

Response to consultation on new permitted development rights May 2017

Introduction

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. Our response has been endorsed by all the National Park Societies in England.
2. National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses. Many of these businesses rely on the high quality environment of these areas for their success.
3. The National Parks are living, working landscapes which must adapt over time so we support the appropriate change of use of buildings particularly where this helps to ensure the future upkeep of traditional buildings, and allows farming and other rural businesses to adapt to changing consumer demand and improvements in technology. However, as highlighted in the evidence we submitted to the Rural Planning Review, reducing planning regulation could actually damage the significant benefits these areas provide as it will reduce local planning authorities’ ability to manage the impacts of new development.
4. Factors such as access, landscape, and environmental issues need to be given even greater consideration in isolated locations and in National Parks, decisions also need to take account of the statutory National Park purposes. Even small changes in these locations can have a disproportionate impact which is why we believe that planning permission should be required for such changes so that they can be properly managed through the planning system.
5. In general, we do not believe that further relaxation of the planning system is needed as the existing planning system in National Parks ensures that appropriate changes are allowed while continuing to protect the special

qualities for which National Parks are valued and which contribute so much to the rural economy.

Rural development and agricultural permitted development rights

6. We do not believe that there should be any increase in the thresholds for agricultural permitted development rights. We already have significant concerns about the visual intrusion and negative impacts on the character of the landscape of some of the modern agricultural buildings allowed under the existing thresholds. We are also concerned about the impacts of large agricultural structures in the settings of National Parks i.e. in areas just outside their boundaries. Such development can sometimes have significant economic disbenefits for an area if it makes it less attractive to visit. So we do not believe that increased thresholds should be introduced anywhere.
7. Ideally we would like to see a reduction in agricultural permitted development rights because the best way to manage such impacts would be to require planning permission for structures such as polytunnels. If increased thresholds are introduced, these should not apply in National Parks or AONBs and the existing thresholds should continue to apply in these areas. National Parks and AONBs are our finest landscapes with the highest level of protection so there are strong grounds for exempting them from this proposal in the same way that they were exempted from the permitted development rights for the conversion of agricultural buildings to residential use.

Rural housing and the use of agricultural buildings for residential purposes

8. We welcomed the Government's decision to exclude National Parks and AONBs from the agricultural to residential permitted development rights which were introduced in 2014. This is something that we had made a strong case for in responding to the related consultation in 2013 and the grounds that we set out then still apply. It would not deliver the type of housing that is needed in National Parks and could lead to significant amounts of new development in completely inappropriate locations in National Parks with detrimental landscape and environmental impacts.
9. We note that the consultation refers to a new agricultural to residential use permitted development right as well as increasing the threshold for the existing right but does not make any reference to the exemption for designated landscapes. We would like a reassurance from Government that the proposed new right will not apply in National Parks and AONBs and that these areas will continue to be exempt from the existing right.

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