



## Consultation on proposed changes to national planning policy

### A response by National Parks England

18 February 2016

#### Introduction

- I. National Parks England supports the policy-making process by co-ordinating the views of the nine English National Park Authorities (NPAs) and the Broads Authority. It is governed by the Chairs of the ten authorities. Our response represents the collective view of officers who are working within the policies established by the NPAs and Broads Authority and follows internal consultation amongst the officers. **It should be noted that all references to 'National Parks' in this response refer to the nine National Parks and the Broads.** We are happy for our response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.

#### National Parks England – Summary Consultation Response

National Parks and the Broads are recognised as 'areas of restraint' within the NPPF. The *National Parks & the Broads Circular (2010)* confirms that these designated landscapes are not appropriate locations for unrestricted housing and new housing should instead be focused on meeting local affordable housing needs. **Given this we call for the nine National Parks and the Broads to be granted an exemption from the following:**

- The proposed presumption in favour of housing on brownfield land (paragraph 22 & Question 7). NPAs have a statutory duty to foster the socio-economic well being of their local communities and the scarce brownfield resource in our National Parks & the Broads can be utilised for a range of uses to deliver this duty, not just housing.
- The proposed definition of 'small sites' as a site of less than 10 units (Question 9), on which the presumption in favour of housing would also apply. Most housing sites in our National Parks and the Broads are smaller than 10 units and the Government has previously recognised the particular circumstances faced in designated landscapes.

In addition, we also:

- Have concerns regarding the proposed broadening of the definition of 'affordable housing' to include low cost market dwellings and 'starter homes', which could result in the displacement of new affordable housing for which there is a clear need in National Parks. The impact of this would be worsened by the potential removal of the 'in perpetuity' clause, which would result in new housing being effectively lost from the affordable housing stock within 5 years (Q1).

- Consider that the proposed ‘housing delivery test’ would be better aimed at developers and landowners, rather than planning authorities who have a good record on granting planning permissions. Where sites have been identified and permissions have been granted, there are rarely any planning reasons for lack of delivery (Q11).
- Do not consider that rural exception sites should be used to deliver starter homes as the fundamental test for exception site development is not met by this product (Q17). Instead starter homes could be delivered on allocated housing sites, where the product will contribute towards addressing general housing needs (Q18).

### Consultation questions

2. As context for the answers to the specific consultation questions asked, NPAs point out that the significance of affordable housing provision in National Parks is clearly recognised in the National Parks Circular<sup>1</sup> which states that NPAs:

*“...have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.”*

3. In order to achieve this, NPAs need to be able to tailor their approach to meeting the housing needs of local communities through the use of a range of products, which could include self/custom build and, in some circumstances, starter homes. In addition, affordable rent is still the most popular and practical choice for many people.<sup>2</sup> NPAs need to retain the ability to determine in what circumstances starter homes and other housing products are appropriate, in order to retain the confidence of local communities and landowners.

**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?**

4. While recognising that the low cost homes product can contribute to addressing issues of viability, NPAs do not generally consider that the definition of ‘affordable housing’ should apply to low cost open market homes. Most NPAs already support lower cost housing - including intermediate housing for owner occupation within the existing definition of ‘affordable housing’ - and such development is usually permitted with a local connection ‘tie’ meaning that although the properties are not ‘affordable’ to all those in housing need, they are more affordable than houses on which there is no occupancy restriction. Such a ‘tie’ is vital for communities to be able to offer the opportunity for local people to work and live in the area. Without such a tie,

<sup>1</sup> English National Parks and the Broads - UK Government Vision and Circular 2010 (DEFRA)

<sup>2</sup> Exmoor SHMA shows net housing requirement for 50% social rented as a percentage of all housing; and 61% as a percentage of all housing for all forms of affordable & intermediate housing including shared ownership

evidence suggests that houses in National Parks are in no way affordable to many on average incomes and certainly not affordable to those on low quartile incomes<sup>3</sup>.

5. It may also be helpful for the Government to enable local planning authorities to control the size of starter homes (the term 'starter home' suggests a modest size home which would not be an inappropriate criteria). Specifying size limits on new housing is already a useful policy through which a number of NPAs currently improve its ongoing affordability through the planning system.
6. Looking at the detail of the proposals, NPAs have significant concerns over the proposal to allow 'starter homes' to be sold as market housing after only five years. In the context of our National Parks and the Broads, where there is a finite land resource, this proposal would result in sites that could meet the affordable housing requirements of the area (in line with requirements of the National Parks & the Broads Circular already mentioned) instead being developed in favour of housing that can be sold after five years for use as a market home. This would include use as holiday or second homes, which in some parts of our designated landscapes significantly reduce the stock of dwellings available to local people.<sup>4</sup> This use of housing is one that successive governments have acknowledged is an issue for many local communities in areas such as National Parks, but chosen not to control.<sup>5</sup>
7. All NPAs find it extremely difficult to find exception sites that can be developed in ways that conserve and enhance landscape and cultural heritage, as well as overcoming constraints caused by flood risk and topography. Add to this the challenge of getting community and landowner agreement to new development and it should be apparent that it is crucial that NPAs retain flexibility to make best use of the scarce land resource for development wanted and needed by communities.<sup>6</sup> Our experiences as the local planning authorities for the National Parks is that landowners need certainty of the development potential and consequent land value to enable sites to come forward to meet the needs of local communities. With no tie on these properties beyond the proposed 5 years, land values will soar and price out the models of housing the local Housing Market Assessments prove are needed.
8. There is a strong feeling that the 'starter home' product, if a requirement rather than an option, will displace affordable housing for which there is a clear need and which enables people on lower incomes to live and work in National Parks. The starter home product as proposed would not respond to local people on average or lower quartile incomes; has the potential to worsen the deficit of affordable homes by giving over scarce sites for housing that could meet that need. And by being open

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<sup>3</sup> In North York Moors the lower quartile income to lower quartile house price ratio is 8:1. The average house price is £155,000, which even with a 20% discount would still be unaffordable to many. In Exmoor the equivalent ratio is 11:1 For houses at 80% of lower quartile prices i.e. starter home price, the ration would be 9:1 The mean house price in Exmoor is £282,227, the median is £233,500 and the lower quartile price is £175,000

<sup>4</sup> For example 1 in 5 of houses in the Exmoor National Park is either empty or in second/holiday home use according to the 2011 census.

<sup>5</sup> While some Neighbourhood Plans have been granted leave to adopt policies restricting second home use on new properties, local planning authorities have not been granted the same leave.

<sup>6</sup> The Examination into the Peak District NPA Core Strategy: paragraph 67 sums up the justification for the NPA's exception site approach and avoiding loss of land to higher value housing

[http://www.peakdistrict.gov.uk/\\_data/assets/pdf\\_file/0016/141217/LDF-InspectorsReport.pdf](http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0016/141217/LDF-InspectorsReport.pdf)

to be sold as market housing this will increase the stock of housing available to second home owners, buy to let landlords, holiday home companies, increasing already above average proportions of such properties.

9. In conclusion, a requirement to consider the 'starter home' product as 'affordable housing' and provide for it across the National Parks and the Broads will not allow NPAs to deliver the requirements of the National Park Circular, or meet the specific needs identified within their Strategic Housing Market Area Assessments, and will not help us achieve sustainable communities in line with the NPPF and adopted National Park development plans. NPAs welcome the option to encourage this product where it would aid viability to enable development within the development plan policies<sup>7</sup>.

**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?**

10. The Equalities Assessment focuses on the impacts of the proposed changes on different groups of people, rather than different areas. The proposed changes are likely to have a significant impact in rural areas and 'areas of restraint' as identified in paragraph 14, footnote 9 of the NPPF, including National Parks and the Broads, but these consequences have not been fully considered.
11. In addition, starter homes are by definition focused on people under 40 years of age, which will disadvantage people over 40 who have not been able to buy their own home. If starter homes are included in the definition of affordable housing and, as predicted, adversely affect the delivery of other types of housing, particularly social rented housing, it will disproportionately and adversely affect people over 40 years of age<sup>8</sup>. NPAs suggest that while it is laudable to want to help younger house buyers, the proportion of starter homes in any scheme should be balanced by other products that can meet local evidence of need. This would avoid discrimination on grounds of age, when need exists across age groups.
12. Evidence also suggests that the starter home model could potentially have a more marked effect on poorer households, as they would find it more difficult to afford to buy a 'starter home' (which could cost up to £250,000) and would more likely instead be more reliant on social rented accommodation which is likely to be squeezed out by these proposals. The social rented sector offers security and more

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<sup>7</sup> Development plan policies vary across NPAs, with some encouraging market and other intermediate forms of housing to enable social housing; and others encouraging market and other forms of housing to enable schemes for conservation and enhancement e.g. on previously developed land or to conserve heritage assets.

<sup>8</sup> Evidence shows that 20% of the occupants of affordable housing on Exmoor are over 40. Currently delivery of affordable housing on Exmoor is determined by need, not age (source: Exmoor NPA). Evidence shows that in one local need survey (Grindleford in the Peak District) 20 out of 55 persons needing a home were over 40 years old<sup>8</sup>, representing 36% of those in housing need. The proportions are similar across other housing need surveys such as Stoney Middleton where 8 of 20 were over 40 years old i.e. 40% ineligible (source: PDNPA).

affordable rents with public sector funding cuts having a significant impact on levels of provision.<sup>9</sup>

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

13. The definition of a commuter hub proposed in paragraph 15 of the consultation document includes any rail station, “...that has, or could have in the future...” a service at least every 15 minutes during normal commuting hours. This definition could apply to virtually all rail stations within our protected landscapes (not just stations that currently have a frequent service like Brockenhurst in the New Forest or Oxenholme in the Lake District) as smaller rail stations *could have* a service of this frequency. If this policy approach is pursued in the NPPF it is important that adequate safeguards are in place to ensure it does not result in very dense housing developments around small rural rail stations in protected landscapes.

**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?**

14. There is already a national policy presumption in favour of redeveloping brownfield land which we support. However, for a number of reasons it would be unhelpful and unnecessary to strengthen policy in the context of trying to achieve sustainable development in National Parks. Through National Park development plans, brownfield land can already be re-developed for a range of uses including, where appropriate, housing. However the re-development of brownfield land must remain a local decision, rather than the subject of a nation-wide presumption in favour of housing.
15. NPAs across the country prioritise the redevelopment of brownfield sites through their development plans and development control decisions<sup>10</sup>. However there are also brownfield sites within our National Parks which would be more suited to business and employment use due to their links to the main road network and the fact that they are detached from any settlement or services and so would be totally unsuited to housing. In addition, employment sites have often historically been located in areas where residential development would not be particularly appropriate due to amenity issues and noise for example. It is equally important to sustain the local economies in the Parks if they are to remain sustainable and this is line with the Government’s Rural Productivity Plan. If previously developed land attains hope value for housing development, it reduces the likelihood of it being useful for economic development and therefore makes for a less sustainable mix of uses.
16. NPAs recognise that development of brownfield land can bring many benefits, but it is generally a scarce resource in our protected landscapes that can be an opportunity

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<sup>9</sup> (source Housing and Poverty, Joseph Rountree Foundation (June 2015) <https://www.jrf.org.uk/report/housing-and-poverty> (NNPA)

<sup>10</sup> The Broads Sites Specific Local Plan (2014) for example, allocates around 300 new dwellings on brownfield sites. This is in the context of dwelling completions averaging around 12 net new dwellings per annum.

to create either housing, or business and employment.<sup>11</sup> Given the desirability of National Parks as places to live, it would therefore be unhelpful to increase the presumption in favour of residential use in preference to other uses.<sup>12</sup>

17. **We therefore call for the Government to grant National Parks an exemption to the proposed ‘permission in principle’ for housing on brownfield sites.** NPAs have a statutory duty to foster the socio-economic well being of their local communities and previously developed land can make an important contribution to sustaining the local economies of our National Parks, rather than being subject to a nationally imposed presumption in favour of housing. This would be consistent with the NPPF’s policy approach to National Parks which recognises them as ‘areas of restraint’ (paragraph 14, footnote 9). Finally it would be useful if the term ‘previously developed land’ was used rather than brownfield land as that’s the one that’s defined in Annex 2 of the NPPF.

**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’ 5-year land supply?**

18. In many National Parks, the majority of development sites accommodate less than 10 housing units. The use of small exception sites to deliver locally needed housing is already a tried and tested means of addressing housing need in areas such as National Parks and the Broads, where in order to conserve their landscape and cultural heritage, it is less common to develop larger sites which are rarely available.
19. A consequence of creating an in principle presumption in favour of housing on small sites (particularly starter home type housing products) would be that starter homes will displace affordable housing, where otherwise that scarce land resource would be addressing the housing need of the National Park communities<sup>13</sup>.
20. We have significant concerns regarding the proposal to support the principle of small housing development within and immediately adjacent to defined settlement boundaries. Settlement boundaries are not a requirement of the NPPF and NPAs need to be allowed to decide whether they are an appropriate policy tool in their local context. Ultimately it is for the NPAs through their development plans to decide whether to adopt settlement boundaries and their precise definition. In National Parks that have adopted boundaries (e.g. the New Forest) it is often the greenfield sites immediately adjacent to the settlement boundaries that are particularly sensitive and in need of protection. This proposal would potentially apply a presumption in favour of housing development on all unused and undesignated sites within and immediately adjacent to villages. This could significantly undermine

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<sup>11</sup> Such locations are generally identified in development plan settlement hierarchies. Outside these locations, the presumption is often different based on the impact of the use and the need to conserve the landscape.

<sup>12</sup> There are other options to secure more housing in National Parks. For example in the Yorkshire Dales, 22% of existing stock is not permanently occupied and is predominantly in second home use. Recent revisions to the taxation of such properties are welcomed and may discourage such use.

<sup>13</sup> YDNPA points out that it has 400 plots with consent, at least half of which are immediately available for development. There is therefore already the potential for strong delivery on small sites by developers and landowners with planning permission.

the planning policy approach in National Parks which seeks to conserve the character of Park settlements.

21. We do not consider that proposals for development on small sites immediately adjacent to settlement boundaries should have a stronger in principle presumption in favour of permission (as the consultation document paragraph 24 hints by saying such sites should be supported if suitable). Indeed it could be said that such a presumption undermines any boundary adopted through a Local Plan process<sup>14</sup>.
22. In terms of the final part of Question 8, where NPAs have a housing target we consider that small allocated sites should be part of the 5 year land supply<sup>15</sup>, but it remains important that such sites can be counted as windfalls.

**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**

23. We feel that the proposed national definition of ‘small sites’ fails to reflect local circumstances. In reality most housing sites in our National Parks are smaller than 10 units, which would be considered a relatively large development in many Park villages. The release of larger sites is not compatible with conservation objectives of National Parks but becomes a pressure where, with cuts to housing grant, the only financially viable means of delivering affordable homes is to cross subsidise with market homes. The Government has previously recognised the particular circumstances facing planning within designated landscapes in its planning reforms, including (i) restricting certain permitted development rights in National Parks and the Broads; and (ii) in granting NPAs the right to introduce a lower threshold (5 dwellings) than that set nationally (10 dwellings) in November 2014 for seeking affordable housing and other tariff based contributions. This recognition has been welcomed by NPAs and the communities living within the National Parks.
24. Given the nature of development sites in the National Parks and the Broads, allied to the NPPF’s recognition of the designated landscapes as ‘areas of restraint’, **we call on the Government to exempt National Parks and the Broads from this proposed definition of a ‘small site’ as a site of 10 dwellings or less (with the associated presumption in favour of housing)**. The planning system is a key instrument in the achievement of Park purposes and, “...is a vital tool for managing the impact of development on landscape and biodiversity and a key part of conserving and enhancing the cultural heritage, including the built heritage of Park settlements<sup>16</sup>”. An exemption would allow NPAs to continue to ensure all new development is acceptable within our finest landscapes.

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<sup>14</sup> The examination into the New Forest NPA Core Strategy (2010) concluded that removing defined village boundaries could create uncertainty and increase the pressure for greenfield development on the edge of these villages.

<sup>15</sup> YDNPA Local Plan has allocated 18 sites smaller than 10 units.

<sup>16</sup> Paragraph 136, English National Parks and the Broads, UK Government Vision and Circular, DEFRA, 2010

**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?**

25. Given that paragraph 24 of the consultation document states that “...most plans include clear policies supporting small windfall sites...” and paragraph 25 goes on to state that the vast majority of local plans adopt a criteria based approach for small sites, it would appear that local plans already have positive policies in place. It is not clear therefore what is intended for windfall sites and we would welcome clarification.

**Q11: We would welcome your views on how best to implement the housing delivery test.**

26. The proposed housing delivery test presents two challenges – one specific to National Parks; and the second an issue with the principle of what the test is seeking to achieve. In terms of how it could operate in the context of National Parks, recognition must be given to (i) the strong planning framework that operates within all our protected landscapes, derived from primary legislation, which seeks to conserve the landscape and built heritage; and (ii) the planning policy approach taken in a number of National Parks where there is no target specific local plan target for housing delivery and housing is instead based on a needs-led approach. Given this, the proposed housing delivery test would be difficult to implement in National Parks.

27. Secondly, performance on permissions and completions is dependent to a large extent on the strength of the local economy, rather than the planning system. All NPAs produce Annual Monitoring Reports (AMRs) which show permissions and completions so there is useful evidence of performance against development plan and NPPF objectives for housing. NPAs permit on average around 90% of planning applications received – above the national average – and within the National Parks there remains a significant stock of extant permissions awaiting delivery. Ultimately NPAs only have direct control over the granting of permission and the discharge of planning conditions and therefore other important factors influencing housing delivery are beyond our control.

28. Given this, **we would suggest that the housing delivery test is better aimed at developers and landowners.** Where sites have been identified and permission has been granted, there are rarely any planning reasons for lack of delivery. Instead the hold-up is likely to be caused by factors such as skills shortages, lack of mortgage finance, and land banking. The consultation document itself acknowledges in paragraph 27 that in the year to June 2015, permission was granted for nearly 250,000 homes across the country and the Government should focus on why this increased level of permissions is not resulting in a similar increase in completions.

29. In conclusion, **it would be wrong to suggest that requiring planning authorities to identify more sites would result in better planning outcomes, especially in our nationally protected landscapes. In all likelihood this approach would perpetuate poor planning outcomes by**



**encouraging developers to sit on permissions and forcing planning authorities to allocate more land.**

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

30. As outlined above, we believe the proposed housing delivery test is aimed at the wrong party in the development process. Consequently the test may even have the effect of stifling further development as landowners and developers could continue to land bank permissions without implementing them to require planning authorities to allocate more land in their Local Plans and subsequently trigger more land release. **Alternatives to encourage a positive improvement in housing delivery could be the threat of de-allocation of housing sites from a development plan under a ‘use-it-or-lose it’ type rule.**

**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?**

31. As outlined in our response to Question 7, National Parks are attractive places to live and as a result they are subject to significant development pressures. Within the context of the duty placed on all NPAs to foster the socio-economic well-being of their communities (Section 62) of the Environment Act 1995<sup>17</sup> authorities use their planning powers to ensure our National Parks remain living-working areas, rather than simply dormitory residential areas for surrounding conurbations. **The availability of commercial land is typically limited in National Parks and therefore we feel that such land should remain available for commercial uses and not be time limited. Where a time limit is required, NPAs request that this be set at local level** to recognise the differences in economic cycles from area to area. Existing planning policies allow a pragmatic approach to new uses for these sites if they are deemed to be economically non-viable.
32. In terms of the second part of the question, planning authorities are required to provide evidence of strategic need for employment land for their area over their plan-period. As plan periods are typically 15 or 20 years, release of land should not be time limited at the whim of developers or businesses simply because they believe another form of use can be more lucrative. The evidence for retention or release of B class use land should be provided as part of the evidence when the local plan is reviewed. Development Plan policies in many cases already include marketing tests for ‘surplus’ commercial land where developers wish to change the use of employment/business space and this would appear to be a more suitable approach.

**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?**

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<sup>17</sup> Similarly the *Norfolk & Suffolk Broads Act 1988* documents the Broads Authority's duty to have regard to the economic and social interests of those who live or work in the Broads.

33. Our response to Question 14 picks up on many of the points made in response to Question 13. Within our National Parks it is important that employment land is protected to ensure the sustainable development of the area. The proposals in paragraph 37 of the consultation document are of particular concern as they suggest that (at a minimum) an up to date assessment and significant additional evidence of market demand would be required to retain an unviable or underused employment site. It would therefore be an onerous task for local planning authorities to justify retaining employment sites in the face of demand for housing. Such a policy may be necessary in urban areas, but is not appropriate for designated landscapes, where NPAs are trying to maintain balanced communities and the retention of existing employment sites is a vital element of this mix.
34. If this change to national planning policy is introduced by the Government, there needs to be strong tests to ensure that existing employment or commercial land is not deliberately run down to allow redevelopment for housing. Where sites are unviable or underused, their re-development for starter housing may be appropriate and may reduce pressure to develop greenfield sites. However creating the presumption in favour of residential use may lead to deliberate under use and site degradation to skew any marketing process and trigger residential use.

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

35. The fundamental purpose of exception sites is that the housing must meet an identified local need. This evidence of need is necessary to justify what is otherwise a departure from the adopted planning policies in the statutory development plan. Using a national rural exception policy as an avenue for more general housing delivery could undermine public confidence in the plan-led system. **As starter homes are a more general form of housing that would not meet identified local need and would not be affordable, a departure from policy to accommodate such housing is therefore unjustified.**
36. If the Government decides it does need to create and give weight to a starter home exception site policy, it should remain an option for NPAs to refuse planning permission where the development would contradict the aims of the NPPF and National Parks Vision and Circular with respect to development in National Parks.

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

37. As outlined in our response to Question 15, NPAs do not consider that rural exception sites should be used to deliver starter homes as the fundamental test (that the housing must meet an identified local need) for exception site development is not met by this product. The general lack of exception sites means that any homes built for which there is no proven need (e.g. starter homes) will displace housing for which there is evidence of need, with no sustainable options to backfill that loss of capacity. Starter homes can already be included as part of mixed schemes of housing on sites requiring conservation or re-development; and (in some National Parks) as part of mixed schemes of market and social housing subject to viability. There is no

need or justification to require the product on exception sites or other sites to any greater extent than NPAs could already facilitate through adopted policies. To require it would create a fundamental conflict with NPPF paragraph 115 and Circular.

38. Where starter homes could provide a useful contribution to the housing mix, NPAs should in line with their development plan, have the flexibility to require local connection of future owners and secure this by a legal agreement when the starter homes are permitted. The discount on market value should be at least 20% on first sale and remain so on subsequent sales. It would be preferable if initial prices were pegged to wages rather than market values of housing, which in National Parks significantly outstrips wages and is part of the reason for the need for social housing.
39. **Without such flexibility, the proposal to allow the first owner to sell to the wider market after only five years, will lead to rapidly inflated house prices and undermine any hopes NPAs have in achieving plan objectives with regard to providing homes for which there is evidenced local need.**
40. In terms of delivery, the experiences across many National Parks is that communities and many landowners find the prospect of housing palatable only when they can be re-assured that the housing will meet local need. Without the flexibility to lock in a local connection, we are concerned that these changes will dissuade some landowners from releasing land for housing at all; and lead to significant opposition to development from local communities, who for many years have been working closely and carefully with NPAs, housing enablers, registered social landowners, and landowners to find housing solutions that respond to local need.

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

41. Local planning authorities could identify a supply of deliverable sites suitable for the provision of starter homes where local demand for the 'starter home' product exists. Windfall sites could also make an allowance for starter homes if appropriate. However, not all NPAs allocate or identify sites for housing and some do not have housing targets. Any such approaches should be optional for a local planning authority depending on its development plan approach. Where NPAs do allocate conventional housing sites, the starter home product is a much better fit because it allows the mix of housing to address the general need for housing.

National Parks England  
18 February 2016