



Department for  
Communities and  
Local Government

# Proposed Changes to NPPF (Dec 2015) - Summary of Consultation Responses



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# Overview

The consultation on proposed changes to national planning policy was published on 7 December 2015. The original closing date of 25 January 2016 was extended. The consultation closed on 22 February 2016.

The Government received 1,138 responses to the consultation. Respondents addressed some or all of the questions set out in the consultation paper, offered comments on the draft changes, and in some cases made specific suggestions for revised wording. This document sets out a summary of the responses made to each question and the Government's response. Where Government is taking forward changes to the National Planning Policy Framework, these are set out in the Housing White Paper: 'Fixing Our Broken Housing Market', published on 7 February 2017.

## Introduction

The consultation document sought views on proposed changes to national planning policy. It covered the following areas:

- Broadening the definition of affordable housing to expand the range of low cost housing opportunities.
- Increasing the density of development around commuter hubs to make more efficient use of land in suitable locations.
- Supporting sustainable new settlements, development on brownfield land and small sites and delivery of housing agreed in Local Plans.
- Supporting delivery of starter homes.
- Transitional arrangements.

Respondents were invited to reply online using an internet survey package or to email or post written comments to the Department for Communities and Local Government.

We were grateful for all the responses received, including the alternative or additional text which some respondents offered. These have been given full consideration.

# Responses

## Affordable Housing

<b>Question 1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national policy to include a wider range of low cost homes?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
701	546	155

Respondents expressed mixed views on the proposal to widen the definition of affordable housing in national planning policy to include a wider range of low cost home ownership options. Many of those who expressed an opinion in favour of the proposal – largely individuals – saw the widening of the definition as increasing opportunities for affordable home ownership. Some in favour also suggested that the definition should be widened further to include self-build and custom build housing. In contrast those against the proposal – including many local planning authorities – considered that a change in definition would not help address the needs of those with greatest housing need, and would likely lead to a reduction in the provision of social and affordable rented housing. Opponents also expressed concern about the long term impact of removing the in perpetuity requirement from the definition.

### **Government response:**

The Government has considered the opposing views on this issue and, after careful consideration of all responses, proposes to extend the definition of Affordable Housing to include starter homes and other products. The Annex to the Housing White Paper seeks views on an updated definition of affordable housing, which includes a revised definition of starter homes that has an income cap. Alongside that, the Government has decided to restrict the availability of starter homes to first time buyers with a mortgage.

<b>Question 2. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
349	314	35

The majority of respondents felt that the proposal would have implications for people with protected characteristics. Disabled and elderly people were cited as being expected to be

mostly disproportionately affected by the change, since some respondents felt that the majority of housing for such groups would not be provided for by the private sector. Some respondents considered that the Equalities Statement was incomplete as it failed to address specific issues, such as: considering low incomes and need and the relationship between these and protected characteristics; acknowledging the difference between aspiration and affordability; and acknowledging the risk that starter homes simply replace affordable homes.

**Government response:**

The Government welcomes the many responses on this issue, which it has carefully considered in bringing forward the proposals in the Housing White Paper.

## Increasing residential density around commuter hubs

<b>Question 3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
620	483	137

The majority of respondents supported the principle that commuter hubs are an appropriate location for higher density housing development and a constructive way of promoting sustainable development. However, many respondents felt that the proposed definition of a commuter hub was too vague and that the term "transport interchange" needed better clarification. Some respondents felt that local authorities should have the ability to set their own standards and define these terms as part of their Local Plan.

### **Government response:**

The Government agrees with the responses to this proposal and both Chapter 1 of and the Annex to the Housing White Paper confirm its intention to strengthen planning policy to increase density in these locations as part of wider proposals to make more efficient use of land. Following concerns about the proposed definition of commuter hub, the Government has decided that it should not define the term, but instead make its intention clearer by referring to the scope for higher-density housing in urban locations that are well served by public transport. The Housing White Paper also sets out other proposals to make more efficient use of land.

<b>Question 4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
501	383	118

The majority of respondents commented that the planning system should not support high density development where the infrastructure and facilities will not cope with demand. Many respondents felt that, in order to make such a proposal sustainable and effective, significant levels of additional funding should be invested in transport infrastructure to ensure that there is sufficient capacity in the network to accommodate the envisaged increase in numbers of people using public transport, due to its increased accessibility.

### **Government response:**

The Government considers that there is scope to make more effective use of land to help meet this country's housing needs. Chapter 1 of and the Annex to the Housing White Paper

set out further proposed changes to the National Planning Policy Framework to achieve this aim. The Annex sets out the Government’s view that indicative standards for particular types of location could be helpful in driving the right level of ambition in areas of high demand, and in areas where it is reasonable to expect densities to be relatively high (such as locations that are well served by public transport). It is seeking views on what standards should be appropriate and the locations to which they would apply.

<b>Question 5. Do you agree the government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
532	429	103

The majority of respondents considered that the Government should not introduce a minimum level of residential density in national policy, that this should be a local decision depending upon specific local circumstances.

**Government response:**

The Government considers that it is ultimately for local authorities to decide the level of density taking account of local circumstances and local character of the area. The Annex to the Housing White Paper sets out the Government’s view that indicative standards for particular types of location could be helpful in driving the right level of ambition in areas of high demand, and in areas where it is reasonable to expect densities to be relatively high (such as locations that are well served by public transport). It is seeking views on what standards should be appropriate and the locations to which they would apply.



## Supporting new settlements, development on brownfield land and small sites, and delivery of housing agreed in Local Plans

<b>Question 6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
618	485	133

The majority of respondents were supportive of the proposal to provide greater policy support for new settlements in meeting development needs, but felt it should remain a locally-led process delivered through Local Plans. Some respondents raised concerns about the impact of the proposals – such as the level of protection given to Green Belt locations, the effect the proposal would have on the plan led system and the need for national financial support to deliver such schemes. A few respondents suggested that support should also be provided for the major expansion of existing smaller and urban settlements and that policy should focus on the use of brownfield land before a new settlement is considered. Some respondents felt that existing policy in paragraph 52 of the Framework already provided sufficient support for new settlements.

### **Government response:**

The Government welcomes the broad support for this recommendation, and will strengthen national planning policy to give support for new settlements in meeting development needs. As set out in Chapter 1 of and the Annex to the Housing White Paper, the Government recognises the need to make the most of the potential for new settlements alongside developing existing areas, and is supporting the creation of ten new garden towns and 14 new garden villages.

<b>Question 7. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
899	588	211

The majority of respondents were broadly supportive of proposals to strengthen policy on development of brownfield land for housing, and some called for the Government to reintroduce a policy requiring brownfield land to be developed before greenfield land. However, many also expressed concern at the possible unintended consequences about the Government's proposed approach.

Respondents felt that it was important: i) to retain local determination in order to ensure policy is applied within the context of the local market conditions; ii) that brownfield sites should only be considered as suitable for development where they have adequate access to services and amenities; iii) that they can be retained for employment purposes in circumstances where there is a demonstrable need; and iv) that the delivery of housing on brownfield land should not be to the detriment of affordable housing provision. Other respondents felt that brownfield sites can be environmentally sensitive, and that there is a need to ensure that the planning process affords appropriate weight to this aspect. They also considered that inclusion of sites on the brownfield register should not override other policy considerations.

Some respondents felt that existing policy was adequate to bring forward brownfield land for development, while others expressed concern about the viability of brownfield sites and suggested that financial incentives should be considered to make brownfield more attractive to developers. Some respondents also expressed concern about the relationship between permission in principle and the brownfield register.

**Government response:**

The Government is committed to bringing forward more brownfield land for development and Chapter 1 of and the Annex to the Housing White Paper set out proposals to amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within existing settlements for homes.

<b>Question 8. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
757	535	222

There was broad support for strengthening policy on small greenfield sites within existing settlements but, like brownfield sites, concern over proposals to limit grounds for refusal. Some respondents felt that existing policy already provided a presumption in favour of sustainable development for small sites, and that change would have little impact on the 5 year supply. Respondents who wanted policy to be strengthened on small sites felt that it would support small and medium sized builders and boost the economy. The majority of respondents did not favour the proposal to strengthen policy on small sites to include land adjacent to existing settlements. The main concerns were that such proposals could lead to unrestricted sprawl of villages, therefore undermining neighbourhood plans and rural exception sites as well as the cumulative impact on the character and appearance of villages.

**Government response:**

The Government agrees that there are local economic and social benefits arising from the development of suitable small sites for housing within existing settlements. Chapter 1 of and the Annex to the Housing White Paper sets out the Government’s proposals for better supporting sustainable development on small sites and promoting housing in rural areas, including through encouraging local planning authorities to identify opportunities for villages to expand. Following careful consideration and in recognition of the potential harmful impacts to villages, the Government will not take forward proposals for extending the presumption in favour of sustainable development of small sites adjacent to existing settlements.

<b>Question 9. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
513	414	99

Respondents expressed a range of opinions on how national planning policy should define a small site. Local authorities and developers generally considered that 10 units was appropriate and consistent with existing definitions of major development. However, there were some caveats to this support, with some local authorities feeling that smaller sites contributed to the cost of the supporting infrastructure, and others considering that local authorities should be able to set their own definition of a small site. Some respondents also felt that there should be a size site threshold of 0.25 hectares.

**Government response:**

The Government welcomes the responses and, after careful consideration, intends to align the definition of a small site in national planning policy with the established legal definition set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (SI 2015/595).

<b>Question 10. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
606	496	110

The majority of respondents felt that the National Planning Policy Framework already requires Local Plans to have positive policies for development and that a specific national

policy was not required for assessing applications for development on small sites not allocated in the Local Plan. The minority of respondents in favour suggested the use of set criteria for determining planning applications and felt that a statement in national policy would increase transparency in decision-making. Some respondents also suggested that if there was a policy that it should exclude development in Areas of Outstanding Natural Beauty and that it should not override local planning policy and community involvement.

**Government response:**

The Government accepts that placing a requirement on local planning authorities to put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan would in some respects reflect existing good practice. However, the Government considers that introducing this policy would further underline its ambition to promote sustainable development on small sites. This is part of a package of measures set out in the Housing White Paper to support small and medium sized builders.

## Ensuring housing is delivered on land allocated in plans

<b>Question 11. We would welcome your views on how best to implement the housing delivery test, and in particular</b>		
<ul style="list-style-type: none"> <li>- What do you consider should be the baseline against which to monitor delivery of new housing?</li> <li>- What should constitute significant under-delivery, and over what time period?</li> <li>- What steps should be taken in response to significant under-delivery?</li> <li>- How do you see this approach working when housing policies in the Local Plan are not up-to-date?</li> </ul>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
349	314	35

<b>Question 12. What would be the impact of a housing delivery test on development activity?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
527	421	106

On Question 11, the majority of respondents were supportive of the principle of a housing delivery test. However concerns were expressed about potential unintended consequences, including undermining local plan-making and the need to get the detail of the test right.

Respondents had mixed views on the proposal to introduce a baseline for monitoring the delivery of new housing. Some considered that comparing the annual number of net additional dwellings to the annual housing requirement set out in the Local Plan or London Plan for London authorities would be a good way of assessing delivery. There were concerns that setting a baseline would encourage developers to slow development in order to push forward sites they favour or to use delaying tactics against other developers. It was also suggested that the Government should impose a delivery test on house builders – that developers should be expected to complete within 5 years of receiving planning permission, or face losing permission or financial penalties.

Some respondents agreed with the proposed approach to assessing delivery through applying a percentage requirement and a two-year period. Other respondents believed that the assessment would be more robust if it was considered over a longer period as this would allow economic cycles and market conditions to be taken into consideration.

The majority of respondents suggested that steps should be taken in response to significant under-delivery, although consideration should be given to incentives and tools to support Local Plan making and encourage development activity. It was also considered that the

onus should be on developers to build-out their planning permissions and sanctions should be imposed on them in cases of significant under-delivery.

Some respondents suggested that local authorities should identify in their Local Plans a series of reserve sites that may come forward in the event of under-delivery, that if a scheme was not substantially implemented by a certain time the planning permission should lapse and that developers of large sites sub-divide them for delivery through a number of smaller building companies. Other respondents considered that planning authorities should be discouraged from designating very large sites for development in favour of a number of smaller ones.

Respondents also felt that national policy already deals with not up-to-date Local Plan policies through the presumption in favour of sustainable development. It was suggested that national policy should make it clear that household projections produced by the Department for Communities and Local Government would only be used in areas where the Local Plan policies are out of date or the evidence of an emerging plan is not at an advanced stage of preparation.

Specifically on question 12, respondents expressed mixed views on the type of impact a housing delivery test would have on development activity. It was generally considered that it would have a positive impact as it should incentivise local planning authorities and developers. It was suggested local authorities may be more likely to allocate a mix of small, medium and larger sites rather than seeking to rely on one or two major strategic sites. Respondents also highlighted that the impact should be to maximise the use of brownfield sites and provide the right mixture of housing in every development. Concerns were raised that the approach could result in a 'land banking' approach by developers and threats to greenfield sites.

### **Government response:**

The Government welcomes the broad support for the principle of the new housing delivery test. After having carefully considered the responses received, the Government will introduce a new housing delivery test to ensure that local authorities and wider interests are held accountable for their role in ensuring new homes are delivered in their area. The housing delivery test will identify authorities where the number of homes being built is below target and require them to take extra steps to improve delivery. The Housing White Paper sets out the Government's proposals on this as well as proposals giving local authorities more powers to hold developers to account.

## Supporting delivery of starter homes

### Unviable and underused commercial and employment land

<b>Question 13. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
607	485	122

A small number of respondents supported the proposal, considering that it would encourage local authorities to release employment land no longer required and that it would discourage land banking. The majority of respondents considered that there is sufficient evidence available in Employment Land Reviews, Strategic Employment Land Availability Assessments and other documents used to inform Local Plans. Respondents also considered that an arbitrary timescale would be in conflict with the long term approach of Local Plans, would not take into account local circumstances and could jeopardise future planning of employment sites. Concern was also raised that employment sites were often not in the most sustainable locations for housing due to lack of transport/infrastructure and amenities.

#### **Government response:**

The Government considers that there is scope to bring forward more vacant, unviable and unused employment land for starter homes. As explained in Chapter 3 of the Housing White Paper, it intends to make it clear that any proposal on employment land that has been vacant, unused or unviable for a period of five years, and is not on a strategic employment site, should be considered favourably for starter home-led development.

<b>Question 14. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
646	489	157

The majority of respondents generally considered that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land although comments were made that there was no definition of 'unviable' and that land that was currently underused may not always be so. It was generally considered that local authorities/Local Plans should hold responsibility for this decision.

Comment was made that communities should be mixed in terms of age and income and the need to ensure provision of necessary infrastructure in order to be sustainable.

**Government response:**

Following careful consideration and as explained in Chapter 3 of the Housing White Paper, the Government proposes to extend the current starter homes exception site policy to include other forms of underused brownfield land such as leisure centres and retail uses while retaining limited grounds for refusal.

<b>Question 15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
548	452	96

The majority of respondents considered that starter homes would not be suitable for rural areas in their current form, that starter homes on rural exception sites would not be affordable to rural workers and that once starter homes were sold and the re-sale limit elapsed, subsequent buyers would not benefit and the homes would cease to be affordable. Emphasis was put on the need for starter homes to remain affordable after the 5 year restriction period to ensure affordable housing for the local, rural community. It was questioned why starter homes weren't subject to the same planning considerations as other types of housing, raising concerns around sustainability, provision of infrastructure and building quality.

**Government response:**

This question sought views on whether there were grounds to further restrict the grounds to refuse permission on starter home exception sites. Following consideration of relevant responses, the Government will not change the current grounds of refusal on starter homes exception sites. Planning permission should only be refused if there are overriding conflicts with the National Planning Policy Framework which cannot be mitigated. Representations on this question which focused on rural exception sites were considered when analysing question 17.



## Encouraging starter homes within mixed use commercial developments

<b>Question 16. Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
474	390	84

The majority of respondents considered that starter homes should form a significant element of any housing component within mixed use developments and converted unlet commercial units. The need for housing to meet local needs and for other forms of affordable housing to remain in place was emphasised as was the need for mixed use developments. It was felt that affordable housing of all types should be supported in this way. Concern was raised over the lack of a definition of 'significant' and the loss of commercial units due to the higher returns on investment from housing.

### **Government response**

The Government welcomes the support for this proposal and considers that it is captured by proposals for allowing development on employment sites.

## Encouraging starter homes in rural areas

<b>Question 17. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
629	453	176

Respondents expressed mixed views on whether rural exception sites should be used to deliver starter homes in rural areas. It was suggested that starter homes should only be allowed to be included within rural exception schemes, where they are required to assist with the viability of the development and should be provided instead of market housing. It was commented that landlords were willing to release land for rural exception sites because of their understanding that it would be used for affordable housing that would be affordable in perpetuity, and questioned the likelihood of rural landowners' willingness to release land for starter homes as the policy stands. It was also considered that starter homes would push up the price of rural exception sites, which will make it unaffordable to provide affordable housing. It was considered that exception sites for starter homes within the Green Belt would be at odds with the government's pre-election pledge to protect the Green Belt, that Areas of Outstanding Natural Beauty should be exempted from having starter homes on exception sites and that a specific requirement should be included to protect existing and future provision of affordable homes in perpetuity in Areas of Outstanding Natural Beauty. There was general agreement that there should be a local connection test.

### **Government response:**

The Government acknowledges that rural exception sites are an established means for supporting sensitive housing growth where it is locally supported and will meet local needs. In response to the consultation responses, and as set out in Chapter 3 to the Housing White Paper, we will clarify that starter homes, with appropriate local connection tests, can be acceptable on rural exception sites.

<b>Question 18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
455	299	156

Respondents set out a range of new ideas for promoting starter homes in rural areas. These included:

- Self-build projects as starter homes

- Looking beyond brownfield land for housing sites: also look at garden land and existing redundant buildings (e.g. agricultural buildings)
- “Community Land Trust” development: people who own extensive land (e.g. farmers) can be rewarded with affordable rent in return for allowing the building of starter homes on their land
- Giving priority to newly qualified key workers for starter homes – this can in the long term attract further residents to rural areas
- Allowing neighbourhood plans the discretion to determine the need for starter homes locally where this is consistent with district level Strategic Housing Market Assessments. However, these would need to be delivered on suitable sites which are consistent with local and national policies.
- Through the re-use of existing buildings (unless needed for other purposes). As part of mixed market/affordable housing schemes where the market element is needed to support viability.
- Underused and derelict agricultural sites should be considered as sites for starter homes

Conditions required for support of policy approaches:

- Policy approaches should incentivise development of all forms of affordable housing, not just starter homes, as reflected by local need
- Policy approaches should also include some market housing (having developments of purely affordable housing will not lead to diverse and mixed communities) and some downsize homes for elderly residents wanting to move out of large family homes (which can in turn be freed up as starter homes)
- Housing should be developed in areas where residents will be served by appropriate infrastructure, in particular infrastructure which will support the demographic of individuals that will buy starter homes (most notably public transport)
- Housing should be developed in areas where there is a need for local services and facilities to be maintained
- Stringent local connection tests for incoming residents
- Allocating additional housing site in sustainable locations
- Encourage greater use of Green Belt land where local and neighbourhood plans support it.
- Have a quota system with 25-33% of houses on a site being reserved for people with a local postcode.
- Self build starter homes on local authority owned brownfield land sold at discount possibly with some form of resale restriction that provides an incentive for buyer and seller.

**Government response:**

The Government welcomes the alternative policy approaches to delivering starter homes in rural areas. It has considered some of these proposals when considering measures to drive up overall housing supply. However, following careful consideration of the responses, it considers that the proposals set out in Chapter 3 of the Housing White Paper, combined with measures under the Housing and Planning Act 2016 and changes to the definition of affordable housing, will encourage starter homes in rural areas.

## Enabling communities to identify opportunities for starter homes

<b>Question 19. Should local communities have the opportunity to allocate sites for small scale starter home developments in their Green belt through neighbourhood plans?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
529	397	132

Respondents expressed mixed views on whether local communities should have the opportunity to allocate sites for small scale starter home developments in their Green Belt through neighbourhood plans. It was generally considered that Neighbourhood Plans should be able to authorise housing to meet all types of need in a rural community not just young first-time buyers and that unless a local community retained the homes in perpetuity this proposal would not be taken up. Concern was raised that the proposal did not prevent cumulative impact or coalescence from village extension, that both local strategy and national policy on Green Belt would be undermined and that starter homes must be within settlement boundaries. It was also considered that there must be evidenced local need and proof of local connection if local people are to accept the loss of Green Belt.

### **Government response:**

The Government remains committed to giving communities power to develop a shared vision for their neighbourhood and shape the development and growth of their local area through neighbourhood planning. After carefully considering the responses, it does not propose to take forward proposals to allow communities to identify opportunities to allocate sites for small scale starter home developments in the Green Belt through neighbourhood plans.

## Brownfield land in Green Belt

<b>Question 20. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
561	395	166

The majority of respondents felt that amending policy to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact of openness in Green Belt policy would undermine Green Belt policy; that openness is the keystone of Green Belt protection and should be applied no matter who would live in the planned new homes; that Local Plans must retain primacy; and that existing policy is flexible enough. It was also generally considered that even small incursions on the Green Belt have a cumulative impact, and would bring pressure to allow more and more. It was also considered that if any such policy went ahead, it should cover all forms of affordable housing in Green Belt, which should be protected from disposal in perpetuity and should reflect identified local need.

### **Government response:**

The Government has considered the respondents views on this issue. Following careful consideration of all the responses it intends to proceed with this policy, but it does recognise the concerns about the impact of any development on Green Belt land. It will ensure that proposals for development on brownfield land in the Green Belt will only be permitted if it contributes to the delivery of starter homes and it does not lead to substantial harm to the openness Green Belt. This is set out in Chapter 3 of the Housing White Paper.

## Transitional arrangements

<b>Question 21. We would welcome your views on our proposed transitional arrangements</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
434	345	89

Respondents expressed mixed views on the proposal for a transitional period. It was felt that local planning authorities needed to have sufficient time to gather new evidence on housing need and consult on any proposed changes to Local Plan policies on affordable housing, with suggestions of a transitional period of at least 12 months. There was a call for no transitional period, arguing that decision makers should treat any changes as a material consideration and, if necessary, review plans as early as possible. It was also commented that the need for a transitional period was dependent on the position a local authority was in the plan-making process. The general consensus was that care was needed to ensure there is clarity and certainty for all stakeholders on how this change will relate to existing Local Plan policies.

### **Government response:**

The Government has considered the opposing views on this issue and after careful consideration of all responses considers that a transitional period of between 12 and 18 months from revision of the Framework would be sufficient to enable planning authorities to consider making amendments to their Local Plan policies. However, the Government is consulting on a further revision to the definition of affordable housing in the Housing White Paper, and will consider this issue further. The Government's final position will be made clear when the National Planning Policy Framework is revised.

## General questions

<b>Question 22. 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?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
435	323	112

The majority of respondents considered that the consultation document did not provide any up to date information by using the 2010 National Land Use Database. It was commented that the Database was out of date and would not provide a reliable basis on which to estimate the impact of the proposed policy changes. It was suggested using a much more nuanced analysis to understand the differential impact that the proposed broadening of the affordable homes definition might have at local level. It was also suggested using regional studies and statistics to gain a better understanding of the operation of local housing markets and local developers.

### **Government response:**

The Government welcomes the many responses on this issue, which it has carefully considered and taken into account when finalising changes to the National Planning Policy Framework.

<b>Question 23. Have you any other views on the implications of our proposed changes to national policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?</b>		
<b>Total number of responses</b>	<b>Organisational</b>	<b>Personal</b>
183	152	31

The majority of respondents considered that starter homes as affordable housing would not be accessible to a wide range of people with protected characteristics as defined in the Equalities Act 2010, and are likely to be disproportionately affected by the proposed change. It was considered that a significant proportion of older people, those with disabilities and ethnic groups in some areas would be less likely to afford the housing for purchase included within the new definition, while they would be more likely to afford the affordable housing for rent. It was felt that the proposed age limit for starter homes was discriminatory and that a lack of rural proofing of the proposals would have a potential impact in rural areas. Comment was made that Starter homes must be required to meet Part M of the Building Regulations or any recent up grading of standards.

### **Government response:**

The Government welcomes the many responses on this issue, which it has carefully considered taking decisions flowing from the consultation.