Executive Committee

Appendix 1

Officers' response to Communities and Local Government 'Planning Policy Statement 4: Planning for Prosperous Economies'

PLANNING POLICY STATEMENT Consultation Questions

When complete, please email to economicdevelopment@communities.gsi.gov.uk or post to Richard Canovan, Planning for Business Team, Communities and Local Government, 1/J3 Eland House, Bressenden Place, London SW1E 5DU

PART 4: Consultation Questions

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Questions on which we would particularly like your views:

Please state whether you agree to your response being made public. Yes/No

1. **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?**

   Yes ☒ No ☐

   Comment:

2. **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?**

   Yes ☐ No ☐

   Comment: No comment

3. **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.**

Yes ☒ No ☐

Comment: Policy EC1: Using Evidence to plan positively

Policy EC1.3 provides detail on what the local level evidence base should encompass. The policy refers to the need for a Local Authority to carry out a 'land review' to assess the existing and future supply of land available for economic development. In the past this work was undertaken as part of an Employment Land Review, which the Council has recently completed. There is no guidance referred to within the draft PPS as to how a 'land review' should be undertaken. Officers of the Council have been made aware, by discussions with representatives of CLG, that further information will be provided as to how these 'land reviews' are to be undertaken. It is understood, based on discussions with CLG, that regions may be responsible for producing this guidance for their area. It is considered important that if this is the case, reference should be made in the PPS, in addition to this, it is also considered important that any guidance produced should clearly illustrate how Local Authority's can easily and effectively update their recently completed Employment Land Reviews, in order to not unduly waste resources.

4. **Does the structure of the 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?**

Yes ☒ No ☐

Comment:

Officers consider that the draft Statement does make it easier to understand what is required at different stages in the planning process.

However Officers do consider that certain aspects of the Statement can be improved upon.

Policy EC4.1

In relation to site allocations the statement requests Local Authorities to ensure that sites allocated for employment purposes are not simply allocated from one Development Plan Document to a preceding document, without evidence to justify reasonable prospect of the site being taken up during the plan period.

It is agreed that sites should not simply roll on continually over long periods. However Officers consider it necessary for Communities and Local Government to provide a definition as to what is meant by 'reasonable prospect'. Officers consider it necessary for Communities and Local Government to also be cautious with the approach of encouraging site designations from employment to alternative uses. The recession has impacted upon the rate of development, for example during the last monitoring period there was no completed employment development in the Borough. Therefore it is likely that a number of sites are likely to take longer to be developed than would have previously been the case.

Policy EC5: Local planning approach to town centres

Policy EC5 states "Local Planning Authorities should … consider setting floorspace thresholds for the scale of edge-of-centre and out-of-centre development which should be subject to an impact assessment and specify the areas these thresholds will apply to and the types of impacts having particular local importance which should be tested".

Further clarification is required as to whether this is in addition to Regional threshold levels. This is important to clarify in order to ensure the Council's Local Development Framework is in conformity with the West Midlands Regional Spatial Strategy.

Policy EC11: Monitoring

Policy EC11 requires local authorities to carry out monitoring of:

- The network and hierarchy of centres;
- the need for further development;
- the vitality and viability of centres.

It is questionable as to how this can be achieved, Policy EC11 should make it clear as to how Local Authorities are to set about completing this task. Without appropriate guidance Local Authorities could potentially invest time and resources into monitoring techniques which may in the long run, be considered to be inappropriate

5. **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?**

Yes ☐ No ☐

Comment: No comment

6. **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?**

Yes ☐ No ☐

Comment: No comment

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

Yes ☐ No ☐

Comment: In relation to this policy, there are concerns regarding the

associated policy of EC12.

Policy EC12: Planning applications for economic development (see also policy EC21)

The Statement requires Local Authorities to "assess proposals involving the loss of economic activity in rural locations on the basis of evidence about the impact on the supply of employment sites and premises in that community to ensure the economic, social and environmental sustainability of the area is protected and enhanced".

This is considered to be an inappropriate requirement because it is questionable that there is sufficient evidence collated to determine this, and it is not clear as to how the Council can be confident that they have appropriate evidence. Communities and Local Government should reconsider the need for this policy. If Communities and Local Government consider the policy to be necessary, it is requested that detail be provided as to the amount and type of evidence that could be required be set out to.

8. **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.**

Yes ☐ No ☐

Comment: No comment

9. **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.**

    Yes ☐ No ☐

    Comment: No comment

10. **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?**

    Yes ☐ No ☐

    Comment: No comment

11. **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.**

    Yes ☐ No ☐

    Comment: No comment