



RTPI

mediation of space · making of place

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Patron HRH The Prince of Wales KG KT PC GCB

21 April 2016

Dear Sir/Madam,

RESPONSE TO CALL FOR EVIDENCE: Rural Planning Review

The RTPI appreciates the opportunity to respond to the Call for Evidence from DEFRA and DCLG. If you have any questions regarding our responses, please do not hesitate to contact us.

Yours faithfully,

James Harris

Policy and Networks Manager

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1. Name, role, organisation name, address / contact details

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2. Is your response on behalf of an organisation or is it a personal response?

On behalf of an organisation

3. What type of organisation / person are you?

Voluntary / Charity Sector

4. What type of development are you involved in in rural areas?

The RTPI is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The RTPI has an extensive network of members in rural areas who are involved with all aspects of planning and development management, working across the public and private sectors. The RTPI is also part of the Rural Coalition, which comprises 14 member organisations who subscribe to a vision of a living and working countryside.

5. What types of permitted development take place under Part 6 (agricultural and forestry) that you are aware of?

N/A

6. Have you been involved in the development of a farm shop, polytunnel or on-farm reservoir?

N/A

7. What were your experiences of the planning system in developing a farm shop, polytunnel and / or on-farm reservoir?

N/A

8. Is there other development which would benefit from permitted development rights?

No

10. In your view, what planning issues need to be considered for development in rural areas?

We are pleased to see that this review calls for “...evidence on how the planning system can better support rural life and invites ideas about how the planning system could further support sustainable rural life and businesses”. There are many productivity challenges facing rural communities, including the loss of affordable housing, declining local services, outward migration of skilled workers, poor transport connectivity, and the impacts of climate change. Addressing these issues requires coordinated action across a range of different areas, addressing economic, social and environmental factors as stated in the NPPF.

However the subsequent focus of the Call for Evidence is much narrower, concerned with just two elements of the Rural Productivity Plan. These include looking at “...how improved permitted development rights in rural areas can support new homes, jobs and innovation” and a review of the “...current threshold for agricultural buildings to convert to residential buildings”. These are defined as “planning and regulatory constraints facing rural businesses”, suggesting that additional deregulation is solution to increased economic productivity. However it remains our view that minor measures of this kind do little to address the serious issues of planning for housing, employment and economic growth in rural areas.

This Call for Evidence also comes at a time when the Government is pursuing a series of parallel changes to planning in England in primary and secondary legislation. Many of these will have an impact on rural areas, including the use of rural exception sites to deliver Starter Homes, changes to neighbourhood plan-making, and extension of the Right to Buy scheme to include housing association tenants. These proposals could have a significant on issues of affordable housing and infrastructure provision in rural communities, and these relationships need to be considered in the context of this Rural Planning Review.

11. In your view, are these issues given appropriate consideration in the planning process?

No.

12. If not, how can these issues be given appropriate consideration in the planning process?

The RTPI supports the view that the planning system should not be the way to control minor development, and we have always supported the existence of permitted development rights. However permitted development has a cumulative impact on issues like infrastructure and amenity, and it is important that local planning authorities are able to manage these impacts in line with the broader

strategic objectives of the rural community. Proposals for further change should recognise that proper safeguards are still needed to ensure that permitted development does not result in poor quality development, strain on infrastructure, or neighbourhood conflict. They should also consider the relationship with proposals to deliver Starter Homes on rural exception sites, which would not provide contributions to affordable housing or general infrastructure pots. More evidence is therefore needed on a) the affordability of rural housing delivered through permitted development, and the extent to which these have helped to meet the housing needs of local communities, and b) its cumulative impact on infrastructure investment and delivery, in the context of declining local service provision.

We have argued that issues of access and location need to be considered in relation to all types of development, not least rural housing. Allowing the conversion of agricultural buildings under permitted development can create a principle of residential development in locations with poor access to employment and services. In subsequent applications for development, or even prior approval applications, we believe these criteria should be factored into decision making.

Planning also helps to manage the impact of development to ensure that it does not negatively impact on the ecological, heritage and amenity value of rural areas. While mineral and waste developments are obvious examples and well regulated through minerals and waste plans, permitted development can have a significant impact on the character of a rural area over time. This includes pressures for recreational uses like equestrian activity, and conversions of agricultural buildings which can in many cases have architectural value or form an intrinsic part of the local heritage. These types of development must be dealt with sensitively, for example through Part Q of Schedule 2 of the GPDO which rightly restricts physical alterations to those that are required to make a building structurally sound for conversion. More evidence is needed on the cumulative impact that numerous minor alterations and conversions have to the character of rural areas. Further evidence is also required on the impact of permitted development rights on a range of other issues, including biodiversity and resilience to environmental risks and climate change resilience. These are important factors which affect long-term productivity, and would help to frame this review within a broader context of rural sustainability.

Previous changes to permitted development rights also reduced revenues to local authorities while providing little in the way of savings. We are concerned that any further relaxation of these rights would continue to negatively impact on local authority finances during a period of cuts. Research undertaken for the RTPI in the North West region by Arup found that there had been significant reductions in local planning authority budgets and staffing since 2010, with a third fewer planning staff overall, including a decrease on average of 37% in planning policy staff and 27% in development management staff. These cuts are now undermining economic

recovery across the region, and any further loss of revenue would have a detrimental impact.

13. Please detail any local planning authority best practice which you would like to highlight.

N/A

14. Are the current thresholds and conditions allowing change of use from agricultural to residential appropriate?

No

15. What improvements could be made to the existing permitted development right allowing change of use from agricultural to residential?

We expressed several concerns about this measure when it was introduced under the coalition government, including:

- That it contained no provisions to ensure that the homes created are affordable, or to limit occupancy to those connected to the farm or local area, creating a risk that new houses would be of excessive price and not contribute to local housing need.
- That it was open to abuse on several fronts, including on a lack of safeguards to prevent multiple subdivisions of an agricultural unit
- That the prior approval process contained insufficient incentives for the applicant to undertake mitigation measures, such as flood mitigation, if the principle of development was already established.

No evidence has been provided on the impact that this permitted development right has had on issues like the affordability of the new housing delivered, or the level of enforcement action required by local authorities to prevent abuse. We would encourage a closer analysis of these impacts before any further amendments are proposed.