

Review of Planning Policy Guidance 7 “The Countryside – Environmental Quality and Economic and Social Development”

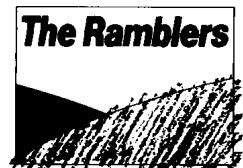
Wildlife and Countryside Link initial comments

January 2003

Wildlife and Countryside Link (Link) brings together environmental voluntary organisations in the UK united by their common interest in the conservation and enjoyment of the natural and historic environment. Taken together, Link's thirty-three members turnover more than £500 million per annum, employ 7,200 full-time staff and have the support of approximately 6 million people in the UK.

This statement is supported by the following organisations:

*Buglife, The Invertebrate Conservation Trust
Council for National Parks
Council for the Protection of Rural England
Friends of the Earth
Ramblers' Association
Royal Society for the Protection of Birds
Wildfowl and Wetlands Trust
Woodland Trust*



Introduction

1. Wildlife and Countryside Link (WCL) welcomes the opportunity to make an initial contribution to the review of Planning Policy Guidance 7 (PPG7): *The Countryside – Environmental Quality and Economic and Social Development*. This is an important area of planning guidance in which we have a key interest. The rural environment is under increasing pressure and PPG7 provides the principal source of guidance for rural authorities on managing change in rural areas.

2. The current review is an opportunity to update PPG7 to take account of recent changes in rural and environmental policy and practice. This includes the publication of the Rural White Paper and the England Rural Development Programme (ERDP), the creation of Regional Development Agencies and the establishment of the Countryside Agency. It is also an opportunity to develop a more streamlined style of PPG, as the proposed Planning Policy Statements, and to update and enhance accompanying good practice guidance.

3. This paper sets out Wildlife and Countryside Link's (WCL) initial views on the opportunities presented by the impending review of PPG7. WCL believes there is an urgent need for much clearer integration of sustainable development objectives throughout PPGs, MPGs and Circulars. They should also clearly be informed by environmental capacity and an understanding of the importance of objectives-led, rather than predict-and-provide, planning.

The role and structure of PPGs

4. WCL firmly believes that comprehensive national planning policy guidance is vital to good planning, achieving sustainable development and protecting the countryside from damaging change. We would be extremely concerned if the Government's review of planning, and in particular PPG7, were to lead to any weakening of national policy guidance or removal of guidance on issues where it is necessary.

Retaining and strengthening current guidance

5. There is much in the current guidance that WCL welcomes and believes should be retained. This includes critical policy guidance on the intrinsic value of the countryside, the recognition that sustainable development should be at the centre of policy, the need to avoid inappropriate development, and the role of rural planning policy in re-enforcing the Government's wider objectives for urban renaissance and effective environmental protection. Three key policies which need to be retained and strengthened are:

- *'the countryside should be safeguarded for its own sake'* (para. 2.14);
- *'Development of greenfield land...should not be permitted unless opportunities have been assessed for accommodating development on previously developed sites...'* (para. 2.17); whilst recognising the nature conservation value that sometimes exists in previously developed land (PPG3 Annex C) and
- *'Building in the open countryside ... should be strictly controlled.'* (para. 2.3).

6. These established policies should be further strengthened by the introduction of a stronger sequential test for development that reflects the approach outlined for housing in PPG3. In a previous statement, WCL outlined reasons for adopting this

approach proposing, 'a broad sequential approach to decision making (both strategic and development control) which should:

- identify and seek to enhance, or protect, important environmental features;
- consider potential impacts (direct, indirect and cumulative) on the environment likely to result from policy and development proposals (using SEA and Environmental Assessment (EA) where appropriate) then:
- seek to improve environment through new development or landuse change;
- avoid adverse impacts, exploring all available options, including doing nothing;
- mitigate any residual adverse impacts where development is considered to be necessary i.e. where no alternative solutions are available; where adverse impacts cannot be avoided; and where over-riding economic or social interests have been demonstrated, which outweigh the need to conserve or enhance sites; and
- always, and as a last resort, compensate for adverse impacts.¹

7. Another key statement in PPG7, which needs to be emphasised in the revised guidance, is 'the appeal of countryside is central to its economic prosperity'. This is a key theme in the Rural White Paper and a central message from the report of the Policy Commission on the Future of Farming and Food, which states that "the rural environment...is the biggest competitive advantage for the rural economy – a proven key factor in companies' decisions to relocate to rural areas"(p.69). Protecting and enhancing this resource should be an over-riding objective and a main theme of the revised PPG7. Such an approach would demonstrate recognition that there is no inevitable choice between promoting or restricting new physical development, and recognise there are many ways of addressing social and economic needs which can work with the grain of environmental protection and not against it.

8. PPG7 should also continue to omit any reference to the 'rural economy'. This should demonstrate an understanding that the economies of rural areas are as diverse as the wider economy, that both are inextricably linked, and one cannot be treated in isolation. This was graphically illustrated by impacts on local rural economies of the methods used to control the FMD outbreak.

9. PPG7 should continue to promote the use of planning controls over farm diversification as necessary and desirable. This is again reflected in the report of the Policy Commission, which highlighted the need for better advice from local planning authorities (LPAs) rather than any relaxation of planning policies as the basis of a strategy for farm diversification.

Removing current anomalies

10. We would welcome the removal of the damaging policy in PPG7 (para. 3.21) that encourages the development of new country houses. The current planning system is already flexible enough to allow truly exceptional proposals for new development in a rural setting. The policy is, therefore, unnecessary: it creates a loophole that can be exploited by speculative developers; it is contrary to subsequent planning guidance; and it risks damaging the qualities of the countryside with no benefit to the local area. An example of a recently refused case is a proposal for an isolated country house at Bedlam Green in Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty. The Planning Officers Report

¹ A Modern Planning System for Wildlife and the Countryside, WCL, 1999

recognised that the proposal was contrary to the Development Plan, had no justification in terms of agricultural or forestry purposes, and would be harmful to the character and appearance of the AONB. However, a similar proposal in the Test Valley, which was originally turned down by planners, has now been accepted on appeal. This demonstrates the confusion this policy is causing. Proposals, even if turned down by LPAs in the first instance, risk being let through on appeal despite being contrary to other national planning guidance and local policies.

11. We also suggest the test for local countryside designations (para. 4.16 of PPG7) is removed. This has proved difficult to apply in practice and should be replaced by an approach that requires a robust justification for local designations through landscape assessments. This should be complemented by a requirement for local authorities to adopt a landscape character approach. Local landscape character assessments should also be used more widely to inform the targeting of agri-environment schemes, economic strategies and design guidance.

12. The policy protecting the Best and Most Versatile (BMV) agricultural land needs reconsideration. Policies for protecting rural land should consider broad objectives that go further than protecting agricultural land but consider environmental and landscape qualities as well, and reflect more closely policies set out in PPG9. This should include a commitment that development should not harm semi-natural or ancient landscapes and habitats in the countryside, which are often irreplaceable.

Enhancing PPG7

13. PPG7 should promote a positive approach to planning that encourages more discerning rural development, better matching development with identified needs. This approach can be encouraged by:

- a requirement for LPAs to undertake local (social and economic) needs audits as a precursor to preparing development plans, local development frameworks, and making planning decisions. These should identify a clear 'match' between proposals and needs, and be linked to wider processes such as local authority Community Strategies or Regional Chapters of the England Rural Development Programme (ERDP);
- fostering participation and a positive culture where LPAs help rural businesses identify how new necessary development can meet planning policies, as well as being clear about what would be considered unacceptable development;
- stronger support for the countryside character approach and the importance of the beauty, diversity and tranquillity of the countryside, as recognised in the Rural White Paper. PPG7 should require LPAs to develop policies to protect remaining areas of rural tranquillity or dark skies, and to promote better quality design through the adoption of Village Design Statements as Supplementary Planning Guidance;
- retention of the advice that National Parks and AONBs enjoy the highest status of protection in terms of landscape and scenic beauty as reinforced by the Countryside and Rights of Way Act 2000;
- clarification of the wording of the test for major developments in National Parks and AONBs. This should ensure real scope for assessing 'national need and

alternatives'. The decision to go ahead with the massive intensification at the Otterburn Military Training area in the Northumberland National Park is an illustration of the need for this. There should also be new safeguards against damaging proposals on the edges of National Parks and AONBs and LPAs should be encouraged to introduce planning policies to ensure the protection of these buffer zones. This would be compatible with their statutory duty to have regard to the purposes of National Park and AONB designation²;

- reference to the SEA directive and the role that Strategic Environmental Assessment can play in effective rural planning policy integration and assessment; and
- a greater role for the planning system in relation to agricultural development, including more effective scrutiny of applications for agricultural and forestry dwellings.

14. Finally, the annex of PPG7 should include reference to the relevant regulatory framework, particularly EIA regulations on uncultivated land and forestry regulations.

² Section 62 of the Environment Act 1995 and Section 85 of the Countryside and Rights of Way Act 2000