

## Planning White Paper response from NAAONB

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The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a charity that promotes the conservation and enhancement of natural beauty, and advances the education, understanding and appreciation of the public in relation to this, in and around Areas of Outstanding Natural Beauty (AONBs), other Protected Areas, and those landscapes for which designation might be pursued.

A number of AONB partnerships have responded individually to this consultation and the comments of the NAAONB should be seen as supportive and supplementary to these.

The NAAONB welcomes the opportunity to comment on the proposals in the Planning White Paper – Planning for the Future (PWP). It accepts that many of these proposals are ‘high level’ and it looks forward to working constructively with Ministers and officials of MHCLG and Defra on the detailed guidance and legislation necessary to implement them.

This paper is intended to provide a high-level response setting out the impact of the proposals on the planning system’s ability to protect and enhance Areas of Outstanding Natural Beauty (AONBs) in line with the requirements of the Countryside and Rights of Way (CROW) Act 2000. It has been informed by discussions within the community of planners working in the different AONB bodies in England. The absence of commentary on particular proposals should not be taken as implying support for those proposals.

As an over-arching comment, there is a worrying implication in the PWP that the existing planning system adequately protects AONBs. This does not align with the experience of many AONB partnerships, particularly those in the south east that have seen a dilution of protection in the last decade due to development pressure, especially for housing, being given priority over the conservation and enhancement of AONBs. The proposed planning reforms are an opportunity to redress this situation and value these landscapes as an asset for the nation, rather than being seen as a constraint that must be overcome.

The response is informed by considerations in three key areas that have been identified as of particular importance to the protection and enhancement of AONBs through the planning system. These are:

1. How the proposals align with the intended outcomes other relevant recent initiatives;
2. How the development needs of AONBs will be assessed and planned for; and
3. How the complexities that planning needs to address are catered for in a significantly “simplified” system.

1. How the proposals align with the intended outcomes other relevant recent initiatives

The key documents that need to be taken account of in reforming the planning system are the Landscapes (“Glover”) Review, the Environment Bill – biodiversity net gain, nature recovery networks – the Agriculture Bill – Environmental Land Management - and the Letwin review of housing delivery. Any alignment is not obvious in the PWP and this is an important issue for future detailed work.

2. How the development needs of AONBs will be assessed and planned for

The proposal for binding housing requirements needs to take account of the landscape character and capacity of protected areas like AONBs for development, based on research that is best undertaken at the local level. Similarly the other development, community and infrastructure needs for protected areas should be based on local evidence based assessments rather than the application of formulas to achieve sustainable development that conserves and enhances protected areas rather than harming them.

3. How the complexities that planning needs to address are catered for in a significantly “simplified” system.

Whilst the ambition to simplify the existing system is supported, this could be done by removing the many layers of complexity that have been added over the last decade, particularly with the many different routes to gaining permissions. The proposals for simplifying local plans raise the following issues:

- The restriction to three zones in Local Plans is too simplistic. The creation of high quality places needs a more nuanced approach that recognises that new communities need green areas for leisure and health and space for nature and that protected landscapes need to accommodate some growth.
- There also needs to be better integration of the system of land-use planning (now generally described as planning for housing) with other types of planning, in particular with planning for transport infrastructure and services, and minerals and waste – often key issues in AONBs. The current proposals seem to consider housing in isolation, detached from other considerations.
- There is a missed opportunity to look at basing local plan boundaries on landscape-scale geographies, including enabling single local plans for AONBs as recommended by the Glover Review.
- While there may be a case for including some current local plan development management policies in the NPPF (and even turning some of them into building regulations) it is difficult to see how the NPPF could include sufficient detail, including the necessary spatial distinctions, to effectively represent development management policies necessary for the protection and enhancement of specific AONBs (let alone the different character areas within them). The ability of local and neighbourhood plans to include policies which address issues that are specific to their area should be retained, whilst avoiding the duplication of development management policies.