have a role in the provision of volume house building. This point was recognised by the former Housing and Planning Minister, Yvette Cooper MP, when ENPAA met her in January 2008.
8. ENPAA believes that significant progress could be achieved if National Park Authorities were able to benefit from specific funding support – tailored to the specific needs of these special places. Such funding could assist with the commissioning of research; the collection of data (which is often not available cut to National Park boundaries); provide longer term security for Rural Housing Enablers working in National Parks; support Housing Partnerships and assist with scheme development.

9. England's National Parks cover 8% of the country. Yet they have specific needs, and challenges. NPAs, working with partners, aim to ensure that those communities that help contribute to a thriving National Park are able to live in high quality designed, affordable homes (whether in public or private ownership) which demonstrate the principles of sustainable development, and therefore complement the special qualities of the National Park. We hope the conclusions of the Taylor Review will be able to assist NPAs in this task.

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