

# **Draft Planning Policy Statement 4 “Planning for Prosperous Economies”**

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**A response by the Royal Town Planning Institute to  
Draft PPS4 Planning for Prosperous Economies, May 2009**

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**RTPI**

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## Contents

	<b>Page</b>
1. Introduction.....	2
2. Section One: General Issues.....	3
3. Section Two: Comments on specific aspects of policy in draft PPS4 .....	7
4. Section Three: Response to consultation questions.....	10
5. Nations Considerations .....	15

# 1. Introduction

The Royal Town Planning Institute is the leading professional body for spatial planners in the United Kingdom. It is a charity with the purpose to develop the art and science of town planning for the benefit of the public as a whole. It has over 22,000 members who serve in government, local government and as advisors in the private sector.

This document responds to the Department for Communities and Local Government's consultation on draft Planning Policy Statement 4 "Planning for Prosperous Economies".

The response has been formed drawing together internal consultations and the results of meetings with members.

The response is in three parts. The first addresses some issues with draft PPS4 not specifically raised by the consultation questions, the second gives comments specific to the policies in the draft PPS, and the third responds directly to the consultation questions.

## 2. Section One: General Issues

### *Overview*

1. The RTPI's response to the consultation on draft PPS4 is framed within the context of the government's stated intent of streamlining the planning system in England, making policy more strategic, clearer and shorter and distinguishing it from practice guidance.
2. The RTPI considers that in many respects, the ideal outcome of this intent would be a single, integrated planning policy statement for England, taking a similar approach to those now developed for Wales and under development in Scotland. Such an approach has the merit of supporting a much clearer relationship between generic policy and spatial policy such as is found in the Wales Spatial Plan or the Scottish National Planning Framework.
3. An alternative approach is to have a suite of focused, topic-specific policy statements, operating within the context of an over-arching strategy or set of principles.
4. With either approach, it is essential that a rigorous approach is taken to ensure that individual policies:
  - do not conflict;
  - do not duplicate each other;
  - are cross-referenced where appropriate;
  - are not lost in the act of consolidation, unless a conscious decision is taken to repeal them; and
  - are incorporated within a clearly identifiable document or section that is meaningful to the user.
5. On balance, the RTPI considers that draft PPS4 makes a valiant effort in moving towards the intended integration and streamlining of national planning policy. In particular, great advances have been made in focusing on policy, rather than practice guidance, and in clearly distinguishing between policies for plan-making and development management.
6. However, there remain questions as to whether the consolidation of policies into draft PPS4 responds fully to the intention to streamline planning policy. It would seem that there is a debate to be had on which approach to the structure of national planning policy should be followed. This debate has been partially broached in draft PPS4, and some of the consultation questions are seeking views as to the success of the approach taken, with the clear intention of taking this forwards in future PPS reviews.
7. The integration and co-ordination of policies, in terms of addressing the "rigorous approach" outlined above, has not been entirely successful in several respects, including:
  - whether users will necessarily expect a document entitled "Planning for Prosperous Economies" to include policies on issues that are not necessarily economic in nature, including arts, culture, rural development, and non-residential parking standards (noting that within the new planning system, with increasing reliance in development management being placed on national policies, this is particularly unhelpful to non-professional users,

and will require signposting both within the PPS system, and by hard-pressed local planning authorities);

- the extent to which the relationship between “economic development” and housing is properly addressed (see also “Housing” below);
- the lack of a resolution of the issue with existing PPG4/PPS6 on the locational principles for “economic development” that does not necessarily relate to town centres, including offices and ancillary uses in employment areas, quasi-retail uses like car showrooms, and the appropriateness of “town centre uses” at other highly-accessible locations, such as public transport interchanges outside of town centres;
- clarifying the relationship between the apparent presumption in favour of “economic development” in PPS4 and the requirement in PPS1 to balance economic needs with social and environmental factors and the need to manage natural resources.

### ***“Economic Development”***

8. It is unfortunate that the PPS uses the term “economic development” to cover “development that provides employment, generates wealth or produces an economic output or product”, since “economic development” already has a broader currency as meaning the activity of promoting the economy of an area, supporting businesses and tourism, and generating inward investment, and including the activity of regeneration.

### ***“Town Centre Uses”***

9. The RTPI strongly supports the continued emphasis within draft PPS4 of the long-established “town centre first” principle of national planning policy, and would emphasise that the continued application of this aspect of policy is fundamental to the proper planning of sustainable communities.
10. The RTPI has some concerns about the definition of main town centre uses, although we recognise that this represents the transposition of an existing policy from PPS6.
11. Our main concern is with what appears to be a lack of guidance on the approach that should be taken with regard to co-locating certain uses defined as town centre uses with other uses in locations other than town centres (for example employment areas and transport nodes). This element of policy was also absent from the existing and previous combinations of PPG4/PPS6.
12. The difficulty is that the only locational policy in the guidance is the town-centre-first element of the sequential test. There needs to be a moderation of the policy to allow for appropriate levels of development necessary to provide facilities to meet the needs of and support the economies of employment areas and transport nodes, which are not necessarily co-located with town or local centres.
13. The continued inclusion of “drive-through restaurants” as a town centre use appears incongruous, for a variety of reasons, not least the fact that such facilities could encourage car-use, and necessitate relatively low-density development, inappropriate in town centres. The natural market for drive-throughs is on through routes rather than in congested centres. A drive-through restaurant on a strategic route can be argued to be providing a service to existing road users, whereas the same use in a town centre is likely only to be used as a specific destination. It might be more appropriate to include drive-through restaurants with other car-movement-intensive uses such as roadside services (see also below), appropriate policies for which appear to be lacking from PPS4 and PPG13.

14. Further attention may also be given to the town centre uses definition in terms of clarifying the types of leisure, arts and cultural activities that might be appropriate outside town centres, and what principles should guide their location; this might be more appropriate in practice guidance.

### ***Housing Issues***

15. The RTPI, along with colleagues in the Chartered Institute of Housing, are concerned that draft PPS4 fails to make sufficient links between policies for “economic development” and policies for housing. The links between these two areas of policy could be argued to be sufficiently strong to necessitate further consolidation between PPS4 and PPS3 (which would result in something very close to a single national policy document). In the meantime, there needs to be a combination of overarching policy in PPS1 and cross-referenced detailed policy in PPSs3 & 4 that covers the relationships between housing and employment policy, including:
- the need to plan jointly for commercial development alongside the homes in which workers and customers will be living, or, looking at it the other way, the need to plan jointly for residential development alongside the places in which residents will work, shop and spend their leisure time (i.e. the relationship between the economy and the location of its workforce and customers);
  - the contribution of housing construction to employment and the economy (which may be particularly significant in rural areas);
  - the balance to be struck between the immediate pressing need for housing and how this might conflict with longer term requirements to protect employment land, which may be under-utilised in the current economic climate (see note below on draft policy EC4.1(7)).

### ***Competition Test***

16. The RTPI welcomes the fact that the “competition test” has not been included in draft PPS4, and would urge CLG not to accept the recent recommendation of the Competition Commission that it should be. It is a fundamental position of the RTPI that there is no place in planning policy for a test that brings the matter of who owns or manages a property into the definition of what is a material consideration for planning purposes. To effectively enforce such a test through the planning system would require a change to the definition of “development” in primary legislation to include a change of ownership. This would have far-reaching and undesirable impacts on the operation of the planning system as a whole, which would not be proportionate to the actual impact of local monopolies on consumers.
17. If local retail monopolies are to be managed with the effect intended by the competition commission, then this needs to be implemented by means of some system other than planning control, perhaps through licensing powers, or through a capacity in the OFT or the Competition Commission to recommend and enforce retail floorspace divestment in areas found to lack competition.
18. Conversely, the RTPI is satisfied that the elements of the “impact test” set out in draft PPS4 (notably policy EC6) that relate to managing local consumer choice do provide a proportionate and reasonable framework within which to help address this issue. It must be remembered, however, that a shop is a shop in planning terms, and it may not be possible, desirable or practicable to prevent future changes of ownership that might lead to a reduction in consumer choice.

### ***Needs Test***

19. The RTPI fully supports the Communities & Local Government Committee’s conclusions that there is no case for removing the “needs test” from national planning policy on determining

applications for retail development, and commends the Committee's recommendations to the authors of draft PPS4.

20. We are pleased to note that the Committee has confirmed the RTPI's view expressed in evidence that market uncertainty means that it would be unwise to remove the test at this time, even if there was a case in favour of changing the policy in the long term.
21. The RTPI agrees with the Committee, for the reasons set out in their report, that the needs test should explicitly be retained alongside the impact tests, and looks forward to working with CLG to integrate the needs test back into the "town centre first" policy.

***Policies apparently missing from draft PPS4***

22. In addition to aspects identified elsewhere in this response, the RTPI have been unable to identify policies that would guide local authorities on the following issues important to positive planning for prosperity:
  - more explicit guidance on the location of new employment areas (building on and clarifying the principles in EC4 and in the Employment Land Reviews guidance);
  - guidance on the approach to be taken in LDFs to the quality of employment land to be provided, as well as the quantitative aspects;
  - the approach to be taken with planning for car-movement-intensive commercial uses, including petrol filling stations, other roadside services and vehicle showrooms (see also note on drive-through restaurants, above); some issues relating to this are addressed in EC23, but only in terms of assessing planning applications.

***Further action***

23. The RTPI considers that, in order to maximise the effectiveness of policies contained within draft PPS4, it may be necessary to review some of the Use Classes that to bring them up to date with the range of "economic development" uses now envisaged by PPS4.
24. The RTPI would welcome the immediate publication, on finalisation of new PPS4, of amended versions of PPS7 and PPG13 (and any other statements that might be affected by changes arising from this PPS) accounting for the changes proposed through PPS4. It should never be expected that DCLG's customers, the users of the policies, should have to keep track of such consequent changes to policy documents themselves.

### 3. Section Two: Comments on specific aspects of policy in draft PPS4

25. **EC1:** The RTPI welcomes the sound advice on developing an appropriate evidence base at both regional and local levels. The emphasis on the use of data that is already available or collected for other purposes is particularly welcomed. In order to fully implement the streamlining intentions set out in the Planning White Paper, some aspects of this policy, including Annex B, might be better set out in practice guidance accompanying PPS4 (see also response to CQ3).
26. EC1.4 and EC1.5 may be expressing practice guidance rather than policy.
27. **EC2:** See response to CQ8 below.
28. **EC4: Rural areas/countryside:** The wording of the introductory sentence to EC4.1 could be interpreted as meaning that the policy is intended to apply only to rural areas (although the RTPI recognise this is not the case). We suggest that this is reworded as “Through their local development frameworks, local planning authorities in both urban and rural areas should:”, and then reword point 1 as  
“positively and proactively encourage sustainable economic growth, in line with the principles of sustainable development and taking account of the need to protect the countryside, based on a clear and proactive locally specific economic vision and strategy.”
29. Protection of the countryside should not be qualified with reference to “rural areas”, as this might mean that local authority areas classified as “urban”, but which include countryside, could be argued not to need to protect their countryside; furthermore, the need to protect countryside outside of an urban area may also be a material consideration.
30. **Live/work units:** We have received reports from some parts of the country of a marked increase in enquiries for speculative live/work units in the countryside. There is a concern that unqualified support for live/work units in the countryside in PPS4 could result in housing development contrary to normal housing policies where, after a few months of the units not being let or sold, the developers will apply for a change of use to “normal” housing, which could be to the detriment of established policies for housing, employment or the protection of countryside. The RTPI would not support policies that give preferential treatment to live/work units, but if there is to be support in PPS4 for live/work development separate from normal policies for housing, there needs to be some kind of test, perhaps similar to the “rural exceptions” housing policy, and developments should also be subject to controls limiting future changes of use.
31. **Protecting employment land:** The RTPI is concerned that point 7 of EC4.1, taken at face value, could lead to the irrevocable loss of valuable employment land being protected for the long term economic prosperity of an area, especially at a time when there is a rigorously-expressed need for housing delivery, and a particularly slow economy. We suggest that this clause should, at the very least, be qualified with regard to the suitability of the site for employment use in the longer term, the appropriate recycling of buildings, and the potential for temporary alternative uses during periods of under-utilisation.

32. **EC5:** This policy does not place sufficient emphasis on the designation of new centres. The examples given of circumstances appropriate to the designation of new centres (“identified growth areas and proposed eco-towns”) are appropriate to regional planning (and do, in fact, replicate policy EC3). At a local scale, however, new centres could be required as a result of much smaller-scale changes, including cumulative effects of development over time. Guidance should also be given with regard to the designation as local centres of existing shopping facilities that are not designated as centres; this might apply for example where an existing out-of-centre supermarket that is well-served by public transport could be enhanced to become a district centre through redevelopment as a mixed-use scheme with residential and community uses.
33. **EC6:** See “competition test” above.
34. **EC9:** See responses to CQ4 and CQ10, below.
35. **EC10:** The RTPI is concerned at the inclusion of this policy in draft PPS4 in two respects. Firstly, we consider that the policy sits uncomfortably within a policy statement on prosperity, because (a) it is more appropriately a transport policy, and (b) many of the uses to which it relates are not necessarily “economic” uses, since it applies to hospitals, schools and places of worship for example. The policy may therefore be difficult for users to locate.
36. Secondly, the RTPI is concerned that the removal of national standards for non-residential parking will lead to undesirable consequences.
37. There is no need for all local authorities to undertake repetitive, detailed and resource-intensive research to underpin their local parking standards, all of which would be challenged by developers and/or community groups locally, leading to an unnecessary burden on all concerned, including the Planning Inspectorate. It would be more practicable to retain national maximum standards, since there is no reason why a hospital in Coventry needs more spaces as a maximum than a hospital in Tunbridge Wells. Local authorities could choose how to reduce from the national maximum according to accessibility (although guidance on this would also be welcome) and could deviate from the standards entirely, through the LDF process, if they wanted to produce evidence as to why they should.
38. Removing national standards may also result in competition between authorities seeking to attract “economic development” by introducing increasingly liberal parking requirements, which would run counter to sustainability goals.
39. **EC11:** EC11.2 may be better set out in practice guidance.
40. **EC13:** The policy refers to the “rural economy”, previously stated not to exist.
41. **EC14:** The policy title includes “local development frameworks” but is a development management policy. (There is no equivalent policy for plan-making.)
42. **EC15:** The policy also includes “local development frameworks” in the title, but gives guidance on policy-making, and should therefore be relocated into the plan-making section; there is no equivalent guidance for development management decisions.

43. **EC18:** This policy reads like practice guidance, but appears to include some elements of policy. Its wording should be re-examined.
44. **EC20:** The policy refers to the “rural economy”, previously stated not to exist.
45. There appears to be a discrepancy between EC20.1(1) and EC20.1(3)(f) about the time over which an impact assessment should apply (being 5 years from the implementation of a proposal or 5 years from the time of application, respectively).
46. **EC21:** See response to CQ7.
47. **EC23:** This policy gives some guidance on determining applications for some uses ancillary to other forms of development; there is, however, no guidance on how to determine whether the use is ancillary (or signposting to other guidance). The policy might be complemented with a plan-making policy addressing similar issues.

## 4. Section Three: Response to consultation questions

***CQ1. Do you support the consolidation and streamlining of national planning policy on economic development into a single policy statement? What do you think are the costs and benefits of the approach?***

48. For a comprehensive response, please see the RTPI's response under "overview" above.
49. In terms of the costs and benefits of this approach, the true benefits of consolidation will only be properly felt if all key national planning policies can be rolled into a single document, as is being attempted in Scotland, Wales and Northern Ireland.
50. The benefits of consolidation are:
- clarity for the users of the policy;
  - reduced risk of duplication;
  - reduced risk of conflict between policies;
  - increased ease of cross-referencing between policies.
51. These benefits can be felt, at least partially, with a partial consolidation as is the case with draft PPS4, subject to the rigorous application of the principles set out at para 4 above.
52. Although it is argued (in relation to LDFs, for example) that a suite of separate but related policy documents is more flexible and easier to update than a single consolidated document, the RTPI is not convinced that this is necessarily always the case. A minor change is just as easily made to a single large document as to a small one, but any change that has knock-on effects with other policies is much easier to manage within a single document.

***CQ2. Does the draft Statement include all that you understand to be policy from draft PPS4, PPG5, PPS6 and PPS7? If not, please be specific about what paragraphs in any of these documents you feel should be included in this document? Please can you explain why this should be the case?***

53. The RTPI have not been able to undertake a full paragraph-by-paragraph analysis of all these PPGs/PPSs (and, in addition, PPG13) and the draft practice guidance.
54. However, the RTPI is concerned about the relationship between this PPS and the residual parts of PPS7. For example, replacing objectives (i)-(iv) of PPS7 would appear to demote or remove the objectives of:
- raising the quality of the environment in rural areas;
  - protecting open countryside, including valued landscapes and environmental resources, for the benefit of all;
  - preventing urban sprawl;
  - providing opportunities for urban and rural dwellers to enjoy the wider countryside;
  - promoting a sustainable, diverse and adaptable agricultural economy.
55. Such objectives must be maintained within PPS7 as they influence policies for development in rural areas not limited to "economic development".
56. Agriculture, as the biggest land-user in the economy, is conspicuous by its absence from draft PPS4, except insofar as non-agricultural development as part of farm diversification is

concerned. While much of agriculture and forestry activity benefits from permitted development rights, this is not true in all cases, and many of the activities that support agriculture and forestry are subject to the need for management through planning.

57. As noted above under “further action”, it would be helpful to users if CLG were to republish PPS7 as proposed to be amended by draft PPS4.

***CQ3. Other than where specifically highlighted, the process of streamlining policy text previously in draft PPS4, PPS6 and PPS7 to focus on policy rather than guidance is not intended to result in a change in policy. Are there any policies which you feel have changed in this process? Please tell us what you think has changed and provide alternative wording that addresses your concerns.***

58. The RTPI has not identified instances of policy being amended through the streamlining process.

59. However, there are instances where what appears to be practice guidance remains framed as policy. The RTPI considers that parts of the draft PPS should be re-evaluated and, where appropriate, removed from the PPS and republished as guidance. Examples of this are as follows:

- EC1.4: guidance on assessing retail and leisure need;
- EC1.5: guidance on assessing office need;
- EC11.2: while it is arguably correct for a policy to require town centre health checks, the indicators (Annex A) may well be better set out (preferably more fully) in practice guidance.
- EC18 is framed as practice guidance, rather than policy.

60. See also notes on individual policies above.

***CQ4. Does the structure of draft Statement make it easier to understand what is required at different stages in the planning process? Are there any improvements you would like to see made?***

61. The RTPI agrees that, generally speaking, a clear distinction has been drawn between policies that are intended to inform plan-making and those that are intended to inform development management decisions. Useful distinctions are also drawn between the appropriate approaches for regional and local planning policies.

62. There seems to be an argument, however, that this approach has led to unnecessary repetition and some inconsistencies, since the goals of policy- and decision-making are the same for any given issue (and most of these are already set out in the introduction to the PPS).

63. An alternative approach that might resolve this could be to restructure the PPS by issue, with each section containing objectives, policies for plan-making and policies for deciding applications relating to that issue.

64. The RTPI considers that different options for structuring PPSs in general should be explored formally, as the approach is likely to be followed in subsequent PPSs.

65. The RTPI has identified some inconsistencies in the current approach, including the following:

- EC9.1 has been framed as a general point that could apply either to plan-making or decision, but is located within the plan-making section. There is no equivalent in the

decision-making section. This part of the policy should be re-framed to be relevant for plan-making, and an equivalent section for decision making inserted before policy EC14.

- EC14 includes “local development frameworks” in the title, but the text appears to relate to decision-making; there is no equivalently detailed advice on policy-making for re-use or replacement buildings.
- EC15 also includes “local development frameworks” in the title, but gives guidance on policy-making, and should therefore be relocated into the plan-making section; there is no equivalent guidance for development management decisions.

***CQ5. Do you think the restructuring of the impact test from the consultation draft of PPS6 achieves the right balance and is it robust enough to thoroughly test the positive and negative impacts of development outside town centres?***

66. The RTPI is satisfied that the principles of the draft PPS6 impact test have been translated successfully into draft PPS4.

67. While the RTPI supports the principle of the impact test, particularly in terms of the continued application of the “town centre first” policy, and has expressed this support in the previous consultation on draft PPS6, it has had reason to more closely examine the relationship between the impact test and the “needs test” which it was proposed to replace.

68. Additional commentary on this issue is provided under “Needs Test” above, and the RTPI commends to the authors of PPS4 the conclusions of the Communities and Local Government Committee’s report on this issue.

***CQ6. Should more be done to give priority in forward planning and development management to strategically important sectors such as those that support a move to a low carbon economy, and if so, what should this be?***

69. While it is important to examine ways in which the low carbon industry can be supported, it is a fundamental position of the RTPI that planning decisions should be made on the merits of the development, and not on the basis of who the applicant is.

70. Implications of prioritising certain sectors could include:

- unnecessarily impeding other sectors;
- reducing the attention paid to other equally important planning priorities;
- running the risk of non-priority sectors later exploiting planning loopholes through permitted changes of use under the GPDO.

***CQ7. Is the approach to the determination of planning applications set out in policy EC21 proportionate?***

71. The RTPI considers that, subject to our separate comments on the impact test, this approach is proportionate. However, some further guidance and definition is needed with regard to the meaning of phrases such as “clear evidence”, “significant adverse impacts” and “likely to be outweighed”.

72. The qualification on this point given in EC21.2 about being informed by “up to date” development plans is not sufficient in this regard. The meaning of “up to date” also needs definition, and there is no guidance as to what the approach should be if there is no “up to date” development plan.

**CQ8. Do you think the requirement for regional spatial strategies to set targets for employment land targets for each district in their area should be imposed? Please give reasons for your view.**

73. The RTPI considers that it is essential that mechanisms are established at a strategic scale to ensure that employment growth is planned for in parallel to housing growth (and, indeed, growth in infrastructure and services to support both).
74. However, experience with forecasting employment land needs would suggest that this is a particularly imprecise science, not least because the relationship between arithmetical approaches to assessing need/demand for jobs and actual land requirements is so variable.
75. The RTPI would suggest that strategic scale plans should suggest ranges of job or employment land supply figures for individual council areas (or sensible groups of areas) that can be used, in comparison with housing supply and other factors, as the basis for monitoring and as measures to be used in town centre and community health-checks.

**CQ9. Do you agree the policies do enough to protect small or rural shops and services, including public houses? If no, please explain what changes you would like to see.**

76. The issue of protecting small, isolated or rural shops, services etc. is a particularly difficult one to resolve solely through planning policy, largely because protecting such facilities is difficult if they are not viable. The RTPI welcomes recognition in the policy of the need to be flexible about proposals which are intended to improve viability of such facilities, although this should not be limited to shops and could specifically mention diversification. Further guidance could be given in the policy on the appropriateness of co-location of and co-operation between local services to aid viability and hence protect the service on offer. Examples of such co-operation can include:
- shops within petrol stations;
  - offering post office services in shops;
  - enabling an element of retail in public houses.
77. Related to consultation question 4, the RTPI notes the lack of an equivalent PPS policy on plan-making for these objectives.

**CQ10. In response to Matthew Taylor, we have altered the approach to issues such as farm diversification. What do you consider are the pros and cons of this approach?**

78. The RTPI considers that the success of PPS4 in delivering the changes recommended by the Taylor Report can only ever be partial because that report looked at the full range of issues affecting rural communities, and not just their economies. In some respects, the separation of economic issues in rural areas from other issues facing rural communities currently set out in PPS7 could be seen to be a negative outcome, particularly as there is not a concomitant consolidation of rural employment policy with rural housing policy.
79. The failure of PPS4 to relate “economic development” with housing, as set out above, could have particularly acute impacts in rural areas, where these issues are more tightly meshed.
80. The RTPI notes the lack of reference to agriculture and forestry as economic activities in rural areas in the draft PPS (see also above). The RTPI supports the approach outlined in the draft PPS to farm diversification, but have not identified a material difference between this approach and that taken in existing PPS7, and therefore seek clarification as to what aspects of the Taylor Report the authors of draft PPS4 consider have been specifically taken into account.

81. The RTPI considers that questions possibly remain to be answered about whether or not there is a case for relating “economic development” in rural areas more to rural policy than to economic policy. It is a fine line to draw, of course, but the policies in draft PPS4 seem to divide fairly clearly into those which apply both in rural and urban areas, and those which only apply in rural areas.
82. The case for consolidating rural economic issues into the general PPS4 appears to be based on the premise (as set out in both the Ministerial foreword and the introduction) that “there is no such thing as a separate ‘rural economy’”. However, the rural economy is referred to in policies EC13 and EC20, apparently contradicting with this view.

***CQ11. Do you think that the proposals in this draft PPS will have a differential impact, either positive or negative, on people, because of their gender, race or disability? If so how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.***

83. The RTPI has not identified any element of the draft PPS that would obviously have a differential impact arising from people’s sex, race or disability.

## 5. Nations Considerations

84. The draft PPS is intended to apply to England only, and the RTPI has not identified any cross-boundary issues arising from the PPS that could not be resolved reasonably.