

THE INSTITUTION OF ENVIRONMENTAL SCIENCES COMMENTS ON
DRAFT REVISION OF PLANNING POLICY GUIDANCE NOTE 7 ON THE
COUNTRYSIDE.

The Institution welcomes this revision and the emphasis which it contains on sustainability. The Institution recognizes that growth and development in rural areas are desirable facets for a healthy economy. However, considerable care is needed in the way in which this is effected in order to maintain the environmental benefits of our countryside and to sustain the unique nature of rural community life and patterns of living.

We have no comment to make on the provisions for agriculture, forestry and protection of countryside character which we feel are reasonably comprehensive. We do, however, have a number of points to raise in connection with development strategies in villages and market towns. In a number of respects we feel that the guidance notes could go further in addressing practices which have for some time been a cause of concern in environmental circles. The comments we wish to make are as follows:

1. Balanced Community Development (Paragraph 1.11).

The protection of 'LIVING' (our emphasis) communities with a balanced development and population structure is of crucial importance. The reference to 'other opportunities' should be more specific and encompass community facilities, shopping, leisure facilities, health facilities and schools. It may be felt that this is stating the obvious but there are many recent cases of expansion in rural areas, primarily housing, where these other facilities have NOT developed in conjunction. Many of the comments which follow will emphasize this point further.

2. Development Plan Policies (Paragraph 2.6, 2.7 & 2.8).

The policies set out for preparation and implementation of local development plans are excellent and comprehensive. It is, however, in just this area that many of the bad practices occur. Stronger emphasis on the adherence of local planning authorities to these policies can only be of benefit.

3. Villages and Market Towns (Paragraphs 2.10 & 2.11-3.19 to 3.23).

The recommended policy for development (which is a continuation of previous policy) is to focus on existing centres. This has the logic of utilising more fully existing facilities for public transport, shopping, health care, and leisure. Where current facilities are under utilised, then controlled expansion can be truly sustainable. The tendency, however, is to develop housing in advance of job creation and pay too little attention to the needs of related expansion of support community facilities and infrastructure. The capacity of existing centres to sustain proposed levels of expansion should always be thoroughly assessed and this requirement should be included in the policy guidelines.

4. Retail Development (Paragraph 2.11).

The guidance note says "Development plans should indicate the circumstances in which new development will be allowed within and adjacent to (our emphasis) villages and small towns". We strongly deplore current pressures to allow large scale retail centres to be built on the fringe or separate from country towns. There is a grave danger that existing centres with a unique character will be forced into decline with consequential effects on traditional patterns of community life and social cohesiveness. Policy guidance should be specific on this point.

5. Achieving Quality Development (Paragraph 2.12)

We endorse the policy statement regarding new building. However, the quality achieved in current housing developments is seldom of a suitable standard usually due to financial constraints. The unofficial policy of "any development is better than no development", *i.e.* what is affordable must therefore be tolerated, leads to unfortunate environmental situations. Housing development that occurs is often on cramped, high density sites, unsympathetically located and constructed with the minimum of infrastructure improvement or community facility provision - even open space. The effect is of boring urban sprawl rather than compatible rural expansion and growth.

More should be included in the policies to require high standards in plan implementation.

6. Rural Business Location (Paragraph 3.10)

Again the policy as stated in the draft paper for location of new rural industry is good and is supported by a Good Practice Guide. Despite this, implementation often falls short of the desirable result and more emphasis should be made in the Guidance Note of the requirement for suitable infrastructure development for growth and the sensitivity of location.

7. Financial Policies

Many of the difficulties experienced in achieving sustainable development arise from financial restrictions or perceived economic difficulties. These often derive from traditional patterns of funding and accepted 'historical' rules controlling expenditure in the public sector. The benefits obtained from sustainable development are often not assessed on comparable terms with the financial costs which are given greater importance.

There should be a requirement in PPG 7 for economic and financial assessments to be carried out in conjunction with ALL plans from Regional planning policies, through structure plans, down to unitary development plans.