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By email and post

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Dear Ms Barker

## **BARKER REVIEW OF LAND USE PLANNING**

Thank you very much for your letter dated 24 January, 2006 inviting the CLA to provide views on the Review of Land Use Planning. We warmly welcome the wider remit you have been given to review the land use planning system.

### **Introduction**

1. The Country Land & Business Association (CLA) welcomes the opportunity to respond to the call for evidence by Kate Barker. The CLA represents 40,000 members in England and Wales. Our members both live and work within rural areas; they operate a wide range of businesses including agricultural, tourism and commercial ventures. The quality of the countryside is of vital importance to our members and frequently brings them into contact with the planning system. Most planning objectives for the countryside - economic, social and environmental - rely on landowners and managers, for their success, and thus the CLA has a special locus on such matters.

2. The rural economy makes a major contribution to the national economy: land based businesses, within the rural economy, provide the environmental and recreational benefits in the countryside that are valued by the population as a whole. The best security for rural areas is a successful and sustainable rural economy allied with a flexible, integrated and sustainable planning system with policies that all pull in the same direction.

## **CLA ANSWERS TO SPECIFIC QUESTIONS – ANNEX 1**

### **Question 1**

3. No the current planning system is not sufficiently flexible or responsive.

4. The planning system has a major role to play in ensuring economic vitality and delivering sustainable development in rural areas. Planning regulations on development in rural areas has increased in response to changes in rural life and activities thus increasing the burden on rural businesses. However, the broad principle of development control has not really changed since the introduction of the Town and Country Planning Act 1947 with its underlying theme of protection; if anything it has hardened against development, reinforced by Section 54A of the 1991 Act. However the countryside can accept a range of developments without suffering

damage. Clearer policy guidance to Regional and Local Planning Authorities is still needed to get away from the pre-conception that only a narrowly defined range of “appropriate” uses of land and buildings are acceptable – the countryside used to accommodate a more diverse range of economic activity and needs to do so again.

5. The planning system, prior to the 2004 Act, was far from fault-free. The 2004 Act has merely imposed further failings and added new ones to the system. Recent reforms to the planning system stem from the Planning and Compulsory Purchase Act 2004. ODPM constantly tout the message that the 2004 Act has made the system “transparent, flexible, predictable, efficient and effective”. Clearly ministers and civil servants must have very little interaction with the sharp end of the planning system because otherwise I think they would agree that the reforms have most definitely not been realised in practice. What has been produced is the most complex and opaque system imaginable that is totally incomprehensible to the layman and barely understood by the professionals. Professionals and firms having regular contact with the system find it daunting; it is often difficult to advise clients how best to proceed. The new system is complex and rigid, obsessed with process, difficult to predict as to outcomes, time-consuming and inefficient. It is very expensive and is failing to produce the required outcomes to meet the government’s own aims for sustainable development.

6. Yes, the planning system needs further reform if economic development is to be placed at its heart and certainly an important place to start can be made with the urgent review of PPG4: industrial, commercial development and small firms. PPG4 takes no account of the rural economy, thus we would be looking for PPS4 to contain specific mention of the rural economy and how the planning system can help to encourage inward investment into the rural economy and the profitability of rural-based businesses together with the recognition in PPS4 that all rural businesses must be allowed to modernize to survive even if this requires business expansion and new buildings (whilst taking account of environmental and landscape considerations of course).

7. Having said that, the CLA believes that it would probably be unrealistic, at this stage, to suggest that further reforms should be made to the 2004 Act. We would suggest that the new system should be allowed to bed down for a couple of years then the 2004 Act and its impacts on economic development and sustainable development should be reviewed through a Royal Commission led by an eminent Planning QC.

## **Question 2**

8. Pre-2004 the main concentration and pool of planning expertise resided at a County and large city level; County level also contained officials and elected members. Post-2004 the County element is declining rapidly and there is no certainty that it will relocate to Regional level. District councils have a more localised approach, are short on strategic understanding and are chronically short of resources.

9. The result of is that local planning lacks a sense of strategic direction and takes little account of major economic issues; local housing environmental issues being easier to deal with and more popular.

10. The calibre of planning in Regional Spatial Strategies is yet to be seen but to-date has been broad-brush and overly influenced by local political factions and a concentration on housing – but not housing or employment needs in rural areas!

11. Regional Development Agencies, who might have supplied a more independent and economically oriented influence, have proved to be tied too closely to Government. Of the Regional Economic Strategy that we have seen so far, they demonstrate good intent, but are particularly weak on delivery of economic development, especially in rural areas. We suspect that RDAs are reluctant to criticize the planning system and its inherent faults which cause many of the good intentions to fail in the long term.

12. At a regional level, CLA generally finds that there is no real link between economic development strategies and planning policies. We have experienced occasions where rural strategies have been developed but rarely implemented. This is partly due to funding but also to the fact that development plan policies do not reflect the needs of such strategies. This issue has not really been totally resolved following the creation of the RDS even though it is important that there is a link between RES and plan policies which provide for implementation.

13. The planning system has historically been founded on a balance of, what are now, the three pillars of sustainable development: economy, community and environment. However that cannot disguise the fact that planning, at policy and at decision levels, requires prioritisation; Government guidance has consistently ignored this.

14. A very clear example of this lack of prioritisation exists today with respect to housing policy which is under active and urgent review in draft PPS3. Unfortunately, and despite the CLA's repeated requests, and warnings of the implications, to ODPM, there is no parallel review of PPG4 to deal with economic development and employment land. We are now seeing local development plan documents (DPD) coming forward with detailed assessments and policies for housing, enshrined in a Core Strategy, but with no assessment or policy for employment land - a very clear example of how the aims of sustainable development are not being met.

15. LPAs have clearly received a message from ODPM that economic development and the provision of jobs has a lesser priority than housing; similarly Planning Inspectors will have received the same message and will assess the "soundness" of local development frameworks accordingly. With respect to environmental matters, national policy has increasingly favoured environmental issues at the expense of economic ones, whilst housing tops the priority for employment.

16. Previously, development plan policies have been too vague and some circumstances meaningless to guide economic development. Even where a plan policy is positive about economic development, it can be undermined by an environmental protection policy. While the CLA does not advocate a "free-for-all" with no regard to environmental protection, it does urge the Barker Review to issue guidance that encourages local authorities to identify where development policies have priority. Plan policies should clearly identify the situations where economic development would take priority.

17. But it is important that these policies are not expressed in isolation. DPDs that we have seen have separate sections on issues such as housing, economic development and environmental protection; but there is little guidance on how these issues inter-relate. There is a need for integrated planning policies to address these issue and concerns.

### **Question 3**

18. Sustainable development is a key topic for the Government and it has expended a great deal of effort over the past few years to refine the concept of sustainable development and to give it operational significance. This effort has not, so far, been very successful, certainly in the land use planning field.

19. There is a close interaction between economy, community and environment in rural areas which serves as a lesson for sustainable development elsewhere. For example, good land management from an environmental perspective produces a valuable backdrop for inward investment and tourism, but that management can only be sustainable on the back of the profitable use of land and buildings; this use generates jobs and incomes which leads to the need for housing in all rural settlements, whether remote or not; and ultimately all of the above assists in the maintenance of sustainable communities and retention of some rural services. All three pillars of sustainable development are important, but ultimately environment and community depend upon the economic pillar. Thus a healthy environment and community cannot be sustained without a viable rural economy.

20. The current system does not achieve a good balance between the three pillars of sustainable development. To date too much weight is given to environmental interests generally because they are more popular and because they are better presented and campaigned for by green lobbying bodies who are expert in these techniques; economic organisations, on the other hand, are weaker in these techniques.

21. The CLA's views on sustainable development for rural areas are set out below:

#### **Economic development**

22. The CLA strongly believes that economic viability should be placed at the heart of rural planning policy. Economic development strategies and similar documents only address some of the relevant issues. Rural businesses, most of which are small and medium-sized enterprises (SME's), are the driving force of the rural economy, generating jobs and incomes in many different ways. Rural businesses play a crucial role in underpinning rural communities and services, and in providing the means for stewardship of the countryside.

23. Unfortunately, these businesses are being undermined by urban-centric National guidance set out in Planning Policy Guidance 3 Housing (PPG3) which has had, and is likely to continue to have, a severe impact on the provision of rural employment sites. PPG3 precludes development on most greenfield sites by restricting residential development to "previously developed land". As a consequence all "previously developed land" in rural areas is vulnerable to residential development and rural businessmen have to take account of the very high value of residential land in deciding whether they can afford to purchase "previously developed land" to set up a rural business. It is increasingly difficult for businesses to re-locate since most alternative sites have been previously developed and are being sold for residential development. This is a serious and as yet unacknowledged problem which is affecting small businesses upon which the national economy is heavily dependent and will be increasingly so as large-scale business relocates abroad owing to lower labour costs and superior transport infrastructure.

24. The case for the provision of employment in rural areas is urgent. Business in rural areas should not be caricatured as comprising craft workshops and tearooms. Small businesses of every kind should be encouraged in rural areas by a flexible planning system; for example small scale industry, offices, packaging, processing,

manufacturing and distribution services and nursing homes as well as agricultural businesses. Currently, however, there is significant pressure on local authorities to turn down applications for development because they do not meet sustainable development objectives set out for example in Planning Policy Guidance 13:Transport (PPG13). But rural-based businesses, which are not located on public transport routes, have to rely on road transport and cars as there are few alternatives because of sparsity.

25. National guidance for planning in rural areas is set out in Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7) is unequivocal; development that is close to urban areas is intended to be more acceptable, while development in the more remote countryside (including for tourism and leisure) is intended to be more limited. Practically all rural businesses rely on road haulage for goods in and out and the use of the private motor car by employees as their only means of travelling to work. Whilst the CLA would not oppose the general view that major enterprises generating volumes of traffic would best be located close to urban centres, neither do we accept the notion that such activities are barred from rural locations. An increasing range of economic activity can only exist in large units and some will require (and for the viability of the rural economy should have) a rural location. Renewable energy generation sites are a case in point and some grain, fruit and vegetable processing sometimes falls into a similar category together with associated road haulage.

26. The current interpretation of sustainable development is still too narrow; there is a real danger that if “sustainable development” is interpreted only in terms of transport policy, and the need to reduce reliance on the private motor car and travel by roads generally (and this is often the case) large areas of the countryside will be denied become unsustainable. This will surely militate against the shared objective to reinforce the fragile economies of the more remote rural areas. The narrow interpretation of sustainable development by Government has become a prime example of the law of unintended consequences.

### **Cohesion of Rural Communities**

29. Sustainable communities start at parish pump level, not at regional or even District level. Community based planning commences from local needs assessments, in other words - the ‘bottom-up’ approach, not the ‘top down’ approach which has been in place for some time. This view is reinforced by the Government’s review of the planning system and in the introduction of the Planning & Compulsory Purchase Act 2004 which is considered, by Government, to be the means of delivering “sustainable communities” and places where people want to live and work. If this is the case then PPG3 Housing, which is currently “predict and provide” guidance and therefore in conflict with the new planning system, must either be updated to a Planning Policy Statement or updated to provide local authorities with guidance on providing for a “bottom up” approach to planning for housing in rural areas.

30. The aspirations and needs of rural people for jobs, housing, transport, services and leisure are similar to those of their urban counterparts. However many rural communities in the countryside feel that they do not enjoy the benefits of national economic growth, that their particular needs are not being met, and that interdependence between rural businesses, rural life and the environment are not appreciated by Government. The planning system must enable all communities to pursue their legitimate aspirations – for jobs, incomes, housing, transport, services, recreation and leisure.

31. The Government's proposals for "sustainable communities" is flawed at regional level where there are concerns about concentration of functions at this level being undemocratic, less accountable and difficult to coordinate, quite apart from adding another layer of bureaucracy, regulation and confusion.

32. Changes to the planning system, as set out in the Planning & Compulsory Purchase Act 2004, will create a new interregnum and the knock-on effects on services other than planning will be considerable. Furthermore, speeding up the process may result in less time to consider the implications of proposals to the detriment of those proposals and the vision required for complex issues.

33. We therefore suggest the Government should consider a re-think on the definition of regions, how people identify with them and what constitutes a 'local' area within which communities are more familiar.

### **Environment**

34. The question is not whether the environment should be protected, or the countryside conserved, but how. Farming remains the dominant land use in rural areas. Our most valued habitats and landscapes have resulted from the benign practices and monetary resources of successive land managers who have conserved the landscape for a variety of reasons: scientific, biodiversity, landscape, shooting, historic family ownership, historical pressures. Planning regulation can prevent undesirable action, but cannot in itself engage the active and willing commitment of land managers. The variety and distinctiveness of Britain's countryside depends on the positive decisions of thousands of individuals.

35. The future of our countryside and the economic success of our rural areas are inextricably linked. A well-managed countryside enriches the nation's heritage, but is also an attractive backdrop for much needed inward investment and tourism.

36. The environment is not a free good; its management entails resources which have alternative uses and value. The environmental value of a habitat, a landscape or an historic building must be underpinned by a public payment or an economic use. Ideally, planning policies (as set out in Planning Policy Statement 9: Biological and Geological Conservation) to conserve the richness of our flora and fauna must therefore work with, not against, the grain of rural business and must be underpinned by evidence and sound science.

37. Government should give more active consideration to the positive contributions of land-based activities to the production of renewable energy, in providing carbon sinks and to the issue of climate change.

38. From a rural business perspective, the planning system should offer greater freedom for the private sector to realise business potential within acceptable environmental criteria and, importantly recognize the role of landowners and land managers in achieving environmental objectives, rather than relying on policy prescriptions and restrictive planning designations.

39. Despite CLA's many attempts at prompting ODPM, there is still little attempt to relate PPS3 to providing a rural community with housing, employment land, services and access to them (i.e. integrated land use or mixed uses of land). There is currently a monocular focus by government on housing with little or no regard to the other elements that are essential for sustainable development, notably jobs. If the government persists in focusing solely on housing and not taking into account the

need for jobs, then clearly the government will not meet their own sustainable development objectives.

#### **Question 4**

No experience to offer.

#### **Question 5**

40. Since the 2004 Act, we have been subjected to a deluge of policy, guidance and procedural requirements flowing from ODPM. Planning policy statements (PPS), which are to replace Planning Policy Guidance (PPG), which were supposed to be shorter than PPGs, are in fact longer and much more complex. Consultations on new PPS follow a well-trodden route: the draft PPS is issued without accompanying companion guide/good practice guidance etc although it is mentioned in the draft PPS. How is anybody supposed to be able to provide a holistic, well considered response to a draft PPS when one is not provided with all the relevant guidance/information up-front? This problem was particularly noticeable in the recent PPS3 consultation when much important and relevant information, for example concerning definitions of affordable housing, was to be contained in the guidance which was not issued at the same time as the draft PPS!

41. A couple of examples of “tick-box” exercises:

(a) Sustainability appraisal (SA) was a feature of good planning without being formalised. Now it fills enormous volumes and takes the time, attention and funds of planning authorities, whilst providing a rich vein for consultants, without necessarily improving sustainable outcomes – a “tick-box” exercise.

(b) Statements of community involvement (SCI) – this is now a statutory requirement which is subject to an Inquiry before an Inspector – the Planning Inspectorate is already experiencing difficulties with the provision of timely dates for inquiries into real planning issues - another “tick-box” exercise.

42. SA and SCI are preoccupied with procedural compliance rather than with proper outcomes. Community involvement is essential to good planning but it does not require a mind-numbing set of statutory measures to ensure that it takes place.

43. What is required urgently is a radically different approach to planning policy and guidance provisions and especially to the complex “tick-box” procedures associated with it. Furthermore and we would ask the Barker Review to consider how the system can better deliver its goals for sustainable development and in particular economic development.

44. On the specific issue of rural Diversification, the rhetoric of national planning policy guidance (PPS7 Sustainable Development in Rural Areas) is positive and encourages diversification. However, the interpretation and implementation of this policy statement by some LPAs remains a problem, not least because some LPAs admit to ignoring the contents of PPS7. By the way, some LPAs are already saying that they are going to ignore the paragraphs devoted to rural housing in PPS3 (paras 30-33) which the CLA has long lobbied for and welcomed.

45. Returning to the matter of rural diversification, even where such economic development is accepted, sites tend to be restricted to within larger settlements or for small-scale uses. The dilemma is that while the need for economic development is recognized, there is a concern that success will lead to unacceptable growth. It is this fear of expansion that is considered to be sufficient justification for planning

application refusal. Other authorities, and many green-campaigning lobbyists, reluctant to accept that rural areas can accommodate economic development at all. It is felt that any form of activity will be harmful to the environment and contrary to the objectives of sustainable development! This opinion is backed up by research (Rural Development Commission 1999) which identified the following conflicts and tensions when dealing with economic development in rural areas:

- The provision of rural employment and a Government aim for reducing the need to travel (see PPS7);
- Reluctance by LPAs to accept that a range of businesses can fit into a rural area;
- Restrictive definitions of small-scale employment use.

46. What is required is the reintroduction of the presumption in favour of development in the countryside – but development that is well designed and of an appropriate scale that takes account of environmental and landscape considerations. We would suggest that the Barker Review considers this very strongly in its conclusions.

### **Question 6**

47. The CLA constantly lobbies for integrated planning policy at a national, regional and local level. It is clear that the message given out at a national level is that planning policy is not to be integrated and this is demonstrated in the paragraphs below.

48. We do not deny that there is a need for additional housing; there is a need for market and affordable housing in rural settlements just as much as in urban towns and cities. However, we consider that it is a mistake to focus solely on housing without at the same time assessing and planning for other essential features of sustainable development, such as jobs. OPDM may point to its policy on sustainability as making that point, but the outpouring of ODPM housing policy and general pressure on LPAs means that that balance is not secured in practice.

49. The CLA strongly believes that economic viability should be placed at the heart of planning policy. Rural businesses, many of them SMEs, are the driving force of the rural economy generating jobs and incomes in many different ways. Rural businesses thus play a crucial role in underpinning rural communities and services, and in providing the means for stewardship of the countryside.

50. Unfortunately these businesses are being undermined by national policy guidance set out in PPG3:Housing which is having a severe impact on the provision of rural employment sites. PPG3 precludes development on most greenfield sites by restricting residential development to brownfield land. The content of draft PPS3 does not suggest that this impact will be resolved.

51. As a consequence all brownfield land in rural areas is vulnerable to potential residential redevelopment and rural businessmen have to take account of the very high value of residential land in deciding whether they can afford to purchase brownfield to set up a rural business. It is increasingly difficult for businesses to re-locate since most alternative sites have either been previously developed or are being sold for residential re-development. This is a serious and as yet unacknowledged problem which is affecting small businesses upon which the national economy is heavily dependent and will be increasingly so as large scale business locates abroad owing to lower labour costs and superior transport infrastructure.

52. We have requested that this problem is acknowledged by OPDM in PPS3 and that consideration is given to greater policy flexibility in rural areas. Rural settlements need a mix of housing and employment sites; this becomes even more important if a local needs assessment raises these needs. Many rural settlements will not have enough brownfield land to accommodate both housing and employment sites and clearly some choice therefore has to be made as what the land will be used for.

53. At the moment there is, as a result of policy guidance set out in PPG3 and PPS3, a presumption in favour of housing on brownfield land. We have requested that ODPM draws back the severity of PPG3 as it relates to certain aspects in rural areas and that PPS3 is redrafted to indicate that its application to rural areas requires special thought that will differ significantly from its application in urban areas. In particular there should not be a presumption in favour of housing as opposed to commercial use. This action may help to bring the land within the reach of rural businessmen and women seeking to set up a new business or expand an existing one.

54. ODPM must indicate that LPAs must encourage mixed use development (to include some employment uses) – not only is employment crucial to the economy and hence the attainment of sustainable development, but proper employment provision must be made for the expansion of existing businesses and inward investment; that must include a choice of sites suitable for a variety of businesses. If not then we are likely to end up with unsustainably banishing industry to the periphery of conurbations and pricing locally needed businesses out of towns and cities – in short we turn towns, cities, growth areas into dormitories with many residents commuting long distances to these areas where “industry” is permitted to locate, or into London, M4 corridor etc.

55. CLA requested that PPS3 should not be issued without parallel attention given to PPG4. In other words PPG3/PPS3 should not be revised in isolation of PPG4. The policies in PPG3/PPS3, PPG4 and PPS7 must be consistent one with the other if rural areas are to remain viable.

56. Clearly we were unsuccessful. We are now advised by ODPM that PPG4 will be reviewed following the conclusions of the current Barker Review.

### **Question 7**

57. An example of not only a major project but also, with respect to Question 8, the cost implications involved: A proposal for a new nuclear power station, or any power station for that matter, will require Strategic Environmental Assessment at Regional/Local level, but will also require an Environmental Impact Assessment at site level. Does it really make economic sense to have undertake, in effect, two environmental assessments? We would suggest that the system needs simplifying.

58. If one asks the question “Has the environment for business got better or worse over the past 5 years?” the response would be that the environment for business is worse and the main culprit is the planning system. The planning regime in this country creaks at the seams. It was created in 1947 for a different society with different needs in a different world. The planning system is now trying to deal with the fourth-largest economy in the World which is trying to beat China. Nothing has changed in the past 6 years. The planning system is worse; it is expensive, unpredictable, and slow and the quality is poor. It is a huge inhibitor to productivity enhancement in this country.

59. The planning system is failing to deliver the infrastructure that the UK needs in order to compete in the new globalised economy. It is ill-equipped to deliver a new port, a new runway at an airport, building a bypass, providing new railways. The planning regime is serving the UK badly and up to now there has been little political will to change it.

#### **Question 8**

60. With respect to all of the foregoing, it is currently difficult to quantify the effect the planning system is having on the economy. However the costs are likely to be considerable both in terms of costs incurred and also perhaps even more important in terms of opportunities foregone because of uncertainty and delays.

61. Colin Byrne, Director of Planning at ODPM, has clearly recognized the sheer complication that now exists when one makes a planning application. He commented that this complication had been brought home to him, in the 6-7 weeks he has been in the job, when he reviewed the Standard Application Form and its requirement for vast amounts of information from the applicant. This information will require the use of professionals to provide (e.g. FRA, EIA, etc) thus incurring higher fees for a "small" applicant who in the past was not required to provide this type of information.

#### **Question 9**

62. Please see our comments in the foregoing.

#### **Question 10**

63. There are flaws in the system which constrain business, especially small and medium sized enterprises (SMEs) in rural areas especially.

64. What is not recognized by the planning system is the burden it places on SMEs. This impact is clearly misunderstood at national level, as evidenced by Partial Regulatory Impact Assessments in draft PPSs which generally and clearly state that the draft "PPS is unlikely to have much effect on SMEs". Very often the draft PPS has been drafted without having rural-proofed its contents (PPG3 is an example that is used throughout this response) and thus the impact of urban-oriented planning policy on rural areas, and rural businesses, is ignored.

65. SME interface with the planning system is largely at a much different level than, for example, large multinationals who interface with the system at a completely different higher level. Thus the impact of the planning system on SMEs is proportionately much larger. The cost of planning fees and professional fees for the paraphernalia that now surrounds a planning application, is proportionately much higher for an SME than it is for a multi-national. If one takes into account that the largest number of business start-ups is currently taking place in rural areas, you can see why a more simplified system and application process is required for SMEs, including rural businesses.

66. SMEs are less able to contest the system, owing to the overall costs involved. Certainly in rural areas, owing to the artificial residential premiums now paid for all brownfield sites that have been designated for employment use, this prevents small businesses from breaking into the market. We know of at least one CLA member who runs an agricultural machinery business who is unable to set up a second dealership owing to the premiums that are now required to be paid for brownfield land.

#### **Question 11**

67. Enterprise hubs have been set up across the country. To what extent the planning system has aided the creation of these hubs is a moot point. The planning system pays lip service to fostering innovation but then applies the brakes or the proposed hub is the subject of resistance for one reason or another. In terms of rural hubs, certainly an example is West Midlands – although it is primarily focussed on local food.

### **Question 12**

68. LPA's generally do not have the skill and resources to promote sustainable economic development. However the local authority's Economic Development department should have the necessary skills. In the 1990s the National Planning Forum advocated the "Development Team Approach" – this provided the opportunity for a multi-disciplinary team to deal with proposals, applications, appeals etc at the same time. This type of approach should reduce delays, duplication of effort and costs. The DTA appears to have quietly been dropped, but now the CLA understands that the Planning Advisory Service have resurrected the idea, albeit under a different name.

69. Nobody is advocating an economic development 'free-for-all', but we do suggest that the Barker Review may be able to give a steer on some sort of DTA to assist LPAs with the economic decisions on a planning application.

### **Question 13**

70. Please see our comments under Question 5 concerning SCI and our comments under Question 10 about the different levels of interface.

72. It is likely that SCI will not take into account representation from SME. Firstly a small business does not have the time nor resources to constantly be able to respond to SCI in order to be representational. Small businesses do not employ specific people to deal with the planning system – why should they devote scarce time and resources to "talking shops". SMEs are out there to work and make a profit, as does any modern business. Why should they have to keep a constant eye on the planning system? They expect the system to provide them with the flexibility to be able to modernize and expand, as does any modern business. They do not expect, and cannot afford, to constantly find time and money to monitor the planning system.

73. The composition of all RDA and RPB is weak in terms of SME representation at this level. Is there a Chamber of Commerce, CBI or FSB representative on each RDA and/or RPB?

### **Question 14**

74. There is a sustained need to educate communities that a healthy economy is essential not only to provide and sustain living standards but also to provide for standards of environmental care that communities expect. The green lobby have been successful in obscuring the message that economic development pays for social and environmental goods. It would be helpful if the Barker Review could re-establish the principle that social and environmental goods are underpinned by successful and profitable economic development.

### **Question 15**

75. The new planning system, set out under the Planning and Compulsory Purchase Act 2004, should achieve the aims set out through its principal instruments of integrated planning policy; for example, PPS1, PPS3, PPG4, PPS7, PPG13 etc, Regional Spatial Strategy planning and Local Development Frameworks on the one hand and development control on the other, according to the following guidelines:

- The system should, through planning policy and the new spatial strategies, clearly guide local planning authorities to produce Local Development Frameworks that encourage a mix of economic development in rural areas. The particular circumstances of the countryside can be respected by promoting well designed and suitably (including for use) scaled developments, not by arbitrary restrictions on the type of development that can take place in rural areas. Thus planning policy, spatial strategies and Local Development Frameworks should not restrict the mix of development in the countryside. Nor should policy, strategies and Local Development Frameworks limit the location of development to public transport routes, because so much of the countryside and its economic success will always be dependent on the car and road based freight transport. Development control should fully reflect this positive approach and the specific guidelines above in particular.
- The planning system should promote and provide for a sufficient infrastructure of employment sites, transport, housing, public and private services, to support healthy rural communities.
- Environmental stewardship is best achieved with the willing and active commitment of land owners themselves; the costs to them of stewardship and its value to the wider public should be fully recognised. The planning system cannot achieve positive environmental stewardship through the negative instruments of restrictions and designations; such positive action can only be achieved through economically viable rural business. Not only the environment, but also the local economy and communities, will benefit from this more positive approach.
- The planning system should actively encourage a greater mix of economic development in the countryside, including rural tourism and other new uses of land and buildings.

## **CLA CONCLUSIONS**

76. The countryside is a mosaic of economic activities, each with a contribution to make to the whole. The pattern of that mosaic is dynamic and thus continually changing; new businesses must continue to be encouraged to come into the countryside to provide new sources of income and employment; these businesses may be based on manufacturing and services, tourism and equestrian activities. The mosaic of rural activity extends beyond the economic. The rural economy, management of the countryside, the health of rural communities, the vibrancy of the economy, provision of services – all make up one picture and all depend on one another.

77. In the past, the planning system has been used too much as a brake on economic development in the countryside in the belief that this is the best way to support communities and the environment. There is now a growing acceptance that economic success, the health of communities and environmental stewardship are interdependent. Thus a planning system that seeks to achieve its objectives for communities and the environment by an unbalanced emphasis on restricting economic development will fail, and will fail those communities and the environment it is intended to support. Without economic development, communities and the environment cannot be supported and the system, therefore, is unsustainable, failing the Government's main objectives.

78. CLA believes that the planning system must now be approached in a different way, as a positive and flexible instrument to promote economic development,

communities and environmental stewardship. For sustainability to be achieved, the same principles of working with the grain of rural business should be pursued in relation to the impact of planning on community development and environmental stewardship as on economic development.

79. Following our meeting with you concerning rural housing supply, I know our President, David Fursdon, and I would welcome the opportunity to meet you again to discuss further the issues raised in our response on the impact that the planning system is having on economic development in rural areas. If you agree, I will ask Carol Brown, of David Fursdon's office to get in touch with your office to find a mutually convenient date and time.

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