

North York Moors National Park Authority Planning Committee

16 March 2017

Publication of the Housing White Paper - "Fixing our Broken Housing Market" (February 2017)

Purpose of the Report

- 1.1 To inform Members of the recent publication of the Government's Housing White Paper and update them on its contents.
- 1.2 To present a response to Government from the Authority.

2. Background

- 2.1 On 7 February 2017 the Government published their long-awaited Housing White Paper. The proposals in the White Paper set out how the Government intends to boost housing supply and create a more efficient housing market. The consultation on the White Paper runs for 12 weeks, closing on 2 May 2017. We will be providing a response (likely to be a joint response with the other English National Parks and National Parks England).
- 2.2 Several proposals in the White Paper build on reviews and consultations conducted over the last year, including:
 - The report of the Local Plans Expert Group (March 2016)
 - Consultation on changes to the National Planning Policy Framework (NPPF) (December 2015)
 - The Rural Planning Review call for evidence (February 2016)
- 2.3 A response to each was made by National Parks England, with input from this Authority.
- 2.4 A summary of the responses to these consultations was published alongside the White Paper. The Government is also asking for comments on proposals in two further documents in addition to the Housing White Paper:
 - Upward extensions and changes to permitted development rights following the Rural Planning Review call for evidence
 - Planning and affordable housing for 'Build to Rent'
- 2.5 A Neighbourhood Planning Bill is also nearing completion through the parliamentary process. As this bill shares a common purpose with the Housing White Paper (identifying and freeing up more land to build homes and speeding up the delivery of new homes) a brief summary is also set out below.
- 2.6 The Government intends to publish a revised NPPF later this year, which will consolidate the outcome from the previous and current consultations.

3. Key Points

3.1 This report focuses on elements of the recent consultation documents that are of most relevance to the North York Moors National Park. Taken together these documents propose a comprehensive set of significant planning changes and it is important that our views and those of the wider National Park family are put forward for consideration. Appendix 2 therefore goes in to some detail in terms of our suggested response. It does not cover some other matters which have garnered national press attention - for example garden towns, changes to green belt policy, the creation of new town corporations, national infrastructure and the selling of public land.

3.2 **Appendix 1** includes a summary of the main points. The main proposals of relevance to the Authority are:

- Confirmation that funding for affordable housing will be extended to include affordable rental housing, and not just home ownership models (which was the focus under the previous central administration)
- Strengthening of policy in the NPPF to make clearer that development should be restricted in some areas, including National Parks
- Allowing authorities to prepare joint or higher level strategic plans, complementing separate local plans at authority level
- A requirement for local plans to be reviewed every five years
- A strengthening of policy to indicate that great weight or a presumption in favour of sustainable development should be given to proposals for housing development on small sites, windfall (unallocated or unidentified sites) and brownfield sites
- Amendments to policy on starter homes to set out a policy expectation that 10% of housing on larger sites should be starter homes, instead of the previously proposed 20% requirement. A threshold requirement of ten or more dwellings or 0.5 hectares is also suggested
- Amended eligibility criteria for starter homes. These include a household income cap (£80,000), a requirement that buyers must have a mortgage and proposal to allow military personnel over 40 to buy starter homes
- Amended starter home policy to extend the period (from five to fifteen years) where an occupant is expected to pay back some or all of the initial discount
- Allowing planning authorities to raise application fees by 20% if additional income is spent on the planning function, and fees for appeals to be charged

4. Planning and Affordable Housing for 'Build to Rent'.

4.1 The Government has also released a consultation on 'Build to Rent' This refers to affordable housing built by developers and rented at a discount, A discount of 20% on the rent over 20% of all units is suggested. This type of affordable housing is currently excluded from the definition of affordable housing in the NPPF, with affordable rent models currently requiring the involvement of a Registered Social Landlord or Local Authority. Policy is in effect catching up with the evolution of large housing schemes in cities (particularly London) where economies of scale and high land values mean that such an approach can be viably delivered. The consultation asks whether a size limit of 50 units or more should be included within the definition. Given the typical scale of development in the North York Moors National Park this type of product is unlikely to be delivered in the National Park in the future.

5. Proposed Changes to NPPF - Summary of Consultation Responses

- 5.1 The Government also released its response to the December 2015 consultation on proposed changes to the NPPF at the same time as the White Paper. The proposed changes included broadening the definition of affordable housing to expand the range of low cost housing opportunities, increasing the density of development around commuter hubs, supporting sustainable new settlements, supporting delivery of starter homes and changes to policy on development on brownfield land and small sites.
- 5.2 It was the last two proposals that were of most relevance (and concern) to the National Park family and were raised in the response made by the National Parks (via National Parks England). Firstly the consultation suggested introducing a presumption in favour of sustainable development of small sites (less than ten units) adjacent to existing settlements. This has now been dropped – the response to the NPPF consultation states that this is “*following careful consideration and in recognition of the potential harmful impacts to villages.*” The inclusion of starter homes within the definition of affordable housing was also raised, however the response (and the Housing White Paper) confirm that the Government still intends to include starter homes within a revised definition of affordable housing, albeit with different qualifying criteria (see the affordable housing section at **Appendix 1.**)

6 Upward extensions and changes to permitted development rights following the Rural Planning Review call for evidence

- 6.1 The Government is also consulting on a new agricultural to residential use permitted development right, to allow conversion of up to 750sqm of agricultural buildings, for a maximum of 5 new dwellings (each with a floor space of no more than 150sqm) without requiring planning permission. This would extend the existing Class Q permitted development threshold of 450sqm. The current permitted development right does not however apply to National Parks. The consultation asks if the new thresholds should be subject to similar restrictions.

7 The Neighbourhood Planning Bill

- 7.1 The Neighbourhood Planning Bill is nearing the end of its preparation process and is due for its third and final reading before the House of Lords. This bill is intended to strengthen the neighbourhood planning system by enabling planning decision makers to take account of “well-advanced” neighbourhood plans. A written statement (12 December 2016) indicated that neighbourhood plans could not be considered out of date if they are less than two years old and allocate housing sites where the local planning authority can demonstrate a three year supply of housing (rather than five as at present). The bill also proposes changes to make it easier to modify an existing neighbourhood plan.
- 7.2 The draft bill also covers areas of planning outside the neighbourhood planning process. On local plans it proposes that all local planning authorities in England identify the strategic priorities for the development and use of land in their area. It will give the Secretary of State power to direct the joint preparation of plans or direct a review of plans. It also includes a provision for the Secretary of State to invite an upper tier (County Council) authority to prepare a plan where Government thinks that a lower-tier planning authority are failing or omitting to do anything it is necessary for them to do in connection with the preparation of a development plan document. The bill also seeks to allow pre-commencement planning conditions normally only with the written consent of the planning applicant and implements changes to the compulsory purchase system.

8. Conclusions

- 8.1 Officers consider that the changes suggested by the suite of policy documents published go a long way to address concerns previously recorded. In particular the recognition of the role that affordable rental housing products can play in meeting housing need is welcomed, as are potential changes to starter home eligibility and retention criteria.

The suggestion to amend the central paragraph of the NPPF on the presumption in favour of sustainability (paragraph 14) to make sure that the list of areas where development should be restricted is made clearer is also welcome. The confirmation that the presumption in favour of sustainable development on small sites adjacent to existing villages is to be abandoned is to be supported, as are proposals to increase planning fees. (This is the subject of a separate report to the Urgency Committee). Changes to the local plan system to allow authorities to make changes to draft plans prior to submission and a standardised calculation for assessing need are also supported. Finally, with regard to consultation on the changes to permitted development rights following the Rural Planning Review we are requesting that National Parks continue to be exempted from any new rules to allow the conversion of agricultural buildings to residential use without permission.

- 8.2 In addition, officers do have some more detailed comments or suggestions to make in response to the questions posed in the consultation document. These are set out at **Appendix 2**. Comments include the possible requirement to allocate housing sites in plans, the need for guidance on calculating housing need to recognise the special circumstances of national parks, exemption from the presumption in favour of sustainable development on brownfield sites, changes to the proposed housing delivery test and suggestions on agreeing five year land supply figures with the inspectorate are covered.

9 Financial and Staffing Implications

- 9.1 None.

10. Contribution to National Park Management Plan

- 10.1 The Authority's planning policy and development management functions contribute directly to achieving many of the policies and aspirations in the Management Plan. Proposals to strengthen policy on protection of National Parks and widen the range of affordable housing that can be funded will particularly help deliver the objectives of the Management Plan.

11. Legal Implications

- 11.1 None.

12. Recommendation

- 12.1 That Members note the contents of this report and agree that the response at **Appendix 2** is submitted to Government, either as an input to a wider response from National Parks England or directly from this Authority.

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Housing White Paper and Accompanying Documents - Main Points

The following bullet points refer to proposals in the Housing White Paper and the package of documents released at the same time (see paragraphs 2.2 and 2.4 of the main report), and cover issues particularly relevant to National Parks only.

The main points are:

For local plans the Government proposes to:

- Enable the Government to intervene to ensure that local plans are put in place. The intention is to prioritise intervention in line with the approach set out in the February 2017 response to the DCLG Select Committee inquiry into the recommendations of the Local Plans Expert Group. These are:
 - Where the least progress in plan-making had been made;
 - Where policies in plans had not been kept up to date;
 - Where there is higher housing pressure; and,
 - Where intervention would have the greatest impact in accelerating local plan production.
- Clarify which national policies provide a strong reason to restrict development when preparing plans or making decisions. The list of policies contained in footnote 9 of the NPPF (including National Park designation) will be set out as a 'clear list' rather than as possible examples, meaning policy is strengthened. The 'central' paragraph of the NPPF on the presumption in favour of sustainable development (paragraph 14) will also be re-ordered so that policy on restricting development in certain areas is strengthened.
- Remove the expectation that each authority should produce a single local plan. It will be open to authorities to produce joint higher level strategic plans with local plans sitting beneath. These could include the allocation of strategic sites by Mayors or Combined Authorities. Larger strategic sites could be allocated.
- Require that local plans set out an additional strategic priority that housing allocations should be set out in plans to deliver an area's housing requirement.
- Require that plans are reviewed every five years, with the expectation that plans are reviewed if the current housing target is not sufficient to meet assessed need.
- Streamline the examination process by making clear that the plan should set out "an" appropriate strategy for the area rather than "the most" appropriate strategy, and by tightening the definition of what evidence is required to support a plan
- Introduce a single national methodology for calculating housing need, subject to further consultation. This will apply as a baseline for assessing five year land supply figures from April 2018
- Make clear that authorities are expected to prepare a 'Statement of Common Ground', setting out how they will work together to meet housing requirements and other issues that cut across authority boundaries (an extension of the current "duty to cooperate").
- Amend the NPPF so that 'great weight' should be attached to the value of using suitable brownfield land within existing settlements for homes
- Indicate in the NPPF that 'great weight' should also be given to using small undeveloped sites within settlements for new homes, where they are suitable for residential development.
- Introduce a requirement for plans to include policies supporting the development of windfall sites.(sites not allocated in plans that come forward on an ad hoc basis)

- Indicate that strong support should be given for the development of rural exceptions sites for affordable housing (including starter homes), and that a local connection test should apply to occupants
- Introduce a requirement for at least 10% of allocated housing sites in plans to be half a hectare or less
- Amend the NPPF to give local authorities the opportunity to have their five year land supply figure agreed and fixed for a one year period
- Introduce a 'housing delivery test' where penalties are ramped up year on year in the event of increasing housing under supply. Penalties would be in the form of a requirement to identify additional land for housing and then an increasing chance of losing appeals as a presumption in favour of sustainable development applies
- Strengthen national policy to make it clear that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older people
- Not proceed with the proposal for local planning authorities to compile and maintain a small sites register that could contain one to four dwellings (set out in February 2016's consultation on technical changes to the planning system)

*For **development management** the Government proposes to:*

- Increase nationally set planning fees by enabling local authorities to increase fees by 20% from July 2017 as long as fees are spent on the planning department, with a possible extra amount (up to 20%) if authorities are delivering sufficient homes
- Consult on charging fees for planning appeals. One option would be for the fee to be capped, for example at a maximum of £2000 for the most expensive route (full inquiry)
- Introduce a consideration of how realistic development will be when assessing applications on sites with existing unimplemented permissions
- Take forward proposals to allow the Secretary of State to prohibit conditions that do not meet the national policy tests, and ensure that pre-commencement conditions can only be used with the agreement of the applicant
- Potentially amend national policy to encourage local authorities to shorten the timescales for developers to implement permissions for housing development. Two years rather than the current three is suggested

*On **affordable housing** the Government proposes to:*

- Open up the 2016-21 Affordable Homes Programme (over £7 billion) to include grant for affordable rented housing. It was originally designed to focus on delivering home ownership models such as starter homes and shared ownership
- Bring affordable private rental (i.e. not available through an RSL) and starter homes within the definition of affordable housing
- On starter homes:
 - Replace the previous requirement for at least 20% of new homes on sites to be starter homes with a clear policy expectation (rather than requirement) that housing sites of more than 10 units of 0.5 hectares should deliver a minimum of 10% as affordable home ownership units, alongside other affordable home ownership and rented tenures
 - Amend the previous suggested restriction of requiring some or all of the discount to be paid back if the house is sold within five years by increasing the time period to fifteen years
 - Require that purchasers must buy with a mortgage, with the aim of supporting first time buyers rather than cash buyers. A minimum 25% mortgage and a household income cap of £80,000 per household will also apply

- Extend eligibility for starter homes to households where one individual is aged under 40 and one is over 40, as long as both are first time buyers. Injured military service personnel or people who have lost a partner on duty are also eligible if aged over 40
 - Clarify that starter homes, with appropriate local connection tests, can be acceptable on rural exception sites
 - Commence the general duty on councils under section 4 of the Housing and Planning Act 2016, to promote the supply of starter homes to support delivery
 - Make clear that any proposal on land in employment, leisure or retail use should be considered favourably for starter home-led development where it has been vacant, unused or unviable for a period of five years
- The Government will set out a rent policy for social housing landlords (housing associations and local authority landlords) for the period beyond 2020 to help them to borrow against future income. The 1% rent reduction requirement on housing associations up to the year 2020 remains
 - The Homes and Communities Agency will be relaunched as Homes England with a clear, unifying purpose: *'To make a home within reach for everyone'*

The Government also proposes to:

- Apply a transitional period of between 12 and 18 months from revision of the NPPF to enable planning authorities to make amendments to their Local Plan policies. After this time national policy would take precedence
- Review the Community Infrastructure Levy. The review was originally expected to be released alongside the Housing White Paper but is now expected to be bundled in with the autumn budget review statement

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Proposed Response.

This response is made on behalf of the North York Moors National Park Authority. The North York Moors is one of ten National Parks (including the Broads) which together cover 9.3% of England (compared to 13% for Green Belt). Our starting point is that national planning policy needs to be framed in a way that recognises that National Park Authorities are sole local planning authorities in order to deliver their statutory purposes and duty (as set out in the 1995 Environment Act). Any suggestions made are done so with this goal in mind.

We support many of the proposals set out in the white paper. In particular:

- The recognition of the role that affordable rental housing products can play in meeting housing need alongside other forms of affordable housing. Almost all of the affordable housing need in National Parks is for this type of tenure.
- Potential changes to starter home eligibility and retention criteria.
- The suggestion to amend the central paragraph of the NPPF on the presumption in favour of sustainability (paragraph 14) to make sure that the list of areas where development should be restricted to make it clear rather than suggested. We feel that this offers an opportunity for the NPPF to clarify that the government expects there to be a different approach to housing development in National Parks because of the existing requirement that development in these areas should be restricted.
- The confirmation that the presumption in favour of sustainable development on small sites adjacent to existing villages is to be abandoned
- Proposals to increase planning fees.
- Changes to the local plan system to allow authorities to make changes to draft plans prior to submission and a standardised calculation for assessing need

With regard to consultation on the changes to permitted development rights following the Rural Planning Review we also request that National Parks continue to be exempted from any new rules to allow the conversion of agricultural buildings to residential use without permission. This is in recognition of the NPPF requirement that great weight should be afforded to the conservation of the landscape and scenic beauty of these areas and the conflict such a relaxation of permitted development rights would have on National Park purposes.

Question 1a – Allocation of housing sites in plans. Question 1a asks for views on the suggestion that an additional requirement is set out for local planning authorities to allocate sites to meet an area's housing requirement. The one comment we would make is that sources of land supply in National Parks are often heavily (or entirely) reliant on small scale windfall development coming forward, often as rural exceptions sites. Only five of the ten National Parks currently allocate sites, with the most recent plan to go through Examination (Exmoor) proposing not to allocate sites. We would therefore request that if the intention is to require allocation (rather than identification through a SHLAA) of sites for a whole plan period some flexibility is built in to recognise that this may not be the best approach in all areas where windfalls could provide a better and more deliverable source of supply than allocated sites. For example we would suggest that the text could be amended to read 'allocate and/or identify sources of housing supply to meet plan targets' or that a cross reference to footnote 9 (or its replacements) is made.

Question 2 – Consultation and examination procedures. We support the Local Plan Expert Group's suggestion to allow Local Authorities to make modifications to a Local Plan after consultation on a full draft and prior to submission.

Question 3b – Assessing housing requirements. We support the introduction of a standardised approach to assessing housing need, and would stress a need for simplicity. One suggestion would be to stipulate that national household projections are used as a minimum figure (possibly converted to dwellings based on the last census proportion) and leave it to local planning authorities to increase the figure beyond that should they wish to do so, as household projection figures have historically been above completion rates at a national level.

The one issue we would raise is over the current expectation for National Park Authorities to comply with the NPPF requirement for them to generate an OAN figure. This has recently been subject to discussion between National Park officers, and has also been covered at recent examinations in the Yorkshire Dales and Exmoor. We would welcome any standard guidance on how and whether calculation of need should apply to National Parks (or confirmation that it does not – as per the approach set out in the existing 2010 Circular).

As planning authorities the National Park Authorities are currently required to generate an OAN (unconstrained) figure for their housing market area. However, National Park boundaries overlay district and borough boundaries and there are no geographically distinct available household or economic projections to start from. Conversely, because constituent districts start with projections that will cover parts of their area within the National Parks their OAN figures will likely include need in the National Parks, meaning that if districts and boroughs meet their full OAN need within the National Parks has been addressed elsewhere.

It is therefore not possible to strictly follow current (PBA for PAS) guidance. The only option is to take a proportional split of existing population based on smaller (for example) output area geographies and apply these to projections. This does not necessarily reflect the source of past supply (as National Parks are protected) or the need to meet National Park statutory purposes.

We would suggest that either future guidance on need makes clear that there is no expectation that National Parks should generate a separate OAN figure, however they will be expected to work with constituent authorities to deliver future housing need across housing market areas in light of the expectation that great weight should be given to conserving landscape and scenic beauty. Alternatively a second sentence could be added to NPPF paragraph 115, reading 'Assessment of development needs in National Parks should be restricted to addressing housing need to deliver affordable housing, key services and local employment opportunities only'.

If further information is required on this subject we would be happy to assist.

Question 4 – Presumption in favour of sustainable development and brownfield sites. We very much support the proposal to reorder the paragraphs within paragraph 14.

The White Paper also mentions a previous intention to introduce statutory brownfield registers where a granting of permission in principle for housing will operate on suitable sites, We would draw your attention to National Parks England's previous response on changes to national planning policy (Feb 2016) which strongly argued that National Parks should be exempt from such a proposal on the grounds of scarcity of sites and the need to promote economic development and the need to protect valued landscapes.

Question 8 – Small windfall sites and neighbourhood planning. The White Paper proposes to introduce a national policy (following consultation on NPPF changes) that 'great weight' should be given to using suitable small undeveloped sites within settlements. This is the same phrase as used in paragraph 115 in relation to protection of National Parks and AONBs and potentially gives rise to a policy conflict pulling equally in opposite directions.

We would prefer the phrase provided in the following paragraph 'a clear presumption that residential development opportunities should be considered positively, or that reference is made to policies elsewhere in the NPPF which indicate that development should be restricted.

The intention to give stronger support for rural exceptions sites is supported.

Question 12 – Neighbourhood Planning. The White Paper proposes to consult on a standard methodology to allow local authorities to provide neighbourhood planning groups with a housing need figure. Whilst we can see the attraction of this it may be difficult in practice. The only options are to use a proportion of a district or borough wide target based on a share of people, households or dwellings, or apply a standard percentage to settlements. Both of which would seem to potentially cut across or undermine any wider district spatial strategy based on a settlement hierarchy aimed at delivering sustainable development as it could lead to additional housing in places outside this hierarchy. The other issue is that if lower level census are used their geographies can straddle local authority boundaries or as they are based on population give a high figure for a particular village if they are large in scale and home to a scattered population. The alternative would be to continue to allow neighbourhoods to take a 'bottom up' approach and assess their own needs over time and allocate accordingly. With national policy making clear that policies to restrict supply on matters other than the presence of constraints (for example a certain number of dwellings per year) are considered unacceptable as they are not compatible with the presumption in favour of sustainable development. This would also avoid the perception that neighbourhoods are being given a figure by the local authority which they are expected to find land for.

Question 16 – Agreeing a five year housing supply. We agree with the principle that a land supply figure should be agreed and 'fixed' to aid certainty, and would welcome additional guidance. The obvious issue is that the consideration of five year land supply is often a matter of dispute between local authorities and developers over the deemed suitability and availability of sites. If the Planning Inspectorate were to agree a figure annually there is the prospect that authorities' assessment of suitability and availability could be challenged as part of this process and it is likely that the Inspectorate would need some mechanism for inviting or dealing with representations, which would elongate and complicate a process which if carried out on an annual basis could be very time consuming for both the Inspectorate and local planning authorities. As the intention is to use the Inspectorate as an independent third party we would suggest as possible alternatives: a) increasing the time period to say, two years following adoption of an independently examined plan, or b) after this period introducing the presumption that land supply is robust for a period following the adoption of a plan (e.g. three years) or where a planning inspector has taken a view as part of the appeal process, having invited representations. One further option is to allow a local authority to request an opinion on an ad hoc basis.

We would also welcome some recognition in the NPPF that in locations where it indicates that development should be restricted, development plans should not be rendered out of date in the absence of a five year land supply. At present the NPPF could encourage speculative development in National Parks which would not conform to National Park purposes and it would be useful if the NPPF contained some guidance that paragraph 14 should still apply. We would suggest adding 'except where policies in this Framework indicate that development should be restricted' to the end of paragraph 49.

Question 18. – Fees for appeals. We support the introduction of charging fees for planning appeals as it would be beneficial if there is some reflection of the extra costs an appellant is putting to bear on the planning system should an appeal not succeed. Lower rates for householder type appeals and caps would make the fee rates more proportionate.

Question 28 and 29 - The Housing Delivery Test. As with our response to question 16 we would ask that National Parks be exempt from any housing delivery test as the application of a 20% buffer or presumption in favour of sustainable development may risk compromising National Park purposes and conflict with other policies in the NPPF relating to National Parks.

We would also question whether the housing delivery test appears to either duplicate or complicate existing requirements for a five year housing land supply and preparation of a housing trajectory, both of which were introduced to drive up housing land supply. Firstly, it is difficult to anticipate any situation where a serious under supply would also not result in the loss of a five year housing supply which would trigger a similar policy response. Secondly, as the test is based on a rolling three year average of completions it could easily penalise authorities who have 'frontloaded' a plan with major sites which complete early in the plan period, or those who have major sites which have yet to deliver but have a significant lead in time. In both cases within the 15 year plan period the housing delivery test could be triggered despite the plan meeting its requirements over its duration.

It is this 'lumpiness' of housing supply that led to the development of housing trajectories which were able to look at both past and future supply over a whole plan period to forewarn authorities that a supply problem was looming. We would suggest as alternative that there could be a requirement for local authorities to produce a revised housing supply trajectory alongside the five year land supply calculation within AMRs, taking into account any past shortfalls, either to be agreed as part of the Inspectorate's consideration of the robustness of land supply, or when the monitoring of completions show there is a problem and requires the production of an action plan. Guidance could make clear that the purpose of the trajectory is to make sure the authority is 'on track' at the end of the plan period. Penalties could then be fixed for authorities where anticipated completion rates undershot supply targets at the end of a plan period.

Question 31 & 32 – Affordable housing. We previously expressed concerns (as part of National Parks England response to the February 2016 proposed changes to national planning policy) over the widening of the definition of affordable housing to include starter homes. This was partly on the grounds that it risked preventing a supply of affordable rented housing in areas with scarce supply and on the grounds that it would not be kept affordable in perpetuity. We therefore welcome the possible introduction of a much longer repayment discount period if a house is sold, the introduction of an income cap and the introduction of a ten or more dwellings (or five hectare) threshold. In particular we welcome the greater recognition of the role that social rented housing plays in meeting housing need.

We also support the proposal to make sure rural exceptions schemes are exempt from the requirement to provide at least 10% of homes as affordable home ownership products.

Changes to Permitted Development Rights

Consultation following the Rural Planning Review suggests a new agricultural to residential use permitted development right, to allow conversion of up to 750sqm of agricultural buildings, for a maximum of 5 new dwellings (each with a floor space of no more than 150sqm) without requiring planning permission. This would extend the existing Class Q permitted development threshold of 450sqm. The current permitted development right does not however apply to National Parks. The consultation asks if the new thresholds should be subject to similar restrictions. We strongly support the restriction being carried over into any changes to current permitted development rights as this relaxation would result in sporadic housing development within protected landscapes outside of settlements and clearly conflict with National Park purposes and current policies in the NPPF.