

Written evidence submitted by the Campaign for National Parks [FPS 043]

Introduction

1. The Campaign for National Parks is the only national charity campaigning to protect, enhance and promote the 13 National Parks¹ in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places which everyone has an opportunity to enjoy both now and in the future.
2. National Parks play a vital role in sustainable development. They are home to rural communities and also support the protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses which often rely on the high quality environment of these areas for their success.
3. Many of the benefits which National Parks provide, including tourism and rural economic growth, could be lost if the special qualities for which they are valued are undermined. National Parks are, of course, living and working landscapes but the challenge is to ensure that the range of benefits that they provide is not compromised by insensitive change, unsympathetic land use or irresponsible development.
4. It is essential that the planning system provides strong support for the protection and enhancement of designated landscapes. We are concerned that the Government’s proposals for change place too little emphasis on the wider role that planning plays in delivering the statutory purposes of National Parks. Any changes to the planning system must support the commitments in the 25 Year Environment Plan and must be aligned with existing and emerging environmental legislation, including measures in the *Environment Bill* such as local nature recovery strategies.
5. Our evidence highlights opportunities to address weaknesses in the existing planning protections for National Parks by implementing some of the key proposals from Julian Glover’s *Landscapes Review*², including updating the statutory purposes and ensuring that all relevant partners from all sectors are playing their role in delivering those purposes. As well as maximising the role that designated landscapes play in tackling the nature and climate emergencies, these improvements will ensure they make a significant contribution to the economic recovery, given the importance of the environment to the economic success of these areas.

¹ This includes the 12 National Parks and the Broads, which was designated under separate but related legislation, and is commonly referred to as a National Park.

² <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>

6. We have focused on the following issues from the committee's terms of reference and many of the points we raise are relevant to both issues so we have not addressed them individually. Our evidence starts by highlighting the parts of the current planning system which are particularly important for National Parks. We then go on to discuss our concerns with the Government's proposals and highlight how the current planning system could be improved.

Q1: Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

Q6: How can the planning system ensure adequate and reasonable protection for areas and buildings of environmental, historical, and architectural importance?

Essential elements of the current planning system

7. The Government is proposing to change key aspects of the current system which have been in place for decades and which play a critically important role in the protection and enhancement of National Parks and the well-being of the communities who live in them. Having dedicated planning authorities for National Parks is a successful part of the current system and remains critically important to the protection and enhancement of the Parks and the well-being of the communities that live within them.
8. Another essential element of the existing system is that those responsible for National Parks are able to take account of both the local and national needs and ambitions for these areas. In order to for this to be done effectively, NPAs must have the right balance of locally and nationally appointed members and we would not want to see any reduction in the proportion of nationally appointed members with responsibility for planning decisions in National Parks. Not only are such members appointed to represent the national interest but they also bring specialist skills in areas such as landscape, biodiversity and heritage, which are particularly important to the work of the NPAs.
9. Having strong policies in place to prevent inappropriate or damaging development in these areas is also essential. In particular, the wording of paragraph 172 of the National Planning Policy Framework (NPPF) must be retained in any new national planning guidance or legislation. There will also continue to be a need for locally specific policies in National Parks where locally distinctive natural and built features often make a significant contribution to the landscape character of the area. For example, the Yorkshire Dales National Park Local Plan includes policies to address the conversion of field barns and the Broads Local Plan includes policies on residential moorings and peat.

Concerns about the Government's proposals

10. The Planning White Paper makes almost no reference to National Parks even though National Park Authorities (NPAs) have responsibility for both plan-making and planning decisions in their area. Nor is there any reference to landscape character, natural beauty or cultural heritage, all of which are important considerations when making planning decisions which affect National Parks. There is also insufficient

recognition in the Government's proposals of the climate and ecological emergencies we now face and planning's role in helping to address these.

11. We have some reservations and lots of questions about the proposals to define all land into one of three categories as we are not clear how this would work in practice in the context of a National Park. National Parks are not included in the list of examples of 'protected' areas given in the White Paper even though AONBs which have the same level of planning protection are listed.
12. Another big concern is the impact on the settings of National Parks if adjoining areas become 'renewal' areas or even 'growth' areas where there would be very little control over the type of development that takes place and potentially huge pressure for new infrastructure in surrounding areas to support the planned growth. There is no mention in the White Paper of how local planning authorities will be expected to take account of the 'protected areas' designated by adjoining authorities. Strengthening the duty 'of regard' as we discuss below (paragraphs 17 and 18) would help address this issue.
13. The proposed changes risk undermining the additional protection that the planning system currently affords to National Parks. Under the new proposals, there is nothing to distinguish nationally designated landscapes (National Parks and AONBs) from other areas designated as 'protected' locally. If these new categories are introduced there will need to be a way of making it clear that additional protections apply in designated landscapes.
14. A further significant area of concern relates to the proposed standard method for establishing housing requirements and we believe that this should not apply in National Parks. Attempting to deliver significantly increased housing numbers in National Parks would be in conflict with their statutory purposes and the requirement on all public bodies to have regard to those purposes. Any standardised approach must take account of the fact that there are constraints on the amount of housing that can be delivered in areas where additional planning protections apply. NPAs should instead be able to plan for small-scale development to meet identified local need in order to deliver the most appropriate form of housing for their area.
15. There also needs to be far more emphasis on tackling other barriers to increasing housing supply. Even when NPAs have appropriate policies in place, they cannot always rely on developers implementing planning permissions once granted. For example, in 2018/19 the Yorkshire Dales NPA granted planning permission for 51 houses but only 13 houses were completed – the lowest level of completions in a decade³.
16. Tackling this issue will require action from Central Government as there is currently no mechanism for local planning authorities to require planning permissions to be implemented. Consideration should be given to the introduction of some form of charge, such as a land-value tax, to incentivise developers to implement planning

³ [Yorkshire Dales NPA Annual Monitoring Report 2018-19](#)

permissions and complete developments within a certain period in order to deter land-banking.

17. Another factor which has a particularly significant impact on overall housing supply in National Parks is the high proportion of housing which is used as holiday lets or second homes. One way to help tackle this issue would be to require planning permission before allowing an existing permanent residence to be used as a second home.

How the planning system could better protect and enhance National Parks

18. While there is insufficient detail to judge some of the Government's proposals what is clear is that they are missing an opportunity to address weaknesses in the current planning system which mean that National Parks are not always delivering as much for nature, climate and people as they could be. Reform of the planning system presents an important opportunity to implement key proposals from the Glover *Landscapes Review*⁴ which would help strengthen the existing protections for designated landscapes such as ensuring that all relevant partners from all relevant sectors are taking their responsibility towards these areas seriously.
19. Although there are many successful nature recovery projects in National Parks, there are also significant problems. As set out in *Raising the bar: improving nature in our National Parks*⁵, data from Natural England highlights that a lower percentage of SSSIs are in favourable condition (25.3%) than the national average (38.5%). There needs to be far more focus on enhancing habitats, supporting species recovery and bringing protected sites in these areas into favourable condition. There also needs to be more focus on ensuring that people from all parts of society can visit and experience the health and well-being benefits of designated landscapes.
20. Glover proposed addressing this by amending the purposes for designated landscapes to ensure that they give stronger support for natural beauty, nature recovery and connecting people to nature. However, he acknowledges that amending the purposes will be subject to significant debate and discussion and further work is needed to agree the exact words and definitions to be used in order to ensure that key aspects of the existing purposes, such as landscape and cultural heritage, are retained. Updating the purposes is also an opportunity to ensure they reflect the full range of challenges that now need to be addressed, including climate change. If consensus is to be reached on the final wording in time for updated purposes to be introduced as part of the planning reforms, then the process of amending them should start now.
21. There are currently statutory duties on all public bodies to have regard to the statutory purposes of designated landscapes when making decisions which affect land within these areas. This means, for example, that a local planning authority for

⁴ <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>

⁵ <https://www.cnp.org.uk/news/raising-the-bar>

an area adjacent to a National Park should be considering any impacts on the Park when making planning decisions for areas close to the boundary.

22. However, the existing duties to 'have regard' are the weakest form of duty that can be imposed as they require only that there must be some consideration of the purposes of the designated landscape, not that any weight needs to be given to those purposes. Given the importance of designated landscapes to the nation, it is unacceptable that there are such weak duties in these cases. It is also inconsistent with the National Planning Policy Framework (NPPF) which requires that '[g]reat weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues ...' (para. 172 of the revised 2019 NPPF).
23. Glover proposes that the requirement of 'regard' to landscapes' existing purposes should be strengthened to one of 'furthering' the reformed purposes. In addition, Glover proposes introducing a statutory requirement on relevant bodies to support the development and implementation of Management Plans for National Parks and AONBs. We support both these proposals and would like to see them implemented as part of the proposed planning reforms. Strengthened Management Plans would allow the bodies responsible for designated landscapes to take a more integrated approach to land use and natural resource planning since one of the key mechanisms for delivering the priorities in the Management Plan is the Local Plan.
24. We would also like to see the implementation of Glover's proposal to review the system of Permitted Development Rights (PDRs) and to add further PDRs to the list of those which do not apply in designated landscapes. We support the appropriate change of use of buildings particularly where this helps to ensure the future upkeep of traditional buildings, and allows rural businesses to adapt to changing circumstances, But such changes need to be carefully managed, to ensure that they do not result in unacceptable impacts. This is particularly true in National Parks, where decisions also need to take account of the statutory National Park purposes, and even small changes can have a disproportionate impact. Requiring planning permission ensures that appropriate changes are being allowed while continuing to protect the special qualities for which National Parks are valued and which contribute so much to the rural economy.
25. Adopting these and other relevant Glover proposals would ensure National Parks deliver even more benefits for the nation in future. So if the Government is serious about meeting its commitments to National Parks including those set out in the 25 Year Environment Plan, it really should use the opportunity to introduce these changes as part of its planning reforms.