

IMPACT OF NATIONAL POLICY FOR AFFORDABLE HOUSING THRESHOLDS ON THE DELIVERY OF RURAL AFFORDABLE HOUSING: REPORT OF RURAL SERVICES NETWORK SURVEY

Executive Summary

The lack of affordable housing in rural areas is well evidenced and the need to increase its supply is well rehearsed. However, the ability to address this challenge was restricted in 2014 when the Government raised the site thresholds from which an affordable housing contribution could be taken to 10 dwellings, except in a limited number of designated rural areas where on sites of 6-9 dwellings a contribution could be taken, but only as a financial sum. This approach has now been incorporated into the NPPF, with a slight but ambiguous change that allows a contribution to be taken from sites of 5 dwellings or fewer in designated rural areas.

From the start rural interests raised concerns and provided evidence to demonstrate the negative impact this would have on the supply of new rural affordable housing. It is a case that has continued to be made, including through the consultation on the revisions to the NPPF. Last year it was again highlighted by the House of Lords Select Committee report into the Rural Economy. It recommended, 'Government should provide a full and comprehensive exemption for all rural areas from the policy to limit affordable housing contributions on small sites. Local authorities should be free to work with developers to seek the necessary level of affordable housing contributions on all new housing sites to help meet the fullest range of rural housing needs.'¹

Prompted by further discussions with government to promote this recommendation the Rural Services Network, in collaboration with Rural Housing Solutions, decided to update the evidence on the impacts of the policy. A questionnaire was circulated to RSN's local authority members in September 2019. Sixty-one local authorities responded to the survey and a further two provided detailed responses by e-mail. The key findings are:

- 66% of respondents reported that since adopting a threshold in line with national policy the delivery of rural affordable housing had been reduced.
- Thirty-one of those authorities were able to quantify how many affordable homes had been foregone. Sixteen stated that over the last two years 11-25 new rural affordable homes had not been delivered as a consequence of the higher thresholds. This translates to 275 - 350 dwellings across 16 local authority areas. A further 5 local authorities reported they had lost more than 60 new rural affordable homes since adopting the new rural threshold policy.
- 31% of respondents reported that they usually were able to use financial contributions in the community where they were raised, but 26% had not been able to spend the money. For 51% of respondents it is the lack of sites that limits their ability to use these monies in the communities where they have been raised.
- 61% of respondents reported that primarily higher value properties have replaced the affordable dwellings that they would have secured under their earlier lower threshold policies.
- 94% would like to be able to take an affordable housing contribution from sites of less than 10 dwellings, with 62% of them wanting the option to be able to take the contributions as a mix of on-site and/or commuted sums.

¹ House of Lords Select Committee on the Rural Economy - publ. April 2019 paragraph 341

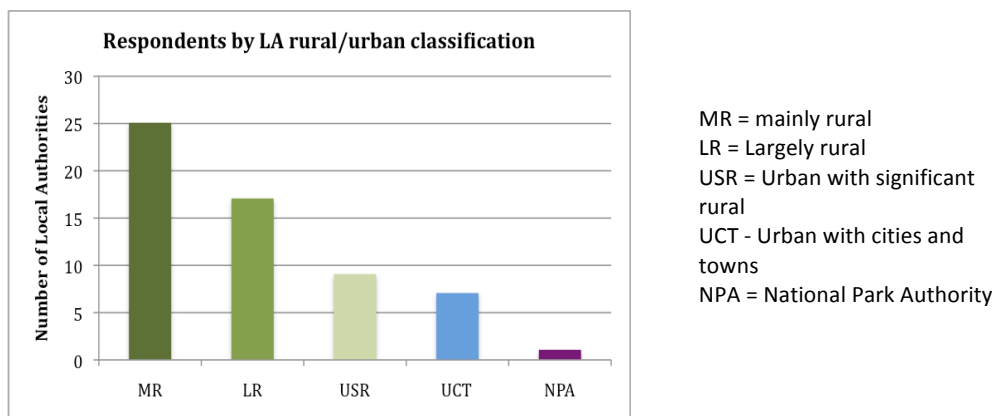
Detailed findings

The Survey and response rate

In September 2019 a questionnaire, using Survey Monkey, was sent to planning and housing enabling officers in local authorities who are members of RSN. A copy of the survey is attached at Annex A.

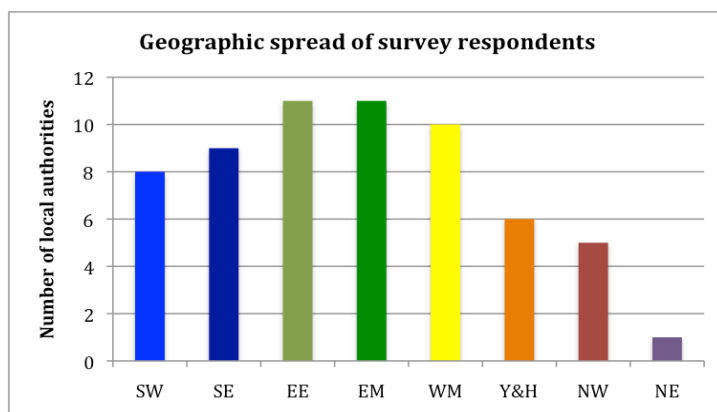
Sixty-one local authorities responded with the highest number of respondents from councils classified as Mainly Rural, followed by Largely Rural. This represents 55% of all Mainly Rural authorities and 41% of all Largely Rural authorities.

Diagram One: Respondents by LA rural/urban classification



As diagram two illustrates there was a reasonable balance of responses from across England, with the distribution to a large part reflecting the rurality of the regions, although in this respect the South West is slightly under-represented.

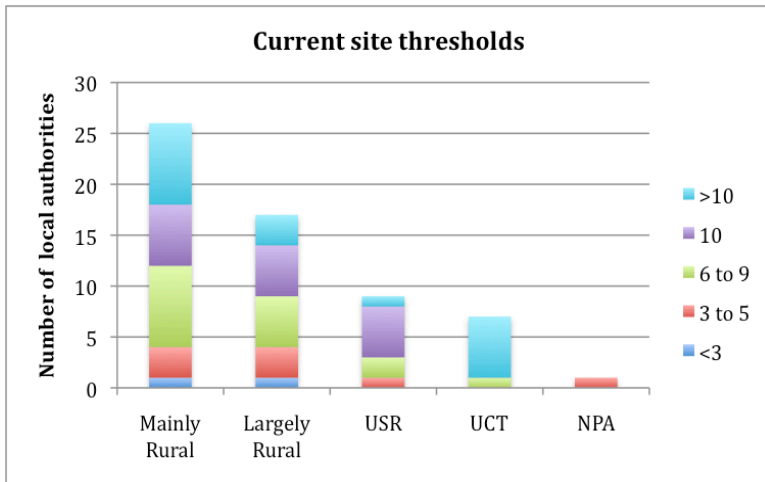
Diagram Two: Geographic spread of survey respondents



Current and changes to site thresholds

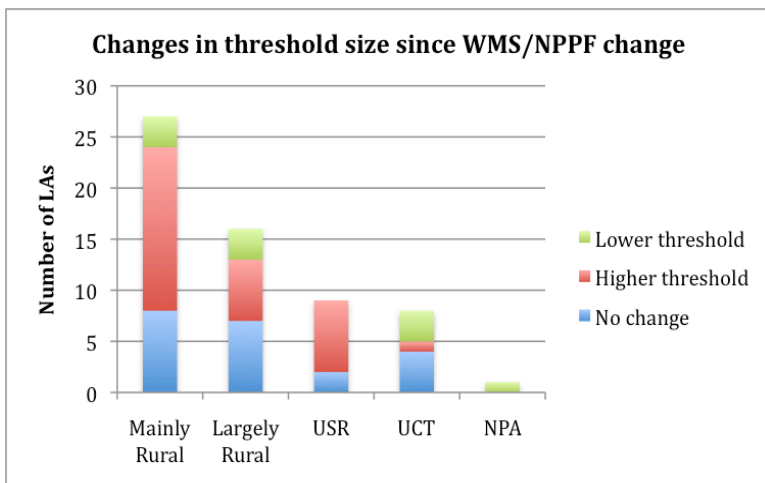
In total 83% of respondents currently have a site size threshold that is in line with national policy, with 56% having a threshold of 10 or more dwellings and 26% 6 - 9 dwellings. Diagram Three shows the different thresholds by type of local authority.

Diagram Three: Current size thresholds



For 49% (30) of respondents this was a higher threshold than their authority had in place before the Written Ministerial Statement and /or changes to the NPPF. The adoption of a higher threshold was greatest in the Mainly Rural councils, with 53% (16) making this change.

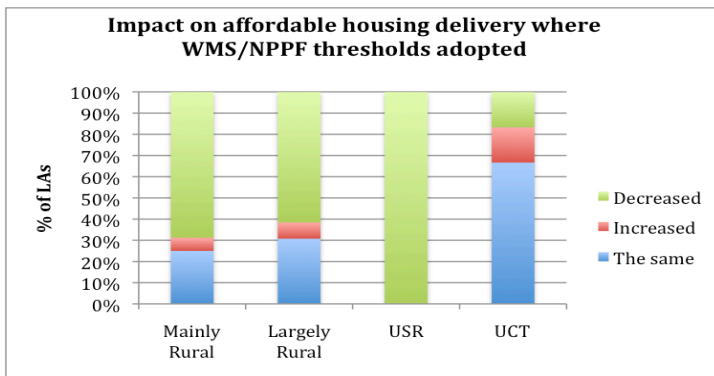
Diagram Four: Changes in thresholds since WMS/NPPF changes



Impact on delivery of rural affordable housing

Of those who had adopted a threshold in line with the WMS/NPPF, 66% (29) reported that the delivery of rural affordable housing had reduced. As Diagram Five shows this is particularly marked in the Urban with Significant Rural Areas, and is the experience of the majority of Mainly Rural and Largely Rural local authorities.

Diagram Five: Impact on affordable housing delivery where WMS/NPPF thresholds adopted

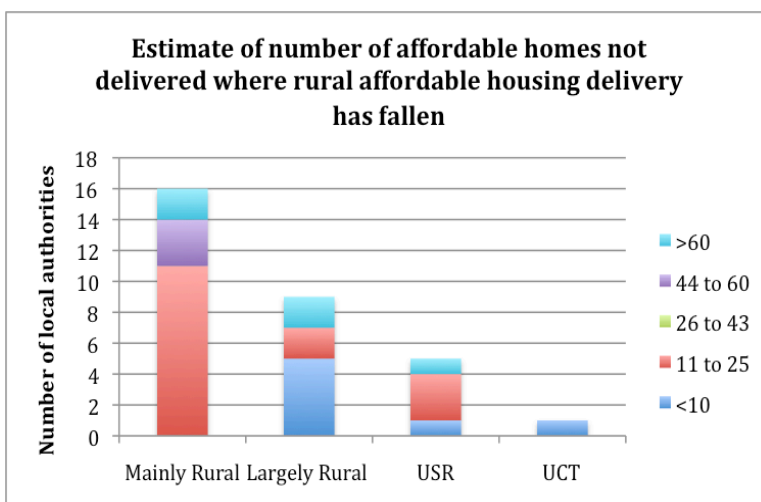


Even amongst the 23 authorities that have retained a threshold below national policy 61% (14) reported that the delivery of new rural affordable homes has fallen. The principal reason, given by 56% (13) respondents, was that developers will not include affordable housing in these small developments, citing the changes arising from the WMS and NPPF. In one case the Planning Inspector ruled against affordable housing being included because the Local Plan policy was contrary to national policy.

Numbers of affordable homes foregone

Respondents who reported a reduction in delivery were asked to give an estimate of how many affordable homes had not been foregone. Thirty-one authorities responded to this question and their replies illuminate the scale of loss. Diagram Six shows how this varies across the different types of local authority.

Diagram Six: Estimate of number of affordable homes not delivered where rural affordable housing delivery has fallen



Across the 16 local authorities that reported they had foregone between 11- 25 new rural affordable homes, this represents a loss of between 275 - 400 such dwellings.

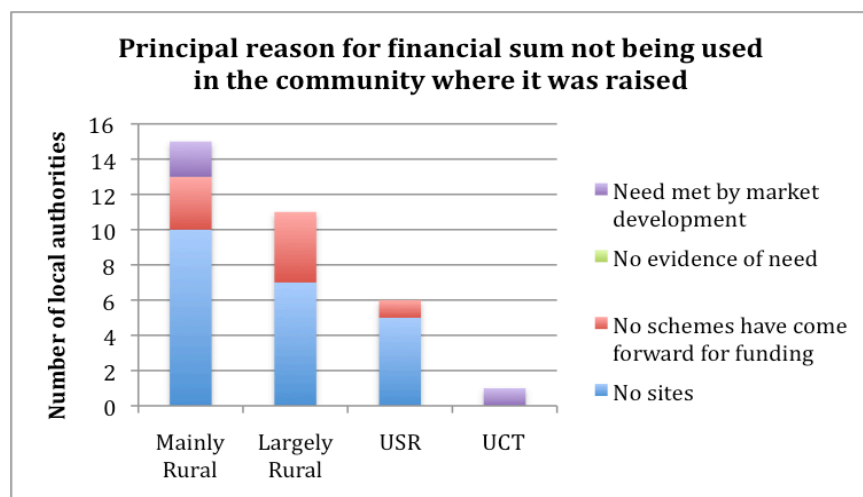
Use of commuted sums

The WMS policy for rural areas stipulated that any affordable housing contribution in designated rural areas could only be in the form of a financial sum, rather than as previously with an option to take the contribution as affordable homes built on the site. An expressed concern was that the lack of sites would mean it was unlikely the money would be used to support rural affordable housing delivery in the community where it was raised.

Where authorities have taken a financial contribution from rural sites of less than 10 dwellings only 2 (5%) reported that they always have used the money where it was raised. More encouragingly, 11 (31%) said this was usually the case and a further 7 (20%) that it was used in another rural community. However, 9 (26%) recorded they had not spent the money and 5 (14%) that they had only used it to support affordable housing delivery in urban areas.

A slightly higher number of local authorities responded to the question, what is the principal factor that limits the use of the raised commuted sum in the community where it was raised. 51% (23) said this was because of a lack of sites. Diagram Seven shows responses by type of authority.

Diagram Seven: Principal reason for financial sum not being used in the community where it was raised



Type of housing that has replaced affordable housing

Those local authorities that had raised the site thresholds in response to the WMS and NPPF changes were asked what impact this had on the form of housing that was built on the sites where previously they would have taken an affordable housing contribution. 61% (14) of the respondents answering this question reported that the affordable housing had been replaced with principally higher value properties.

Future policy and Site supply

In 2015 the High Court overturned the Written Ministerial Statement, but in 2016 it was re-instated following an appeal by the Government to the Court of Appeal. The latter does however leave room for some local discretion, ' (iv) Likewise, if in future an LPA submits for examination local plan policies with thresholds below those in the national policy, the Inspector will consider whether the LPA's evidence base and local circumstances justify the LPA's proposed thresholds. If he concludes that they do and the local

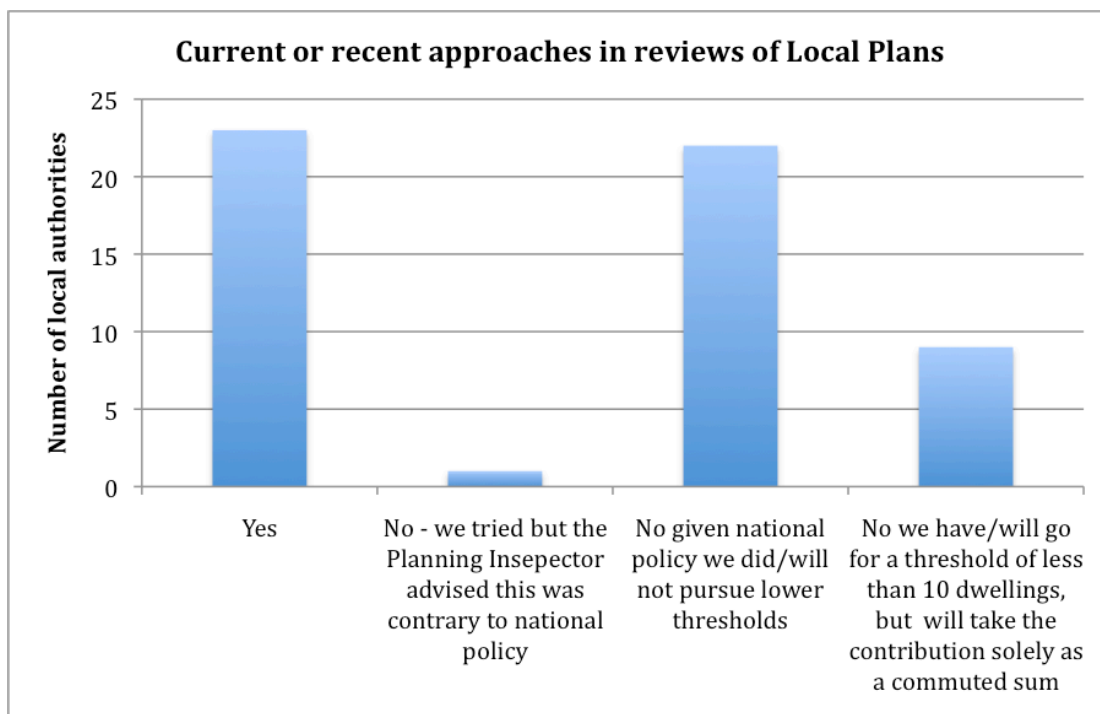
*plan policy is adopted, then more weight will be given to it than to the new national policy in subsequent decisions on planning applications.*²

Anecdotally it appeared that LPAs are wary of acting on this flexibility. To explore this further the survey explored the approach that LPAs had sought to take in reviews of their Local Plan and what would be their preferred approach.

Approach taken in Local Plan reviews currently underway or carried out over the last 3 years

Fifty-three respondents reported that they were either in the midst or had undertaken a review of their Local Plan over the last three years. As Diagram Six shows 23 have considered setting a threshold of less than 10 dwellings for on-site affordable housing contributions in their rural areas. It also shows that national policy has prevented them pursuing a lower threshold.

Diagram Eight: Current or recent approaches in reviews of Local Plans



Impact of changes to the NPPG in March 2019

In March 2019 the NPPG was revised stating that LPAs could choose to set their own lower threshold [i.e. less than the generic 10 dwelling threshold] and seek contributions above that threshold³

However, the wording in the NPPF remains unchanged stating that in designated rural areas policies may set a threshold of 5 units or fewer.⁴ Neither make it clear whether this can be in the form of on-site contributions or whether is still restricted to taking financial contributions.

² Court of Appeal Case Number C1/2015/2559 paragraph 26 - <http://www.bailii.org/ew/cases/EWCA/Civ/2016/441.html>

³ NPPG Paragraph: 023 Reference ID: 23b-023-20190315

⁴ NPPF - Paragraph 63

The survey asked local authorities what has been the impact of the change in the NPPG in March 2019 on their approach to taking affordable housing contributions from rural sites of less than 10 dwellings. 68% (40) said it had not had any impact.

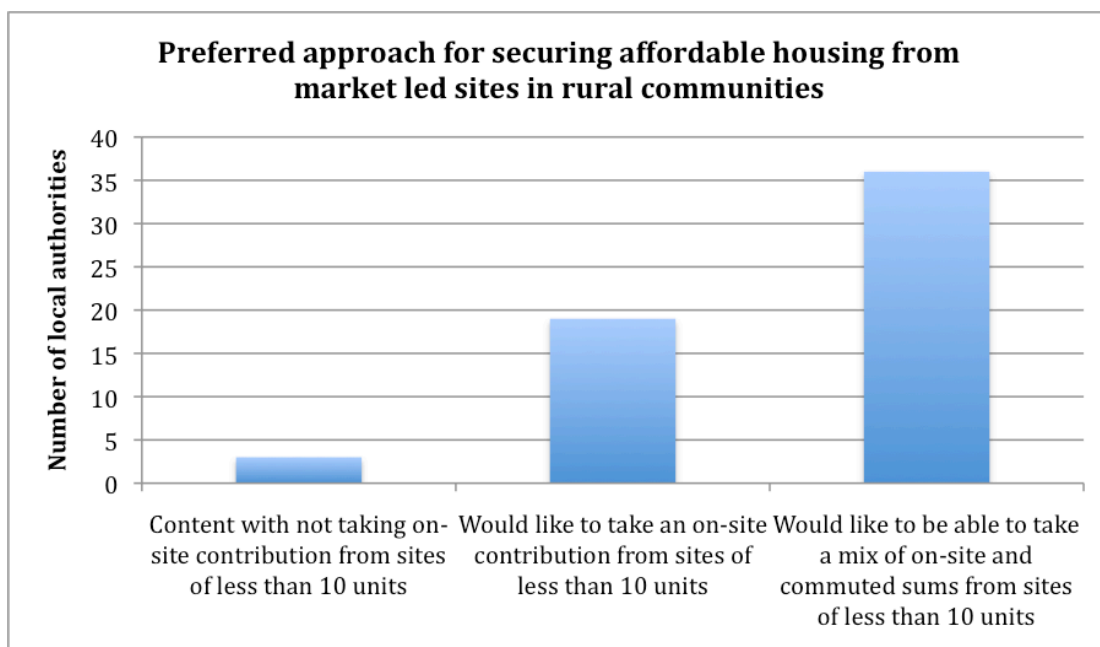
Table One: Impact of changes to NPPG in March 2019

No change	40
The lack of an accompanying change in the NPPF wording means we are unlikely to adopt a lower threshold	7
The lack of an accompanying change in the NPPF wording means we are still unlikely to take an on-site contribution, rather than commuted sum, from small rural sites	2
Not aware this change had happened - but unlikely to change our approach	5
Not aware this change had happened - but would be interested in changing our approach	5

The approach LPAs would like to be able to take

When asked what approach they would like to be able to take, 95% (45) of respondents would like to take an affordable housing contribution in some form from sites of less than 10 dwellings in their rural areas, with 62% of them wanting the option to be able to take the contributions as a mix of on-site and commuted sums.

Diagram Nine: Preferred approach for securing affordable housing from market led sites in rural communities



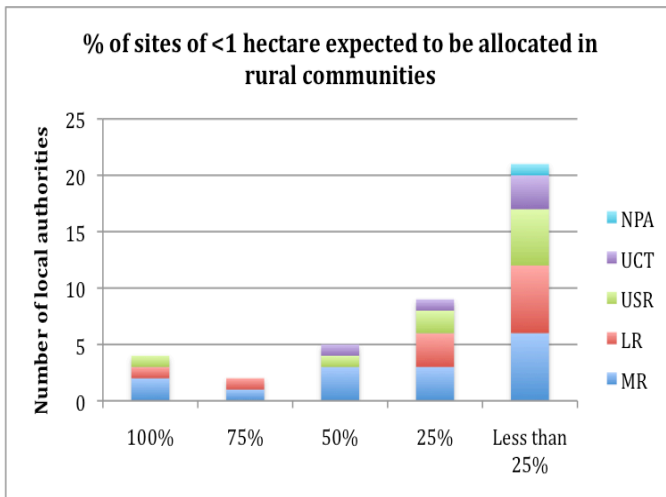
Impact of NPPF approach for meeting 10% of Housing Requirement on sites of less than 1 hectare

Paragraph 68 of the NPPF requires that LPAs should allocate sites to meet 10% of the Housing Requirement on sites of less than 1 hectare. Given that generally rural sites are relatively small this could potentially

improve delivery of rural affordable housing, although currently they would have to be of sufficient size to trigger an affordable housing contribution. To assess the likelihood that this requirement could achieve this benefit the survey asked what percentage of these sites do respondents think they will allocate in their rural communities.

Diagram Ten shows that most respondents do not expect to make more than 25% of these allocations in their rural communities.

Diagram Ten: Percentage of sites of less than one hectare expected to be allocated in rural communities

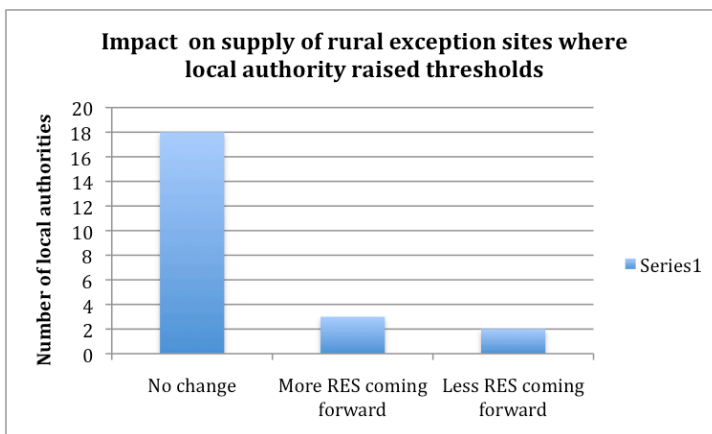


Impact of changes to site thresholds on supply of rural exception sites

One of the potential impacts of the raising of site thresholds was that it would result in landowners holding onto sites in the expectation that they would be allocated, with the attendant increase in value. This in turn could reduce the number of rural exception sites that were offered.

As Diagram Eleven shows for most authorities that had increased site thresholds the supply of rural exception sites had not changed. However, as set out above, finding sites is the principal factor that prevents commuted sums being used in the community where they are raised. Furthermore, as the evidence presented in the next section shows site supply remains a barrier to delivery.

Diagram Eleven: Impact on supply of rural exceptions sites where local authority raised thresholds



Other comments

At the end of the survey respondents were invited to provide any other comments or highlight issues that affect the delivery of rural affordable housing. These are summarised in Table Two.

Table Two: Summary of respondents' additional issues affecting the delivery of rural affordable housing

Comment	Number of respondents
There is a lack of RPs willing to take on a small number of dwellings and/or develop small rural schemes. Two specific consequences were noted. Firstly, where the developer cannot find an RP to take on the affordable homes, they dispose of them as low-cost affordable housing that does not address local needs. Secondly, it makes it difficult to spend the commuted sums raised in the villages where they are raised.	5
A number of respondents reported that not all their rural communities are designated as 'rural' under the 1985 Act, but are for the purposes of Right to Acquire exemptions. This means that they have adopted different thresholds for different rural communities, with lower thresholds for those in the 'rural areas' designated under the 1985 Act. In other areas a similar situation has arisen where rural communities in an AONB are designated with lower thresholds, but in the remaining rural communities the threshold of 10 dwellings or more applies.	5
A high Housing Need Requirement figure, calculated using the national methodology means the LA will focus on large strategic sites and less room for allocating small sites in villages	1
Not being able to meet the 5-year land supply requirement has had a significant negative impact on the supply of Rural Exception Sites. Developers have gained permission to build these out as market developments with only a quota of affordable homes. The numbers of these is often so small RP are not willing to take them on.	1
Delivery is constrained by the lack of site supply and the cost of sites that do come forward.	5
Linked to the above some respondents noted the viability challenge of making an affordable housing contribution stack up, where there is a housing need, but market values are low. Allied to this note was made of the lack of government grant for market led schemes in these areas. Interesting too one LA noted that since raising the threshold to 10 dwellings with a presumption that any contribution would be taken on-site there has been a reduction in the level of commuted sums available to support affordable housing delivery on other sites,	5
Developers submitting schemes below the policy threshold and choosing affordable rent and low-cost home ownership products that are unaffordable to those on an average locally earned incomes.	3
Affordable housing is critical to the sustainability of rural communities	1
Neighbourhood Plans have had a positive impact on delivery in rural areas	1
Where a local authority adopts a policy of only allocating sites in the larger villages, in the remainder the policy requirement is for sites to deliver 100% affordable housing. In the latter threshold policies do not apply.	1

Three examples of a rurally sensitive threshold policy

The Court of Appeal Judgement in 2016 was very clear that the NPPF was one material consideration that should be taken into account when developing Local Plan policy and taking planning decisions. As noted above it went on to state that a local authority could set a lower threshold if this was justified by evidence and local circumstances. Two respondents noted that they have used this discretion and adopted lower thresholds with on-site contributions into their Local Plan.

South Downs National Park

The SDNPA has recently adopted its new Local Plan (July 2019) that includes Policy SD 28⁵ that provides a sliding scale for affordable housing contributions and thresholds as low as three dwellings:

- 50% from sites of 11 or more dwellings;
- 40% for sites of 10 dwellings 3 units for sites of 9,
- 1 unit for sites of 4 or 5 dwellings,
- a financial contribution for sites of 3 dwellings negotiated case-by-case.

At the Examination in Public SDNPA justified their approach citing the Court of Appeal Judgement which recognised that the WMS and PPG does not necessarily either outweigh the Local Plan, or prevent a different approach being taken through the plan-making process to respond to specific local circumstances. Furthermore, the judgement states that it remains legitimate for local plans to take a different approach to that set out in PPG with regards affordable housing thresholds, provided there is robust local evidence to support it.

SDNPA's evidence included the following elements:

- the local context and evidence of housing need
- demonstration that over 60% of homes delivered were on sites of 10 or less.
- The threshold levels and were supported by the economic viability evidence.

The inspector concluded there is a pressing need for affordable homes in the National Park. He also noted the clear evidence that a majority of around 62% of affordable homes delivered in the Park have been on small sites below 10 and often of 4 or 5 dwellings. Given also that the policy focus of housing growth within the National Park is on affordable home provision, the Inspector concluded there is clearly exceptional justification for a sliding scale of contributions for sites below the normal 10, 9- or 5-unit thresholds.

Silverdale and Arnside AONB - adopted into South Lakeland and Lancaster Local Plan

South Lakeland and Lancaster Councils adopted a Local Plan in March 2019 specifically for the Arnside and Silverdale AONB area.⁶ It includes policy AS03 - Housing Provision that requires:

- 50% affordable housing on sites of 2 or more dwellings
- Only where this is demonstrably unachievable will a lower percentage be acceptable

⁵ South Downs Local Plan - adopted July 2019 https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf

⁶ Arnside and Silverdale Area of Outstanding Natural Beauty Development Plan Document - March 2019 <https://www.southlakeland.gov.uk/media/6461/final-aonb-dpd-adoption-accessible.pdf>

- In assessing the level and type of affordable housing on each site the Councils will have regard to site viability, individual site costs and other scheme requirements, the affordable housing guidance set out in an Appendix
- The affordable housing will be on-site and only in exceptional cases as a commuted sum, which will be assessed on a case-by-case basis

The Planning Inspector⁷ accepted this approach on the grounds of: the evidence presented on the levels of housing need; viability assessments, which included site typologies, proved that a 50% contribution was viable; the limited development opportunities to meet specific and significant housing needs in the AONB where housing numbers are modest given the special qualities of the area.

North Devon and Torridge Local Plan

Recognising that affordable housing from small sites made such an important contribution to rural affordable housing supply, North Devon District Council Local Plan included flexibility in their Local Plan policy to allow lower thresholds to be adopted should national policy change.

<https://consult.torridge.gov.uk/portal/planning/localplan/adoption/>

The Local Plan was prepared using evidence from a viability assessment that indicated it was usually viable for the smallest sites to deliver some on site provision and had proposed no thresholds at all. The WMS made it difficult to adopt this approach. However, with the agreement of the Inspector the policy was modified to apply the WMS thresholds 'unless changed in national policy or guidance'.

This allowed the LPA to publish an amendment to their policy in May 2019 through 'Practice notes' that now interprets Policy ST18 in light of NPPF changes. The policy now requires that in designated rural areas affordable housing will be sought on site at a level of 30% on sites of 6 or more dwellings or where the site has an area of 0.5 dwellings or more.

Conclusions

The evidence provided by this survey confirms the negative impact that the national policy of raising site thresholds has had on the delivery of rural affordable housing. This includes the partial exemptions for taking affordable housing contributions from small sites in 'rural areas' designated under the 1985 Housing Act.

The survey reveals that the thresholds adopted by respondents' councils reflect those set out in the national guidance. 49% of respondents had raised their thresholds in response to the WMS and revised NPPF. In these areas 66% of respondents reported a reduction in the delivery of affordable housing in their rural communities. The majority of these also reported that the affordable homes that would have been delivered under their earlier lower threshold policy had been replaced with higher value residential properties.

For those adopting the rural threshold and requirement that the affordable housing can only be taken as a commuted sum, 31% had usually been able to use the money in the community where it had been raised.

⁷ Report of the Examination of the Arnside and Silverdale Area of Outstanding Natural Beauty Development Plan Document - 2018 paras 29 - 35

<https://www.southlakeland.gov.uk/media/6314/aonb-dpd-inspectors-report-jan-2019.pdf>

However, 25% had not spent any of it. The principal reason for being unable to use the money in the rural communities where it had been raised was a lack of sites in these communities.

Not all respondents were able to quantify how many affordable homes were lost, but 31 did reply to this question. Just over half, sixteen local authorities, reported that over the last two years they had lost 11- 25 new affordable dwellings as a result of raising their threshold policy. Across these areas this amounts to 200 - 475 homes. Delivery is of course always uncertain, but to have a feel for the number of homes that could be delivered if the policy were to change, across predominantly rural areas this could amount to an additional 495 to 1125 affordable homes per annum. This could be a 10% - 25% increase in the 2017/18 level of delivery in settlements of less than 3,000 population.

Given the evidenced levels of housing need in rural areas it is not surprising that there is an appetite for a change in policy that would allow local planning authorities to be able to take an affordable housing contribution from sites of less than 10 dwellings. 94% of respondents reported this preference, with 62% of them wanting the option to be able to take the contributions as a mix of on-site and commuted sums. Yet as the survey revealed most are dissuaded from doing so because of national policy, despite the Court of Appeal stating that where there is the evidence LPAs do have the flexibility to set thresholds below those set out in the NPPF.

An issue not covered by the questionnaire, but raised through respondents' comments was the inconsistency of application of the policy because not all rural communities come under the 'rural area' designation for their area. Nationally, approximately 28% of parishes of less than 3,000 population⁸ are designated as 'rural' under the 1985 Housing Act. In these communities the lower site threshold with commuted sum affordable housing contributions can be taken. In contrast all rural settlements of less than 3,000 population are designated as 'rural' under the 1996 Housing and Planning Act. Yet, in some of these it is not possible to apply the rural thresholds. In their comments LPAs called for the ability to apply a consistent approach to all their rural settlements. Previous evidence has suggested that these should be defined as parishes of less than 3,000 population, with some flexibility to include larger parishes in National Parks and AONBs.

Successful delivery of rural affordable housing is dependent on an integrated package of policy and funding mechanisms being in place. As respondents reported other challenges will also impact on delivery. It is however essential to recognise that without sites no affordable housing will be built. Re-opening up the opportunity to take an affordable housing contribution on site from small market sites will increase rural affordable housing supply. The viability testing requirements set out in the revised NPPF and NPPG will ensure that policy thresholds do not affect deliverability. By using cross -subsidy from the market sales the numbers of affordable rural homes can be increased without calling on public grant. Ultimately, allowing LPAs to set rurally appropriate thresholds with the flexibility to take on-site and/or commuted sums will result in a plan led approach to meeting housing needs in rural communities. In so doing LPAs will be equipped to fulfil the NPPF requirement set out in paragraph 77 that, 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.'

Jo.Lavis
Rural Housing Solutions
November 2019

⁸ The % figure has been calculated using Statutory Instrument parish lists for local authorities and number of parishes in National Parks not covered by LA SI lists. A few of the NP parishes are over 3,000 population, but have been included in this calculation. Some local authority SIs include parishes in the AONBs in their area, others do not. Where the parish is in an AONB but not in the local authority SI it is not included in the calculation.

Appendix One - Survey questionnaire

1. Name of local authority

2. What is your authority's current size threshold for triggering an affordable housing contribution from market led developments in rural communities?

Less than 3 dwellings

3- 5 dwellings

6 - 9 dwellings

10 dwellings

Greater than 10 dwellings

3. Is your authority's current threshold for sites in rural communities different to that in place prior to the Written Ministerial Statement (WMS) and/or changes to the NPPF ?

No change

Site threshold is higher

Site threshold is lower

4. Has the form in which you take the affordable housing contributions from sites in rural communities changed since the WMS and changes to the NPPG and /or NPPF?

No change

We now only take a financial contribution rather than on-site contributions

We have changed to taking a mix of financial and on-site contributions

5. If your authority has retained a threshold of less than 10 dwellings for **on-site** contributions in your rural communities has this delivered new affordable homes?

Yes

No because developers will not include affordable housing, citing the changes to the WMS and changes to the NPPG and /or NPPF?

No because at appeal the Planning Inspector has judged that our policy is contrary to national guidance?

6. If you have reviewed your Local Plan in the last three years or are in the process of doing so, have you, or are you considering, setting a site threshold of less than 10 dwellings for **on-site** affordable housing contributions in your rural communities?

Yes

No - we tried but the Planning Inspector advised that this was contrary to national policy

No - given national policy we did /will not pursue lower thresholds in our rural communities

No - we have/will go for a less than 10 dwelling threshold, but will take this solely in the form of a commuted sum.

7. If your authority has adopted a threshold for rural developments in line with the WMS/NPPF what has been the overall impact on new rural affordable housing supply?

- The same
- Increased
- Reduced

8. If the levels of delivery have fallen, approximately how many affordable dwellings in rural communities have you had to forego in the last two years?

- Less than 10
- 11 - 25
- 26 - 43
- 44 - 60
- More than 60

9. If you have secured commuted sums, in place of on-site affordable housing contributions from sites of less than 10 dwellings in your rural communities, where have you spent the money raised?

- Always in the rural community where it was raised
- Usually in the community where it was raised
- Always spent to support delivery of affordable housing in another rural community.
- Usually spent to support delivery of affordable housing in another rural community.
- Always spent to support delivery of affordable housing in the urban communities of the local authority.
- Not spent the money

10. Which of the following factors have limited the use of commuted sums to support affordable housing in the community where it was raised?

- no sites have become available
- no schemes have come forward requiring funding
- no evidenced need in that community for affordable housing
- another larger market led development has provided the affordable housing required to meet the housing needs of the community

11. If you have adopted a threshold of more than 10 dwellings in your rural communities, what has been the impact of the new higher thresholds on the supply of rural exception sites?

- No change
- Less sites coming forward
- More sites coming forward

12. If you have raised the threshold, what has been the form of housing provided on rural sites from which in the past you would have taken an on-site affordable housing contribution?

No change
A mix of market housing types and sizes
Primarily higher value residential dwellings

13. What approach would you like to be able to take?

Content with not taking on-site affordable housing contributions from sites of less than 10 dwellings in rural communities.

Would like to be able to take an on-site affordable housing contribution from sites of less than 10 dwellings in rural communities

Would like to be able to take an on-site affordable and/or commuted sum affordable housing contribution from sites of less than 10 dwellings in rural communities.

14. In March 2019, the NPPG was changed in respect of taking affordable housing thresholds from sites in rural areas (Paragraph: 023 Reference ID: 23b-023-20190315). However, the NPPF (paragraph 63) remained unrevised. What impact has this had on your approach to taking affordable housing contributions from sites of less than 10 dwellings in rural areas?

No change

The lack of an accompanying change in the NPPF wording means we are unlikely to adopt a lower threshold.

The lack of an accompanying change in the NPPF wording means we are still unlikely to take an on-site contribution, rather than commuted sum, from small rural sites

Not aware this change had happened - but unlikely to change our approach

Not aware this change had happened - but would be interested in changing our approach

15. In meeting the NPPF (paragraph 68) requirement that 10 % of the housing requirement is met by sites of less than 1 hectare what % of these sites have/do you expect to allocate in rural communities as part of the requirement for a 5 year land supply?

100%

75%

50%

25%

less than 25%

16. Are there any other comments or issues that you would like to highlight that are affecting the delivery of rural affordable housing in your area?