

Report to: **Council**

Date: **16 February 2016**

Title: **WDBC response to National Planning Policy Framework (NPPF) consultation**

Portfolio Area: **Strategic Planning and Housing**

Wards Affected: **all**

Relevant Scrutiny Committee:

Urgent Decision: **N** Approval and **Y**
clearance obtained:

Date next steps can be taken: **Immediately**
(e.g. referral on of recommendation or
implementation of substantive decision)

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RECOMMENDATIONS:

That Council be RECOMMENDED to:-

- 1. agree the submission of the draft consultation response to the Department for Communities & Local Government (as set out at Appendix 1), subject to inclusion of any amendments agreed at the meeting; and**
- 2. delegate authority to the Lead Specialist – Place and Strategy, in consultation with the lead Member for Strategic Planning and Housing, to agree the precise wording of the final submission**

1. Executive summary

- 1.1 Department of Community & Local Government is consulting on proposed changes to the National Planning Policy Framework (NPPF). These are summarised into;
- 'Broadening' the definition of Affordable Homes
 - Increasing housing densities around 'Commuter Hubs' (defined as towns having a population of over 25,000 people)

- The delivery of Starter Homes
 - The principle of new settlements
 - Using land originally allocated for commercial uses for housing
- 1.2 The consultation asks a total of 23 specific questions regarding the proposed changes, although there is little detail on the exact policy wording that may emerge from the consultation.
 - 1.3 In recent months there have been numerous changes by central government the National Planning Practice Guidance website (NPPG). This website lets Local Planning Authorities know how to interpret national planning policy.
 - 1.4 Changes to the NPPG have, in some instances, sought to change adopted policy, or at least provide an interpretation of policy that is not entirely consistent with the NPPF.
 - 1.5 As a result, and in order to cement some of the government's policies regarding the provision of new housing, the overarching national policy document, the NPPF, is subject to amendment for the first time since being adopted in 2012.
 - 1.6 West Devon District Council has a strong record of housing delivery, and is committed to the delivery of large-scale strategic land allocations in our two main towns of Tavistock and Okehampton. But we also know the numerous constraints of our rural settlements, notably regarding infrastructure and the natural environment, and feel that it is not the case that a nationally prescriptive response to the 'National Housing Crisis' can be applied equally in all locations.
 - 1.7 Given these constraints, officers advise caution with regard to some of the suggested amendments to the NPPF. Prioritising the quantity of new homes over considered plan-led development is not always compatible with the settlement patterns and types typical of most rural areas.
 - 1.8 Given the flexibility to create policies that are locally appropriate, rural local planning authorities can make an important contribution to the number of new homes required across the country, but in a way that continues to meet the varied needs of our communities without compromising our rural settlements or countryside.

2. Background

- 2.1 The NPPF provides national planning policies that all LPA planning policies must conform to. The NPPF was first introduced in 2012 and, following a compliance check, current adopted WDBC policies are considered to be broadly consistent with the NPPF.

- 2.2 This is the first consultation on proposed changes to the NPPF since 2012, and it is unlikely that the opportunity to shape future national policy changes will occur again in the short-term. The deadline for comments is 22nd February 2016, and it is felt by officers that this is an opportunity to emphasise that good planning in rural areas requires flexible application of national policies, particularly in terms of delivering affordable housing.
- 2.3 Any impacts – positive or negative - will be felt by the communities of the West Devon, and the detailed responses will highlight those where appropriate.
- 2.4 The Council has been positive and, in anticipation of the government's change of direction in affordable housing policy has embraced alternative models of provision, such as Rent Plus and Rent to Buy. However, as detailed below, a number of the changes proposed to the NPPF will challenge the ability of rural councils to meet their corporate priorities, particularly with regard to provision of affordable housing within the rented sector and, consequently, to meet the varied housing needs of our communities. These needs are well understood, and the WDBC NPPF response has been informed by the Rural Services Network.

3. Outcomes/outputs

- 3.1 The proposed submission to the consultation on behalf of WDBC is designed to highlight to government that the approach to housebuilding needs to be more flexible in rural areas than in more built up areas.
- 3.2 The aim is to seek a number of amendments to the proposed changes to the NPPF that would not, in themselves, fundamentally change the definition of affordable housing. In particular, it is suggested that:
- the delivery rate for Starter Homes should not be standard across the country but should reflect local circumstances.
 - the assumptions made for urban areas about alternative land-uses for brownfield land should not automatically apply to rural areas.
 - the assumption that housing delivery should be afforded a higher priority when weighing the considerations that combine to deliver 'sustainable development'.
 - the assumption that a 'one size fits' response to the national housing crisis can be consistently applied across all urban and rural areas.
- 3.3 Success in this regard will be known when the final NPPF amendments are the extent to which policies related to the delivery of new housing in rural areas are moderated in accordance with the above points.

4. Options available and consideration of risk

- 4.1 In terms of options, nothing would be gained by not submitting a response.
- 4.2 A critical analysis of the proposed amendments needs to be accompanied by suitable alternatives.
- 4.3 The alternatives proposed in the WDBC response reflect the priorities of the council, not least need to secure the continued provision of affordable housing, available in perpetuity to meet the varied housing needs of our communities.
- 4.5 The alternatives proposed also recognise the principles of good place making, and in particular the importance of situating new housing in the right locations, and not simply as an alternative to commercial land-uses.
- 4.6 The biggest risk to WDBC is if the proposed changes to the NPPF are implemented without any amendment. This may have a profound impact on the ability of WDBC to manage new development in a way that is compatible with our rural settlement pattern, and is able to meet the affordable housing needs of our communities in an appropriate manner.
- 4.7 As WDBC move towards the adoption of a new Local Plan, opportunities to respond the revised NPPF will present themselves. However, there is a possibility that changes to national planning policy will require the LPA to write planning policies that do not comfortably meet the corporate objectives of WDBC.
- 4.8 The extent to which the proposed WDBC response is consistent with other rural and nearby authorities has been partially tested by sharing draft responses with Teignbridge DC, South Hams DC and some communication with Exeter City Council.
- 4.9 Available responses from the Chartered Institute of Housing, The Rural Housing Enabler, the Rural Services Network and the Planning Officers Society have provided useful context for parts of the draft WDBC response. The proposed WDBC response is broadly in line with consensus across the housing and planning sectors, and this has been further confirmed by input from specialists with knowledge in specific areas, such as affordable housing.

5. Proposed Way Forward

- 5.1 The consultation on proposed NPPF amendments closes on February 22nd 2016. It is not clear at this stage how long it will take to review the consultation responses and if necessary revise the proposed NPPF amendments.

- 5.2 Many of the proposed NPPF changes accord with the contents of the Housing and Planning Bill, currently progressing through the Houses of Commons and Lords.
- 5.3 Using previous government consultations as a guide, and recognising that the proposed policies are key components of the governments short-term aims, a realistic assumption is that the NPPF will be amended by mid/late-2016.
- 5.4 Given the clear policy direction included within the consultation, officers working in the emerging local plan will be able to draft a range of policies that can be adapted to a range of consultation outcomes. For example, there will be a requirement to deliver Starter Homes, but the proportion required and the mechanisms used to deliver them will be apparent only once the final amendments to the NPPF have been released.
- 5.5 This does allow for the emerging policies being written into Our Plan West Devon to be in full conformity with national policy.
- 5.6 Given that the Department for Communities and Local Government have identified a deadline for new Local Plan adoption as 'early-2017', it is unlikely that the government will create delay by withholding the results of the NPPF consultation unduly.

6. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance	Y	<p>There are no legal implications to the council in submitting a consultation response.</p> <p>The potential changes to the NPPF will have an impact on WDBC policy making, due to the statutory function of the council as a Local Planning Authority.</p> <p>New Local Plan policies currently being drafted include an awareness of the proposed NPPF changes, so that a set of draft policies could be used depending on the scale of final changes to the NPPF.</p> <p>Existing evidence assessments are being extended to include potential evidence requirements around land availability for Starter Homes and brownfield etc.</p>

Financial	N	
Risk	Y	<p>As described, there is no risk associated with the decision to submit a consultation response.</p> <p>There will be risks to the Council as an LPA, but these cannot be fully understood until we know how the NPPF will be amended following the consultation.</p> <p>One clear risk is that of timing, and the government delaying the release of final amendments to the NPPF until after the new Our Plan West Devon has been submitted for examination.</p>
Comprehensive Impact Assessment Implications		
Equality and Diversity	N	It is assumed this matter will be dealt with in government review of proposed policy changes. See also answer to Q2.
Safeguarding	N	It is assumed this matter will be dealt with in government review of proposed policy changes
Community Safety, Crime and Disorder	N	It is assumed this matter will be dealt with in government review of proposed policy changes
Health, Safety and Wellbeing	N	It is assumed this matter will be dealt with in government review of proposed policy changes
Other implications	N	Access to safe and affordable housing.

Supporting Information

Appendices:

Appendix 1: Proposed WDBC response to the consultation below.

Background Papers:

Proposed changes to the NPPF:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/488276/151207_Consultation_document.pdf

Appendix 1: Proposed WDBC response to NPPF consultation.

Overall Comments

1. West Devon District Council welcomes the opportunity to comment on the proposed changes to the National Planning Policy Framework (NPPF). This consultation regarding national policy is particularly timely following a recent flurry of amendments to Planning Practice Guidance (PPG), which has occasionally resulted in ambiguity.
2. The challenges of providing a range of housing in sufficient quantity, and of sufficient quality, to meet the needs of our communities have been WDBC corporate priorities for a number of years. As a council we are committed to the delivery of new communities within our administrative area, and are exploring the preparation of a new Local Plan with three neighbouring planning authorities. In short, we feel that we are embracing the challenges that the 'housing crisis' has presented us with, and will continue to innovate and evolve to achieve the best outcomes for our communities.
3. What we feel has been missing since the NPPF came into force, is flexibility that allows LPAs in rural areas to adopt policies that are more appropriate to the landscape character and settlement types typical of the English countryside. There seems to be a prevailing wind within government policy that incentivises significant growth without allowing for flexibility in rural areas that are constrained by sensitive landscapes and rural settlement patterns.
4. This does not mean that we seek to absolve ourselves from playing a full part in contributing the many new homes that are needed. It is, we believe, simply unsustainable for market towns and rural villages to keep growing at a rate required by current policies, particularly in areas that have a high proportion of designated landscapes such as Areas of Outstanding Natural Beauty, National Parks and World Heritage Sites, all of which West Devon has.
5. Local Planning Authorities (LPAs) in rural areas want to provide more housing, particularly affordable housing, but many are having to do so on increasingly unfavourable sites. What LPAs like WDBC need are suitably flexible national policies that allow us to deliver a broader range of housing types, and to deliver a range of affordable homes tailored to the needs of a low pay rural economy, in addition to the Starter Homes favoured by government.
6. The proposed amendments to the NPPF do little address the very specific needs of rural areas. More flexibility is what we need, along with long term policy solutions to correct the systemic imbalance created by highly inflated house prices in an area with significantly lower than average earnings. Policies also need to encourage mixed economy communities with a range of employment, social and cultural facilities rather than villages that simply serve as commuter satellites for the nearby cities.

7. WDBC hopes that government can see why we believe that some of the proposed amendments are a poor fit for rural areas such as ours, and would welcome the opportunity to work creatively with you to develop specific policies that will help our rural areas to prosper.

Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost homes?

8. WDBC supports policy developments that help to bring forward more affordable housing.
9. Indeed, WDBC is well advanced in developing a range of policies that support Starter Homes and self- and custom-build housing, and that try to improve the ability of people with a local connection to access home ownership. We are also working with a range of privately funded providers in order to create innovative delivery mechanisms, including 'rent to buy' opportunities.
10. To that extent, we support the proposal to include a wider range of low-cost homes within the definition of affordable housing
11. However, the Council does not agree that this should be at the expense of removing the ability of local planning authorities both to require affordable rented accommodation and to secure some of the affordable housing "in perpetuity"
12. The evidence is that, for some time to come, rural districts will continue to experience a significant demand for rented affordable housing secured in perpetuity.
13. Reducing our ability to secure affordable housing in perpetuity will not enable more households in identified affordable housing need in West Devon to buy their own homes, because it will not close the affordability gap between house prices and local wages. It will simply require us to identify ever more sites to deliver the range of rental properties that many in our communities need.

Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

14. The proposed changes to the NPPF seem not to have been 'rural proofed' and will have an equalities impact in rural communities.
15. Some rural communities will be negatively impacted by these proposals as there will be a decrease in genuine affordable housing supply particularly as tenure options that are already limited in rural areas will be reduced by the Voluntary Right to Buy, the sale of vacant high value council homes, and provision of Starter Homes.

16. People on lower quartile incomes in rural areas (and urban) still require rented tenures despite an aspiration to home ownership. Private rentals are limited in rural areas and, where they exist, they tend to be expensive. In addition, in rural tourist areas many private rentals are generally in use as vacation properties.
17. The dominant Affordable Housing need identified through rural housing need surveys conducted is for social and affordable rent. Where there is an expressed desire for shared ownership, respondents rarely have sufficient funds for a down payment and low incomes that will not secure a mortgage. Even where shared ownership is an option the additional costs of paying rent and a mortgage as well as maintaining a property risks putting people in arrears. Even when taking Rent Plus and Rent to Buy models into account, that provide increments towards ownership, there are people within our communities for whom social rent is the only real option.
18. It is essential that affordable housing and planning policy supports the principle of creating sustainable communities. Without a balance of tenure mix the communities will not be sustainable and lower earners will be priced out of the community.
19. Access to affordable housing for all people in need is equally important to support the economic activities that contribute to a thriving local rural community including rural labourers and also for more generic, non-rural employment like carers and cleaners who are low paid but provide essential services.

Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?

20. It is difficult to define what could be considered as a commuter hub without understanding the local context. In West Devon, we have only two towns that currently benefit from a train station with mainline services stops.
21. The proposed threshold of 25,000 would mean that no town would be considered as a 'commuter hub', and be considered suitable for higher building densities.

Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?

22. We have no experience that would assist the government in respect of this question

Q5. Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?

23. We have no experience that would assist the government in respect of this question

Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?

24. The NPPF already provides support for new settlements in paragraph 52. Such are the common constraints shared by small settlements in rural areas we are aware of numerous Local Planning Authorities in rural areas who consider new settlements as one of the best options to deliver a large amount of new housing in a coordinated and managed way.
25. Simply strengthening national policy is unlikely to adequately address the multiple issues that need to be overcome to enable a project of this magnitude to come to fruition, not least mitigating the landscape and visual impact in sensitive and designated landscapes.
26. WDBC Members and officers are supportive of delivering a new settlement in principle, but such is the complexity of such a project that it is only likely to deliver new homes 10+ years from the start of a plan period.
27. It would be helpful if the government could recognise the commitment of LPAs who identify such long-term solutions by clarifying how much evidence is required at examination to support the inclusion of a new settlement. Greater flexibility in terms of detail would allow an LPA time to deliver a complex project without undermining the overall soundness of a plan.

Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

28. WDBC recognises the merits of prioritizing alternative land-uses on brownfield sites. Again it is felt that the proposed changes will not always benefit rural areas, particularly areas where brownfield land is in short supply and where the majority of small developments of under 10 homes do not come forward on brownfield land.
29. The principle of supporting development on brownfield land is well established, but a change in national policy is unlikely to effectively address the issues that prevent brownfield sites coming forward.
30. In rural settlements many brownfield sites are of relatively small-scale, and often in multiple ownership. Viable businesses will often operate adjacent to other parts of employment sites that have fallen into disuse. It is not considered appropriate to make the assumption in a national policy that housing is *always* the most appropriate alternative use for all brownfield sites. Other uses may have a much more beneficial impact,

and also represent more compatible uses with the viable businesses that continue to operate in an area.

31. The need for more housing is widely acknowledged, but it should not be considered the default use of any available land, as this is not how effective and sustainable communities work. In rural areas many commercial and/or employment sites are not located within or adjacent to settlements, and it would be wrong to assume that these sites would be appropriate for housing – the rural settlement pattern in West Devon means that some of these sites could be miles from the nearest town or village, with no public transport links. Development in such locations would be entirely contrary to the collective aims of the NPPF as it would not be considered a sustainable proposal. The fact that a site has previously been used for a commercial use should in no way be considered sufficient justification for using the site for housing.

Q8. Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of local planning authorities' five-year land supply?

32. There is already a broad assumption that housing development within a settlement is supported in principle, and it is often only details of compatibility with surrounding uses and residential amenity that prevent otherwise suitable development coming forward there.
33. WDBC feels that there is a risk that applying such an assumption in blanket fashion within settlements could displace many other vital services, facilities and alternative land-uses that in combination make a settlement sustainable.
34. WDBC has for some time been regarding proposed development sites adjacent to settlement boundaries on a case-by-case basis, weighing the potential benefits against potential impacts before arriving at a balanced judgement as to whether the proposal, and its location, can be considered 'sustainable'. The Council feels that the NPPF already provides us with a framework within which to apply this approach, providing that we can be clear about the factors that we consider to make a balanced judgement. A lot of work has been done with our communities – often through the Neighbourhood Planning process - to help them understand that some development proposals on the edge of settlements can bring about a wide range of benefits, and not just the provision of new housing.
35. Amending the NPPF to give greater weight to development sites simply because they could deliver housing could unbalance the process that, *with the explicit encouragement of government to work with our communities*, we currently use to assess what can be considered 'sustainable'.
36. WDBC has invested countless hours working with our communities and neighbourhood plan groups to understand the priorities of each community. Simply supporting in-fill development is not enough to

secure sustainable futures for rural settlements. Amendments to the NPPF that can help us to work with those communities to bring forward sites in accordance with their priorities would be beneficial. Changes that do not empower these communities would simply serve to lose their trust in local and national government.

Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?

37. The general permitted development order already recognises a threshold for 'major' developments as being over 10 dwelling units, and by default provides a definition of what is considered 'minor'.
38. Providing that the definition of a small site does not trigger concessions, perceived or otherwise, in developer contributions/obligations, WDBC supports this proposal.

Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan?

39. The NPPF already allows for LPAs to apply their own interpretation of what constitutes 'sustainable development' in their areas, and also to adopt criteria-based policies with which to bring forward sustainable development. If, by amending the NPPF, locally adopted criteria-based policies are given greater recognition, then this is supported.

Q11. We would welcome your views on how best to implement the housing delivery test, and in particular

- **What do you consider should be the baseline against which to monitor delivery of new housing?**
 - **What should constitute significant under-delivery, and over what time period?**
 - **What steps should be taken in response to significant under-delivery?**
 - **How do you see this approach working when the housing policies in the Local Plan are not up-to-date?**
40. It would seem appropriate that the baseline should be the remainder of the approved target for the Local Plan period, annualised to provide a 5 year target.
41. Since delivery is in the hands of developers, not the local planning authority, in areas of significant under-delivery, planning permissions should automatically expire in a shorter than normal period, say, one year from approval. On alternative sites, Paragraph 49 of the NPPF

would apply in any event, providing a sufficient incentive to prevent developers from 'land banking'.

42. Paragraph 49 of the NPPF already works well in such circumstances.

Q12. What would be the impact of a housing delivery test on development activity?

43. Would a recognised 'test' replicate the existing need to monitor performance of annualised housing delivery? A standard requirement may be helpful to ensure a uniformity of information from LPAs, although one unintended risk would be schemes being delayed until just after LPAs have published annual figures, particularly in areas where a 5-year housing land supply is contested.

Q13. What evidence would you suggest could be used to justify retention of land for commercial or similar use? Should there be a fixed time limit on land retention for commercial use?

44. There should be no fixed time limit. This would simply guarantee, in many situations, that land would be sterilised whilst developers waited for their land to acquire a 'residential presumption'. That serves neither the local nor the national interest.

45. If the government believes (as we do) in a plan led system, then a land owner will have ample opportunity to make the case that a site should not be allocated for employment development at the appropriate Examination. If, despite this, a landowner decides to apply for alternative (housing) use then he/she should be required to demonstrate that he has made proper arrangements to market the site since the last time that it was so allocated (and approved by an independent inspector)

46. It should not be overlooked that LPAs have a duty to create sustainable places to live, and providing homes in locations that have previously been considered appropriate for employment uses will not make a positive contribution to that requirement.

47. If the economic downturn has taught us anything it should be that the economy should be the subject of long-term planning, and not focused on short-term returns. Employment sites can experience cyclical fluctuations in fortunes, and it would constitute short-sighted policy making to apply a time limit on this use of land.

Q14. Do you consider that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land?

48. No. The provision of new homes should be in locations that are suited to this type of development, within proximity of public transport,

schools, healthcare facilities, shops and other services and amenities. Houses should not be built in locations simply because they might not be considered suitable for any other land-use. There is no prerequisite for retail, leisure or non-industrial uses to satisfy the same sustainable criteria that is required of housing.

Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?

49. If an exception site is to be brought forward it should only be because the development has a clear and identifiable community benefit that outweighs the potential impact of development. On its own, a discount open market price for a limited time period does not represent nearly enough benefit to communities, and risks a significant number of poorly located sites with little or no access to local services. There is no planning justification for using an 'exceptions' policy to deliver Starter Homes.

Q16: Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?

50. WDBC would like to retain the ability to advise on an appropriate housing mix that is delivered in our area. We would prefer to use an evidence base, such as the Strategic Housing Market Needs Assessment (SHMNA) to inform the housing mix required to meet our varied housing needs. In some areas this may require a significant amount of Starter Homes, in other areas less so.

Q17. Should rural exception sites be used to deliver starter homes in rural areas? If so, should local planning authorities have the flexibility to require local connection tests?

51. Noting the response to Q15 this would not be a preferred route. However if a proportion of Starter Homes on exception sites is brought forward in policy, then a local connection would provide a useful mechanism to ensure that they are first and foremost meeting a local need. WDBC would support the use of a local connection criteria in such circumstances.

Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?

52. A policy approach that gives rural LPAs the flexibility to use evidence to determine the right level of Starter Home provision alongside other affordable housing types would be welcomed.

Q19. Should local communities have the opportunity to allocate sites for small scale Starter Home developments in their Green Belt through neighbourhood plans?

53. We have no Green Belt land and, therefore, we have no experience that would assist the government in respect of this question

Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness (NB in Green Belt)?

54. In areas outside Green Belt, a flexible approach to assessing the potential use of brownfield sites for Starter Homes would seem appropriate, providing that wider sustainability criteria concerning location of site forms part of the assessment.

Q21. We would welcome your views on our proposed transitional arrangements.

55. WDBC is currently preparing a new Local Plan, and in that regard we are well placed to respond to new policy requirements that arise in the coming 6 months.
56. However, such is the scale of the changes proposed that it is unrealistic to expect that a transitional arrangement of 12 months will allow LPAs sufficient time to identify all potential impacts of the change and adequately mitigate these where necessary. Given the high land values in West Devon and the existing challenges that we face in providing a suitable mix of housing to meet the clearly identified needs of our communities, we would need to undertake detailed viability assessment work to inform our future policies, and ensure that we can find a way of continuing to provide a range of housing products for our communities.
57. Some of the changes proposed have the potential to significantly stall the reallocation or redevelopment of commercial sites whilst land owners wait to find out if their sites are liable to be considered as acceptable in principle for housing.
58. The delivery of affordable housing, another significant challenge for LPAs, is likely to slow or stall whilst developers wait to find out if the potentially more lucrative Starter Homes requirements can be applied to their sites. This will be particularly felt on allocated development sites, and a reduction in delivery will have a profound impact on the delivery rates of LPAs.
59. WDBC would prefer to see a longer transition period than is currently proposed, allowing for a greater understanding of the potential impact on wider housing delivery.

Q22. What are your views on the assumptions and data sources set out in this document to estimate the impact of the proposed changes? Is there any other evidence which you think we need to consider?

60. Locally appropriate data sources regarding population projections and affordable housing need would seem the most appropriate data sources to use when informing housing provision.
61. Understanding the wider implications of these proposed changes on housing delivery will require SHMNA and Viability Assessments to be adjusted accordingly.

Q23. Have you any other views on the implications of our proposed changes to national planning policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

62. There is some concern among rural LPAs that the changes represent a possible demise of the rural exception site that can meet a range of affordable housing needs.
63. Rural communities need confidence that they have genuine influence over what is being developed in their community and traditionally rural exception sites and more recently Neighbourhood Development Plans and Community Land Trust schemes build this confidence.
64. We need to ensure that communities continue to have confidence in their ability to have some control over housing locally, and in the ability of LPAs to understand what these needs are.