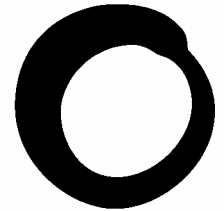


December 2003



**Friends of
the Earth**

Consultation Response

Planning Policy Statement 7: Sustainable Development in Rural Areas

A response by Friends of the Earth

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Planning Policy Statement 7: Sustainable Development in Rural Areas

Introduction

Friends of the Earth has a strong interest in the future of the nation's countryside and rural communities. We believe the post war planning system has proved a successful tool for defending the countryside not just for its intrinsic value in landscape, habitat and wildlife terms, but for the profound contribution these elements make to the quality of life of all our citizens and the cultural heritage of the nation. PPS 7 should reflect more powerfully the nature of countryside as an environmental, social and economic asset, a conclusion recognised by the Rural White Paper (2000). *'Rural landscapes, green spaces, wildlife and the heritage features created by man's interaction with them lie at the heart of why people value the countryside so highly. They are a most precious asset'*¹

Friends of the Earth believes strongly that existing highly restrictive policy in statutory designations along with general protection of 'ordinary' countryside should continue to be the foundation of planning policy for rural areas. Within this framework the planning system should place greater emphasis on supporting localised rural economies and meeting the established social needs of rural communities for housing and services.

The notion of spatial planning enshrined in the draft PPS 1 should also allow for greater integration of rural strategies and for planning policy to promote land use related objectives such as habitat and landscape improvements, local food economies, and where appropriate, small scale low impact housing and small scale renewable energy production.

Friends of the Earth supports the general concerns contained within the Wildlife and Countryside Link submission. This document is intended as short distillation of Friends of the Earth's key concerns and provides some greater detail on areas of specific concern to our organisation.

General comments

1.1 Friends of the Earth welcome the continuation of a number of key planning objectives expressed in paragraph 1 of PPS 7. However, we are concerned that this PSS represents a significant shift towards a greater relaxation of control over non-land management related commercial activity in rural areas. While a sustainable rural economy is an essential, national policy must re-emphasise the unique characteristics of England's countryside and natural habitats. While great emphasis is placed on rural businesses (paragraphs 2 to 6 et al), there is little discussion of the vital need to promote landscape enhancement, habitat conservation or to anticipate the profound effect climate change will have on characteristics of the countryside. The PPS should acknowledge clearly that ill-considered commercial development has, and continues to do, lasting and irreversible damage to the character and value of the countryside.

1.2 PPS 7 should provide more precise guidance on how local planning authorities are to integrate the diverse objectives of this PPS in the decision making arena. In particular there should be clear guidance on kinds of environmental considerations which should feature in development plans and be implemented through Development Control decision making.

¹ Our countryside: the future, a fair deal for rural England, November 2000, 104

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Specific comments

Protecting the 'ordinary countryside'

1.3 PPS 7 sends a clear policy signal that areas outside statutory designations are not worthy of assessment and protection through the use of local countryside designations. Paragraph 25 makes clear that the Government wishes to see the wholesale abolition of local designations in development plans. This is by far the most radical relaxation of locally determined environmental planning policy, both in number and geographical extent, ever undertaken in the post war planning framework. It sends a clear signal that the Government wishes to curtail local discretion and flexibility and that many highly valued landscapes and conservation interests are now to be disregarded.

1.4 Given the breathtaking scale of this deregulation it is vital that we understand the rationale for its implementation. Unfortunately PPS 7 provides no justification for the policy, suggesting only that criteria based policy should be applied rather than area based designations. The case for locally determined countryside designations is clear:

- There are clearly areas of countryside which have not (often simply because of their scale) been subject to national designation but whose cumulative landscape and nature conservation qualities justify a local designation.
- The sites make a vital contribution to protecting biodiversity by providing a safeguard for habitat and wildlife sites. Many vitally important wildlife sites are not protected by national designation and in order to protect natural and semi natural habitats, communities need the flexibility of locally determined designations.
- These designations provide clarity and certainty in the planning process

1.5 Prohibiting such designations, which is the clear purpose of PPS 7, is an unjustified use of central control over the local planning framework. ODPM should consider how local communities can meaningfully express their aspirations to protect valued landscapes when government has denied them all means to effectively achieve this. Ruling out local designations rules out not just restraint policy but positive land management initiatives which the new spatial planning framework should seek to encourage. As a result PPS 7 runs counter to everything the government has been promoting in relation to strong participative local planning and in particular the flexibility of LDF framework to meet local needs through action plans.

1.6 Criteria based policy is an inefficient instrument to deal with landscape quality because it suggests that an appraisal and judgment of landscape quality and impact must take place in relation to each application. Area based designations rigorously assessed and regularly reviewed, provide greater certainty to all participants as to the policy constraints which exist in a particular locality.

1.7 In our view paragraph 25 should be deleted in its entirety. It is irrational, inefficient and profoundly contentious. Instead, PPS 7 should make clear the need for local flexibility and emphasise the need for robust and transparent justification of any locally determined designations.

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1.8 The Wildlife and Countryside Link organisations briefing on PPS 7 makes the case for the defence of the ordinary countryside but Friends of the Earth wish to emphasise that the vast majority of our citizens experience the ordinary countryside as an everyday activity. These areas are vital in sustaining biodiversity, provide informal opportunities for recreation and are therefore essential aspects of the quality of life for sustainable communities. The ordinary countryside should not be under valued or allowed to be degraded through intensive farming practices or urban development.

Development in designated Areas

1.9 Friends of the Earth is extremely concerned at the wording of paragraph 23 which suggests a change in status of National Parks and AONBs inside the planning system. Both National Parks and AONBs enjoy the highest status of protection not just the more vaguely drawn notion of 'great weight' as indicated in PPS 7. PPS 7 should clearly reflect this status and uphold the provisions of the Countryside and Rights of Way Act 2000. PPS 7 must also deal effectively with criteria to be applied in the determination of major developments in National Parks and ANOBs which should reflect the ultimate priority of preserving the conservation value of these designations. PPS 7 should make clear in paragraph 24 that meeting local needs through provision of low cost social housing should be the key priority rather than just 'local needs'.

Agricultural land quality

1.10 Paragraph 28 of draft PPS 7 is a significant weakening of current protection of Best and Most Versatile land (Grade 1, 2 or 3a). However any large scale loss of good quality agricultural land because of current decline in primary agricultural production would be short-sighted. In assessing our need for agricultural land and the needs of future generations we must base assessments on sustainable methods of production, the desirability of reducing our dependence on imported food, population increase and the potential loss of farm land as a result of climate change.

1.11 Friends of the Earth have calculated that if imports are taken into account, the UK 'borrows' an area equivalent to Yorkshire and Lancashire from other countries simply to grow our requirements for animal feed². The challenge is to reduce imports, adopt sustainable practices and continue to feed our own population. Reducing the wastage which is a feature of our current food system, reversing land degradation and enhancing yields from sustainable systems will all contribute to this aim, but it will remain important to maintain high quality agricultural land.

1.12 Friends of the Earth is keen to stress that environmental and agricultural value are not synonymous. Certainly there are areas of wildlife value which need special protection but the aim should be a countryside in which environmental and agricultural value are usually synonymous. With this aim in mind the Government should consider whether a different definition of BMV is needed. The present definition is based on productivity - but this is productivity reliant on chemical inputs. A new definition which would better suit the new vision for farming could take into account the environmental and agricultural value of the land. For example, certified organic land, which is a positive asset to the environment and the economy, could be included in BMV. Soil in good condition is an essential prerequisite for sustainable agriculture which does not rely on chemical inputs and this needs to be taken into account in defining BMV.

² Friends of the Earth, Land and Environmental Space Briefing, 1997

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Housing development in rural areas

1.13 Friends of the Earth recognises the vital importance of meeting local social housing needs in rural areas. These needs must be determined locally through comprehensive local needs surveys. PPS 7 should make clear the need not just for housing provision but for specific requirements of affordability and tenure choice. Friends of the Earth believes that reliance on the private sector to provide social housing through mechanisms like planning obligations is inefficient and iniquitous. Social housing should be provided directly from public funds and should remain in the long term rental sector. Beyond the specific needs of local social housing Friends of the Earth is concerned that the draft PPS 7 appears to relax control over development in the countryside so long as this is focused on existing settlements (Paragraph 1 iv). PPS 7 should recognise that many rural communities have limited opportunities for expansion without compromising the essential character or the quality of surrounding countryside.

Design

1.14 PPS 7 should recognise the importance of promoting energy efficiency low impact housing and small scale communities which positively contribute to sustainable development.

Farm Diversification

1.15 Friends of the Earth welcomes greater flexibility to allow farm diversification so long as this:

- is in character with countryside,
- represents sustainable development,
- and is primarily focused on land management activities.

1.16 PPS 7 should continue to promote the use of planning controls over farm diversification as necessary and desirable. This is reflected in the report of the Policy Commission on the Future of Farming and Food³, 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.

1.17 The planning system should especially encourage farm diversification into sustainable food processing and marketing activities. In this context, Friends of the Earth would welcome stronger and more detailed guidance to Local Planning Authorities on the importance of fostering sympathetic and appropriate economic activity in rural areas. A list of appropriate activities would be a useful tool for local authorities. Activities directly linked to local food production will be appropriate for rural areas and have the potential to boost the local economy as well as helping some farmers out of the current crisis.

1.18 Farm shops for example can be a way for farmers to diversify, increase their income and provide a valuable service to the community. However it can be difficult for farmers to find the time and resources to set up and run a farm shop and many would find it easier to do so in collaboration with other farmers in the area. Additional flexibility in both planning policy and the application of business rates would make it easier for farm shops to be set up on a co-operative basis.

³ "Land use planning has an important role in reconciling diversification with wider land use and transport policies" p 54, Farming and Food: a sustainable future, January 2002.

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1.19 A more flexible planning system could potentially help small farming enterprises to flourish. There would be value to the environment and the rural economy in encouraging more small producers who would sell locally e.g. through box schemes and farmers markets. Small, viable, holdings which provide for local needs should therefore be considered as appropriate development within Green Belts. This may require a change in the way that viability is assessed by MAFF - which currently favours intensive farm units e.g. heated glass and battery egg production.

1.20 The creation of new rural jobs, including in labour intensive farming systems such as organic systems, needs to be accompanied by more affordable rural housing to allow local people to live and work in rural areas, and to limit commuting. It is also important to preserve family and other social relationships in rural areas. However, while Friends of the Earth can welcome the general tone of the draft PPS 7 on diversification we have a number of serious concerns about the specific policy instruments:

- There is an over emphasis on diversification into non-land based commercial activity. By definition this diversification can locate anywhere and its appropriateness in high quality countryside must be carefully considered in relation to issues such as traffic impacts.
- Related to the above, Friends of the Earth is concerned at the provision in PPS 7 for building 'Other occupational dwellings' (annex A). Allowing housing development for non-land management based diversification is a major departure from the stringent tests on the approval of agricultural or forestry related housing provision. The potential speculative demands for housing whose occupants have no relationship with land management activities is likely to adversely impact on the character and value of the countryside. Therefore such non-land management related dwellings should have no privileged status inside PPS7.