

Appendix I Consultations Responded To Already

Implementing measures to improve build out transparency

Q1 Do you agree that the build out reporting measures should apply to developments which involve the building of new dwellings (including mixed use development)? **Yes**

Q 2 Are there any other types of residential development that the build out measures should apply to? **No**

Q3 Do you agree with the proposed threshold of 50 dwellings for the build out measures to apply to? **Yes, nationally this makes sense provided there are safeguards to ensure that large sites are not artificially subdivided into parcels of less than 50 home to avoid more onerous requirements. However, implications for National Parks should be considered as they will have very few applications above this threshold. The proposals for reducing requirements for sites below 50 homes could impact on our ability to support National Park purposes and duty through the planning system, particularly achieving nature recovery and climate resilience. The Authority asks that any changes to categories of development consider our statutory purposes and, where necessary, exempt protected landscapes from the proposals where there could be a conflict.**

Q4 Do you think a higher threshold should be set for development progress reports and the power to decline to determine applications? **No**

Q20 Do you have any views on the implications of this consultation for you, the environment or the group or business you represent, and on anyone with a protected characteristic? Is there anything that could be done to mitigate any impact identified? **The South Downs National Park Authority supports the principle of more accountability and transparency around build-out rates, recognising the concerns about large numbers of unimplemented planning permissions which could be addressing the housing crisis. However, it also notes the significant increased administrative burden for local planning authorities in assessing build out statements and development progress reports and taking action where delivery is unsatisfactory. The Authority therefore asks for an uplift in the planning fees for 50+ home applications to reflect the additional resource needed. If the proposal to allow local planning authorities to set their own planning fees is brought into force then Regulations should make clear that administrative processes like this can be taken into account in setting fees.**

Reforming site thresholds working paper

Q15 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? Is there anything that could be done to mitigate any impact identified?

The South Downs National Park Authority welcomes the proposed retention of the principle that, whilst affordable housing contributions are not generally required on minor development, this can be justified in Designated Rural Areas, which include National Parks. This exemption is key because National Parks deal with very few major (or indeed medium) developments, yet the 2010 Circular for National Parks and the Broads prioritises the delivery of affordable housing (paragraphs 67 and 76-79).

The National Park Authority also supports in principle the lightening of the burdens for both small developers and local planning authorities. However, as an Authority which deals with very few developments in excess of 50 homes, the proposals could impact on our ability to support National Park purposes and duty through the planning system,

particularly achieving nature recovery and climate resilience. The Authority asks that any future proposals for relaxing planning requirements for smaller developments consider our statutory purposes and, where necessary, exempt protected landscapes from the proposals where there could be a conflict.