

RTPI response to the independent review of National Parks and AONBs

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About the RTPI

The Royal Town Planning Institute champions the power of planning in creating prosperous places and vibrant communities. We have over 25,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates.

Part 1: Opening thoughts

What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.

1. National Parks and AONBs demonstrate the critical role that planning plays in protecting, conserving and enhancing some of England's most valued landscapes. As designated areas they benefit from consistently high levels of protection, delivered through effective regulation, enforcement, planning and conservation management. Stability and certainty are important factors for their continued success. National Parks and AONBs should not be considered in isolation, but instead managed as integral components of a wider network of open land which incorporates the valuable and highly accessible green spaces which lie around and within more heavily populated areas.

What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.

2. The future of National Parks and AONBs needs to be considered within the context of significant challenges related to biodiversity loss and climate change. The Committee on Climate Change¹ notes that, across the UK as a whole, the current policy framework has resulted in a significant degradation in ecosystem services, including a loss of soil fertility through intensive monoculture farming, biodiversity losses resulting in the reduced

¹ Committee on Climate Change. 2018. *Land use: Reducing emissions and preparing for climate change*. Available from: [theccc.org.uk/publication/land-use-reducing-emissions-and-preparing-for-climate-change](https://www.theccc.org.uk/publication/land-use-reducing-emissions-and-preparing-for-climate-change)



functioning of semi-natural habitats, and forests that have become unproductive through lack of management. Climate change is expected to exacerbate these trends, while increasing the frequency and severity of flooding and drought. Current Defra policies for agriculture, forestry and peatland are insufficient for achieving the decarbonisation objectives of the 2008 Climate Change Act and the ambitions of the Paris Climate Change Agreement. Furthermore, a growing population will continue to exert pressures of land through settlement growth and the demand for food, energy and mineral extraction, at a time when the UK's departure from the European Union has created uncertainty around the domestic environmental regulation. An effective land use strategy is needed that can take account of these competing demands, and plan accordingly.

3. The 2018 House of Lords Select Committee inquiry on the 2006 Natural Environment and Rural Communities (NERC) Act raised concerns about whether Natural England has sufficient resources and capacity to fulfil its range of functions as a statutory consultee for planning applications in National Parks and AONBs². The role of Natural England should be reviewed and strengthened to ensure that planning authorities are able to properly address biodiversity, wildlife and landscape matters. This would fit with the proposals from Defra to embed the principles of Biodiversity Net Gain and Environmental Net Gain into the planning system.

Part 2: Views

What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity? Could they do more to enhance our wildlife and support the recovery of our natural habitats?

5. The NPPF states that the conservation and enhancement of wildlife are important considerations in National Parks and AONBs, and should be given great weight in planning decisions in National Parks. This is dependent on effective working relationships between local authorities (e.g. biodiversity officers and ecologists), AONB Partnership and Conservation Boards, Local Nature Partnerships, Wildlife Trusts, Natural England and others. However, a greater emphasis should be placed on these matters at all levels of decision-making, including at the corporate and councillor level, and embedded into the priorities of other bodies such as Local Enterprise Partnerships.

What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

6. The NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and AONBs. This means that the scale and extent of development within these designated areas should be limited, and planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. However, the non-statutory advice on landscape matters, provided by AONB Partnership Boards, does

² House of Lords Select Committee on the Natural Environment and Rural Communities Act 2006. 2018. *The countryside at a crossroads: Is the Natural Environment and Rural Communities Act 2006 still fit for purpose?* Available from: publications.parliament.uk/pa/ld201719/ldselect/ldnerc/99/99.pdf



not carry the same weight as statutory advice from Natural England, which due to resource constraints, may more often consist of standing advice on biodiversity and wildlife. The NERC inquiry raised concerns that this can lead landscape matters to be undervalued by developers, planning authorities and the Planning Inspectorate, especially if no biodiversity or wildlife objections have been raised by Natural England³. Greater integration between AONB management plans and local development plans could assist in this regard (see paragraph 17), as would an increase in resourcing and landscape expertise within Natural England.

What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

7. The Agriculture Bill, which is near completion, is promoting ‘public money for public goods’ and identifies environmental outcomes as the new target of subsidies. Questions remain about how and by whom the new system should be managed, but financial incentives will need to encourage farmers and others to manage land in a way that delivers maximum public benefit, related to biodiversity, natural capital, carbon reduction and climate resilience, along with landscape objectives.
8. The RTPI believes that, following our withdrawal from the EU, this should be overseen by a new UK-wide watchdog, established to scrutinise and enforce the implementation of environmental laws and policies by the UK and devolved governments, including the 25 Year Environment Plan⁴.

What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

9. Priority should be given to pedestrian movement through improvements to the footpath and bridleway network within National Parks and AONBs. This requires sufficient resourcing for management, maintenance and enhancement. Access should be considered in the context of wider spatial plans which cover public transport, traffic management and development, as discussed in paragraph 15.

What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

10. Rural poverty is a particular concern in National Parks and AONBs. This is due to a number of factors, including lower average wages rural areas, a lower proportion of socially rented homes, fewer new affordable houses being built, and demand for second homes. This means that young people and families can become priced out of these rural communities, which raises the average age and leads to services like shops and post offices closing down. A higher proportion of residents which commute to jobs in larger settlements can also exacerbate these problems, resulting in a loss of local employment opportunities and

³ House of Lords Select Committee on the Natural Environment and Rural Communities Act 2006 (page 40)

⁴ RTPI. 2018. *Response to the Defra consultation on UK Environmental Principles and Governance*. Available from: bit.ly/2QIHMqc



services (especially out of peak tourist seasons) and contributing to problems of traffic and congestion.

11. Planning plays a key role in delivering affordable housing of various tenures in National Parks and AONBs, and is integral to capturing uplifts in land value for the public where there is new development. Where planning is strong and well supported, it can ensure that the right housing mix is developed, along with the social, physical, and environmental infrastructure needed to support it.
12. The past decade has seen almost continual changes to English planning policy and regulation, especially in relation to housing policies and initiatives, as a way to address the affordable housing crisis. However, reforms have often focused on boosting housing *supply* at the expense of tenure, design, quality, and location. These have failed to address the wider factors which contribute to unaffordable housing, which include:
 - The reduced role of local authorities in housebuilding
 - The financialisation of housing
 - An emphasis on owner-occupation, including state-sponsored and debt-financed expansion of individual owner-occupation of housing, and the privileging of home ownership in the tax system
 - A limited supply of land in optimal locations close to major employment clusters and transport infrastructure, amplified by the financial system and demand side policies, which means that land values tend to rise at a considerable rate over time.
 - A lack of mechanisms for capturing the gain in land values delivered by the granting of planning permission and public investment in infrastructure, which can encourage strategic land trading rather than development, and which can in some situations result in landowners being the greatest beneficiaries of residential development, rather than developers, communities and government.
13. The National Planning Policy Framework (NPPF) requires local planning authorities to meet the full objectively assessed need for market and affordable housing in a manner that is consistent with the other policies of the NPPF. In National Parks and AONBs, the high status of protection afforded to landscape and scenic beauty means that authorities will often be constrained in the availability of land for housing, while facing the specific challenges related to affordability, employment and infrastructure mentioned above.
14. Instead of continued planning reform, we recommend government consider a wider package of measures to address rural affordable housing. This could include a dedicated funding programme for rural affordable housing and infrastructure, and a review of the relative weightings in the distribution of the £44bn housing subsidy to give more priority to social and affordable housing and less to market housing for sale. As the government now plans to remove the HRA borrowing cap, it should become easier for affordable housing to be delivered in National Parks and AONBs through direct local authority housebuilding⁵. If the

⁵ See RTPI research on local authority direct provision of housing: bit.ly/2NYuSSI



Right to Buy policy is to continue, then local authorities should also be allowed to retain all receipts if they are using them to build replacement affordable housing.

15. Greater support and incentives from government are also needed to encourage the development of strategic spatial frameworks which cover designated areas and their neighbouring authorities, and which plan for housing, employment, infrastructure and land management in a more coordinated way. The current approach from government has been to provide strategic planning powers through devolution deals to large metropolitan areas. While this is welcome, it should be extended to include more rural areas without an obvious core settlement. The devolution deal for Cornwall offers a useful example in this respect.
16. LEPs covering significant rural areas need to ensure that rural people and businesses have a strong voice, and that strategies contain specific programmes which address enterprise and employment in rural areas. A CPRE survey in 2017 suggested that the majority of LEPs were not taking sufficient account of the economic potential of rural communities, or their social needs and environmental quality⁶. Emerging Local Industrial Strategies will also need to ensure they take sufficient account of the potential of rural communities to contribute to UK productivity.
17. Planning authorities in designated areas also work closely with Town and Parish Councils, and Neighbourhood Planning groups, to prepare policies which deliver much needed rural affordable housing and support local services and facilities. In Cornwall, for example, the St Ives Neighbourhood Plan includes a policy restricting new homes to primary residences. However, smaller rural communities in remote areas, or without the necessary skills base, can lack the capacity to develop an effective Neighbourhood Plan. Continued support and resourcing will be needed to enable all communities to benefit from this opportunity.
18. National Parks and AONBs benefit from tighter restrictions and exemptions related to permitted development (PD) rights and entry-level exception sites. These restrictions should be maintained for reasons of environmental quality. The exemption from providing entry-level exception sites should help to ensure that rural exception sites continue to come forward, which are an important means of providing affordable housing in rural areas.

Part 3: Current ways of working

What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

19. As planning authorities, National Parks are better placed to take the integrated approach outlined above. The situation in AONBs is more complicated, as planning responsibilities will often be split between a number of local planning authorities, each with a local development plan. Here, there is concern that the duty on local development plans to 'have regard' for AONB management plans is not sufficiently strong. Greater integration between local development plans and AONB management plans would be beneficial, for example through the establishment of AONB planning boards, or the creation of dedicated AONB Development Plan Documents.

⁶ CPRE. 2018. *Next steps for LEPs*. cpre.org.uk/resources/housing-and-planning/item/4894-next-steps-for-leps



20. The latter approach is being tested in the Arnside & Silverdale AONB, where South Lakeland District Council and Lancaster City Council are preparing such a document which, when completed, will form part of both Council's Local Plans. It will identify sites for new housing and employment to contribute towards meeting local needs, and will set out planning policies to ensure that development reflects the AONB designation. This model could be rolled out to other AONBs if successful.
21. As mentioned in the introduction, the challenges of climate change mean that National Parks and AONBs need to be managed within the context of a wider land use strategy that responds fully to the need for deep decarbonisation and adaptation to the impacts of a changing climate, along with the other objectives of the 25-Year Environment Plan. If National Park and AONB authorities are to proactively fulfil both their original objectives and respond to new challenges, then they require sufficient staffing, financial resources, and access to training and expertise.

Part 4: Closing thoughts

The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

22. We encourage this review to also consider the relationship between marine and terrestrial designated sites.