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Dear Ms Williams

Consultation on Greater Flexibilities for Change of Use

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through 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.

Our response focuses on Question 3 in the consultation document as we strongly object to the proposed changes to permitted development rights for existing buildings used for agricultural purposes to change use to a dwelling house and believe that these should not apply in National Parks.

Any change of use will have a range of impacts in areas such as access, parking, lighting, landscape, noise, highways and environmental issues which need to be taken into consideration as part of the process of determining whether the new use is appropriate for the location. Such factors need to be given even greater consideration in isolated locations and in National Parks, where decisions also need

to take account of the statutory National Park purpose to conserve and protect the special qualities of the area. In addition, National Parks contain a high number of the buildings which could potentially be affected by this proposed extension to permitted development rights, for example, there are around 4500 field barns in the Yorkshire Dales National Park many of which are in locations which would be completely inappropriate for residential use.

We do not believe these changes should be introduced at all, but if they are then they should not apply in National Parks for the following reasons:

- They conflict with national policy on planning and National Parks
- They will have a detrimental impact on the statutory purposes and special qualities of National Parks
- They undermine the existing policies National Park Authorities (NPAs) have in place to support affordable housing and ensure new development takes place in appropriate locations
- They will not result in new homes for those who most need them
- They could potentially have a negative impact on the farming industry
- They will result in negative impacts on the landscape
- They will remove the ability to manage and monitor important aspects of development such as requirements for new infrastructure and the impact on wildlife
- They will not necessarily reduce bureaucracy

Further details on each of these points are provided below.

National policy

The National Planning Policy Framework (NPPF) emphasises the special status that National Parks should be afforded in planning policies and decisions and makes it clear that they have the highest status of protection. These proposals would conflict with this. They are also contrary to the Government's own advice as set out in the English National Parks and the Broads Circular which states that 'the Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them'.

National Park purposes

These changes will lead to the development of new, isolated residential units in unsustainable locations. Residential use will also require physical changes (power lines, driveways, gardens etc) and generate more traffic, for example, there will be postal and other deliveries in addition to the journeys made by the occupants and their visitors.

All of this will be harmful to the special qualities of the National Parks and is contrary to the first statutory purpose of National Parks which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park. The changes would also undermine the NPAs' statutory duty to seek to foster the social and economic well being of communities living within the National Park by undermining policies that support local occupancy of new dwellings as discussed below.

There is also likely to be a proliferation of new agricultural buildings in the countryside as owners seek planning permission to replace those lost through conversion. Although the consultation suggests that permitted development rights will be removed, in practice local planning authorities will find it very difficult to refuse planning permission for new agricultural buildings where there is a good agricultural

business case for them and these could then subsequently be converted to residential use.

Existing NPA policies

Appropriate change of use should be encouraged, particularly where this helps to ensure the future upkeep of traditional buildings, however such changes of use need to be carefully managed and monitored to ensure that the potential impacts of any proposed new use are properly considered and that due account is also taken of the cumulative impacts within an area.

This is what the existing planning process is designed to do and the National Park Authorities (NPAs) have positive policies relating to change of use of agricultural buildings which allow them to support conversions to residential use where the location, scale and character is appropriate and there are no adverse impacts on neighbouring properties. For example, the North York Moors NPA as a policy which supports the conversion of traditional rural buildings outside villages to residential letting for people with a local connection which is subject to a number of criteria and controls that seek to minimise the impact of such new uses on the landscape and prevent harm to the special qualities of the Park. These include that the building is of traditional character and appearance and that there is an existing dwelling on the site. If NPAs lose this kind of policy control, they will effectively lose their ability to deliver one of the statutory purposes of National Parks.

NPAs also have policies relating to local occupancy conditions on new homes and conversion schemes to ensure that the majority of new residential development is being used to meet local housing needs. Most also have a policy framework which guides new residential developments to the most appropriate locations, such as particular village(s) or areas which are served by public transport and community facilities. This both restricts new development from taking place in environmentally unsustainable locations and helps support existing services in village centres. The proposed changes would undermine all these policies.

Providing homes for those who need them

The consultation paper suggests that the proposed changes could bring forward additional homes in rural communities but these homes will not be available to those who need them most as they will not be covered by NPAs' policies on local occupancy. The high quality environment in National Parks makes them attractive places to live particularly for those who are retired or looking to purchase a second home in a rural area.

Average house prices in National Parks are already significantly higher than the average house price in their respective region. The premium for a property in a National Park varies from 27% to 90% but in five of the 10 National Parks it is over 60%¹. This means that the need for affordable housing is a significant issue for NPAs and restricting the occupancy of new housing to people from the local area is vital to sustaining rural communities so it is unlikely that the proposals would benefit existing rural communities.

Impact on the farming industry

The 7,150 commercial farm holdings in England's National Parks employ 17,300 people, equating to over 12,000 FTE jobs¹. This is a significant proportion of the total employment in the National Parks. Farming also makes an important contribution in

¹ Valuing England's National Parks – Final Report for National Parks England, May 2013

National Parks by supporting habitats and wildlife, shaping the landscape and helping to sustain tourism in addition to producing food.

If the proposed changes are introduced there will be a significant incentive for farmers to convert buildings to residential use as the value of residential dwellings is significantly higher than that of agricultural buildings. This could have unintended consequences for the agricultural sector and threaten the contribution it makes to sustaining the special qualities of National Parks as well as having knock on effects on food production.

Impacts on the landscape

Although there are many traditional agricultural buildings in National Parks, there are also many much larger modern buildings which have been granted planning permission due to their functional agricultural use. Such buildings are often constructed of materials such as breeze block and corrugated steel which are of much poorer quality appearance than the traditional materials such as stone and brick required for new residential development in such sensitive landscapes.

The proposed changes risk allowing buildings which have a detrimental impact on the landscape to continue in use for much longer than would otherwise be the case if they are no longer required for agricultural purposes. The introduction of driveways, formal gardens and external driveways as a result of conversion to residential use will also have an impact on the landscape.

Managing other aspects of development

As we have already set out above, existing planning policies in National Parks do not prevent the appropriate reuse of redundant agricultural buildings. However they do ensure that where the proposed new use may be inappropriate there is a means of identifying, reducing and, if necessary, mitigating for, any negative impacts. Without the need for a planning application, there will be no mechanism to negotiate contributions to affordable housing or S106 requirements.

Although a prior notification process is proposed, this does not include any requirement in relation to wildlife protection. Many redundant agricultural buildings, including more modern ones, are home to wildlife such as bats, which are protected under the Wildlife and Countryside Act 1981.

The proposed changes will remove the ability of NPAs to alert those undertaking conversions to the requirements of this Act so that they can undertake wildlife surveys where appropriate. The fact that the permitted development right would extend to the demolition and rebuilding of the property on the same footprint means there is an even greater risk to protected species and habitats.

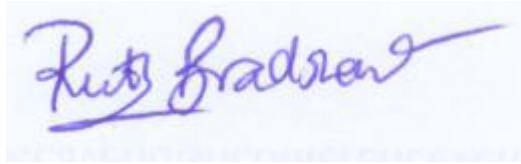
Reducing bureaucracy

The consultation document suggests that the need for planning permission is unnecessarily burdensome and that the changes will provide a 'lighter touch approach than would otherwise be possible through the planning application route'. However, the requirement for prior approval, whilst removing NPAs' ability to manage and monitor certain important aspects of the development, is unlikely to lead to reduced bureaucracy or a much speedier decision, particularly if the reduced fees for local planning authorities restrict the resources they are able to devote to this.

In conclusion, we strongly object to the proposed changes to permitted development rights for existing buildings used for agricultural purposes to change use to a dwelling house. We do not believe these changes should be introduced at all but if they are,

then they should not apply in National Parks for the reasons set out above. We would welcome an opportunity to meet with CLG officials to discuss our concerns about the changes proposed in this consultation and to demonstrate why they are unnecessary.

Yours sincerely

A handwritten signature in blue ink that reads "Ruth Bradshaw". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Ruth Bradshaw
Policy and Research Manager
Campaign for National Parks

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