

DCLG consultation on Planning performance and planning contributions

Submission from Action with Communities in Rural England (ACRE)

1. Introduction

1.1 Action with Communities in Rural England is the national umbrella body for the 38 Rural Community Councils (RCCs) who make up the ACRE Network and work at a local level in support of rural communities across the country.

1.2 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.

1.3 We have a strong track record of speaking up for rural communities on the national stage and delivering multi-million pound projects that enable rural communities to find innovative solutions to the challenges they face.

1.4 Our rural community councils - some of whom date back 90 years - have a long and fruitful history of making a difference at grassroots level. ACRE was formed in 1987 to bring them together under one umbrella and we harness the strength of their experience to support our national work.

1.5 Examples of the work of the ACRE Network can be found in [***Making a Difference in rural communities throughout England***](#) - published jointly by ACRE and Defra in the autumn of 2013.

1.6 Our response is informed following consultation with our Network members. We have selected comments and evidence from our Network that is broadly representative of the responses received.

1.7 RCCs have had long standing involvement in the challenging arena of delivering rural housing. Many RCCs employ a Rural Housing Enabler (RHE) who act as 'honest brokers' between communities, local authorities, housing associations and the private sector to support the development of homes within rural areas.

1.8 RHE work includes close liaison with communities and other stakeholders to develop and understanding the often location specific, local issues and demand for

housing in rural areas. This normally includes the assessment of housing needs through local surveys and investigation of potential housing sites in the vicinity.

2. We wish to submit a response for question 5 only.

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 making section 106 affordable housing contributions?**

2.1 The view of ACRE is that a balance needs to be struck between incentivising development and having a **fair affordable housing provision**. There is an intense shortage of affordable homes across the UK and Government policies should ensure that **more affordable homes are built not less**. The proposed change **will not benefit rural communities** and developers will be seen to be benefitting at the expense of the provision of affordable homes.

2.2 Currently evidence on site viability is gathered and tested by the Local Planning Authorities and incorporated in policies in the Local Plans. These are then considered by an independent Planning Inspector. These Local Authority policies reflect actual local land values, housing market resilience etc. **Local conditions affecting viability vary considerably** both across the country and between urban and rural areas.

2.3 The blanket approach suggested in the consultation **would not constitute a responsive, flexible approach to local conditions**. It appears to be a policy that would benefit developers and could significantly reduce the numbers of affordable houses that can be developed.

2.4 The proposed changes to the threshold for provision of affordable homes on new developments to ten units are likely to have a significant adverse impact on local delivery of affordable housing. This likely impact is due to the very well known fact that a **large proportion of the delivery of affordable housing in communities of less than 3,000 population, is through section 106 sites that are 10 units or less**.

2.5 Based on 2012/13 housing delivery figures from the Department of Communities and Local Government for settlements under 3000, **only 34% (981) were delivered through rural exception sites, the remainder (1905) through section 106 agreements**. Preventing this significant number of homes being

developed each year would be highly detrimental to smaller rural communities. At a local level our member in Dorset states that **"almost 90% of rural starts in Dorset are for 10 units or less"**. Our research also shows that currently at local government level and 'small' registered provider level, very small scale developments can be viable and profitable.

2.6 Evidence from over 5 years of local needs housing surveys in Devon indicates that there is a consistent affordable housing need of about 3% of the population in rural communities surveyed. **Most rural communities are very concerned about the socio-economic balance of their communities.** The current approach to development helps to provide for this section of the population whereas the proposed policy does not.

2.7 Information from Local Authorities in Devon suggest the percentages of affordable homes provided on sites of less than 10 homes varies from about 5%-27% of all homes built in a district. Although numbers can be low it is important to realise that in small communities **even a small number of affordable homes can make a huge difference to the long term sustainability of the community.**

2.8 Should these changes go ahead we expect to small scale developers building market housing as this provides the greatest profit margin – given the figures described above any reduction in the number of affordable housing could destroy the historical demographic essence of many rural communities.

ACRE would welcome the opportunity to be more involved in the development of local housing policy and measures.

Further information

Janice Banks CEO j.banks@acre.org.uk

ACRE, First Floor, Northway House West, The Forum, Cirencester, Gloucestershire GL7 2QY. Telephone 01285-653477.

E-mail acre@acre.org.uk

Website www.acre.org.uk Twitter @ACRE_National