



## Government Planning Reforms

### National Parks England's Reactions and Aspirations

The Government published a Planning White Paper in August 2020 proposing radical reforms. The Nine National Park Authorities (NPAs) and the Broads Authority are the statutory local planning authorities for almost 10% of the country. National Parks are the most sensitive and cherished landscapes in the country and often require a more-fine grain approach and high levels of communication and engagement. NPAs have built up a great deal of expertise in the special challenges and sensitivities of delivering planning in National Parks that we would like to deploy in support of the Government's emerging new planning system.

Below sets out what National Parks England's key reactions and aspirations are to the Planning White Paper. Our more detailed [response](#) is available on our website.

#### NPE's Aspirations

- 1. We support improvements to the current planning system in key areas.** We agree there are areas where the current planning system could be improved. For example, emphasising the importance of Local Plans, speeding up plan preparation and ensuring the evidence required to support them is proportionate. We also welcome the intention to strengthen enforcement powers and sanctions.
- 2. Planning reforms need to be part of a package of measures.** The issues that planning addresses are complex, especially in protected landscapes. There are many other factors at play that influence land use change, the rate of new development and the affordability of housing and these all need to be addressed in tandem with proposed planning reforms.
- 3. National Park purposes and duty need to be built into the new system.** The proposals are surprisingly silent on National Parks. Much more clarity is needed on the role and status of National Parks and the Broads in any new planning system. The two statutory national park purposes and associated duty should be adequately reflected in the proposals, particularly in the standardised housing requirement methodology and environmental protection.
- 4. National Parks and the Broads should be included in the definition of 'protected' areas for Local Plans, and their high level of protection retained.** We look to Government to confirm their inclusion in the definition for protected areas, and to work with us to consider how appropriate small-scale new development would be provided in our areas. The existing high level of protection is set out in paragraph 172 of the National Planning Policy Framework (NPPF). It should be retained and carried forward in any new legislation and national guidance.
- 5. The new planning system for England must be firmly rooted in the principles set out in the Government's 25 year Environment Plan and Environment Bill,** and support the new land management approach being introduced via the Agriculture Bill.
- 6. The reforms provide an opportunity to deliver on the Landscape Review 2019.** The recommendations in the Government commissioned Landscapes Review on permitted development rights and protecting the setting of protected landscapes should be implemented through these reforms.

7. **Opportunities for community engagement and public participation need to be maintained.** It is important that reforms do not dilute opportunities for community engagement and public participation, both at the plan making stage and in considering applications for new development.
8. **The new system should value and enable discretion and planning judgement in protected landscapes.** Proposals to streamline decision making processes, with planning applications judged against national rather than local policies, suggests a move to centralise and 'automate' planning decisions. National Parks and the Broads are exemplars in facilitating bespoke development to meet a diverse range of local needs that will be much harder to deliver through a more centralised and codified planning system, with less room to exercise discretion and judgment according to local circumstances.
9. **National Parks should be exempt from further permitted development rights.** We are opposed to 'consolidating existing routes to permission' in National Parks and the Broads. We prefer to work proactively with the resident and business community in meeting their development needs in a highly sensitive environment. The Landscapes Review recommended exempting National Parks from further PD rights.
10. **In National Parks prioritise new affordable housing.** Any new planning system must prioritise and support new affordable housing in National Parks (as currently iterated in the Government *National Parks Circular*) rather than catering for external housing demands. Addressing housing affordability simply through increasing delivery is not a model that will work in protected landscapes.
11. **Invest in affordable housing in National Parks.** In order to provide affordable housing that responds to local needs in perpetuity NPE has made a number of proposals. The most significant measure would be for MHCLG to proactively support the pilot that Homes England has developed with the South Downs NPA and the Rural Housing Network to ensure its Land Assembly Fund is made available to small suitable sites in rural areas.
12. **Abolishing the 'duty to cooperate' is a retrograde step.** There is a need to consider the impact of new development beyond and close to National Park boundaries. Local Plans must have regard to 'wider-than-local' matters and this duty plays an important role in supporting the Section 62 'duty of regard' towards the two National Park purposes. The Landscapes Review proposed strengthening the duty by requiring all relevant authorities to 'further' the two national park purposes. This should be reflected in the reforms.
13. **Stronger emphasis on design quality is welcome but local variation is key.** We need to avoid the production of Design Codes resulting in the building of identikit houses. Rather than reinforcing local vernacular and local distinctiveness, these risk replacing it with uniform development typologies which is less well suited to the scale of development that takes place in National Parks and the Broads.
14. **The Planning system should do more for climate.** We support the Government's commitment for a reformed planning system to play a more effective role in mitigating and adapting to climate change and maximising environmental benefits, but it is unclear how this will be achieved.
15. **Reforms to environmental assessment need to retain the precautionary principle** in order to protect the National Parks' most important habitats.
16. **The proposed abolition of Section 106 agreements is a concern.** Most NPAs do not currently operate CIL and Section 106 agreements currently enable on-site measures to be secured and other mitigation measures that cannot be secured through an infrastructure levy.