

Sustainable development opportunities



Rufus Bellamy, BH&HPA National Advisor on conservation and environmental management, examines sustainable development and the new National Planning Policy Framework

The last few months has seen the subject of planning hit the headlines as the Coalition Government has pushed through the new National Planning Policy Framework (NPPF).

As Martin Taylor of GVA Humberts Leisure says (see page 59), the new Framework represents the biggest shake-up of town and country planning policy in England for decades, one that is geared towards growth and is undoubtedly 'pro-business'.

Despite this shift in emphasis, the NPPF has at its heart the concept of sustainable development and throws down a challenge to developers to work in environmentally-sensitive ways. The final version of the document saw its environmental focus considerably strengthened in comparison to the draft that was sent out for consultation. This rewrite was due, in part, to a vocal campaign of criticism (the 'Hands Off Our Land' campaign) mounted by organisations such as the National Trust, the Campaign for the Protection of Rural England (CPRE) and The Daily Telegraph.

'The countryside emerges this week bruised and bloodied from the most bizarre assault on it for half a century,' wrote Simon Jenkins, Chairman of the National Trust, in The Daily Telegraph just after the launch of the NPPF. *'Since the publication last year of draft changes in planning rules, no county in England has felt safe. But a last-minute climbdown ... means that the character of our landscape is back under some sort of control.'*

Anyone who attended the 2010 BH&HPA Conference will remember that Simon ruffled a few feathers with his opinions on the visual impact of holiday parks. However, the support for the 'Hands Off Our Land' campaign shows that he speaks for many – and the fact that the government has, to a degree, listened, shows that this is an influential constituency.

Interpretation

The toughening up of the draft NPPF has meant that the published Framework contains a much clearer definition of sustainable development, an explicit recognition of the value of the countryside as a whole and reassurances relating to protected areas such as National Parks, the Broads and Areas of Outstanding Natural Beauty.

The NPPF also creates the possibility of more uncertainty in the planning process as local authorities impose their interpretation of sustainable development, depending on what they want to see in their areas. This may require more lobbying to win over both councillors and local people.

This new planning environment is touched on in the 'Mythbuster' document on the NPPF produced by the Department for Communities and Local Government. This explains that the Framework *'puts local people in the driving seat of decision-making in the planning system. Communities will have the power to decide the areas they wish to see developed and those to be protected, through their local plan'*.

It also notes that: *'The presumption is not a green light for development. All proposals will need to demonstrate their sustainability and be in line with the strict protections in the draft Framework. Strong environmental safeguards remain as part of the planning system, including protecting communities and the environment from unacceptable proposals.'*

Therefore, far from providing a developer's charter for development in the countryside, the NPPF has thrown the focus of planning even more onto sustainability and its interpretation. The optimistic take on this is that it gives parks an opportunity to embrace sustainability.



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Parks' response

How should English parks respond to the sustainable development challenge contained in the NPPF? The document highlights a number of areas of action where parks can capitalise on their unique characteristics. For example, it says that *planning should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside*. The Framework also calls for the promotion, retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

It is relatively easy for any park to argue that they are doing their bit to support a prosperous rural economy. The parks industry generates billions of pounds of tourist spend each year and it is estimated that every 15 caravan holiday home pitches creates one FTE job. It is also clear that parks can help the fight against the negative impact of second home owning - a threat that has already damaged many rural communities.

By providing key services, promoting local businesses and tourist attractions and by using and highlighting local produce and services, parks can be a strong link in the local economy. Many parks are already working with other businesses in their areas to set up local business networks, thereby boosting the local economy.

The NPPF notes that any development should support *the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres*. This is another opportunity for BH&HPA members to prove their value to the local community. An excellent example is a park on the Norfolk Broads which has been working with its local Wildlife Trust to reinstate an old foot ferry (see page 46 of the March-April 2012 edition of the BH&HPA Journal). Other examples are parks that have worked to improve cycling provision, footpaths and a range of other visitor facilities.

When the NPPF turns its attention to the specific social benefits of sustainable development, it notes that: *The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities*. This wording is mirrored in a lot of work that park owners are already doing to be good neighbours - one of the main criteria judged in the DBCAS.

Parks in the Scheme have long recognised that it makes sense to build bridges with their local communities through letting local people use their facilities, supporting local charities, working with local schools on conservation projects or even teaming up with their neighbours to plant community orchards. Inclusivity is already apparent through the disability access work that park owners are doing - everything from providing wheelchair platforms around fishing lakes to making sure that a percentage of the hire fleet is designed for those with disabilities. *continued...*

The focus of the NPPF makes it very important that any park seeking planning permission in the future should be able to demonstrate environmental awareness and a commitment to the three aspects of sustainable development - economic, social and environmental. Getting this right should help pre-empt interpretation of the phrase 'sustainable development' by the planning authorities and increase the likelihood of obtaining permission.

Many parks are already doing this and are leaders in the field, as shown by the hundreds of parks participating in the annual David Bellamy Conservation Awards Scheme (DBCAS). However, even for parks that are 'Gold', when it comes to environmental management, good neighbourliness and sustainability, the NPPF makes interesting reading as it highlights key areas that planners will be looking at when they make their decisions.

The Framework states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including:

- making it easier for jobs to be created in cities, towns and villages
- moving from a net loss of biodiversity to achieving net gains for nature
- replacing poor design with better design
- improving the conditions in which people live, work, travel and take leisure
- widening the choice of high-quality homes.

These challenges dovetail with government's drive to get businesses to do their bit for society as responsible corporate citizens.



Clever design

The NPPF brings the concept of ‘good design’ into the sustainable development debate. It states that: *‘Although visual appearance and the architecture of individual buildings are very important factors, securing high-quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.’*

BH&HPA members have been building in the local vernacular and using planting to make any developments blend into the countryside for a long time. Indeed, many are going a step further and are finding that good design, and the clever implementation of cutting-edge environmental technology, can help smooth the progress of a planning application.

This is certainly the case in the development of new sewerage systems. Space allowing, parks have found that reed beds can be an environmentally-friendly and cost-effective way forward. Many have reported that they are a good way to demonstrate to the local council (and visitors) the park’s commitment to the environment.

Some park owners are harnessing the power of plants by putting a ‘living roof’ on their park buildings – for example, Freshwater Beach Holiday Park (see page 31 of the November-December 2011 edition of the BH&HPA Journal). These structures are becoming more widespread, particularly for buildings in areas of natural beauty such as National Parks and Wildlife Reserves where it is important that any structures blend into the background. This is an example of how good design can be used to achieve planning aims.

Renewable energy

Another major test thrown down by the NPPF is meeting the challenge of climate change, flooding and coastal change. The Framework states that: *‘Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.’*

This gives parks an opportunity to prove that they can be at the forefront of positive change. Many parks are already leaders in the adoption of renewable energy technology such as solar panels, biomass-fuelled energy systems, ground source heat pumps and the implementation of energy-saving heating and lighting technology. For example, new residential park homes are being introduced that incorporate the very latest energy-efficient innovations, including state-of-the-art double glazing, high-efficiency boilers and innovative walls made of a bespoke sandwich of insulation materials.

As well as being sustainable, the bonus is that investment in these technologies and in energy efficiency can bring real bottom-line gains. The Feed-in Tariffs and Renewable Heat Incentive have made investment in this area even more cost-effective, despite uncertainty about the changing levels of the tariffs.

Even when promoting sustainable transport, it is possible to argue that caravan holidays offer a more sustainable travel option than many package holidays. Caravan storage facilities and the promotion of public transport and walking can also give park operators a stronger hand in this area.

Not surprisingly, the NPPF is quite specific when it explains how the planning system can help conserve and



enhance the natural environment. It lists five key ways in which this can be done:

- *‘protecting and enhancing valued landscapes, geological conservation interests and soils*
- *recognising the wider benefits of ecosystem services*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*
- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

The valuable role that parks play in protecting biodiversity is well known and is recognised in the DBCAS. A park that is well managed with the environment in mind can have significantly more biodiversity within its boundaries than surrounding monoculture farmland.

The parks industry already has a lot of experience and expertise in reducing the impact of any proposed developments through careful planting and landscaping, mitigation and compensation. Mitigation refers to measures to limit the impact of any development, such as changing the timing or design of any development or designing-in wildlife value. Compensation refers to measures to compensate for lost habitat by adding wildlife value in other locations.

Additionally, park developments that have had at their

core the reclamation of derelict or degraded land, such as old quarries or gravel pits, have turned these areas into thriving new habitats rich with wildlife.

Many park owners already manage and protect vitally important habitats in protected areas and work with local nature conservation bodies to make sure that they are in the best of ecological health. Others help to conserve and reintroduce rare and endangered species, such as the red squirrel and the silver-studded blue butterfly.

Overall, this means that there are many ways in which BH&HPA members are strongly placed to make any new developments a real boon to the countryside and its biodiversity and therefore align themselves strongly with the priorities of the NPPF.

Boosting biodiversity doesn’t just provide planning gain, but also helps improve the quality and beauty of a park, enhances the visitor experience and makes it a more socially responsible company. This is where the challenge and opportunity of sustainable development meet.

In conclusion, it is worth noting that a detailed reading of the NPPF will throw up a wide range of specific ways in which a park can boost the value and appeal of any new developments - to its customers, the environment, planners and its local community. It is well worth BH&HPA members downloading a copy if they are planning development of any kind. The NPPF is available online at: tinyurl.com/cc5vc5t.

Editor’s note: *Each country of the United Kingdom has its own planning system devolved to the Northern Ireland Assembly, the Scottish Parliament and the Welsh Assembly – the NPPF applies only to England, but its principles make good business and commercial sense across the UK.* ●