

Response to Housing White Paper proposals May 2017

Introduction

1. 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. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. Our response has been endorsed by all the National Park Societies in England.
2. The high quality environment in National Parks makes them attractive places to live. Based on 2011 Census data we know all the National Parks have an increasingly ageing population, indicating that they are seen as particularly attractive places to relocate for those who are retired. We also know that second home ownership is an issue in National Parks. Consequently, average house prices in National Parks are already significantly higher than the average house price in their respective region. The premium for a property in a National Park varies from 27% to 90% but in five of the 10 National Parks it is over 60%¹.
3. The current approach to housing delivery in National Parks, as set out in Local Plans, ensures that the limited development opportunities available cater for local needs rather than meet the high demand for market housing. It is essential that any proposed changes do not undermine this long-standing approach and lead to inappropriate housing developments in National Parks. Given that current policies restrict development in these areas, and that houses can be sold at a premium, developers are likely to be keen to build new housing in National Parks. They are also likely to want to do this quickly in order to maximise their profits, as the price premium is unlikely to be maintained if the additional planning protections which make National Parks such attractive places to live are removed.
4. We are also concerned about the potential for an increase in inappropriate housing development in areas that may affect the setting of National Parks i.e. in areas just outside their boundaries. It is essential that planning authorities in areas neighbouring National Parks are made fully aware of their statutory duty² to take account of the potential effect of their decisions and

¹ Valuing England’s National Parks, Cumulus Consultants Ltd and ICF GHK report for National Parks England 2013

² This is in section 11A(2) of the National Parks and Access to the Countryside Act 1949 as amended by Section 62(2) of the Environment Act 1995. It is often referred to as ‘the S62 duty’.

activities on National Parks. This requirement also covers activities outside National Park boundaries which may affect land within them.

5. We would like to see a housing policy which prioritises the quality of development over the quantity of housing delivered. For that reason, we are pleased to see the increased emphasis on the design of new homes in the Housing White Paper and the proposal to allow local planning authorities to raise their planning fees by 20% provided this additional funding is invested in their planning department.
6. Our response to specific consultation questions below focuses only on certain parts of some of the questions which have the most significance for National Parks. Many of the issues we have covered would also apply to Areas of Outstanding Natural Beauty (AONBs).

Q3. Do you agree with the proposals to:

(a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?

7. It is important that local planning authorities have clear policies for addressing the housing requirements of groups within their area, including those with particular needs such as older and disabled people. However, it is also essential that they are able to adopt planning policies which ensure the most appropriate form of housing for their area. National Park Authorities have a strong track record of supporting the delivery of housing which makes it easier for local people to work and live in areas which would otherwise be unaffordable. We would not want national prescription about the types of housing that should be delivered to undermine this.

(b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?

8. We recognise the need for a more consistent approach to calculating housing requirements and agree with the Government's desire for all local planning authorities to have an up to date local plan. It is essential, however, that any standardised approach takes account of the fact that there are constraints on the amount of housing that can be delivered in areas such as National Parks and AONBs where stronger planning protections apply. We note that the Government intends to consult on options for a standard approach to assessing housing requirements and these options must allow for areas where there are constraints on development.

Q4. Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

(c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?

9. We welcome the inclusion of Ancient Woodland and aged or veteran trees in this list of policies. However, we would like to see the existing wording at the start of footnote 9 retained i.e. 'For example, those policies relating to...'

There is a risk that the inclusion of a definitive list rather than a set of examples could lead to some areas of land receiving less protection than intended simply because they are not included in this footnote.

Q8. Do you agree with the proposals to amend the National Planning Policy Framework to:

(b) encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?;

10. We believe there needs to be greater clarity about exactly what opportunities for villages to thrive this proposal is intended to cover but we would support the inclusion of policy changes which ensure that new development takes place in the most environmentally sustainable locations and helps support existing services in village centres. Most National Park Authorities already have a policy framework which guides new residential developments to the most appropriate locations, such as particular villages which are served by public transport and community facilities. Such policies should be encouraged and supported.

(c) give stronger support for 'rural exception' sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;

11. Rural exception sites were originally created to allow exceptions to normal planning policy so that affordable homes could be built to meet local housing need. It also enabled land to be acquired at a cheaper rate than land that could be used for market housing; this was an essential part of the economic viability of delivering rural affordable housing. So we do not support policy amendments which would place a greater emphasis on allowing general market housing on rural exception sites nor do we support the use of rural exception sites for starter homes. Allowing the limited number of exception sites available in National Parks to be used for general market housing will limit NPAs' ability to deliver the kind of affordable housing required to meet local need. It will also potentially drive up the price of land that is on the edge of a village but not allocated for housing in the local plan. It is precisely because exception sites have been used to address identified local housing need that many landowners have been willing to release land for housing and communities have been willing to accept new housing developments.

12. If rural exception sites are to be used to deliver market housing in National Parks, it is essential that local planning authorities have the flexibility to require local connection tests and that such a requirement remains with the property 'in perpetuity'. Given the price premium and the demand for holiday homes in National Parks, general market housing in these areas is likely to be unaffordable for most people working locally and is highly likely to be sold as second homes or holiday rental properties unless there is a local connection requirement.

Q13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should: (a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?; (c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?

13. We recognise the need to make the most efficient use of the land that is available to meet identified housing needs. This will be important in areas such as National Parks where there are constraints on the amount of land that can be built on as well as in urban areas. However, it is essential that any changes aimed at encouraging increased density take account of the scale and size of development that is appropriate in a National Park and the nature of local housing needs. So we welcome the changes aimed at ensuring that the density and form of development reflect the character, accessibility and infrastructure capacity of an area. Larger housing developments are often not appropriate in National Parks as they have greater impacts in these remote settings.

Q31. Do you agree with our proposals to (a) amend national policy to revise the definition of affordable housing as set out in Box 4?;

14. Most NPAs already have policies that support lower cost housing and the local occupancy of new dwellings. These ensure that properties are more affordable for those in housing need and make it easier for local people to work and live in areas which would otherwise be unaffordable. It is not clear that all the models set out in the revised definition of affordable housing would allow for local occupancy restrictions and for these to continue to apply 'in perpetuity'. We are therefore concerned that the revised definition could undermine NPAs' policies and their statutory duty to seek to foster the social and economic wellbeing of communities living within the National Park.
15. We are very concerned that including 'starter homes' and discounted market sales housing within the definition of affordable housing could have a negative impact on the delivery of other forms of low costs homes, which may be more important for the social and economic wellbeing of communities in National Parks. Given the price premium and the demand for holiday homes in National Parks, starter homes in these areas are likely to be unaffordable for most people working locally even with the initial discount and are highly likely to be sold on as second homes or holiday rental properties if there are no restrictions on future occupancy.

16. NPAs have a strong track record of supporting the delivery of affordable housing as part of small scale housing schemes and it is particularly important that they are able to continue this success. This means that they need to be free to allocate land for, and create planning policies to ensure the delivery of, the most appropriate form of affordable housing for their area. There is a very limited pool of suitable sites for new housing in National Parks and allocating these for starter homes or discounted market sales housing will reduce the availability of sites for other forms of affordable housing which would be more appropriate for meeting local needs.

(b) introduce an income cap for starter homes?;

17. As set out above we do not believe that 'starter homes' should be included in the definition of affordable housing. However, we welcome the fact that the Government has listened to some of the concerns raised previously about 'starter homes' and is proposing to introduce measures aimed at reducing the risk of speculation. We particularly support the measure to prevent cash buyers of these properties but, whilst an income cap is welcome, the proposed limit of £80,000 is significantly higher than the average household income in most National Parks. Consideration must be given as to whether such a limit is appropriate in areas with very low average incomes.

Q32. Do you agree that:

(a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?

18. We welcome measures that increase the amount of affordable homes being delivered on all sites. However, we are concerned that this particular proposal could have unintended consequences if 10% starts to be considered as the norm for the proportion of affordable housing. Many NPAs already have existing targets which are significantly higher than this, for example, Dartmoor NPA requires 50% affordable housing. So it is absolutely essential that the target of 10% for affordable home ownership products is a minimum which local planning authorities can choose to increase in their local plan policies and use alongside targets for other forms of affordable housing, rather than a blanket policy that would replace any existing, locally determined, targets for affordable housing delivery.

19. We are also concerned about the reference in the text (para 4.17) to local areas working with developers to agree 'an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures'. As already set out above, it is essential that NPAs retain the flexibility to secure the type of affordable housing which is most appropriate for their area. In some cases, it may be that there is a far greater need for affordable homes to rent than affordable home ownership.

(b) that this policy should only apply to developments of over 10 units or 0.5ha?

20. We strongly disagree with any measures which would limit the delivery of affordable housing on smaller sites. In many National Parks, the majority of housing development sites are for 10 or fewer units so make an important contribution to the overall provision of affordable housing. Unless it is made clear that the minimum of 10% for affordable home ownership is separate from, and can be used alongside, existing, locally determined, targets for delivering other forms of affordable housing, then this policy could significantly reduce NPAs' ability to deliver affordable housing and would force them to be reliant on rural exception sites which cannot deliver the amount of affordable housing needed in many of the National Parks.
21. The house price premium in National Parks both increases the need for affordable provision and increases the viability of housing development on sizes of all sites so there are strong grounds for NPAs to be exempt from this policy. If that is not going to happen then the lower threshold of five units should apply in National Parks and AONBs in line with existing national policy as set out in the written statement referred to in footnote 113 of the consultation document (HCWS50 (28 November 2014)).

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