



Planning Policy Statement - Consultation

Response to Consultation by:



East of England Rural Forum

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Please state whether you agree to your response being made public: Yes

East of England Rural Forum

The East of England Rural Forum (EERF) is an independent body and its purpose is to provide a voice for rural stakeholders at a strategic level, capable of influencing the rural agenda in the East of England.

Overview

We applaud the aspirations of the revision to planning policy and its objectives to respond positively and in an enabling fashion to the Rural Advocate's report on the rural economy and Matthew Taylor recommendations for a more enabling and flexible planning system in support of the rural economy.

We welcome and support recognition that:

- Rural economy is significant contributor to nation's wealth and is as diverse and varied as urban
- Planning should be a positive enabling tool for creation of sustainable communities and especially in rural areas that there should not be presumption against development
- Decisions and monitoring should be evidence based
- Planning system and processes should be more responsive and flexible to local needs and more efficient in application

We are concerned that the document is excessively focussed solely on economic development and does not take sufficient account of the need to support and enable creation of inclusive sustainable communities through encouragement for social networks, community facilities and public and private services as recommended in Taylor report. A better title for the PPS would be "*Prosperous Communities*" not *Economies*.

The emphasis on (major) growth and development misses the need for planning policy to support existing businesses and creation of sustainable communities through small scale developments and start-up of businesses located in smaller settlements. Excessive consideration of current situation would lead to presumption against development and self-fulfilling decision to maintain status quo and continuation of non-sustainable community. Sustainable communities are more than just reduced carbon emission but are achieved through creation of social, cultural, environment and economic factors. They require mixed developments of housing (for workers) and businesses (for jobs) which underpin social fabric and economic vitality - a key recommendation of Taylor report.

We wish to see planning policy requirements that:

- Evidence base for decisions and monitoring explicitly separates urban and rural ("data disaggregation")
- Decisions on planning for market towns recognise and support their role as service centres for their rural hinterland
- Decisions on major retail developments include an impact assessment on existing supply chains from local producers and suppliers through to local retail outlets
- Provide for explicit recognition in the detailed policy statements of the broad scope and diverse nature of rural businesses beyond farm shops and equitation centres

- Recognise benefits to environment and reduced carbon emission that accrue from co-location of dispersed small housing and business developments and reduced commuter traffic.

Specific comments

Introduction

In describing the need for preparation of local development documents, there should be a reference to planning authorities taking into account local community strategies and bottom-up community aspirations and requirements (eg community-led planning and local housing needs surveys).

(p15) Promotion of social inclusion should include local access to services and not just access to remote "main town centre uses".

EC1: Evidence

EC1.1 The evidence base preparation should have an explicit requirement for the data to be **separated into urban and rural** to provide understanding of the relative need and to monitor impact of planning decisions and resultant developments.

EC1.3

The evidence base should include **housing need** not just employment and retail. Results of local housing need surveys provided by affordable housing enablers should be used to quantify demand and inform planning policy.

There should be inclusion of need for small distributed development which is particularly beneficial to rural communities and not just a focus on main town centres.

EC1.4

The thrust of this is town centre, large floor space retail outlets. It must include consideration of demand for **small mixed retail services** serving the needs of local communities. This would add weight to requirement " *to improve accessibility for whole community*".

EC2.1 - 5

This only considers large development for businesses or town centres. It should require accounting for **small scale business and retail development** and include positive support for close location of businesses, retail and housing in rural areas.

EC3.1

Regional planning must include support for **role of market/coastal towns** not just big town centres.

Consideration of expanded town centres or out-of-centre developments must take account of the **impact on local supply chains** and the indigenous producers and suppliers.

EC4.1

Encouragement of economic growth (and support for existing business) in rural areas is strongly supported. But it should be based on a more inclusive socio-economic view of sustainable development.

EC4.2

We welcome the support for **start-up and SME development**. This should be linked to the support for home-working and change of use and renovation of buildings

within EC4.1.

Local development frameworks should be required to take account of the results of **community led planning** in support of government policy for greater **community empowerment and engagement**.

EC5, 6, 7, 8

There is need to clarify role and support for **market / coastal towns** and the important consideration of providing services and leisure facilities beyond just retail outlets.

EC9.1

The requirement for "*strict control*" contradicts earlier statements regarding **proactive and positive encouragement of rural developments**.

The emphasis should be on the broad approach of economy, social and environment factors to create **sustainable communities** and not the narrow definition of sustainable development.

EC9.2

This is too restrictive in supporting development only near existing centres, would in effect consign existing smaller rural economies to decline and loses the opportunity to **proactively encourage and support sustainable communities**.

Social exclusion is better tackled through provision of accessible job opportunities, affordable houses and building social capacity of communities.

Why the explicit support for equitation enterprises? This contradicts the earlier recognition that rural economy is based on businesses as diverse and varied as urban economy. Re-use of farm buildings should be supported for all and any business subject to overall impact and there is a lack of recognition of development of small ICT based **modern, high value jobs in rural areas**.

EC11

Monitoring reports should include a **rural proofing** aspect.

This would be helped by separation of data and activity into rural and urban locations.

Market / coastal towns should be reported on in same way as "town centre".

EC12

We welcome and support **presumption in favour of development**.

We welcome and applaud the **support for market / coastal towns** and small scale rural development.

EC13

We strongly support this whole section and would urge strengthening it through "*ensure*" instead of "*seek*" to protect village

EC13 should take precedent over EC9 which contradicts it through support to development in existing urban centres.

EC14

We welcome the **support for re-use of buildings** in the countryside and the inclusion of both local economic and social needs.

EC15

Whilst we welcome the objectives of this section, the focus on tourism risks forgetting the **range and diversity of rural businesses** as thriving economic areas where people live and work as locations much more than recreational areas for visitors and tourists.

EC18

The impact assessment should include viability and sustainability of **local supply chain** of producers and suppliers in face of any new developments.

Annex A

The assessment should include impact and consideration of town's (including market / coastal?) role as service centre for surrounding **rural hinterland**.

Policy Objectives (p45)

Promotion of **social inclusion** should not be restricted solely to town centre facilities but include access to local facilities and services either in rural areas or market / coastal towns.

Costs and Benefits - More holistic assessment (p68)

The requirement for a wider set of considerations is welcome but does not include tackling social inclusion or the support for **sustainable communities** across the three pillars of **economy, social and environment**.

Other Impact tests - Small Firms (p72)

We welcome the need for **impact on small suppliers and independent retailers** but would wish to include the wider local supply chain and the potential adverse impact large retail development (national supermarket chains) have on local producers and retailers.

Answers to specific consultation questions

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

Yes No

Comment:

The creation of a single coherent and consistent set of policies should reduce conflicts and make planning decisions easier and more transparent. However, it is not clear how the proposed streamlined policies will work in practice to increase the efficiency of the planning or reduce the timescales for decisions. It is assumed this will be achieved through accompanying guidance.

If the consolidated planning policy has an effective equality impact assessment including comprehensive 'rural proofing' we feel there is the opportunity for rural areas to address many of the issues specific to them such as affordable rural housing, provision of services through the community, diversification of business or outreach and sustainable transport solutions. The report of the rural Advocate addresses these and many other issues; and highlights that specialist support and policy investment is needed to cultivate the best contribution from rural areas.

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?

Yes No

Comment:

The sections on town centres (previously PPS6) are ambiguous in their applicability. Are market towns included in their scope and included in statements referring to "cities and towns"?

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.

Yes No

Comment: [No Comment](#)

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?

Yes No

Comment:

There are some contradictions between EC9 development in or near existing urban centres and EC12/EC13, support for small dispersed rural developments. EC12/13 should take precedence.

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

Yes No

Comment: [No Comment](#)

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?

Yes No

Comment:

However, there should not be an emphasis on specific market sectors but local circumstances and priorities should apply.

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

Yes No

Comment: [No Comment](#)

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.

Yes No

Comment:

It would be too complex to create and impractical to apply. Where would home working or accommodation above retail outlets fit in?

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.

Yes No

Comment:

- Yes if EC13 & EC14 take precedent over EC9.
- Yes if town centre planning decisions take full account of the impact on local supply chains.
- Yes if views of local communities expressed through community-led planning are used in local development frameworks.
- Yes if results of local housing need surveys are used to support small developments for affordable houses for local people increasing market for local services and helping to create sustainable communities and tackle social exclusion.

5. 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?

Yes No

Comment:

A more flexible approach to farm diversification and alternative uses of farm buildings is to be encouraged.

6. 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.

Yes No

Comment:

Application of effective rural proofing will provide a check on adverse impact to the disadvantaged in rural locations who risk isolation and exclusion through absence of local services and facilities.