

BABERGH DISTRICT COUNCIL

FROM: Head of Natural and Built Environment

REPORT NUMBER: **J63**

TO: DEVELOPMENT COMMITTEE
STRATEGY COMMITTEE

DATE OF MEETING: 29 JULY 2009
30 JULY 2009

CONSULTATION ON PROPOSED RESPONSE TO NEW NATIONAL PLANNING POLICY ON ECONOMIC DEVELOPMENT (PPS4: PLANNING FOR PROSPEROUS ECONOMIES)

1. PURPOSE OF REPORT

- 1.1 This report is provided to allow Members to agree a response to the Government's invitation to comment on a new combined, national planning policy document dealing with economic development.

2. RECOMMENDATIONS

- 2.1 That Development Committee provides Strategy Committee with comments on the proposed response to CLG as set out in the attached Appendix A.
- 2.2 That the proposed response to the CLG as set out in Appendix A be approved for submission to the Government's (Department of) Communities and Local Government (CLG) as the Council's formal agreed response.

The Development Committee will be requested to submit their comments to Strategy Committee (2.1).

The Strategy Committee is able to resolve this matter (2.2).

3. FINANCIAL IMPLICATIONS

- 3.1 There are no direct or immediate financial implications arising as a result of any response that the Council may or may not wish to submit on this planning policy document.
- 3.2 However, the proposed policy (in the form of new draft PPS4) advocates the continuation of (and arguably increased emphasis on) a high profile and very positive approach towards promoting economic development. If this overall approach is supported and adopted, this could have financial benefits through a strengthened local economy, with better local employment prospects. This may result in reduced demand for benefits among Babergh residents and an improved local business rates tax base over time.

4. RISK MANAGEMENT

- 4.1 This report is most closely linked with the Council's Significant Business Risks No. 7 – Financial Management and No. 10 – Local Response to National Issues. Key risks are set out below:-

Risk Description	Likelihood	Seriousness or Impact	Mitigation Measures
That the proposed positive stance on economic development is not secured, with less benefit to Babergh's economy and financial circumstances.	Very low	Marginal	Add Babergh's expression of support in principle for the generic / overall stance of the proposed policy

5. **KEY INFORMATION**

5.1 Whilst this new PPS does not intend to change the Government's overall approach / policy in this area (much of it brings existing policy / guidance into one convenient place), it is expected to result in a set of policies / guidance that Babergh would be expected to implement as local planning authority - some being new. The proposed planning policies have four main functions:

- Overall policy on collaborative use of evidence based planning (to plan positively)
- To provide policy guidance for the content of Regional Spatial Strategies and Local Development Frameworks
- To provide policy coverage for monitoring by regional planning bodies and local planning authorities
- To provide a planning policy framework for decision making (in the development management process) on planning applications where economic development considerations may be involved

5.2 This also re-emphasizes that the overall suite of planning policy that operates in Babergh is not confined to its own Local Plan (or LDF in future). Planning policy that must be applied here is also provided by Suffolk County Council's planning documents (elements of saved Structure Plan and minerals and waste planning documents), the regional plan (RSS) and national planning policy / guidance.

5.3 The document seeks to provide an integrated, positive and flexible approach towards planning for economic development and brings together this policy for urban and rural areas, as well as that for town centres and transport (regarding car parking standards) within the context of sustainable development. These are all considered points deserving support. There is a change in approach since part of this new document expresses its detailed policies in the form of actual planning policies (Policy EC1 – EC24) which has never previously been the case in any of the Government's planning policy guidance notes or statements before.

5.4 In particular, the view is expressed that the PPS helps go some way towards putting economic development (including jobs, protection of local economies and protection of essential facilities / services, such as village shops) on a more even footing with the current national housing agenda. Officers would support this overall principle strongly and it is felt to have particular application both to Babergh and the wider Haven Gateway area.

- 5.5 Whilst the officer group convened to consider the new PPS4 has reached a view that it is generally supportive of the new document overall, a few detailed points of concern would be raised in view of their relevance to the Babergh district, the most important of these being as follows in paragraphs 5.6 to 5.8.
- 5.6 There is a concern that the new PPS does not do enough to protect the best agricultural land (where under pressure for change through downturns in prosperity affecting farming).
- 5.7 It is also considered that the PPS needs to be more guarded about the re-use of redundant rural buildings, so as to avoid expressing encouragement for conversions to (unsustainable) residential use as far as possible in principle. This approach is generally in line with planning policy and sustainable development aims at all levels. It is also advocated because the preferred uses for such buildings here are for business / commercial, community and leisure purposes.
- 5.8 Finally, it is believed that due to the timescales often involved in bringing forward major sites for economic development, the PPS should not place undue pressure on local authorities to release such sites for alternative uses in the short term (for instance due to short-term economic downturns). The suitability of the site for its chosen use in planning terms should remain the paramount consideration.
- 5.9 The deadline for submission of a response to this draft policy was 28 July 2009. Accordingly, a provisional, draft response was submitted to CLG by officers as attached at Appendix A, in order to meet this deadline, on the basis that it would be subject to endorsement, or otherwise, by members at this meeting. It therefore remains open to members' choice as to whether they wish to take any one of the following courses of action:
- (A) Agree a response as drafted (as per recommendation 2.1 above);
 - (B) Amend this initial response and submit it;
 - (C) Replace the response entirely and submit the same; or
 - (D) To withdraw the response as originally submitted (without substitution).

6. **APPENDICES**

- (A) Full text of proposed response, using standard questions pro-forma supplied by CLG
- (B) Full text of CLG's Consultation paper on a new Planning Policy Statement 4: Planning for Prosperous Economies (electronic link with a paper copy available in the Members' Room).

7. **BACKGROUND PAPERS REFERRED TO:**

None.

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Appendix A

Consultation Questions

Name: Planning Policy Team, on behalf of

Organisation: Babergh District Council

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- 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:

We support the overall shift to a more holistic view of the economy, recognising the need for economic growth to support housing growth. This is particularly important in view of the challenging targets for both housing and economic growth in local areas.

With the emphasis on simplifying policy, it seems sensible to have all planning policies relating to or impacting on the economy (for example town centre and retail) consolidated into one document. This approach also acknowledges the wider links between traditional employment uses, retail and town centres, and the need to consider this comprehensively in planning policy.

We are pleased to see some acknowledgement in the document of the rural economy. Rural economies and issues that affect these economies differ significantly from urban economies, with complex links between town centres and their rural hinterlands. A potential concern with consolidating all related policies into one is that the mentioned complexities are over simplified. One way of overcoming this is to reinforce (through cross-referencing, for example) the links between this document and those remaining policies in PPS7 to ensure that all aspects are appropriately considered.

Another benefit of considering the wider economic environment in one policy document is that it will recognise jobs that will contribute to economic growth but that do not fall within the traditional B Land Use Classes. There is, however, no current guidance as to how to deal with other land uses that create jobs (although it is included in the jobs targets in the RSS) and perhaps this is something that could be considered in PPS4. We also support the evidence based approach promoted by this draft PPS.

- 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:

Draft PPS4

Whilst this document is an overall improvement on the previous draft PPS4 (2008), some of the strengths of the 2008 version are lost. In particular the additional guidance in the 2008 draft version on the types of evidence recommended to produce robust decisions at local level was helpful and it is proposed that this be included in the final PPS4.

PPS7

Objective iv, paragraphs 1 and 16 cover the protection of agricultural land from development. There is pressure for change when farming is not performing well, and this draft policy statement does not provide enough guidance on how to ensure the protection of good quality farmland. It does not reflect Paragraphs 28-29 of PPS7 and whilst we appreciate that the draft PPS4 does not supersede these sections, we do feel that a direct reference to them here would be appropriate.

It is felt that the section on re-use of buildings in the countryside could lead to pressure for residential development in an unsustainable fashion, which would be unacceptable (EC14.1). There should not be an emphasis on residential development.

Some mention of the need to protect landscape character, particularly outside the nationally designated areas, would also strengthen the document.

- 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 problems**

Yes No

Comment:

We have no problems with the broad policy content as referred to in our response to 1, however it is felt that the requirements in EC5 is too detailed for a Core Strategy and Point 6 onwards should be dealt with in alternative documents (for example in Site Specific Allocations or Supplementary Planning Documents).

EC14.1 could lead to pressure on some sites for change of use, particularly to residential, which should be as a last option.

EC.14.1.5 should read "the need to preserve, or the desirability of preserving, buildings of significant historic or architectural importance or interest and *where that historic or architectural interest is considerable and the preservation can be carried out sustainably*".

- 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:

It is particularly beneficial to have policies identified to assist Development Control officers.

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:

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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:

It is important that flexibility should be maintained in terms of forward planning since it is difficult to predict the sectors that will be growing and where these will develop. All appropriate growth (that will contribute to sustainability objectives) should be supported (as in EC4.2).

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

Yes No

Comment:

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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:

Figures should be provided to give districts a target, although as mentioned above- the key is maintaining flexibility and as such figures should be used as a guideline/ target only. It should be for local authorities to determine whether these are realistic or not (with local evidence to support local targets). It could be possible for sub-regions or groups of LAs to amalgamate targets comprising urban areas and rural hinterlands and develop combined targets- e.g. where there is greater capacity in urban areas it could provide some of the rural share of jobs, or vice versa.

Also referring to our answer to question 1- there should be clearer guidance on how to deal with jobs in classes other than B Land Use Classes (e.g. widening scope of Employment Land Reviews/equivalent studies in future?)

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:

We are pleased to see recognition of the importance of local and rural facilities.

Rural businesses contribute to the rural economy and rural regeneration. It is important to support existing local and rural businesses, and to promote their growth where these are locally important and appropriate.

10. 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:

There is recognition of the importance of the rural economy and this includes farm diversification.

11. Do you think 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:

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Other comments we wish to make:

Although we support the evidence based approach and the principle that site allocations should only be continued when there is some evidence that they will be brought forward (EC4.1.7) it should be considered, particularly with the current economic climate, that some sites will not come forward for development over the short-term and the appropriateness of land uses and development should be the primary concern. It would be worse to see unsuitable development coming forward on a site than to wait for it to come forward with an appropriate use and so the policy wording should refer to this. This policy could result in pressure on sites to come forward for unsuitable land uses or development.

Appendix B

[CLG's Consultation paper on a new Planning Policy Statement 4: Planning for Prosperous Economies](#)