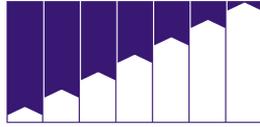


CEDOS



Chief Economic
Development
Officers' Society

Working for Economic Development

Department for Communities & Local Government: Consultation on Draft National Planning Policy Framework

CEDOS views

October 2011

Chief Economic Development Officers Society

The Chief Economic Development Officers Society (CEDOS) provides a forum for Heads of Economic Development in upper tier local authorities throughout England. Membership includes county, city and unitary Councils in non-metropolitan areas, which together represent over 47% of the population of England and provide services across over 84% of its land area. The Society carries out research, develops and disseminates best practice, and publishes reports on key issues for economic development policy and practice. Through its collective expertise, it seeks to play its full part in helping to inform and shape national and regional policies and initiatives.

Department for Communities & Local Government: Consultation on Draft National Planning Policy Framework

Response by the Chief Economic Development Officers Society (CEDOS)

1. CEDOS welcomes the invitation to offer suggestions and comments on the draft National Planning Policy Framework. With our national economic development remit, we have a very clear interest in the planning process and its role in enabling and facilitating sustainable economic development growth. We are very pleased to take the opportunity to respond to the consultation and put forward the Society's views, which have been formulated in the light of consulting with our members from across the country.

2. In addition to setting out our overall views, we provide detailed comments and suggestions on those aspects of the National Framework that relate most directly to economic development and as requested we have focused in particular on the relevant questions set out in Part 3 of the consultation document.

CEDOS – OVERALL VIEWS

3. We welcome the aim of the draft National Planning Policy Framework (NPPF) to help simplify and streamline national planning policy into one document. The focus on key principles and policies has the potential to make an important contribution to the localism agenda.

4. We strongly support the statement that the Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. We support the 'presumption in favour of sustainable development', whilst recognising the importance of achieving a balance between economic, environmental and social considerations. In this context, there is a need for a clearer national definition of 'sustainable development', whilst at the same time allowing scope for local interpretation in the light of local objectives and priorities.

5. We agree that the planning system has a key role to play in rebuilding Britain's economy. However, whilst planning can enable and facilitate, it alone will not ensure that the sustainable development needed to support economic growth takes place. A reformed planning system needs to be accompanied by a pro-active local approach to promoting economic development and regeneration, with local authorities and their partners in Local Enterprise Partnerships having the resources and powers to achieve this.

CEDOS - DETAILED COMMENTS & SUGGESTIONS

Delivering sustainable development (Questions 1a and 1b)

6. CEDOS supports the 'presumption in favour of sustainable development' and the recognition that its delivery has economic, social and environmental components, which should be pursued in an integrated way where possible looking for solutions that deliver multiple goals. We strongly support the emphasis given in the Framework to planning for economic growth. At the same time, we recognise the

importance of achieving a proper balance between economic, environmental and social considerations. We believe it would be helpful if this is made clearer in the final version of the NPPF.

7. There are concerns, particularly in areas where there is no local plan, at the statement that “decision-takers at every level should assume that the default answer to development proposals is yes” (Draft NPPF paragraph 19). In this context, it is recommended that the final version of the NPPF provides clear guidance on defining what is meant by sustainable development whilst at the same time, in the spirit of localism, ensuring there is the necessary flexibility that allows local objectives and priorities to be taken into account.

8. In terms of economic development, we strongly support the statement that the Government’s top priority in reforming the planning system is to promote sustainable economic growth and jobs. It is important to recognise, however, that whilst an effective planning system will facilitate sustainable economic development, it will not on its own, ensure its delivery. To do this, local authorities and their partners in the new Local Enterprise Partnerships will need to have the powers and resources to take a pro-active approach to promoting economic development and regeneration, including supporting the provision of the infrastructure necessary to underpin economic growth and regeneration. The role of planning in helping to achieve effective regeneration of both urban and rural areas needs to be made clear in the NPPF.

Plan making (Question 2a)/Joint Working (Questions 2c/2d)

9. CEDOS welcomes the statement that planning should be genuinely plan-led, with plans based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Given the emphasis on planning for economic growth, we consider that the section on the evidence base to be used (NPPF paragraph 27 et seq) should include a specific reference to Local Plans being informed by the Local Economic Assessments.

10. We welcome the strengthening of the duty to co-operate through the Localism Bill and agree about the importance of co-operation on planning issues that cross administrative boundaries. However, in our view, the exclusive focus of the plan making section of the Draft NPPF on local plans could lead to a strategic vacuum in some areas, which could risk impeding economic growth. Particularly in 2-tier areas, we agree with the view of the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) that local plans are only part of the solution to deciding how to facilitate and accommodate economic growth. A more strategic approach, which can extend beyond the boundaries of local planning authorities, is needed – one that reflects the approach taken by Government in approving Local Enterprise Partnership areas based on natural economic geographies.

Business & Economic Development

Questions 5a/5b

11. CEDOS strongly supports the objectives set out in paragraphs 71 – 72 of the Draft Framework and the overall ‘planning for business’ policies set out in paragraphs 73 – 74 and those specifically in support of the rural economy in paragraph 81.

However, we are opposed to the proposal (paragraph 75) that 'planning policies should avoid the long term protection of employment land or floorspace'. A reserve of such land is essential to facilitate the start-up and expansion of local businesses and to ensure key sites are available to attract major inward investments.

12. The proposal in paragraph 75 makes specific reference to 'market signals'. Paragraph 21 of the consultation document goes further stating that the Government "wants to ensure that the planning system is more responsive to changing economic conditions. Market signals, such as the price of land, can play a role in indicating relative demand for different uses of land in both plan making and decisions on planning applications". Jointly with ADEPT we have already set out our serious concerns at the over-reliance on market signals, in particular land prices, in our response to the recent consultation on the proposal to relax planning rules for change of use from commercial to residential¹.

13. Clearly there has to be a realistic prospect of identified employment land/floorspace being used for employment. However, the support in the Draft NPPF for alternative uses on employment land allied to the proposal to relax planning rules for change of use from commercial to residential could seriously undermine local economies where business is in competition with other potentially more lucrative land uses such as housing. This could put at risk economic recovery and growth in many areas of the country.

Town centres (Questions 6a/6b)

14. CEDOS welcomes the emphasis in the Draft NPPF on promoting the vitality and viability of town centres. However, whilst the Draft Framework refers to town centres accommodating commercial uses, we are concerned that offices are not specifically referred to. Given the importance of delivering sustainable economic development, there should be a requirement for office developments to be covered by the sequential approach set out in paragraphs 77/78.

Transport (Questions 7a/7b) and Communications infrastructure (Questions 8a/8b)

15. CEDOS considers these sections of the National Framework should be strengthened to underline the importance of the role of transport and communications infrastructure in underpinning and acting as a catalyst for economic growth.

¹ Department for Communities & Local Government: Consultation on relaxation of planning rules for change of use from commercial to residential – ADEPT/CEDOS response June 2011