

Response to consultation on planning performance and planning contributions

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. Our response has been endorsed by all the National Park Societies (NPSs) in England. We also support the response submitted by National Parks England on behalf of the National Park Authorities.

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.

We strongly object to the proposed changes to Section 106 planning obligations and believe that National Parks should be excluded from the proposal to introduce a 10 unit threshold for affordable housing contributions. We welcome the fact that the Government is proposing to exclude Rural Exception Sites from the scope of the 10-unit threshold. However, we are aware that NPAs have concerns about the delivery of Rural Exception Sites continuing in the future due to reduced grant funding for such schemes.

Our response to the questions relating to planning contributions is as follows:

Question 5: Is the Government’s objective of aiding the delivery of small scale housing sites and expanding the self build housing market supported by:

- **the introduction of a 10-unit and 1000 square metres gross floor space threshold for section 106 affordable housing contributions; and**
- **the exclusion of domestic extensions and annexes from section 106 affordable housing contributions?**

No, we believe that National Parks should be exempt from the proposed threshold as it will significantly reduce the delivery of affordable housing in these areas.

National Park Authorities (NPAs) have a strong track record of delivering affordable housing as part of small scale housing schemes and it is particularly important that they are able to continue this success. 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. As a result average house prices

in National Parks are significantly higher than the average house price in their respective region - in five of the ten English National Parks, the premium for a property is over 60%¹. This increases the viability of development on sites of all sizes but it also means that the provision of affordable housing is a significant issue for NPAs.

The key benefit of granting planning permission for open market quota sites in National Parks is often to secure the proportion of affordable housing for the local area. If the 10 unit threshold were to be introduced, it would have a significant impact on the NPAs' ability to secure affordable housing and would force them to be reliant on Rural Exception Sites for delivery of affordable housing on smaller sites. Larger housing developments are often unacceptable in National Parks as they have much greater visual and landscape impacts.

NPAs have a statutory duty to foster the economic and social wellbeing of local communities. In addition the Defra Circular the National Parks and the Broads published in 2010 and endorsed by the current Government requires them *"to maintain a focus on affordable housing...to ensure that the needs of local communities in the Parks are met"* (paragraphs 78-79). It is important to ensure that the majority of new residential development in National Parks is being used to meet local housing need. Preventing affordable housing provision on small quota sites as proposed in this consultation will make it much harder for NPAs to meet the requirements of the Defra Circular, reemphasised in the NPPF, that National Parks are not suitable locations for unrestricted market housing.

The proposal would also undermine localism if communities developing neighbourhood plans are unable to secure any affordable housing from small quota sites in their areas. Rural Exception Sites alone cannot deliver the affordable housing needed in many of the National Parks.

Currently, most NPAs have a policy of negotiating section 106 obligations and accept a locally-agreed reduced level of contribution where marginal viability can be demonstrated, for example, the North York Moors NPA assesses the viability of affordable housing on all sites where a contribution is due. These flexible approaches could not continue if there was a blanket restriction on developments below a certain size. We therefore urge Government to exempt National Parks from any threshold to be introduced following this consultation.

Question 6: Should the proposed exemption apply beyond affordable housing to other tariff style contributions based on standard formulae?

No, all developments have a proportional impact on local infrastructure and the fairest way to ensure that they are contributing to the costs of such infrastructure is through tariff style contributions. In many areas, the Habitats Regulations require a financial contribution towards a package of mitigation measures in addition to standard infrastructure. Preventing tariff contributions may also cause serious delays where developers would have to undertake their own 'appropriate assessments' for even a single dwelling.

Question 7: We would like your views on the impact on the Government's policy objectives to incentivise brownfield development through proposed national policy change. This would reduce the financial burden on developers by requiring that affordable housing contributions should not be sought where

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

buildings are brought back into any use – other than proportionately for any increase in floor space.

The planning policies of the individual NPAs allow the viability of proposed brownfield redevelopment schemes to be assessed on a case-by-case basis. Limiting affordable housing contributions on brownfield sites (it is not clear from the consultation document whether the 10-unit threshold would apply to this proposal) could risk a significant reduction in planned affordable housing provision in settlements with larger brownfield redevelopment opportunities.

In conclusion, we strongly object to the proposal to introduce a 10 unit threshold for Section 106 affordable housing contributions and believe that National Parks should be exempt from this proposal.

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