

Peak District National Park Authority

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**PEAK
DISTRICT
NATIONAL
PARK**

Ministry of Housing, Communities and Local Government

Your ref:

Our ref: LTT.PWP.JRS

By email:

Date: 28 October 2020

Dear Sir/Madam

MHCLG consultation on the Planning White Paper – Planning for the Future

Please find attached the response of the Peak District National Park Authority to the consultation on the Planning White Paper. We welcome the opportunity to respond to the consultation and we have engaged with this in a constructive way. As one of England's National Parks, we support the response that has been submitted by National Parks England on behalf of the nine English National Park Authorities and the Broads Authority. The Peak District National Park Authority is the statutory local planning authority for 555 square miles of England, covering parts of Derbyshire, Staffordshire, Cheshire, Sheffield, Barnsley, Kirkcaldy and Oldham.

Our responses to the specific questions are set out in the attached schedule. In addition to this, we wish to add the following general comments. As we endorse the National Parks England's response, this letter does not repeat everything that is said in their response of 27 October.

We agree that the current planning system is in need of reform, largely as a result of the many changes that have been made to it since 1990. Despite this, it is essentially a good system that delivers in the wider interests of the nation, the environment, the economy and our communities.

However, we acknowledge that there are areas where the current planning system could be improved and the proposals in the White Paper seek to address these. For example, as noted in the National Parks England response, the emphasis on the importance of Local Plans, speeding up plan preparation and ensuring the evidence required to support them is proportionate, the need to raise the bar on design quality and removing the duplication of national advice in Local Plan policies are all areas that we believe would benefit from reform.

Whilst there are proposals we support, there are also areas where more detail is required, as is to be expected in a White Paper. However, as noted above, there is much in the current

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Holder of Council of Europe Diploma



Chief Executive: Sarah Fowler

Chair: Andrew McCloy Deputy Chair: James Berresford

Working together for the Peak District National Park:

• To speak up for and care for the Peak District National Park for all to enjoy forever •

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system that we should respect and value. The analysis in the White Paper focuses on the problems with the current system but does not give enough credit to its strengths. In the Peak District National Park we have an up to date Local Plan and we have a good track record in determining planning applications within the 8 and 13 week targets, with over 80% being approved on average. 90% of planning applications to support small scale development that is vital to sustaining our local communities and working landscapes. Over the last 70 years we have developed a bespoke way of working that reflects the local distinctiveness and challenges of the Peak District, sitting in a unique location at the heart of the country, so close to major conurbations.

Most importantly, we deliver our planning function in a way that supports our statutory purposes and duty as a National Park Authority (see the answer to question 1). It is essential that this is reflected in any detailed proposal that follow from the Planning White Paper, as the proposals are generally silent on National Parks. We assume that is the intention of Government and that National Parks and the Broads would be afforded 'protected' status under the current proposals, but as we suggest in our responses to the detailed questions, this "broad brush" approach lacks the flexibility of the current planning system, which allows specific sites to be allocated for development ("Renewal" in the language of the consultation) in National Parks and other protected areas. We note that National Parks are not listed on page 29 of the White Paper in the areas that are "Protected":

"Areas that are Protected – this would include sites and areas which, as a result of their particular environmental and/or cultural characteristics, would justify more stringent development controls to ensure sustainability. This would include areas such as Green Belt, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas, Local Wildlife Sites, areas of significant flood risk and important areas of green space".

We would be very concerned if this is a definitive list and that it deliberately excludes national parks, given our statutory status under the Environment Act 1995; however, it may be a list that is not definitive or exclusive, so some clarity on this would be welcome.

As noted in the NPE response, any new planning system for England must be firmly rooted in the principles set out in the Government's 25 year Environment Plan and support the new land management arrangements being introduced through the Agriculture and Environment Bills. The recommendations of the Government commissioned Landscapes Review ('the Glover Review') are also relevant in considering how the planning reforms should apply to protected landscapes. Proposals to streamline and speed up the decision making process, with planning applications judged against national rather than local policies, all suggest a move to centralise and 'automate' planning decisions. Our National Parks and the Broads are exemplars in facilitating bespoke development to meet a diverse range of local needs that will be much harder to deliver through a more centralised and codified planning system, with less room to exercise discretion and planning judgment according to local and individual circumstances. Any new planning system must prioritise and support new affordable housing in National Parks rather than meeting external housing demands (as currently stated in the Government National Parks Circular 2010).

As you will see in the answers to the specific questions we welcome the principle of digital first, but we are concerned about the way this could disenfranchise people in remote rural areas that do not have sufficient broadband and mobile coverage and those without the necessary skills.

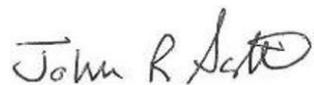
The abolition of the 'duty to cooperate' will be a retrograde step if it is not replaced by a mechanism that allows strategic and 'wider-than-local' matters to be dealt with at the appropriate level. From the Peak District National Park perspective, the duty to cooperate plays an important role in supporting the Section 62 'duty of regard' to National Park

purposes (section 62 of the Environment Act 1995). The Landscapes Review proposed strengthening the Section 62 duty with a requirement for all relevant authorities to 'further' the two statutory national park purposes; this should be reflected in the planning reforms.

We welcome the stronger emphasis on design quality but have concerns that the production of Design Codes could result in bland uniformity rather than "beauty". In the Peak District National Park we have had many years of using our Design Guides and active engagement with applicants and agents to raise the quality of built development and to promote design that respect the local vernacular and distinctiveness. As noted in our responses, a "pattern book" approach may be appropriate in some large-scale housing developments in Growth areas, but it is less well suited to the scale of development that takes place in this National Park.

Finally, it is essential that any future reforms to the planning system embed principles and processes to tackle climate change, enhance biodiversity and improve the health of our nation at the heart of the system; National Parks have a vital role to play in all of these.

Yours sincerely

A handwritten signature in black ink that reads "John R. Scott". The signature is written in a cursive style with a large, stylized 'S' at the end.

John Scott
Director of Conservation and Planning