

Rural Planning Review: A submission of evidence from the Campaign for National Parks

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 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. We welcome the opportunity to contribute to this review but we are disappointed that the call for evidence makes only one brief reference to protected landscapes. These areas are afforded additional protection under the planning system and make a major contribution to the rural economy. It is essential that both these facts are taken into account as part of the review. The recently published 8-Point Plan for England’s National Parks¹ describes them as ‘drivers of the rural economy’ and highlights the important role they can play in delivering the Rural Productivity Plan. There is no evidence that the additional protection afforded National Parks has acted as a barrier to economic growth in these areas.
3. It is also important that the review considers the wider context for rural planning, such as the proposed changes to affordable housing currently under consideration, as these also have implications for planning and the economy in National Parks. If the economy in National Parks is to continue to thrive then those who work there must also be able to afford to live there.
4. The starting point for the review appears to be an assumption that existing processes for managing development in the countryside are a barrier to growth and existing planning protections should be relaxed. We do not agree with this assumption. There needs to be recognition of the benefits to the rural economy of managing and monitoring new development and changes of use. National Parks are living, working landscapes which must adapt over time but reducing planning regulation could actually damage the significant benefits they provide. It will also reduce the opportunities for local communities to influence the kind of development that happens in their community which would be inconsistent with the neighbourhood planning process and localism.
5. We hope the responses to this call for evidence enable decision makers to unpick some people’s perceptions of the planning system compared to the reality. It is clear from the Government’s own live tables on planning applications that the vast majority of planning applications receive permission. This is echoed in National Parks where in 2015 National Park Authorities granted approval for 89% of the planning applications they received compared to 87% for all English planning authorities (Live table P121²). More specifically in relation to rural businesses, we know the Yorkshire Dales National Park Authority, for example,

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509916/national-parks-8-point-plan-for-england-2016-to-2020.pdf

² <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

are very supportive of farm-related planning applications. Between April 2012 and April 2015 they received 189 applications for agricultural buildings or that affected existing agricultural buildings and 183 (97%) of those were approved (personal communication). That is not to say the planning system is unnecessary – rather we believe it demonstrates the planning system is enabling appropriate development but still able to prevent inappropriate and/or unsustainable development. We also know that these high percentages are due to NPAs taking a proactive approach to planning and working with applicants to inform, and where necessary improve, applications before they are submitted.

6. Our response begins by setting out the benefits that National Parks provide to demonstrate the importance of protecting them from over- and inappropriate development. We then go on to explain why we do not believe that further relaxation of the planning system is needed. This includes evidence on why National Parks should continue to be exempt from permitted development rights for the conversion of agricultural buildings to residential use.

The benefits that National Parks provide

7. The statutory purposes of National Parks are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. National Parks contribute significantly to the wellbeing 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.
8. As well as being inspiring places for people to enjoy and improve their health and wellbeing, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses. National Park Authorities (NPAs) have a statutory duty to seek to foster the economic and social well-being of their local communities and they undertake this duty very seriously and enthusiastically.
9. In 2012, £10.4bn of turnover was generated by businesses in the National Parks in England and employment grew by 2.7%³. More than half of businesses in National Parks believe their performance is improved by being in a National Park. The local economy in many National Parks relies heavily on tourism and many visitors are specifically attracted to these areas by the natural beauty of the landscape. National Parks in England attract 90 million visitors a year, who spend more than £4 billion and support 68,000 full time equivalent tourism related jobs.
10. Many of the benefits which National Parks provide, including tourism and rural economic growth, could be lost if the special qualities for which they are valued are undermined. National Parks are, of course, living and working landscapes but the challenge is to ensure that the range of benefits that protected landscapes provide is not compromised by insensitive change, unsympathetic land use or

³ http://www.nationalparksengland.org.uk/__data/assets/pdf_file/0007/338362/3209-NPE-INFOGRAPHICweb.pdf

irresponsible development. It is the role of the planning system to enable appropriate development and prevent damaging development. A local planning authority, including a National Park Authority, refusing planning permission is not a failure of the system.

Change of use of existing buildings

11. 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, any change of use could have a range of impacts in areas such as access, parking, lighting, landscape, noise, highways and environmental issues which need to be taken into consideration as part of the process of determining whether the new use is appropriate for the location. Such factors need to be given even greater consideration in isolated locations and in National Parks, where decisions also need to take account of the statutory National Park purposes. Even small changes in these locations can have a disproportionate impact. In general, the existing planning system in National Parks is ensuring that appropriate changes are being allowed while continuing to protect the special qualities for which National Parks are valued and which contribute so much to the rural economy.

Use of agricultural buildings for residential purposes

12. The review document makes specific reference to the permitted development rights for conversion of agricultural buildings to residential use but does not mention that these do not apply in National Parks and Areas of Outstanding Natural Beauty (AONBs). We made a strong case for this exemption when the rights were first proposed in 2013 as National Parks contain a high number of agricultural buildings. There are around 4500 field barns in the Yorkshire Dales National Park alone many of which are in locations which would be completely inappropriate for residential use. We do not believe that anything has changed since then which would justify the removal of this exemption and there are strong reasons for continuing to treat National Parks differently in this case.
13. The high quality environment in National Parks makes them attractive places to live. Based on 2011 Census data we know all the National Parks have an increasingly ageing population. This is partly because they are seen as attractive places to relocate for those who are retired. We also know that second home ownership is an issue in National Parks. Consequently, average house prices in National Parks are already significantly higher than the average house price in their respective region. The premium for a property in a National Park varies from 27% to 90% but in five of the 10 National Parks it is over 60%⁴.
14. The current approach to housing delivery in National Parks, as set out in Local Plans, ensures that the limited development opportunities available mainly cater for local needs rather than meet the high demand for market housing. Introducing greater flexibility in the conversion of buildings for residential purposes would

⁴ Valuing England's National Parks, Cumulus Consultants Ltd and ICF GHK report for National Parks England 2013

undermine this long-standing approach and lead to the development of new, isolated residential units in unsustainable locations. Residential use also requires physical changes (power lines, driveways, gardens etc) and generates more traffic in the form of postal and other deliveries in addition to the journeys made by the occupants and their visitors. So there could be a significant impact on the special qualities of these places.

15. NPAs already ensure that their policies relating to change of use of agricultural buildings allow them to support conversions to residential use where the location, scale and character is appropriate and there are no adverse impacts on neighbouring properties. In one recent example from the South Downs National Park, planning permission has been granted for the conversion of historic barns to residential in Greatham, a conservation area in Horsham district. Following refusal of an earlier planning application, the applicant took specialist conservation advice, amended their proposal and secured planning permission. The final alterations agreed are far more appropriate for traditional barns located in a tiny hamlet in the National Park.
16. NPAs recognise that they need to adapt to changing circumstances and are already doing so where appropriate. For example, Yorkshire Dales NPA's revised local plan which was submitted for inspection in January 2016 includes new more flexible policies to allow the conversion of agricultural buildings in roadside locations.
17. There is no need for permitted development rights for residential barn conversions in National Parks. There are a number of strong reasons why the current exemption should continue, including the following:
 - These permitted development rights would conflict with national policy on planning and National Parks. National Parks are our finest landscapes with the highest level of protection.
 - They will have a detrimental impact on the statutory purposes and special qualities of National Parks.
 - They undermine the NPAs' statutory duty to seek to foster the social and economic well-being of communities living within the National Park by undermining existing policies that support local occupancy of new dwellings.
 - They also undermine NPA policies to support affordable housing and ensure new development takes place in appropriate locations.
 - They will not result in new homes for those who most need them. Restricting the occupancy of new housing to people from the local area and ensuring that those who work in National Parks can also afford to live in them is vital to ensuring the economy in these areas can thrive.
 - There could potentially be unintended consequences for the farming industry which provides a significant proportion of the total employment in National Parks. The 7,150 commercial farm holdings in England's National Parks employ 17,300

people, equating to over 12,000 FTE jobs⁵ and make a significant contribution to sustaining the special qualities of National Parks as well as the rural economy. The value of residential dwellings is significantly higher than that of agricultural buildings so there will be huge pressure to convert buildings for short-term gain. Conversions may become more appealing even though this may not be in the best interests of the rural economy in the longer term as it will limit the opportunities for the buildings to be used for farm diversification activities in future.

- There will be negative impacts on the landscape if larger modern agricultural buildings which are of poorer appearance are allowed to continue in use for much longer than would otherwise be the case if they are no longer required for agricultural purposes. The introduction of driveways and formal gardens as a result of conversion to residential use will also have an impact on the landscape.
- The introduction of permitted development rights will remove the ability to manage and monitor important aspects of development such as requirements for new infrastructure and the impact on wildlife.
- The requirement for prior approval, whilst removing NPAs' ability to manage and monitor certain important aspects of the development, is unlikely to lead to reduced bureaucracy or a much speedier decision, particularly if the reduced fees for local planning authorities restrict the resources they are able to devote to this.

Other changes of use

18. We also have some concerns about the permitted development rights that have been introduced to allow agricultural buildings to be converted to commercial uses. We are aware of examples where this has resulted in barns being converted into uses such as hotels and cafes leading to the urbanisation of very small rural settlements. One such example is a barn that has been converted into a hotel in Fryupdale in the North York Moors. In such cases, there is no opportunity for the local community to give their views on changes which could have a significant impact on the area they live in and the NPA has only limited control over development which could have a significant impact on the special qualities of the National Park.

19. We do not believe these permitted development rights should apply in National Parks either but if they are to continue, thresholds or limitations should be applied to avoid the conversion of several buildings within a single farm complex and the subsequent cumulative impacts. Permitted development rights should be limited to one building in any farm complex and should be restricted to traditional buildings greater than a certain age as many modern agricultural buildings are less appropriate for conversion to other uses in any case.

Other issues

20. We would not want to see any relaxation of the planning regulations for polytunnels or for replacing one agricultural building with another on the same

⁵ Valuing England's National Parks, Cumulus Consultants Ltd and ICF GHK report for National Parks England 2013

footprint as some modern agricultural buildings can be very large and intrusive. A recent example where the need for planning permission has resulted in a more positive outcome in a situation like this is the approval of two large new barns, partly on the footprint of an existing barn, on the Rathfinny wine estate near Alfriston in the South Downs. These were for use in the winemaking process and the need to apply for planning permission ensured that a much better design was secured to reduce the visual impact of the barn in an open, largely treeless landscape. It also allowed appropriate conditions to be imposed, such as a travel plan, external lighting restrictions and requirements for biodiversity enhancement.

21. We would also like the review to consider whether there are some types of rural development for which more control is needed in order to be able to better manage the cumulative impact of significant levels of change in an area. The specific example we have in mind is equestrian-related development for which there is increasing demand in some National Parks. The planning system currently has very little control over the conversion of open grazing to equestrian uses or the incremental growth in the size and number of related buildings and associated paraphernalia even though these can result in significant changes to the landscape.
22. Finally, we would like a reassurance from Government that there will be a consultation on any specific changes to the planning system to be introduced following the review. Although the review document sets out briefly how any changes identified as a result of this call for evidence will be implemented, there is no reference to any consultation as part of this process. Given the broad range of issues that could potentially be raised in response to this call for evidence, it is essential that any specific changes proposed as a result are the subject of a full consultation to allow any unintended consequences to be identified.

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