

Report to	South Downs National Park Authority
Date	30 March 2017
By	Director of Planning
Title of Report	Housing White Paper

Recommendation: The Authority is recommended to:

- 1) Note the potential impacts of the Housing White Paper on the South Downs National Park, and the content of the proposed SDNPA response**
- 2) Purpose any additional comments on analysis to include in the SDNPA consultation response**
- 3) Delegate Authority to the Chief Executive Officer in consultation with the Chair of the Authority and Chair of Policy and Programme Committee to prepare and submit the consultation response**

1. Summary and Background

- 1.1 On 7th February 2017, the Government published the Housing White Paper “Fixing our broken housing market” which sets out a broad range of reforms that it plans to help reform the housing market and increase the supply of new homes. The consultation on the Housing White Paper (and supporting technical documents) runs for 12 weeks, closing on 2nd May 2017. The Annex to the Housing White Paper sets out 38 consultation questions (please note not all of the questions are relevant to the National Park).
- 1.2 Officers conducted an initial review of the Housing White Paper and produced a summary briefing paper which was shared with Members and Staff, and reported to the Policy & Programme Committee on 28th February 2017 (copy of report is attached at **Appendix I**). That report sets out the key themes and areas of potential impact to the National Park.
- 1.3 Members are asked to consider the themes and issues emerging from the Housing White Paper, the response from the Policy & Programme Committee and in addition the more specific responses set out below.
- 1.4 It is the intention that any Member views would feed into a joint response to the consultation via National Parks England. Members may however wish to highlight certain issues that are particularly pertinent to the National Park, or where we would want to stress certain matters relevant to ourselves.
- 1.5 Members also need to be aware that the Housing White Paper refers to a review of the Community Infrastructure Levy (CIL), implications are unclear at this stage and further information is expected in the autumn budget review statement. Should this review include any major change in policy this will have an impact on our own going workload since we are introducing CIL from the 1st April this year and we are putting mechanisms in place for infrastructure delivery.

2. Specific Responses to Housing White Paper Questions

- 2.1 As referred to above, the Annex to the Housing White Paper sets out 38 consultation

questions (the executive summary is attached at **Appendix 2**). Not all questions are relevant to the South Downs National Park or wider rural agenda, or demand a response given they are very general. Please find below Officers suggested response to the relevant questions.

- 2.2 Questions 1 & 2 - we generally agree with the proposed changes to the National Planning Policy Framework (NPPF) to make it easier to form Local Plans. This includes further guidance on what evidence is required to support Local Plan policies, and ensuring that all consultation and examination procedures for all forms of plan making are appropriate and proportionate.

- 2.3 Question 3(b) - the Government is suggesting a standardised approach to assessing housing requirements.

We are generally supportive of a standardised approach as it can help address the challenges faced at examinations where time and resources are wasted arguing over different technical aspects of methodologies used. However, as a National Park, our authority cuts across four Housing Market Areas so such a standardised approach will not always work. The Government needs to recognise that when balancing housing provision against a set of data, we cannot use a proportionate approach to allocate land. P&P Committee at its meeting on 28th February 2017, suggested that Members may wish to make specific comments on this issue as not all National Parks are affected by these issues to the same degree as SDNPA.

- 2.4 Question 4 – As a National Park, we endorse the Government's suggested change to the presumption in favour of sustainable development to include reference to National Parks as part of the definitive list of where development could be restricted. We also support the inclusion of Ancient Woodland and aged or veteran trees on the suggested definitive list.

- 2.5 Question 8 refers to the Government's intention to amend the NPPF to highlight the opportunities Neighbourhood Plans present in encouraging the identification of small sites, as well as suggesting that stronger support should be given to 'rural exception sites' even if these rely on an element of general market housing.

We are generally supportive of these changes but believe the stronger presumption of allowing rural exception sites with an element of general market housing needs to be carefully considered (although we do recognise that in some circumstances there is need for cross subsidy).

- 2.6 Question 12 refers to different elements aimed at strengthening neighbourhood planning and design policies.

In terms of 12(a), in many ways SDNPA has led the way in this specific recommendation. We already provide housing requirement figures to our neighbourhood planning groups and this approach has generally been well received. Our expertise in the field of neighbourhood planning has led to officers acting as consultants for other Neighbourhood Plans outside the National Park Boundary.

Questions 12(b), 12(c) and 12(e) relate to design issues. We support these changes as they emphasise the importance of good design in Neighbourhood and other Plans.

- 2.7 Question 16 refers to introducing a 1 year agreement (between the Local Planning Authority and developers) on how the planning authority is doing against their 5 year housing land supply. We would express concern about this approach given that National Parks are not driven by housing targets and our reliance on small sites is arguably less predictable, therefore fluctuations in any given years delivery are more likely. In any case it seems perverse to reward non-build out by increasing the pressure on LPA's to release more sites even if a Plan is up to date.

- 2.8 Question 17 relates to Neighbourhood Plans and the weight to be given to them.

We are concerned that the proposed changes seek to link Neighbourhood Plans with wider housing delivery in a complicated fashion that could override the local community's careful assessment of capacity for growth. In our instance any individual neighbourhood plan would,

to a degree, be beholden to wider housing delivery throughout the National Park. The suggested changes would reduce the likelihood of Neighbourhood Plans coming forward and undermine the passion of local volunteers who are ultimately responsible for producing Neighbourhood Plans.

2.9 Question 18 - we welcome the ability to charge for appeals in certain circumstances.

2.10 Questions 22 – 24 - suggest that planning authorities would be able to take into account the track record and character of the applicant when determining planning applications for housing schemes.

A number of recent planning applications in the National Park have raised this issue. It would have been helpful to understand the track record of the applicant. We support the recommendations particularly where relevant to nationally protected landscapes.

2.11 Question 28 – 30 – these questions refer to proposed changes to the NPPF and the introduction of a 'housing delivery test'. This includes a cascade mechanism whereby there would be a 'presumption in favour of sustainable development' should a planning authority fall below its annual housing requirement.

Whilst the suggested changes purport to increase housing delivery we would argue that these changes are only looking at a very narrow aspects of the supply side (e.g. permissions granted and numbers of completed schemes) as opposed to addressing the other issues which influence the delivery of housing. Housing delivery is subject to strong economic forces and drivers well beyond the control of local planning authorities. We believe the argument put forward by the Government that the complex cascade mechanisms being proposed would increase the supply of housing is false. It is also important to highlight that this approach could alter the view of 'sustainable development' particularly in National Parks, where currently housing targets are subordinate to a landscape led approach.

2.12 Question 31 - we have some concerns about the widening of the definition of affordable housing (as set out in Box 4 in the Housing White Paper), albeit we are aware that one of the outcomes of our recent Land Owners conference was general support in widening the definition to include other forms such as affordable private rent. Indeed we are piloting new approaches to rural housing provision.

2.13 Question 33 relates to the possibility of certain types of residential development from being excluded from any affordable housing policies.

As a National Park, we would like to highlight that rural exception sites should be strictly led by local housing needs and should be all social rented if appropriate.

2.14 Question 34 - we do not understand why the Government believes the NPPF should be amended when there is a well-established definition of sustainable development. The NPPF is so flexible as to help no-one. The proposed change would end up codifying an even looser approach.

3. P&P Considerations

3.1 P&P committee considered the key themes of the Housing White Paper at its meeting on 28th February 2017. During discussions, it was felt that whilst it would be preferable to make a joint response along with other National Parks, under the auspices of National Parks England, there was a need to reserve the right to make further points where the impact upon the South Downs may be different to that on other National Parks.

3.2 The committee highlighted three areas, Affordable Housing, Housing Market Assessments and CIL, where it recommended that NPA may wish to consider making a specific response to the Housing White Paper.

3.3 In relation to Affordable Housing, the committee also discussed the points raised at the recent Land Owner's conference and suggested this should be reflected in any response together with putting forward the Authority's current affordable housing work as a pilot to address rural affordable housing issues.

- 3.4 It was resolved that the Committee considered the impacts of the Housing White Paper and that the points raised in its discussions be forwarded to the NPA for its consideration in its contribution to the National Parks England response to the Housing White Paper.

4. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	Much will depend on the Governments actions following consultation and any revisions to the NPPF. There are also numerous other consultation documents promised which again may need further committee or full authority consideration.
Does the proposal raise any Resource implications?	None directly arising from this report.
How does the proposal represent Value for Money?	Not applicable
Are there any Social Value implications arising from the proposal?	Not applicable
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	There are no equalities implications arising from this report
Are there any Human Rights implications arising from the proposal?	None directly arising from this report
Are there any Crime & Disorder implications arising from the proposal?	None directly arising from this report
Are there any Health & Safety implications arising from the proposal?	None directly arising from this report
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy	This report contributes to sustainability principles 2 – building a strong, healthy and just society and 4 – promoting good governance

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Appendices
 1. Report to Policy and Programme Committee – 28th February 2017
 2. Housing White Paper – Annex Questions

SDNPA Consultees Chief Executive; Director of Countryside Policy and Management

External Consultees None

Background Documents [The Housing White Paper – 'Fixing our broken housing market'](#)