



Campaign to Protect
Rural England

Barker Review of Land Use Planning

Submission by CPRE in response to the call
for evidence

March 2006

BARKER REVIEW OF LAND USE PLANNING

Submission by CPRE in response to the call for evidence

March 2006

CPRE and planning

1. CPRE welcomes this opportunity to contribute to the Barker Review of Land Use Planning. The benefits of good planning have been a central interest of CPRE for 80 years. We were closely involved in the establishment of the system in 1947 and subsequent revisions, particularly the 1990, 1991 and 2004 Acts, and we are the leading voluntary organisation engaged in both shaping and operating the land use planning system at all levels. Through our network of local branches in every county and our regional groups we engage in the planning process daily. We appear at more public inquiries, Local Development Framework Independent Examinations and Regional Spatial Strategy Examinations-in-Public than any other organisation, and monitor an estimated 200,000 planning applications a year.

Why planning exists

2. The planning system has long been identified as an important means of managing development and change and regulating the use of land to achieve environmental objectives. Its legacy is visible in the beauty of the countryside, the strong physical divide between town and country and the relative lack in England of the urban sprawl and sporadic development evident in many other countries. This is a vital and continuing role for the system but it can do more. The planning process provides important opportunities to influence long term issues like how and where people live and earn their living, access to facilities, the need to travel and the choice of transport and the pressure on resources such as minerals, soil, water and energy. It can also provide a framework and opportunity for public involvement in wider land use decisions over forestry, agriculture, regeneration, economic investment and housing.

3. We identify a particular challenge for the planning system in developing its wider role as an instrument for integrating potentially conflicting pressures to secure genuinely sustainable development for the long term. This approach, in line with the Government's flagship statement of national planning policy, PPS1 *Delivering Sustainable Development* (2005), needs to combine full recognition of natural resource management imperatives and the importance of meaningful public participation with an understanding of planning's role in creating and facilitating business opportunities which will complement, rather than conflict with, wider public policy objectives.

4. The development of this role needs to be considered against a complex backdrop of increasingly stretched local authority resources; growing public mistrust of local, regional and central government; continuing tensions in central/local government relations; the democratic deficit in regional governance; growing public expectations for involvement in decisions which affect their quality of life; continuing business concerns over the flexibility of land use policy and delays in planning decisions; and demands for better integration of social, economic and environmental objectives.

5. We have responded in brief to most of the questions listed in the call for evidence and enclosed copies and/or included web links to a number of relevant CPRE publications where appropriate. We intend to submit further evidence in support of these points to the Review in the coming weeks.

Review timing, scope and terms of reference

Prematurity

6. We believe that, in asking questions about the performance of the new arrangements established in 2004, the review is premature. The new system is significantly different from the last in terms of both mechanics and scope. The period of uncertainty preceding the *Planning and Compulsory Purchase Act 2004* have done nothing to improve the quality of planning or public confidence in it. Throwing even part of the new system up in the air again now would serve only to demoralise and confuse those involved in and affected by planning, and further delay progress towards a functioning system of up-to-date development plans. While we have concerns about the new system, we are committed to playing our part in applying it in practice. Inevitably it will take all those involved in the new RSS/LDF processes several years to become familiar with them, identify and acquire the necessary skills to engage with them and adapt the statutory requirements to local circumstances. This applies particularly to third party participants and elected members. **CPRE therefore recommends that the review should resist the temptation to suggest any further significant amendments to the structure or process of planning.**

Terms of Reference

7. We are surprised and dismayed that the Review appears not to be aware of the substantial changes to the scope and intent of planning in the last few years. Prominent among these are the policy shift from land use to spatial planning, and a continuing debate over the meaning and purpose of sustainable development, now a core legal objective of planning.

8. The title of the review and the questions refer to 'land use' planning, despite the deliberate shift in emphasis – set out in the 2004 Act and subsequently elaborated on in policy statements – to 'spatial' planning. The distinction may appear arcane, but in practice the implications are very significant. PPS1 (paragraph 30) states that:

'Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they can function.'

9. The inadequacy of land use regulation in isolation for securing sustainability has been recognised. Spatial planning should, among other things, factor in the availability and management of resources such as land, minerals, water and air quality, and services and needs such as transport, education and healthcare.

10. The Review asks whether the 'right balance between economic and other goals' is achieved in the planning system. Again, this appears to be written in ignorance of the basic guiding principles of the modern planning system. Far from encouraging a mentality of 'balance', PPS1 stresses that:

'Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy' (paragraph 13 i).

11. Paragraph 24 elaborates on this:

'In particular, they should carefully consider the interrelationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development – for example, by recognizing that economic

development, if properly planned for, can have positive social and environment benefits, rather than negative impacts, and that environmental protection and enhancement can in turn provide economic and social benefits.

12. The overall aim is *‘to achieve outcomes which enable social, environmental and economic objectives to be achieved together’*. These points are summarised in the text:

‘Considering sustainable development in an integrated manner when preparing development plans, and ensuring that policies in plans reflect this integrated approach, are the key factors in delivering sustainable development through the planning system’ (paragraph 28).

13. The Review also appears to display some confusion as to what it is seeking to achieve. Specifically, the emphasis on whether the system is ‘sufficiently flexible and/or responsive’ (question 1) sits unhappily with the reference to ‘the need to encourage a positive/proactive approach to planning’ (question 2). If spatial planning is to provide the certainty demanded by both business and the community it needs to agree clear policy objectives to guide development and change. In doing so it needs to be cognisant of the needs of different interests, but the role of positive planning must primarily be to lead, not to react. If, however, the system is highly flexible and responsive, the inevitable reluctance of investors and developers to take planning policies seriously in a relatively laissez-faire environment will make it difficult or impossible for planning authorities to enforce those policies and achieve their objectives. **Thus, while a degree of flexibility is necessary, it is essential to accept that planning cannot easily be both highly responsive to business needs and highly effective.**

The case for planning: economic benefits

14. CPRE believes that there is a strong business case for clear, consistent planning control over development and change. The key advantages include:

- the creation and maintenance of a clear framework, in the form of the development plan, which provides a stable, rational and transparent environment for business and investment decisions;
- certainty, with a supporting effect on property values, which itself instils confidence and helps minimise wasteful speculation;
- an opportunity to secure a degree of public consensus over development and change – since all strategic planning decisions are essentially political, maximising agreement on the criteria that will govern them is vital for minimising delays and unnecessary conflict; and
- contextual benefits, e.g. protection and appreciation of investment through control over neighbour development and avoidance of poor design, conservation of historic buildings and streetscapes, maintenance of attractive open countryside, management of demands on natural resources, infrastructure and labour markets.

15. Clear policy emphases can yield beneficial results for both business and the wider community, as long as they are consistently supported and enforced by national as well as regional and local government, and sustained for long enough.

16. For example, the national policy on the location of shopping (introduced by PPG6 in 1996) established a clear framework for siting of new and expanded retail space. Since then the sequential test – aimed at ensuring that town centre and edge-of-centre sites were identified and used before out-of-centre and out-of-town sites were considered – has been maintained, refined and extended by different Governments for more than 10 years. The

result, delayed by the large supply of out-of-centre floor space already permitted but not yet built at the time of the change in policy (the legacy of the Conservative government's previous laissez faire approach), is now becoming clear, as most leading retailers have responded to the certainty of a clear approach by adapting their business models to invest in town centre sites. Remarkably, this has happened despite the continuing contrary pressure from other policies. Key among these are the price of car travel relative to alternatives; the large public subsidy to air freight and road haulage, which makes global distribution more profitable than local supply models; the continuing lack of controls and charges on car parking at out-of-town sites commensurate with town centre charges; and the greater competition with more profitable uses such as housing for central sites.

17. Another example relates to housing. Since 2000, Government, local authorities and developers have successfully applied revised planning policy for housing (PPG3 *Housing*) to boost the proportion of housing built using previously developed urban sites from 57% to 72% and increase the efficiency with which sites are used from 25 dwellings per hectare to 40+ dpha, at the same time as delivering the highest level of housebuilding since 1990.

The case for planning: wider public policy benefits

18. While we would argue that the planning system delivers significant benefits for business in the short and medium term, we believe it comes into its own in assessing and refining long term policy objectives and, where it works well, developing and applying the measures needed to secure them for the wider public benefit.

19. The tension between short term business and political pressures and the long term interests of society are real, and mediating them is a key responsibility of spatial planning. A fundamental flaw with an approach that attempts to 'balance' conflicting pressures is that the more easily measurable quantitative factors (eg. GVA growth) tend to be those that are important to participants in the short term and therefore the most powerful, while those which are more qualitative and less measurable tend to have an importance in the longer term. This too often results in short term decisions which put at stake long term well being. It is vital to understand and appreciate the value to the whole of society of the benefits that planning can confer. As argued above, these may yield substantial benefits to the business, but this is not always recognised because they do not necessarily appear on the balance sheet of an individual company that benefits, let alone UK plc.

20. For example, in tranquil countryside the net effect of restrictions on car-dependent diversification that would generate traffic on country lanes and cause light pollution is continuing rural tranquillity. In conventional terms, each individual refusal of planning permission will register as productivity foregone because of planning; but the continuing attractiveness of quiet lanes to walk, cycle or ride on, and dark skies and tranquil landscapes for rural tourism, is essential for the continued success of existing businesses that trade on the quality of the local environment as well as for our quality of life. Future opportunities for increased productivity from more such business are also protected. More than that, however, the benefits to society of tranquil, attractive countryside where urban visitors and foreign tourists can recharge their batteries, high quality food can be produced, historic buildings conserved and community traditions maintained for the future are incalculable in financial terms. For more information on the risks inherent in ill-advised rural development see CPRE's research report *Undermining the Land-Based Economy*: www.cpre.org.uk/resources/pub/pdfs/rural-services-and-economies/rural-development/undermining-the-land.pdf and summary *Squandering our Assets*: www.cpre.org.uk/resources/pub/pdfs/rural-services-and-economies/rural-development/squandering-our-assets.pdf (copies enclosed).

21. Similarly, CPRE's work on the effects of a new supermarket on a small town and its surroundings has shown that not only is the net loss of jobs in retailing likely to be substantial, but the wider ripples can do enormous cumulative harm to the community and its environment. The reduction in income to local shops and suppliers - often operating on the margins of profitability - can make their continued trading unviable; local shops are most likely to carry local goods (which most supermarkets do not) so their closure removes markets from small-scale local suppliers, potentially undermining their profitability; in many cases the local suppliers will either source their raw materials locally or themselves produce them, so demand for local produce will fall, forcing some farmers and growers out of business. The net results are:

- substantial loss of local businesses whose income would largely be ploughed back into the local economy;
- fewer jobs overall, with possible social security costs;
- reduced access for people to local shops (and consequent increase in traffic and emissions); and
- reduced incentives for small-scale farmers to manage the landscape extensively, with benefits for soil quality and productivity, groundwater protection, wildlife and public enjoyment.

22. This is all without considering the significant environmental and social harm arising from the sourcing and distribution methods likely to be used by the new supermarket.

23. See CPRE's *Food Webs* report (enclosed) for more details:

www.cpre.org.uk/resources/pub/pdfs/farming-and-food/local-foods/food-webs.pdf.

We plan to publish a new report updating *Food Webs* this summer.

Opportunities for improvement

24. While we believe that a strong and effective planning system is vital to society's and the environment's well-being and prosperity, that does not mean we do not think it can be substantially improved. Areas for possible improvement include :

- Urgent measures to secure more effective implementation of the Strategic Environmental Assessment Directive in practice, so that short-term measures which will give rise to serious problems in the long term are avoided and plans instead pursue options that will deliver genuinely sustainable development.
- Removing or relaxing the limits currently placed on the scope of the planning system to tackle important issues such as natural resource management (eg. the injunction against planning policy addressing issues partly also within the scope of building regulations), which artificially and unhelpfully narrow the scope of those trying to do spatial planning in practice;
- Fostering greater public confidence in the system by reforming the current bias in favour of developers with a limited third party right of appeal (eg. against approval of proposals contrary to the development plan), and restoring democratic scrutiny and accountability to strategic planning.
(See CPRE's report *Third Party Rights of Appeal in Planning* (copy enclosed):
www.cpre.org.uk/resources/pub/pdfs/planning-and-development/planning/third-party-rights.pdf.)
- Sharpening planning's ability to play a role in building markets and creating the conditions for long-term prosperity by fostering competition (eg. new use class

controls to encourage the development and retention of small shops in the face of oligopolistic practices by larger players).

- Addressing the continuing conflicts of transport and energy policy with planning, climate change, health and wider environmental objectives. Reducing the overall need and the distance goods and people have to travel, as well as changing the mode of travel used, are objectives that need to be placed at the heart of spatial planning. More mixing of compatible uses in developments would help here, but the main levels lie with other policy instruments. For more analysis of the need to co-ordinate land use with transport planning, see CPRE's report *Back Together Again* (copy enclosed): www.cpre.org.uk/resources/pub/pdfs/transport/tranport-policy/back-together-again.pdf.
- Tackling the chronic over-supply of employment land in development plans, to encourage investment in more productive use of sites. For more information on employment land and the countryside, see CPRE's report *Towards Sustainable Economic Development* (copy enclosed).
- Developing a new approach to planning for commercial and industrial development. This should make use of the increasing compatibility of employment with other uses and the decreasing amount of floor space required per employee to apply the sequential brownfield-first approach to most employment uses (the least labour intensive uses could still be located in less accessible places). This should be combined with a measure of density/intensity of employment use to maximise productivity per hectare of site developed. For more detail on this idea, see CPRE's discussion paper to ODPM on revisions to planning policy for industrial and commercial development *Draft PPS4: Planning for sustainable economic development* (copy enclosed).
- Reducing the overemphasis on speed of decision-making in local planning - which is driven by centrally-dictated assessment measures and appears to have had some perverse effects - with a more intelligent approach. This should include the use of planning timetable agreements between local authorities, applicants, statutory consultees and third parties, and qualitative performance measures of processes and outcomes in local planning.
- Addressing institutional capacity and the availability of resources. The success of any attempts to improve planning will depend in large part on the availability of the resources – human, financial, skills – to deliver it. Despite the welcome introduction of the Planning Delivery Grant, the current shortage of resources in all areas is acting as a major brake on the effectiveness of planning in achieving policy objectives. The expected tapering-off of PDG suggests these problems could soon get worse.

Win-win or trade off? - the sustainability challenge for business

25. The Review appears to assume that the pressing need is for the planning system to become more responsive and flexible better to accommodate development proposals. We hope this is not the case, but if it is we strongly suggest comparing that approach with the opposite perspective: how can development proposals be made good enough to be welcome in planning terms?

26. The ODPM Select Committee report on planning, competitiveness and productivity (4th Report, 2003), together with supporting research by Roger Tym and Partners, found no

evidence that planning stands in the way of competitiveness. This, despite hearing evidence from some of the system's most trenchant business critics, including senior CBI staff. The Committee concluded that ‘

‘Claims that planning damages the nation's competitiveness seem to have been made without evidence The 'cost / benefit' approach to planning has not only tended to focus on the easier to measure costs but has also failed to produce definitive answers, fostered anti-planning sentiments amongst those predisposed to that perspective, and delayed attention to what matters: which is making the planning system work better for business whilst staying true to its wider purposes’.

27. The Tym research found that:

‘the benefits of planning are especially hard to pin down [and] there are social and economic costs and benefits from planning aside from the economic ones, and these are very important but even more difficult to quantify.’

(See www.publications.parliament.uk/pa/cm200203/cmselect/cmodpm/114/11402.htm for the Committee's report).

28. Arguably, much of the conflict and delay that still besets the planning system is the result of development proposals not being sufficiently well informed and shaped by the policy objectives set and pursued through the planning system. This raises the need for other influences on development proposals to be redirected to complement the sustainable development aims at the heart of planning. **We therefore recommend that the Review make suggestions as to what can be done to help improve the sustainability of development proposals before they reach the planning system.** For more analysis of the issues surrounding planning and sustainability, see CPRE's report *Sense and Sustainability* (copy enclosed).

CPRE
March 2005

Questions

1. Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?

The meaning of 'flexible' is ambiguous. Planning's role is not simply to accommodate economic drivers and pressures but to steer the market in ways which deliver more sustainable development. Effective planning needs above all to provide clarity and certainty for investors and the public; if flexibility undermines this it risks doing more harm than good. The system is not responsive enough to natural resource pressure and urgent environmental threats, and needs to be applied more effectively to address these. Change to other policy levers (e.g. energy prices, the cost of borrowing, property taxation) is essential to allow planning measures to work.

A qualitative approach to economic development is the most appropriate response to the immense environmental challenges we face. At the heart of this should be a recognition of the special qualities that this country has (including a high quality built and natural environment), which can provide a sound basis for prosperity in the long term. A qualitative approach to economic development will focus on increasing prosperity per capita rather than in toto, measured using a broader range of measures than GVA on its own and recognising the role of a high quality environment and quality of life in underpinning economic activity and prosperity. See the recommendations of the ODPM Select Committee's 9th Report on Reducing regional disparities (2003):

www.publications.parliament.uk/pa/cm200203/cmselect/cmmodpm/492/49202.htm.

2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?

Further significant changes to the new system would be premature. The system could be improved (see comments in paragraphs 6 and 24 above). There are serious problems with the overwhelmingly centralist character of the new system, where national Government dictates detailed policy to districts by proxy through unelected regional assemblies. This raises particular issues for the level of detail required for successful sub-regional planning and for co-ordination of land use with transport policy. See CPRE's report *Mind the Gap: the Future of Sub-Regional Planning* (copy enclosed) for detailed examination of these issues.

3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?

See our comments in paragraphs 3, 7-12 and 25-28 above.

4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?

5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?

Planning can do much to impede or encourage investment. It can create conditions where businesses are likely to thrive and provide the basis for long term prosperity or it can exacerbate neglect, decline and blight. To do the former, it is vital to recognise the role of planning in protecting qualities which make places special and which attract investors in the first place. It is also important to recognise the profound effects that planning in one area can have upon another.

It is too early to gauge the effect of the planning reforms (see our comments above). As for further reforms to improve the effectiveness of the system, we suggest that stronger measures are needed to:

- ensure better quality development which contributes to a sense of place and community;
- make better use of existing resources – land, infrastructure, water, buildings, labour;
- secure more efficient use of land, eg. through mixed use and increased employment intensity/productivity;
- address the chronic oversupply of employment land that exists in some areas – efforts and resources should focus on bringing sustainably located sites into productive and beneficial use through refurbishment, modernisation, environmental improvements and other measures

The conflicts between sustainable development objectives and development proposals that come forward need to be addressed by bringing other signals influencing market decisions into line with planning policy objectives.

6. Is the planning system sufficiently “joined-up” with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?

No. There are large and harmful disjunctions between planning and other policy eg. the revised UK Sustainable Development Strategy (2005) on one hand and the Sustainable Communities Plan (2003) and the Air Transport White Paper on the other. The main problem at regional level is the absence of a clear understanding of which strategy ultimately takes priority; Regional Spatial Strategies, which benefit from much more robust process of public engagement and independent scrutiny, should clearly take precedence over Regional Economic Strategies. RSSs (which crucially incorporate Regional Transport Strategies) should set the spatial framework for business decisions.

7. Planning applications for major projects will typically take a considerable time to work through all the necessary stages. Do you consider the system puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could

they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?

In recent years there has been an undue emphasis placed on speed of decision making. This has harmed the quality of decisions made and outcomes on the ground. Quality of decision-making, in both process and outcome, is just as important. Larger, more complex and contentious applications will inevitably take longer to consider if they are to receive the scrutiny they deserve. We suggest the following would help to improve both the speed and quality of decision-making:

- well resourced planning departments;
- clear, comprehensive development plans and policies, with a high degree of public involvement - more likely to provide a sound basis for decisions and send a clear message to developers and investors about the type of development that is sought and considered acceptable;
- measures to improve morale and motivation within the planning profession – this is not just a question of pay but also about the role and status of planning and planners, within local government particularly, and whether planning is seen as a positive way of shaping places or a mechanical processing operation.

CPRE's joint *Future Planners* project with Demos is looking at the last of these issues in detail, and we hope to publish our conclusions later this year. The project team has made a separate, brief submission to this Review.

8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?

Given the public service role that planning plays, CPRE does not support the levying of any application fees on principle.

We are not aware of any evidence that the cost of applications deters investment, although we are aware of concern among developers that the undue emphasis on speeding decision-making leads local authorities to favour processing the bulk of smaller applications at the expense of giving full consideration to large proposals.

9. To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?

While planning controls doubtless lead to higher costs for some businesses than if they did not exist, they need to be seen in the context of the wider benefits they deliver. Business itself could do much to reduce these costs by attaching greater importance to planning policies when it devises business and development strategies and models. See our comments in paragraphs 14-23 and 25-28 above for more detail.

10. How does the planning system impact on competition, through influencing barriers to entry and exit and economies or scale? If there are areas where there is a negative

impact, how can these be addressed, while protecting other goals of the planning system?

There is scope for the planning system to be focussed more effectively than is it now on creating the conditions for competition in some circumstances, eg. by encouraging the provision of a wider range of commercial space, with a degree of protection for certain types of user such as sole traders. This approach is already being piloted in some urban regeneration projects. The benefits it could yield in terms of diversity and character should be advantageous to the economic resilience of the area as a whole, including other businesses and the wider community.

11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?

It depends almost entirely on what policies are adopted by the relevant authority, and the degree to which these are supported by other players and other policy levers. While there are examples of places which have successfully generated their own economic momentum through positive planning for distinct themes (eg. ICT, education, biotechnology, books, media), in the light of the available evidence we believe the importance of physical clustering is open to doubt.

If agglomeration of economic activity is not be left entirely to the market, regional policy and incentives have an important role to play. The continuing problem of regional disparities presents an enormous challenge to spatial planning – one that current policies are failing to address effectively. The Sustainable Communities Plan (2003) - which has been presented as an integrated national framework for planning and growth, but in fact appears to assemble in one document two distinct plans, one to stimulate further growth in the already overheated southern regions and another to manage decline in the northern regions - does little to address the problem. There are real fears it may actually make it worse, eg. by pushing for large-scale suburban growth in the East Midlands which risks undermining the prospects of success for the strategy of urban concentration and regeneration in the West Midlands. CPRE's *Even Regions, Greener Growth* report (copy and summary enclosed), www.cpre.org.uk/resources/pub/pdfs/local-and-regional-government/regional-policy/even_regions_summary.pdf highlights some of the salient issues in relation to regional disparities and the capacity of the environment to accommodate development.

12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?

In many cases no – but the problem lies just as much in the proposals coming forward, and the formative influences on them, as in the planning system itself. See our comments above.

13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?

14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?

Planning decisions need to be in line with planning policies, and these are supposed to be in pursuit of sustainable development for the long term. Any incentive structure risks simply

trying to compensate for bad quality, damaging change by making it worth communities' while in the short term to accept it – thus storing up problems for the future. It is absolutely vital that this should be avoided.

The question appears to imply that 'NIMBYist' local voices must by definition be in opposition to the wider public good. While this may on occasion be the case, it should not be forgotten that often the environmental assets and other qualities that restrictions on development safeguard are appreciated as regional and national benefits by a much wider population.

Where development is clearly inappropriate, it should not be accepted. Where it both is needed and can be accommodated without unacceptable harm to the long term interests of a community and its environment, it should be treated on its own merits within the context of national and local planning policies. Incentives for development also risk further igniting public opposition and mistrust of the planning system.

15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?

Economic development plays a vital role in helping to regenerate urban and rural areas. We recognise that there are many ways in which planning can strengthen economic performance but we would stress the need to:

- understand better how planning influences economic activities, whether intentionally or not;
- take a long-term view; and
- take fully into account qualitative factors, which are often difficult to measure, when considering prosperity and economic performance.

See CPRE's *What You Measure Matters* briefing (copy enclosed) for an example of how regional rankings change when different measures of prosperity and quality of life are used).

The priority in some areas may be counter-intuitive. For example, rather than assume we need to diversify out of low-paid sectors, such as agriculture, as quickly as possible, we need to value the contribution made by people who work on the land in managing the landscape and thereby improving the quality of the environment for public enjoyment. While in terms of GDP/GVA this sector may be very small, its contribution to the UK economy through tourism and in terms public health benefits is very significant. Overseas visitors regularly cite our built and natural heritage as a major reason for visiting this country. Environmental quality and presence of heritage, are significant factors in attracting and retaining investors, workers and prospective employers.

CPRE
March 2006