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RESPONSE TO NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION 2 MAY 2017

Action with Communities in Rural England (ACRE) is the national voice for the 38 rural community councils who make up the country's largest rural network. Together, we reach 52,000 grassroots organisations in 11,000 rural communities.

Our mission is to provide critical evidence-based intelligence and solutions to achieve a fair deal for rural communities and especially those most disadvantaged by rurality.

Our vision – to be the voice of rural communities – is supported by the wealth of evidence and intelligence on rural matters that we collect from our members.

- We use this evidence to influence national policy on rural issues, from housing, health and transport to broadband, services and fuel poverty.
- We have a strong track record of speaking up for rural communities on the national stage and delivering multi-million pound projects that enable communities to find innovative solutions to the challenges they face.
- Our members, rural community councils – many of whom date back over 90 years, have a long and fruitful history of making a difference at a grassroots level.
- ACRE was formed in 1987 to bring them together under one umbrella, harnessing the strength of their experience to support our national work.
- As well as supporting our members, ACRE works with a wide range of partners who have an interest in achieving a fair deal for rural communities

ACRE supports appropriate development in rural areas especially the provision of affordable housing, to enable communities to develop and thrive. Sustainable development also underpins local service delivery and improves the quality of life of those living in rural areas.

ACRE, through the ACRE Network membership helps communities to establish a need for housing in rural areas including identifying the need for affordable dwellings. This work is led by a network of ACRE Network employed 'Rural Housing Enablers' (RHEs), who are also members of the national RHE group. ACRE Network members also facilitate the development of Community-led and Neighbourhood Plans in rural areas across England to help communities to develop appropriate local need and evidence based policies regarding future development in their area.

In responding to this consultation ACRE has drawn on the experience of its membership across rural England. The following points highlight the main priorities for ACRE and the ACRE Network in response to any proposed changes in the NPPF:

- There is a need to ensure that any alterations to the NPPF have been rural proofed
- The specific challenges faced by rural communities such as; an ageing population, access to services and availability of affordable housing should be considered in relation to any proposed development
- Local Authorities must be empowered to make decisions based on established need in rural communities in their area, especially if there is evidence to include affordable housing on a small scale site
- Neighbourhood Development Plans significantly contribute a local voice to planning decisions, they should be respected and appropriate support offered to enable them to continually update the evidence base in line with local housing need

If you would like to discuss this consultation response further please contact:

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Section	Question	ACRE response
Proposals from Chapter One	<p>Question 1</p> <p>Do you agree with the proposals to:</p> <p>a) Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?</p> <p>b) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?</p> <p>c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan</p>	<p>ACRE supports these proposals, with the following recommendations:</p> <p>ACRE would recommend that :</p> <ul style="list-style-type: none"> • in setting the key strategic priorities the NPPF requires that LPAs rural proof their approach to meeting the strategic priorities to ensure that that rural residents are not disadvantaged when compared to their urban counterparts; • the NPPF requires LPAs to have clearly defined policies for rural and urban development in Spatial Development Strategies, with accountable and robust evidence to support decisions and monitor implementation in rural areas. <p>ACRE supports the strengthening of evidence requirements to support a 'sound plan' which justifies development in any given area, as long as the evidence requirements are proportionate taking into account the capacity of local community groups. However, it is clear from experience that there remains confusion in what happens to Neighbourhood Plans that are adopted before a Local Plan. We would therefore recommend:</p> <ul style="list-style-type: none"> • that greater guidance is provided about the process of reviewing neighbourhood plans in areas where a Local Plan supersedes a neighbourhood plan, through being adopted at a later date.
	<p>Question 2</p> <p>What changes do you think would support more proportionate consultation and examination procedures</p>	<p>ACRE recommends that in recognition of the considerable volunteer time and commitment put into producing a Neighbourhood Plan that becomes part of the Development Plan:</p>

	<p>for different types of plan and to ensure that different levels of plans work together?</p>	<ul style="list-style-type: none"> • LPAs should specifically identify and consult NP groups on where they are proposing alternative development proposals where sites and policies have been identified, approved and ratified through an adopted neighbourhood plan referendum, Any changes that are made should be supported by evidence and written statements that should be formally part of the Examination process. • That greater resource is made available to neighbourhood plan groups to assist them in reviewing and refreshing their documents, to reflect updated needs and local circumstantial change that could lead to a Local Plan including opposing proposals.
	<p>Question 3</p> <p>Do you agree with the proposals to:</p> <p>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?</p> <p>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?</p>	<p>ACRE supports these proposals, with the following further amendments:</p> <ul style="list-style-type: none"> • In view of the older and rapidly ageing population in rural areas such policies are written in consultation with providers of social care. Such policies should provide for different scales of development, forms of tenure and also promote the development of 'hubs' that provide outreach support to residents in the surrounding rural area. • Currently, SHMAs rarely provide coherent evidence at a parish level. Without a rural breakdown LPAs will find it difficult to apportion a housing need requirement to Neighbourhood Plans and devise and monitor policies that support thriving rural communities. ACRE therefore recommends that a standardised approach includes an expectation that assessments of housing requirements will provide a breakdown of the evidence to a parish level. This should include use of secondary data, supplemented

		<p>by local housing needs assessments. To produce this information Government should ensure that relevant data is available disaggregated using the rural/urban and rural settlement classification and or parish.</p>
	<p>Question 4</p> <p>Do you agree with the proposals to amend the presumption in favour of sustainable development so that:</p> <p>a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?;</p> <p>b) it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;</p> <p>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?</p> <p>d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?</p>	<p>ACRE supports these proposals, with the following additions:</p> <ul style="list-style-type: none"> • Neighbourhood Plans in rural areas are expected to, include sustainable development policies and have a strategy in place which can be used in dialogue with a local authority. • ACRE supports the inclusion of National Parks amongst those areas where there can be constraints on development. However, the NPPF should re-iterate that National Park Authorities in pursuing their Statutory Purposes also have a statutory duty to foster social and economic well-being of Park communities.
	<p>Question 5</p> <p>Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?</p>	<p>ACRE supports the principle of the proposed amendment to Regulations but it will be important that the Regulations set out how:</p> <ol style="list-style-type: none"> 1. this power will operate where the land is in an area covered by a Neighbourhood Plan 2. this will operate where the site has been registered as an Asset of Community Value.

		<p>It is important that Local authorities must not circumvent an ACV order, through granting planning consent on their own land without full engagement and consultation with the community.</p> <p>ACRE would like assurances that ACV orders will retain the same powers they currently have.</p>
	<p>Question 8</p> <p>Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <ul style="list-style-type: none"> a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?; 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?; 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?; d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?; e) expect local planning authorities to work with 	<p>ACRE has the following recommendations in relation to the proposals:</p> <ul style="list-style-type: none"> a) Support in part - but communities must be assured that the neighbourhood plans can use site allocation and policies to ensure that the homes provided meet the range of housing needs within their community. In particular require that all such sites will contribute to meet local needs for affordable housing by provision on site. b) Support - but communities must be assured that development would include a proportion of affordable housing to encourage a mix of population locally. LPAs must be able to secure affordable housing allocations on small sites of less than 10 to meet this need. c) Support in part - but it is critical that any amendments retain the principle purpose of 'rural exception' sites to provide affordable housing to meet local affordable housing needs. d) Support in part - allocation of small sites is critical to promoting development that is appropriate in scale to many rural communities. However, it is equally critical that if these sites are to support thriving rural communities it must be possible for LPAs to secure affordable housing contributions on sites of half a hectare or less.

	<p>developers to encourage the sub-division of large sites?; and</p> <p>f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?</p>	<p>e) Do not support - unless there are changes to the thresholds at which affordable housing can be secured. Without this safeguard sub-division will result in no affordable housing contributions. In rural areas where there is already a shortage of affordable homes it will undermine the ability of rural communities to thrive and the achievement of sustainable development in rural areas.</p> <p>f) Support - this would speed up development which would be positive in some rural communities. To ensure accountability, LDOs and area wide design codes must be drawn up in consultation with local communities. The NPPF could expand on this requirement, by advising on the use and support for village design and concept statements. Neighbourhood plans should also make reference to LDOs, indicating support if appropriate to add further robustness to any development decisions.</p>
	<p>Question 9</p> <p>How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?</p>	<p>ACRE supports a streamlined process as positive, in helping to stimulate growth in rural areas. With the following caveats:</p> <ul style="list-style-type: none"> • the process must include securing appropriate infrastructure investment and affordable housing in order that these new communities have the ability to thrive. • any process includes consideration of the impact of new garden towns and villages on existing settlements so they too are able to attract the social and infrastructure investment they need to be sustainable.

	<p>Question 10</p> <p>Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:</p> <ul style="list-style-type: none"> a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements? b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land? c) appropriate facilities for existing cemeteries should not to be regarded as 'inappropriate development' in the Green Belt? d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt? e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question? f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs? 	<p>ACRE supports in part these proposals, with the following specific comments in relation to 10d and 10e:</p> <ul style="list-style-type: none"> d) This provision should extend beyond NDOs to policies and allocations within a Neighbourhood Plan that are responding to specifically identified need i.e. a new village shop. e) ACRE recommends that there must be robust examination of local need at the heart of any decision. If a neighbourhood plan is proposing GB boundary amendments, additional support should be provided to the neighbourhood plan group by the LA to facilitate consultation in order to scrutinise the need for the changes. In areas where there is no adopted neighbourhood plan, steps should be taken by the LA to facilitate local consultation to consider specific alterations to GB boundaries.
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	<p>Question 12</p> <p>Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <ul style="list-style-type: none"> a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?; b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?; c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?; d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?; and a) e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process? 	<p>ACRE supports these proposals, with the following recommendations in relation to 12a and 12b:</p> <ul style="list-style-type: none"> a) there needs to be clarity provided to local communities in relation to the 'housing requirement figures' including a full breakdown of numbers and guidance as to whether this is a total figure or the community can increase the figure if local need supports this? To meet this requirement the standardised housing need assessment methodology must provide a rural breakdown of the data, facilitated by the Government providing data by its classification of rural settlements and or parishes. b) ACRE wants to see appropriate resources, support and expertise made available to community groups producing neighbourhood plans, in relation to helping them to establish clear design expectations that will comply with local planning requirements.
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	<p>Question 13 – ACRE is only responding to 13a and 13d</p> <p>Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:</p> <p>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?;</p> <p>b) address the particular scope for higher-density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;</p> <p>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?;</p> <p>d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?</p>	<p>ACRE supports these proposals with the following caveat:</p> <ul style="list-style-type: none"> • Some rural communities are characterised by low density development. In such cases low density development may be appropriate, but this should be balanced with the impact this would have on the viability to provide affordable homes to meet local needs.
	<p>Question 15</p> <p>What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning</p>	<p>ACRE sees the potential for delivering additional homes on existing public sector sites as positive for rural communities, but with the following additional provisions:</p> <ul style="list-style-type: none"> • the identified need in rural areas must be used to inform the nature of the development and justify any

	(using tools such as policy, local development orders, and permitted development rights)?	<p>development decision.</p> <ul style="list-style-type: none"> • Clear guidance must be provided to rural communities in relation to how this proposal relates to the 'Assets of Community Value' registration process, included in the Localism Act 2011. At present communities can register public sector sites as an ACV, to enable local residents to be accountable for any decision of development on such a site. • ACRE wants to see clear accountability guidance for local authorities and reference made to ACV orders in the NPPF, regarding the disposal of public sector sites for development.
Proposals from Chapter Two	<p>Question 16</p> <p>Do you agree that:</p> <ol style="list-style-type: none"> a) where local planning authorities wish to agree their housing land supply for a one-year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?; b) the Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy? c) if so, should the Inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure? 	<p>ACRE agrees, however, because too often rural communities have had to accept development that is inappropriate in scale and type of housing provided because of the lack of a 5 year land supply We would recommend the following further amendments to strengthen the proposed approach:</p> <ul style="list-style-type: none"> • the NPPF requires that in maintaining a 10% buffer the LPA must take into account what is appropriate in terms of scale and character, form of housing and impact on local infrastructure in rural communities. • It clearly states: <ul style="list-style-type: none"> ○ At what point will sites identified within a Neighbourhood Plan be included in the 1 year land supply ○ How and at what point will policies for development in a Neighbourhood Plan be taken into account as the LPA identifies its 10% buffer

	<p>Question 17</p> <p>In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:</p> <p>a) a requirement for the neighbourhood plan to meet its share of local housing need?;</p> <p>b) that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?</p> <p>a) c) should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?</p>	<p>ACRE supports the amendments in principle, but the detail needs further amendment as proposed below.</p> <p>ACRE is concerned that the protections are not sufficiently clear and do not take account of the fact that Neighbourhood Plans are the result of immense volunteer commitment and time. If these concerns are not addressed there is a danger that the willingness of communities to maintain, or embark on new Neighbourhood Plans, will be significantly undermined by the proposal. It is also likely that the falling away of any protection will result in community opposition to development resulting in costs to LPAs and developers.</p> <p>We would, therefore, recommend that:</p> <ul style="list-style-type: none"> • It is made clear that this protection applies to all Neighbourhood Plans. At the very least there should be alignment between the delivery test, which is over 5 years and the age of NPs that are protected. Our recommendation is that this should be 4/5 years. • The standardised methodology for OAN supports the provision of data disaggregated to a spatial scale relevant to Neighbourhood Plans, for rural areas this should be the Parish. This will be critical to the LPA being able to set an evidenced based housing requirement for Neighbourhood Plans. • Given that to retain the protection NPs will have to be reviewed and re-adopted by referendum within the timescales set for the protection. Government should provide resources to support NP groups undertake this review. Only if this funding is available should NPs be required to take a housing requirement figure. • Specifically in relation to point c we would recommend
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		that the protection is triggered where there are either policies in place and/or site allocations. Not all NP groups have the capacity or appetite to allocate sites, whilst others will allocate as they consider this gives them greater control of future development.
	<p>Question 19</p> <p>Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?</p>	<p>ACRE supports this proposal as digital infrastructure in rural communities is key to sustainable development in these areas, but with the inclusion of the following caveat:</p> <ul style="list-style-type: none"> • The NPPF must make clear that these policies must not be a block to rural development and should benefit rural communities.
	<p>Question 21 – ACRE is only responding to 21c</p> <p>Do you agree that:</p> <p>a) the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?</p> <p>b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?</p> <p>c) the basic information(above)should be published as part of Authority Monitoring Reports?</p> <p>d) that large house builders should be required to provide aggregate information on build out rates?</p>	<p>ACRE supports these proposals but with the following additional requirement:</p> <ul style="list-style-type: none"> • To ensure that remedial action is taken where needed there should be a requirement placed on LPAs to provide rural breakdown of the information within Authority Monitoring Repots.

	<p>Question 22</p> <p>Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?</p>	<p>ACRE is supportive of this proposal but only if a planning application benefits the rural area, and meets the local needs of the community where the development will take place.</p>
	<p>Question 23</p> <p>We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.</p>	<p>ACRE considers that a robust process of checking the track record for applicants for any proposed development in rural areas would be a positive inclusion in the NPPF.</p>
	<p>Question 24</p> <p>If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?</p>	<p>ACRE considers that a robust process of checking the track record of applicants for any proposed development in rural areas should be relevant to both large and small scale proposals.</p>
	<p>Question 25</p> <p>What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.</p>	<p>ACRE would want to see a flexibility included in the NPPF which enables individual local authorities to stipulate time frames for development in rural communities in their area and or for particular forms of development, such as affordable housing.</p> <p>Evidence indicates that two years may be too short timescale for rural schemes, particularly those where the scheme is reliant on a grant or a housing authority to purchase the site.</p>

	<p>Question 28</p> <p>Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:</p> <p>a) The base line for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?</p> <p>b) The base line where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?</p> <p>c) Net annual housing additions should be used to measure housing delivery?</p> <p>d) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?</p>	<p>ACRE supports the proposal of accountability through a standardised methodology and the housing delivery test to demonstrate that need is being met, but there must be clear urban and rural definitions to differentiate these areas.</p> <p>In respect of each proposal:</p> <p>a) The local planning authority must maintain an urban and rural set of housing figures, so that the needs of rural communities are considered as part of annual delivery.</p> <p>b) If a neighbourhood plan exists in an area where there is no local plan, then this should provide the evidence of local need for a specific community. Government evidence and statistics in relation to housing need must be provided for both urban and rural, so that a local authority may interpret this locally.</p> <p>c) ACRE agrees with this proposal, but rural needs must be considered when measuring housing delivery.</p> <p>d) ACRE agrees with this proposal, but rural needs must be considered as part of any assessment.</p>
	<p>Question 29</p> <p>Do you agree that the consequences for under-delivery should be:</p> <p>a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual housing requirement?;</p> <p>b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?;</p> <p>a) From November 2018, application of the presumption</p>	<p>ACRE supports the proposal that there should be consequences for under-delivery, but wishes to raise the following comments:</p> <p>Rural communities must be able to hold their local planning authorities to account if delivery falls below the authority's annual housing requirement. ACRE therefore recommends that:</p> <ul style="list-style-type: none"> • there should be a specific assessment of whether delivery has fallen in rural areas and that any action plan specifically considers how this rural shortfall will be addressed.

	<p>in favour of sustainable development where delivery falls below 25%?;</p> <p>c) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and</p> <p>d) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?</p>	<p>Clarity should be given on how and at what stage neighbourhood plans (both adopted and developing) will be taken into account when an LPA is preparing an action plan for housing delivery, including:</p> <ul style="list-style-type: none"> • At what point will sites identified within a Neighbourhood Plan be included in the 1 year land supply • How and at what point will policies for development in a Neighbourhood Plan be taken into account as the LPA identifies its 10% buffer
	<p>Question 30</p> <p>What support would be most helpful to local planning authorities in increasing housing delivery in their areas?</p>	<p>ACRE would strongly propose that local planning authorities must be able to have local discretion to set thresholds for affordable housing contributions in their rural communities.</p> <p>This would increase housing delivery in rural areas for the following reasons. Firstly, new housing in rural communities gains support where it contributes to meeting local affordable housing needs. Without affordable housing provision there will be high levels of objection resulting in costs and risks to the developer that may result in the scheme being abandoned or severely delayed. Secondly, much development in rural areas has in the past been by SME builders and their future involvement requires that such sites are an attractive venture. Affordable housing provides some certainty of income, reducing risk to the builder, resulting in more small sites being developed by SME builders.</p> <p>We would recommend:</p> <ul style="list-style-type: none"> • To facilitate increased housing delivery, including affordable housing to meet local needs, local planning authorities require adequately staffed and skilled planning and housing enabling teams within the

		<p>authority. ACRE welcomes the decision in the Housing White Paper to raise the planning fees by 20%, in the hope that this will help to retain skilled workers and also increase local budgets to support housing delivery activity.</p>
	<p>Question 31</p> <p>Do you agree with our proposals to:</p> <ul style="list-style-type: none"> a) amend national policy to revise the definition of affordable housing as set out in Box 4?; b) introduce an income cap for starter homes?; c) incorporate a definition of affordable private rent housing?; d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)? 	<p>ACRE supports in part these proposals but with the following recommendations for ensuring the amendments are rural proofed:</p> <ul style="list-style-type: none"> a) Box 4 needs to: (i) include in definition that affordable housing is defined with reference to local incomes, house prices and market rents: (ii) a includes the statutory power for LPAs not to allow Starter Homes on rural exception sites b) Support income cap - but this must be relevant to the community in which the scheme is being proposed - rural incomes are generally lower, a cap set in relation to LA incomes will not meet needs of local first time buyers c) Include definition of affordable rent - housing must actually be affordable, in areas of high house prices and rents 20% of OMR is not affordable to local people, rent should be linked to Local Housing Allowance d) Transitional period - support longer transitional period - needs to be at least a year from when these proposals become part of the NPPF

	<p>Question 32</p> <p>Do you agree that:</p> <p>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?</p> <p>b) that this policy should only apply to developments of over 10 units or 0.5ha?</p>	<p>ACRE does not support these proposals.</p> <p>ACRE believes that the availability of affordable housing is key to sustainable development in rural areas. Any development must meet local need, therefore:</p> <p>a) decisions on the form of affordable housing should be informed by the nature of local housing need</p> <p>b) in rural areas LPAs should be able to require affordable housing from all sites, including those under 10 units or 0.5ha, with the decision on the site threshold to be determined locally informed by evidence of need and viability.</p>
	<p>Question 33</p> <p>Should any particular types of residential development be excluded from this policy?</p>	<p>Evidence shows that that it is essential that in rural areas, sites of less than 10 houses must include affordable housing when there is clear local need. The local planning authority must be empowered to make this decision.</p>
	<p>Question 34</p> <p>Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?</p>	<p>ACRE supports these proposals.</p> <p>ACRE considers that an integrated approach to sustainable development is essential with nuanced policies to how this is achieved in urban and rural communities, reflecting the different circumstances that exist in these areas.</p> <p>The reference to neighbourhood plans in the NPPF (ref paras 183–185) upholds a community's involvement in encouraging sustainable development locally. ACRE wants the principle involvement of communities to remain a part of proposed amendments to the NPPF, to ensure that development meets local need and enables rural areas to thrive.</p> <p>So to encourage mixed development in rural areas, ACRE wants local authorities to be granted decision making powers</p>

		in relation to affordable housing quotas on proposed development sites of less than 10 houses.
	<p>Question 35</p> <p>Do you agree with the proposals to amend national policy to:</p> <p>a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?</p> <p>b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?</p>	<p>ACRE supports these proposals.</p> <p>ACRE encourages planning authorities to support community-led resilience activity where skills, capacity and expertise exist. Resilience plans produced by communities must always be considered supplementary planning documents. The work of FLAG (Flooding on the Levels Action Group) illustrates how community-led action can influence collective local action involving local authorities and other strategic partners to bring about positive change in relation to flood management work.</p>
	<p>Question 36</p> <p>Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?</p>	<p>ACRE supports these proposals.</p> <p>In particular ACRE supports the expectation that local planning authority plans should be supported by a Strategic Flood Risk Assessment and considers cumulative flood risks. The assessment findings should also be shared with residents of rural areas for comment and feedback before a final decision is made.</p>