

## Response to Consultation Questions

ITEM 13C

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

**1. Do the policies set out in draft Planning Policy Statement on Economic Development achieve the right balance between economic, social and environmental considerations? Will they help to deliver sustainable development?**

Yes  No  Comment: Very positive in terms of sustainable development, linking the economy with housing and transport and a clear intention to help people living and working in disadvantaged communities to benefit from economic growth and planning policy. However, it is not always clear how the policy and planning outcomes, particularly in terms of ensuring disadvantaged areas providing benefit from and contributing to economic development, will be achieved through the Policy Statement unless many of the data indicators in Annex A are analysed at a local rather than regional level – as regional and district level figures mask deprived neighbourhoods.

**2. The draft Planning Policy Statement proposes a stronger emphasis on the need for evidence, including economic evidence for plan making and decision making. Do you agree that this is the correct approach?**

Yes  No  Comment: A shared and consistent evidence base is essential to help determine priorities between and within regions, and to assess the impact of initiatives aimed at planning for sustainable economic development.

**3. If you agree that there should be a stronger emphasis on the need for evidence what are your views on the following:**

— The need for final Planning Policy Statement to include a suggested list of data as at Annex A?

Comment: This is extremely helpful and will encourage consistent approaches to enable comparison across the country. There also needs to be a close link with relevant Local Area Agreement/Multi-Area Agreement indicators to reduce the burden of data collection on local authorities and Local Strategic Partnerships.

— Are there any data/forecasts that should be excluded or added to the proposed list?

Comment: As a housing market renewal pathfinder, we closely link our activity to supporting economic development and key indicators that assist in this include:

- The use of household income rather than individual earnings (although the former is only available commercially, it is far more useful when assessing affordability).

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- Labour market – housing choice needs to be monitored in terms of change in tenure, size and type as this is important to support the economy and a key finding of the Northern Way research on ‘Residential Futures’.
- As well as general population, we need to look at how the make up of the population is changing ie. if losing or gaining 30-44 year olds – the core age group and family builders – and gaining older people or younger people. This will help with service planning and indicate whether previously disadvantaged areas are starting to become more attractive to certain groups.

— Could the proposed data and forecasts also help to form part of the proposed new economic assessment that, subject to separate consultation, Local Authorities would be required to carry out?

Comment: Yes, it is important to keep as much consistency as possible and reduce a need to collect yet more data.

— What is the most appropriate level at which data should best be collected: regional, subregional or local level?

Comment: Data availability will determine this – if it is available to a local level (neighbourhood) then it should be collected for local purposes and local authorities be asked to highlight any ‘hot’/‘cold’ spots to regional strategists. District level data is useful but can mask affluence and deprivation in neighbourhoods within the same borough. Some data is only available at a higher geographical level but is still worth collecting, especially if complemented by other local indicators.

### **4. Is there a need for separate planning policy guidance on the use of Simplified Planning Zones as set out in Planning Policy Guidance note 5?**

Yes  No  Comment: Not applicable to BNG as we have no SPZs.....

### **5. Do you agree that the methodology used to determine sub-regional housing markets provide an appropriate proxy for determining economic markets?**

Yes  No  Comment: Travel to Work Areas and Housing Market Areas are good proxies for each other. However, within this approach, there needs to be some consideration given to how this can ensure the delivery of the outcome related to supporting the most disadvantaged areas as they ‘lose’ people to other parts of the same TTWA and housing market; this in part, has led to the need for housing market renewal pathfinder areas. More consideration needs to be given to the links between economic development and Housing Market Renewal as a ‘sustainable development’ tool which should be explicitly reinforced in the final policy statement.

### **6. Is the approach to the location and development of B1 offices suitably flexible to meet the needs of business, whilst delivering sustainable development?**

Yes  No  Comment: Yes. The approach advocated in the draft PPS would provide sufficient flexibility to respond to the needs of business while not compromising the purposes of regulatory control which, inter alia, ensures sustainable and compatible land uses. A key element of the approach is not to stifle enterprise.

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**7. Is the less prescriptive approach to non-residential car parking suitably responsive to the needs of business in the context of the objectives in Paragraph 4 of PPG13 Transport?**

Yes  No  Comment: Accessibility is a key issue for businesses and their staff and is a key issue with respect to location. A less prescriptive approach as set out in Para 25 does not compromise the aims and objectives of PPG13 but rather takes account of the specific needs of business and their locations.

**8. Do you agree that employment sites should not be retained as such if there is no reasonable prospect of them coming forward for development during the plan period?**

Yes  No  Comment: The suggestion for other uses in these circumstances is justified.

**9. Does this draft Planning Policy Statement deal adequately with the particular needs of rural areas?**

Yes  No  Comment: .....No comment.....

**10. Will this draft Planning Policy Statement have an impact upon the “equality strands”, and particularly on the Gender, Race and Disability strands? If not, should it? We particularly welcome the views of organisations and individuals with specific expertise in these areas.**

Yes  No  Comment: Indirectly in terms of race and disability as disadvantaged areas tend to have concentrations of people from BME backgrounds and/or disabilities.