

## PPS 4 – Planning for Sustainable Economic Development

### Recommended Responses to Questions for Consultees

- 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?***

No – concern is expressed that the inclusion of housing under ‘the what is economic development’ heading, may lead to developer pressures that will undermine the ability of an area to deliver sustainable development. House building is an economic activity, but housing as a land use is not.

- 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?***

The advice on the preparation of Employment Land Reviews seems to be comprehensive and adequate to support the preparation of a sound Development Plan. The suggested list of studies and evidence in the draft PPS seems excessive and unnecessary and unlikely to materially affect the outcomes. There are certainly no additional areas that should be included.

- 3) ***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?***

There has been no history of SPZ designations in Kent and very little throughout the Country. If such guidance is still required it could form an Annex to PPS 4.

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

No. There is serious concern that sub-regional housing markets are not an appropriate proxy, because ‘economic and labour markets’ can extend well beyond a Housing Market Area (e.g. influence of commuting & supply chain interactions between cities and their surrounding areas).

- 5) ***Is the approach to the location and development of B1 offices suitably flexible to meet the needs of business, whilst delivering sustainable development?***

Yes - but this may need to be single use development in some circumstances in order to maintain quality and to safeguard land in town centres for B1 offices, for example, rather than other forms of economic development.

- 6) ***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?***

Overall the wording used seems to cover all relevant considerations reasonably well and with sufficient flexibility built in but there should be a cross-reference to PPG13.

- 7) ***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 – but this should only be if there has been a rigorous Employment Land Review which takes full account of local circumstance and opportunities.

- 8) ***Does this draft Planning Policy Statement deal adequately with the particular needs of rural areas?***

Yes, but there needs to at least some cross-reference to PPS7. There also needs to be some recognition of the potential impact on rural lanes of heavy goods vehicles generated by employment uses in rural areas where it is apparent that HGV use differs from that which might be expected from historic use rights.