



Lyons Review of Housing

**A joint submission by the Smart Growth UK coalition on behalf of:-
British Land Reclamation Society
Campaign for Better Transport
Campaign to Protect Rural England
Civic Voice**

February 2014

Introduction

This submission to the Review is made jointly by the above organisations in pursuit of their collective interest in the principles of “Smart Growth”, a approach to spatial, transport and community planning which considers these challenges as a complex, inter-linked whole.

These organisations are supporters of Smart Growth UK, an informal coalition of organisations and individuals who favour the Smart Growth approach to spatial, transport and community planning. The coalition agreed a joint policy statement last year, *Meeting the Growth Challenge*, which sets out the basic principles of this thinking. This is attached as Appendix 1 to this response.

Overarching comments - the need for more housing

As the *Call for Evidence* states, England needs to build more homes. However, issues of housing need, demand and aspiration are not simple ones and necessitate a much more considered response than simply finding ways of increasing the raw numbers of homes built each year. Rather, the emphasis of the Review should be on increasing the delivery of housing to meet identified need.

The Department for Communities and Local Government (DCLG)’s household growth projections are often taken as the starting point of this debate but the draft *Planning Practice Guidance* noted that calculating housing targets is not an exact science, so it is essential that projections are subject to close examination. Even if the figure of projected annual demand for household formation of 221,000 is accepted (and demand is not the same thing as need), then the research on which it is based, DCLG’s *Household Interim Projections in England, 2011 to 2021* needs to be looked at as a whole. It reveals a very much more complex picture.

While much of the demand for housing is often assumed to be “family homes”, i.e. those families with dependent children, the *Projections* reveal a very different picture:-

- two-thirds (67%) of the projected increase is predicted to be households without any dependent children;
- less than a quarter (23%) are projected to be households with one child and only 11% are likely to have two or more children;
- single-person households are projected to account for 28% of the change;
- 15% of the growth is projected to be “other households”, i.e, multi-person households like student accommodation or residential care homes;
- the greatest change is among households headed by (and hence largely made up of) older people;
- households headed by 55-64 year olds are projected to make up 23% of the total increase and by over-65 year olds 54% of the increase;
- only 23% of the increase is likely to be in younger households.

While we recognise that the type of houses needed will vary between local planning authorities and that homes can be used in various ways, these statistics show the type and size of the homes needed must be considered, rather than just the number.

The statistics also indicate the major need is in fact for housing for older people and the main requirement apart from that is younger, single people. Neither of these groups are ideally suited by the “garden suburb” type of development – which in the past has tended to be greenfield, low-density and car-dependent. If a new generation of new towns were built like this, they would create significant social problems. Older people may lose the ability to drive, trapping them in their homes while younger, single adults need the opportunities for social interaction that higher density urban living offers. Indeed, an increasing number of older people are realising the benefits of such interactions too.

There are other issues here too, including the obvious sustainability issues of increased car dependency and destruction of countryside. There are issues of how efficiently we use our existing housing stock and there is also a major inter-generational issue which has been a focus of recent debate. Greater emphasis also needs to be placed on the quality and design of current housing; both have suffered due to recent changes in national planning policy. A crucial part of achieving this will come from increasing diversity within the house building sector.

Vital to consider too is the question of affordable housing provision. Much of the *Call for Evidence* appears to concentrate on market housing and, while this will continue to form the majority of housing built, by far the strongest *need* is for social housing.

We also encourage the Review to place great importance on the issue of sustainability and climate change. Car-based, low-density urban development will inevitably increase our greenhouse gas emissions and damage ecosystem services. But we don't only need to mitigate climate change, we need to adapt to it as well, as recent storms and floods have demonstrated. Building on floodplains not only puts the houses at high risk, it also reduces the storage room for flood waters at times of deluge, exacerbating flooding elsewhere.

Answers to the Review's specific questions:-

1. The land market - unlocking land for housing development

The high cost of land is one of a whole range of factors which account for the high cost of housing. But although this does indeed raise big issues about the availability

and economics of house building land, it should raise the issue of how *efficiently* we use land.

The *Call for Evidence* asks how to get more residential land to the market but we would also encourage the Review to consider how we get more land available for social housing and how to make best use of whatever land is available. England is Europe's most densely populated large country and its land faces a vast range of important demands, of which housing is only one. Despite having the highest population density, however, we also build at Europe's lowest housing densities as a result of the way land markets work as well as older design philosophies which apparently continue to underpin the thinking in the *Call for Evidence*.

We believe the high cost of land in England and the demands placed upon it necessitate a different response. The Smart Growth philosophy proposes higher residential densities than those typical of the garden suburb type of development, thereby making much better use of land. This does not mean the very high "town cramming" densities of high-rise, but in the past developers and planners were quite capable of building attractive houses at net densities of 60-70 dwellings per hectare. The garden city movement, however, specified a maximum density of 30 per hectare and the minimum density of 30 per hectare required by national planning policy for housing in 2000 was dropped in 2010. Building at such low densities can help developers maximize profits, but it squanders land and exacerbates car dependency.

We need to work to find ways of making higher density (though not very high density) living attractive. Traditional forms of development achieved this and much work is underway in Greater London to find new patterns, but it doesn't seem to have spread far beyond the capital. This is a question the Review could usefully address.

Other features of the Smart Growth approach include reuse of brownfield land where appropriate and building within existing conurbations where possible, to maximize use of sustainable transport modes and minimize greenhouse gas emissions. Bringing more suitable residential land to the market will involve reversing the damage to the brownfield reclamation sector done by the planning changes of recent years, including the dropping of a strong brownfield-first planning policy in 2012.

Brownfield-first does not mean only developing brownfield sites, nor does it involve developing all brownfield sites, but the demands of sustainability require urgent restoration of a strong brownfield-first principle. Contrary to what critics say, the high building levels of the early 2000s were achieved with brownfield-first and it is not a barrier to development. Where houses must be built and there is no brownfield land available then greenfield land can be used. But developers will always choose such land in the absence of brownfield-first policies because it is more profitable, even if it is less sustainable.

We recognise that land is expensive. That is all the more reason for the need for it be used efficiently and effectively. Consequently, we urge the Review to advocate the use of the principles of Smart Growth to ensure that all new development makes the most of the limited land we do have in our densely populated country. We must prevent it from being squandered through inappropriate, low density development.

The Review could also usefully consider how to even the flow of house building from the industry which is currently subject to peaks and troughs determined by commercial, not housing, needs.

2. Investment in housing and associated infrastructure

There is certainly a need for greater investment in infrastructure, but it's also important to ensure we invest wisely and that we make the best use of existing infrastructure.

The Smart Growth approach emphasises making best use of existing infrastructure by building within the footprint of existing conurbations – as stated above, this should mainly be achieved through a brownfield-first approach. Greenfield development, especially in new settlements, requires wholly new infrastructure. Brownfield can usually make best use of existing; indeed new settlements are likely to drag economically active population out of existing urban areas that are suffering economic problems, further exacerbating those problems, undermining attempts to promote urban regeneration and increasing underuse of the perfectly good infrastructure they enjoy. Where such settlements have been built in Europe, it has been on the back of very substantial public investment.

3. The role of a new generation of New Towns and Garden Cities

We are disappointed by the assumption that new towns and garden cities are an essential component of a step-change in house building. Even at the peak of the post-war new towns programme, the 1950s and 1960s, new towns provided less than 5% of the new housing built in England and Wales¹. The highest number of new homes Milton Keynes ever provided in one year was 3,500; most years it was substantially less². Yet the new towns were built at a time when more land was available, opposition was much lower and the planning and political regimes were extremely friendly. None of those is now the case.

Mr Miliband recently called for two new towns in the south-east. In the *most* optimistic scenario, they might together provide 100,000 homes over a 20 year period, though this is highly unlikely, and they would cause huge environmental damage in the process. Adding even 5,000 homes a year to the national housing stock is not a “large uplift” in house building.

If any new settlement were to be built as part of a longer-term response to housing shortages, numerous barriers would need to be overcome. New settlements:-

- require wholly new infrastructure which existing settlement development does not;
- as previously built can involve their inhabitants making the bulk of their journeys by car (even if they are built around a railway station), increasing greenhouse emissions;
- can destroy prodigious areas of countryside and the vital ecosystem services it provides – supply of food, water and timber, flood control, biodiversity, landscape, recreation etc..

Any major new urban development would need to satisfy the following criteria to meet the principles of sustainability:-

- would need to be built around sustainable public transport links and seek to maximize opportunities for promoting active travel so that cars are not the main mode of passenger transport;
- should be built only once those sustainable modes were provided;
- should maximize the efficient use of land by being compact, employing appropriate densities;
- should involve high standards of design and up-to-date urbanist thinking;
- should minimize their impact on the countryside;

- should not be built in regions where water is already in short supply;
- should not exacerbate flooding and drainage problems;
- should ideally be located within the footprint of existing major conurbations;
- should have their location determined via the support of local authorities and communities and these locations should be tested against alternatives via the planning system.

Most of these principles should also apply to all new large-scale developments, including major urban extensions. If such are built, they should be firmly integrated with the existing settlement and not, for example, separated by a major highway.

4. A new “right to grow”

We have serious misgivings about the proposed “right to grow” which appears to represent further top-down control of local planning decisions. It will favour the interest of one local authority against those of another, even when the latter has very sound planning reasons for limiting development.

Many issues tackled through the planning system do indeed cross local authority boundaries and there needs to be a mechanism to handle these. But any proposal that seeks to force development on neighbouring authorities to meet aspirations for growth is undemocratic and will only increase frustration and mistrust of the planning system, the Planning Inspectorate and national decision makers.

Any right to grow should only ever apply in places where it’s right and sustainable to grow, for example when a site is connected to a dense development and built around public transport.

5. Share the benefits of development with local communities

If some suitable measure could be found to share financial benefits with communities, these benefits should go to things the community needs, like public transport, improvements in walking and cycling facilities, town centres, public realm, community facilities, open space, biodiversity, heritage and so on.

One potential target for money raised from unsustainable greenfield development would be some kind of funding for reclamation and remediation of brownfield land to make such sites more viable. At present viability provisions in national planning policy militate strongly against brownfield and in favour of greenfield. Some kind of fund or levy could reduce these differentials.

Conclusions

There are many complex issues for the Review to consider in developing its ideas for increased delivery of new homes. We are disappointed the Review appears to have concluded we need a fresh generation of new towns, a right to grow etc. before considering these problems.

We recommend that the whole problem of English housing needs is considered alongside the need to ensure the planning system and housing sector promotes Smart Growth. In taking the Review forward, it must be recognised that the issues faced are extremely complex and it is not sufficient simply to seek to increase the number of houses being built. The type, size and tenure of homes is critical, as are who builds them and where they are located.

¹ Paul Balchin: *Housing* in Barry Cullingworth (ed.): *British Planning – 50 Years of Urban and Regional Policy* (London: The Athlone Press, 1999) and Anne Power: *Hovels to High Rise – State Housing in Europe Since 1850* (London: Routledge, 1993)

² Lord Taylor, quoted in Christopher Hope: *New Garden Cities Won't Deal with Short-Term Housing Crisis, says Coalition Planning Advisor* (London: Daily Telegraph, 24 January 2014)