

2. **CONSULTATION RESPONSE FOR GOVERNMENT'S PROPOSED CHANGES TO THE EAST MIDLANDS REGIONAL PLAN: REGIONAL SPATIAL STRATEGY (RSS) 8 (PTA/A.61442)**

Proposal

- 1 To agree a response to a consultation by the Government Office for the East Midlands (GOEM) on proposed changes to the East Midlands Regional Plan, following its consideration of the Panel Report from the 2007 Examination in Public. The consultation closing date is the 17th October 2008. This response is in line with the Authority's position on spatial and development matters as approved in the earlier response to the Draft Regional Plan (Authority Meeting December 2006 – Min98/06). Any further matters arising will be dealt with by officers in accordance with standing orders.

RECOMMENDATION:

That

1. **The response set out in Annex 1 to this report be agreed: seeking further changes to the proposed RSS8 to improve the context it provides for spatial planning in the Peak District National Park.**
2. **A personal letter be sent to the Director of the Government Office for the East Midlands to highlight the importance of achieving the best possible wording for a Regional Plan that will enable the Authority to maintain its contribution to regional and national spatial priorities in a distinctive manner.**

Policy/Legal Background

- 2 Under the provisions of the Planning and Compulsory Purchase Act 2004, regional spatial strategies replace the tier of spatial planning that used to be provided by structure Plans. The East Midlands Regional Plan is a formal part of the development plan for the Peak District National Park and local development documents prepared by the National Park Authority must conform to it.
- 3 A revision for the Regional Plan has been underway for the past 2 to 3 years, during which time the Authority (in its formal role as a strategic planning authority under Section 4(4) of the Planning and compensation Act 2004) has been represented by officers on a number of working groups, by members (currently Mrs Ratcliffe) on the East Midlands Regional Assembly's Joint Board, and by officers at the 2007 Examination in Public of the submitted plan. For further information on this work please contact the report author.
- 4 After considering responses to the current consultation (which closes on the 17th October 2008) the East Midlands Regional Plan will be adopted by the Secretary of State. Preparation of the next round of revisions (dealing with increased housing targets, transport policy, renewable energy, aggregates apportionment and coastal flood risk) is already underway. The draft project plan will be launched for consultation on the 16th October 2008, with a view to submission of a review (for Examination in Public) in 2010 and formal issue by the Secretary of State in 2011.

Key Issues

- 5 The latest revisions of the RSS8 are summarised in the overview below (paragraph 6). The detail to be included in a response is set out in Annex 1, but in summary

welcomes the return to the position where the regional plan does not put forward a housing target for the National Park, whilst retaining concern about:

- The reduced relative weight attached to the national designation for landscape embodied in the National Park and to its relationship with surrounding areas.
- Wording that causes confusion or even removes or reduces some of the distinctive policy approach available in the National Park particularly in relation to housing, strategic distribution, waste disposal and renewable energy.
- Retention of the A628 in the list of Transport Investment Priorities.

6 The Government's proposed changes to RSS8 can be viewed in full at <http://www.goem.gov.uk/goem/planning/regional-planning/?a=42496>

In summary and concentrating on the relationship to the National Park, they:

- 1) Confirm the urban concentration strategy.
- 2) Emphasise climate change as the most significant issue for the future of the region to be tackled by a coherent strategy that in particular involves policies for better design, enhanced biodiversity, managing and increasing woodland cover and carbon sinks, water resources and quality, energy and transport.
- 3) Accept the EIP Panel's advice for the Peak Sub-area to require all policies and programmes (rather than "development") to help secure conservation and enhancement of the National Park.
- 4) Direct housing towards the "*most* sustainable" locations (my italic). For the Peak Sub-area, the requirement for housing development to comply with statutory National Park purposes is maintained. The Panel's support of PDNPA's request for there to be no housing target allocated to the Park has been accepted. Housing targets for those parts of High Peak and Derbyshire Dales Districts outside the National Park are increased modestly (in line with an overall increase across the region) and more emphasis placed on their delivery of affordable housing.
- 5) Introduce some confusion and potential weakening in relation to policy for housing by treating the National Park in common with other rural areas.
- 6) Increase the number of policy caveats designed to protect designated wildlife sites and especially international designations. However, this does not appear to be the case for designated landscape (an issue to be looked at more closely before responding).
- 7) Emphasise the value of dark skies.
- 8) Draw attention to the risk from air pollution to the Peak District Dales SAC and to the South Pennine Moors SPA and Phase 1 and 11 SPAs.
- 9) Emphasise rural economic diversification, but with possible confusion (present in the earlier submitted plan) as to whether strategic distribution units might be appropriate in the National Park.
- 10) Strengthen the message that adjacent areas should help reduce visitor pressures on the National Park, BUT (inconsistently) weaken the message about conservation and enhancement given to areas outside the Peak Sub-area that about the National Park.

- 11) Emphasise the need to explore ways of minimising and mitigating the impact of tourism and leisure on landscapes and wildlife sites.
- 12) Place new emphasis on the current importance of cement production in and near the National Park and of building slate etc. However, there are caveats and the general policy of reduction in surface won minerals within the Park is not changed.
- 13) Change policy on waste disposal in a manner that removes specific (and Protective) reference to the National Park. The new policy states that locally arising waste should be disposed of within the area of each waste planning authority. This requires a response to Government to point out that this wording is contrary to the current position for the National Park and would cause difficulties for both the National Park authority and the county waste disposal authorities.
- 14) Emphasise that all Local Planning Authorities should accept much more renewable energy development, but without clear cross-reference to the (retained) strong caveat about the difficulty of accommodating large scale schemes within or close to the National Park. This may cause confusion.
- 15) Introduce clearer reference to SPITS with more emphasis on traffic pressures affecting the National Park (both cross park and tourist related) and the need for solutions. However, A628 improvements remain in the programme.
- 16) Emphasise non-car transport alternatives, drawing attention to the National Park as an area with potential for fiscal traffic management measures.

APPENDIX

Background

- 1 See Policy/Legal Background.

Resources

- 2 The report has been prepared within the capacity of the Planning Policy Team (within Policy, Research and Partnerships Service). Work on the regional dimension of spatial planning continues to require considerable attention alongside the preparation of the local development framework.

Risk Management

- 3 **The further response is required to continue to press for proper consideration of National Park Authority policies and positions in the RSS8 process.** The response has been prepared following consultation with the vice-chair of the Authority in her capacity as a member of the regional planning body.

Human Rights, Equalities, Health & Safety

- 4 This report does not raise matters thought to affect these concerns.

Consultees

- 5 The following have been consulted and their comments incorporated:
- Vice chair
 - Minerals Team Manager
 - Transport Policy team
 - Head of Policy, Research and Partnerships
 - Head of Planning

Enclosures

- 6 None

List of Background Papers (not previously published)

- 7 None

Report Author

- 8 Peter Abbott: Policy Planner

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- 9 25 September 2008