

**THE REPORT OF THE RADIX BIG TENT  
HOUSING COMMISSION - OCTOBER 2024**

Foreword by  
Alex Notay

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permacrisis**  
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# welcome

In March 2024 radical centre think tank, Radix Big Tent, established an independent commission with the support of law firm Shoosmiths. The purpose of the commission is to help the incoming government plan a radical but pragmatic response to one of the most important systemic issues of our day – England’s housing crisis.

The multidisciplinary commissioners include property professionals, developers, investors, planners, voluntary sector practitioners, academics and policy experts, as well as representatives of Shoosmiths and Radix Big Tent. They have consulted widely across the sector and taken evidence from dozens of organisations and individuals.

The Radix Big Tent (RBT) Commission was initially chaired by esteemed housing economist Dame Kate Barker CBE, to mark the twentieth anniversary of her landmark review of housing supply for the Blair Government. Following Dame Kate’s appointment as Deputy Chair of the Government’s independent New Towns Taskforce over the summer, the internationally recognised housing and placemaking expert Alex Notay succeeded her to shepherd the RBT Commission’s work to conclusion in this report.

The Commission has been meeting publicly and privately over the past six months to prepare this set of recommendations for radically increasing housing delivery across England. The Commission principles were to embrace a cross-party and non-ideological approach, leveraging the diverse expertise of commissioners to develop innovative yet pragmatic policy solutions that can be implemented, even in our seriously constrained economic environment.

The recommendations span planning policy, governance and funding innovations and suggest ways of ensuring more effective implementation of policies. They range from short-term immediate changes to ten-year programmes as well as longer-term big ideas for exploration in the future.

This report and recommendations represent the synthesis of comprehensive deliberations by the commissioners over a six-month period with an unexpected general election halfway through! We thank all commissioners for their valuable input but particularly the contributing authors: Alexandra Notay, Catriona Riddell, Jackie Sadek, Paul Brocklehurst, Lisa Tye, Tom Chance, Lesley Yarranton and David Boyle. Not all the commissioners necessarily agree with every recommendation in this paper but each recommendation has a majority of support.



## Radix Big Tent Housing Commission Report October 2024





Foreword by  
**Alex Notay**

CHAIR, RBT HOUSING COMMISSION

It is critical to recognise that housing is a complex ecosystem

It is now twenty years since a previous Labour Government commissioned Dame Kate Barker CBE to lead her review of UK Housing Supply<sup>1</sup>. Despite unusually strong support from across the sector, a recent review<sup>2</sup> by the Home Builders Federation (HBF) showed that only eleven of the 36 recommendations made then are currently in place, with a further ten having been only partially implemented and five having been implemented and then reversed.

Sadly, most indicators of housing market health are worse today than they were twenty years ago. In particular, there has been a failure to link new housing with infrastructure delivery and also, since the financial crisis, a further decline in the supply of new social rent homes.

The abolition of the National Housing and Planning Advice Unit (NHPAU) and its regular review of the market is particularly frustrating as this was having a clearly positive impact.

A key lesson twenty years on is that whilst most of the original Review's recommendations enjoyed broad support, there was fractured and inconsistent ownership and governance around implementation.

Too often, policies fell into a battleground between government departments rather than benefitting from strategic leadership focussed on delivery.

As we stated in our interim recommendations in July 2024, it is critical to recognise that housing is a complex ecosystem, where well-intended interventions in one area can often have unintended and significant negative consequences. The importance of integrated policy and implementation across the full range of housing tenures and asset classes, encompassing all professional sectors involved in the housing lifecycle, cannot be understated.

We commend the Government in already actioning a number of our interim recommendations, particularly taking a two-stage approach to housing policy reform, recognising the need to blend short and long-term interventions, pushing for a return to strategic planning, exploring options around the so-called Green / Grey Belt and reviewing the priorities of Homes England. It was particularly positive to see the formation of the New Towns Taskforce, although this meant that we lost Dame Kate as our chair as she had to step down from the RBT Commission to focus on her role as Taskforce Deputy Chair.

We might at last have the holistic framework to deliver meaningful change and progress

We are enormously grateful to all those individuals and organisations who have taken the time to give evidence to the Commission, either in person or through written submissions. The breadth of insights and experience shared has greatly enhanced the deliberations of the Commission over the past six months. Our commissioners themselves have diverse views and experiences so

whilst all recommendations have a majority of Commissioners endorsing them, not all recommendations have been universally agreed. This reflects the nuance that exists within our complex, multilayered housing ecosystem. However, we have challenged ourselves to be bold in our thinking and this report is the distillation of long debate and deep deliberation.

Similarly, there were some complex issues where we could barely scrape the surface in the time available, whether on financing and taxation or particular tenures such as PBSA (purpose-built student accommodation), co-living and specialist housing for older people; or on much broader themes such as embracing new technology

and MMC (Modern Methods of Construction), the critical skills agenda or decarbonisation and climate change. We have not been able to explore these obvious priorities in detail but would urge the Government to continue its proactive approaches i.e. through rapidly expanding the Social Housing Decarbonisation Fund and supporting the extension of the Digital Planning and PropTech programmes at MHCLG, which have already proved so effective. We hope to be able to look at these issues further over the next twelve months.

It has been a great honour to work with this group of multi-disciplinary experts who are all individually and collectively deeply passionate about ending the housing permacrisis in England. I have done my best to step into Dame Kate's shoes to shepherd this report through to its final conclusions and thank all the Commissioners for their generous support and valuable insights.

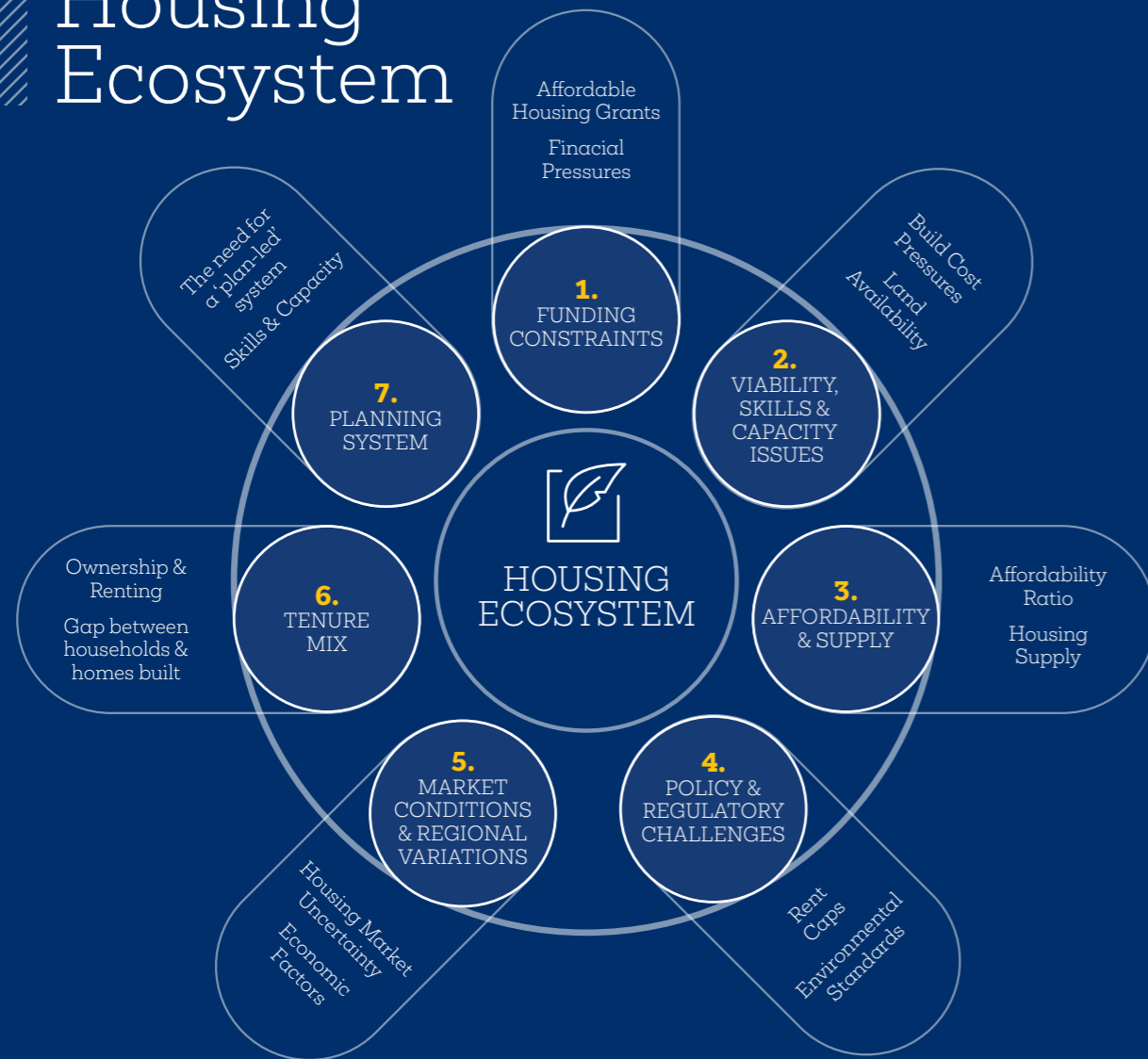
There is no shortage of appetite to tackle this challenge and if some or all of these recommendations are adopted then it is possible that we might at last have the holistic framework to deliver meaningful change and progress.

ALEX NOTAY

<sup>1</sup> [https://web.archive.org/web/20080513212848/http://www.hm-treasury.gov.uk/consultations\\_and\\_legislation/barker/consult\\_barker\\_index.cfm#report](https://web.archive.org/web/20080513212848/http://www.hm-treasury.gov.uk/consultations_and_legislation/barker/consult_barker_index.cfm#report)

<sup>2</sup> HBF Beyond Barker report <https://www.hbf.co.uk/news/hbf-beyond-barker-report/>

# Housing Ecosystem



**1. Affordable Housing Grants:** There is often insufficient grant funding for affordable housing and no long-term certainty, which makes it difficult to meet the demand.

**Financial Pressures:** High inflation, interest costs and rising operating costs are putting financial strain on housing providers across all tenures.

**2. Build Cost Pressures:** Increasing costs of materials, labour shortages and instability in the contractor market impact the overall viability of housing projects.

**Land Availability:** There is a shortage of suitable land for development, leading to strong competition and higher land prices.

**3. Affordability Ratio:** The affordability ratio is a measure of the relationship between house prices and earnings. According to the Office of National Statistics (ONS) in 2022, the median house price in England was approximately 9.1 times the median annual earnings. This ratio has increased over the years, indicating that housing has become significantly less affordable.

**Housing Supply:** The housing supply target has not been met in recent years and the closest the country came to meeting this target was in the late 1970s.

**4. Rent Caps:** Proposed rent caps can limit the revenue potential for housing associations, affecting their ability to fund new projects.

**Environmental Standards:** The necessary push for higher environmental standards increases the cost of development, which can affect viability but also presents a complex retrofit challenge for existing homes.

**5. Housing Market Uncertainty:** Fluctuations in the housing market can impact the financial stability of housing projects.

**Economic Factors:** Broader economic conditions, such as interest rates and economic growth, also play a crucial role in the viability of housing delivery.

**6. Ownership and Renting:** According to the English Housing Survey 2022-23 65 per cent of homes in England and Wales are owner occupied. 19 per cent are in the private rented sector and 16 per cent are in the social rented sector. The rental sector is diversifying further with specialist sub-asset classes such as co-living, student and housing for older people.

**Gap between households and homes built:** The number of new households each year has exceeded the number of homes built in every year since 2008, and the gap has grown in recent years.

**7. The need for a 'plan-led' system:** Approximately one third of local plans are up to date, especially in relation to meeting housing needs which is largely as a result of the abolition of regional plans in 2010.

**Skills and capacity:** According to the RTPI, local authority net expenditure on planning fell by 43%, from £844m in 2009/10 to £480m in 2020/21 and 74% of public sector do not feel their department has the resources it needs. The LGA's Workforce Survey (2022) highlighted that recruitment of planning officers was the top challenge

# Executive Summary

The Commission urges the Government to recognise that **housing IS national infrastructure.** It is a critical driver of economic prosperity and growth and that in all aspects, a more integrated, long-term approach to governance, funding, planning and delivery will enable the transformative change needed to tackle the housing permacrisis.

The failure to meet decades of housing targets or fully adopt the original recommendations of the 2004 Barker Review of Housing Supply lies predominantly with flawed governance structures. On implementation and delivery, we offer an innovative new governance framework for housing, a clear strategy, a new housing delivery unit at the heart of government, cross-party collaboration and clarified roles for different tiers of government.

We also recognise the intense pressures on public finances but urge the Government to be bold and target longer-term investment to address the systemic issues in health, education, social care and inequality that have their roots in poor housing. A focus on achievable efficiencies and savings, process simplification and coherent alignment to the fiscal devolution already underway could shift the outcomes for citizens and communities as well as allowing the Government to make progress towards its own demanding target of 1.5million new homes.

There are significant volumes of global capital interested in but still cautious about investing in our housing market. Institutional investors need clarity, confidence and commitment that the policy and regulatory goalposts won't suddenly move. We need to offer a stable platform to secure that investment, make better use of rental tenures in the housing

mix and rapidly agree a new rent settlement to deliver more affordable housing.

A return to strategic planning is key – making a plan-led system viable and allowing planners to be planners and enable investment rather than be solely focussed on development control. To catalyse investment across ALL tenures at scale, additionality of supply is key and the potential of Small and Medium Enterprises (SMEs) to contribute alongside larger entities must be harnessed and enabled – there are too many policy barriers that could and should be removed.

Whilst this report has a significant amount of detail on addressing reform of the planning system, it is crucial to recognise that it is not the sole barrier to delivery of new homes. A fully consented site on free or subsidised land would still present a number of challenges to delivery because of the breadth of viability issues in the market.

Therefore, the golden thread of our recommendations is to urge the Government to ensure that any policy change is assessed against every aspect of the housing ecosystem. It is imperative to avoid the temptation to cherry-pick linear solutions that sound good in headlines but can't deliver meaningful strategic improvements.

Unblocking the various viability issues addressed here alongside speeding up planning would be transformative. It is possible to do this if these bold recommendations are acted on holistically and proactively. We stand ready to support the Government in this challenge.

These challenges require coordinated efforts from the Government, private sector and housing associations to ensure that the housing needs of the population are met sustainably and affordably.

# Recommendations

**RECOMMENDATION /01**  
Establish a new Housing Delivery Unit and Independent Statutory Housing Committee.

**RECOMMENDATION /02**  
Create and implement a UK Housing Strategy.

**RECOMMENDATION /03**  
Forge a Cross-Party Accord.

**RECOMMENDATION /04**  
Facilitate the release of public sector land for housing.

**RECOMMENDATION /05**  
Provide specific support for local and combined authorities.

**RECOMMENDATION /06**  
Rethink the role of Homes England so it can act as a master developer potentially working with Development Corporations or other alternative bodies or structures.

**RECOMMENDATION /07**  
Streamline existing funding pots and processes.

**RECOMMENDATION /08**  
Recognise the importance of rental tenures to the wider housing mix and support the broadest range of tenures and delivery models.

**RECOMMENDATION /09**  
Recognise the critical role of institutional investment in housing.

**RECOMMENDATION /10**  
Reform the current system of developer contributions through Section 106 and the Community Infrastructure Levy (CIL), with a particular goal to deliver more affordable housing, instead of implementing the proposed Infrastructure Levy.

**RECOMMENDATION /11**  
Agree a prompt rent settlement that provides income security for Registered Providers and provide an enlarged Affordable Housing Programme from 2026.

**RECOMMENDATION /12**  
Restore a mandatory approach to strategic planning at the sub-regional/city region level to support the plan-led system to free up planners for spatial planning rather than regulatory development management functions.

**RECOMMENDATION /13**  
Establish a new team within MHCLG to provide a more coordinated approach to strategic planning within the department (i.e. across teams working on planning policy and delivery; devolution and city growth; housing policy). It should work across departments in concert with the new Housing Delivery Unit to ensure strategic plans can fully support growth.

**RECOMMENDATION /14**  
Commission an independent review of the Metropolitan Green Belt to identify strategic opportunities for growth, including new or expanded towns.

**RECOMMENDATION /15**  
Develop a new, bespoke policy for supporting SME, community-led and self/custom-build housebuilders and the increased delivery of small and medium sized sites to boost the supply of housing in the short to medium term. This could incorporate specific amendments to the NPPF (National Planning Policy Framework), for example, by supporting Permission in Principle.



CONTEXT

# The scale of the housing crisis in England

2003/04

2023/24

A huge amount of research has gone into understanding the current state of housing in England and the scale of the crisis. Rather than duplicate this work, in this section we seek to summarise some of the most important findings, which together provide a narrative about the direction of travel and the scale of the challenge ahead.

We start by considering the progress since the Review of Housing Supply led by Dame Kate Barker in 2004. While the story is mixed, there is no evidence of the great leap forward in housing supply which the review identified as necessary:

<b>NEW BUILD COMPLETIONS</b>	170,969 Source: English Housing Survey (EHS)
<b>SOCIAL RENT COMPLETIONS</b>	22,661 Source: English Housing Survey (EHS)
<b>TOTAL HOMES AVAILABLE (HOUSING STOCK)</b>	21,684,360 Source: English Housing Survey (EHS)
<b>EMPTY HOMES</b>	710,935 Source: English Housing Survey (EHS)
<b>MORTGAGE TO INCOME RATIO FOR FIRST-TIME BUYERS</b>	2.2% Source: Statistica.com
<b>PRIVATE RENTS (PRIVATE RENT/INCOME N/A)</b>	N/A Earliest comparable data is 2013-14: £595 median monthly rent Source: HMRC Valuation Office Agency
<b>HOMELESSNESS</b>	135,600 Shelter*
<b>SOCIAL HOUSING WAITING LISTS</b>	1,360,000** Source: Ministry of Housing, Communities and Local Government (MHCLG)
<b>HOUSEHOLDS IN TEMPORARY ACCOMMODATION (SUCH AS HOSTELS)</b>	83,000 Source: Times newspapers
<b>OVERCROWDED HOUSEHOLDS</b>	6% of all households (1994/5 figures) using a very different definition to the EHS, who came up with an entirely different figure: 9.2 %
<b>HOMES IN POOR REPAIR - FAILING TO MEET THE DECENT HOMES STANDARD</b>	35% Source: MHCLG
<b>ENERGY RATING</b>	47% (2007 figure)*** Source: The BRE Trust

\*Shelter is one of the few research institutions which do not demarcate between different ways of being homeless.; they include statutory homelessness, rough sleeping and those living in hostels.

\*\*2003/04 Waiting list data is notoriously unreliable because its accuracy depends on how much local authorities have tidied their lists - and esp. after they have been allowed under the Localism Act 2011 to set their own criteria for inclusion.

2023/24 This figure is 6% up on the previous year. After the 2011 shift, the waiting list totals fell dramatically, but they now appear to be rising fast again.

\*\*\*2003/04 The BRE Trust measures energy using the SAP system, which gives a percentage of success (100% = perfect energy saving).

2023/24 Both figures in this section are calculated using the 2012 version of SAP; this sequence only goes up to 2017.

<b>NEW BUILD COMPLETIONS</b>	234,397 (figure for 2022/3 - latest available) Source: English Housing Survey (EHS)
<b>SOCIAL RENT COMPLETIONS</b>	9,535 (figure for 2022/3 - latest available) Source: English Housing Survey (EHS)
<b>TOTAL HOMES AVAILABLE (HOUSING STOCK)</b>	25,396,447 (figure for 2022/3 - latest available) Source: English Housing Survey (EHS)
<b>EMPTY HOMES</b>	699,126 (figure for 2022/3 - latest available) Source: English Housing Survey (EHS)
<b>MORTGAGE TO INCOME RATIO FOR FIRST-TIME BUYERS</b>	22.1% (figure for 2022/3 - latest available) Source: Statistica.com
<b>PRIVATE RENTS (PRIVATE RENT/INCOME N/A)</b>	£850 (figure for Oct 22-Sept 23 - latest available) Source: HMRC Valuation Office Agency
<b>HOMELESSNESS</b>	309,000 Shelter*
<b>SOCIAL HOUSING WAITING LISTS</b>	1,290,000** (2023 figure) Source: Ministry of Housing, Communities and Local Government (MHCLG)
<b>HOUSEHOLDS IN TEMPORARY ACCOMMODATION (SUCH AS HOSTELS)</b>	113,000 Source: Times newspapers
<b>OVERCROWDED HOUSEHOLDS</b>	4% of all households, was Resolution's figure for 2021/3 using the same definition as for their 1994/5 figure. The EHS use a rather broader definition: 15.5 %
<b>HOMES IN POOR REPAIR - FAILING TO MEET THE DECENT HOMES STANDARD</b>	19% Source: MHCLG
<b>ENERGY RATING</b>	61% (2017 figure)*** Source: The BRE Trust

## RENTAL AFFORDABILITY

Housing affordability has been a rising challenge for decades but the situation is considerably worse for those at the lower end of the housing market or forced into temporary accommodation:

**“In 2021/22, more than 4 in 10 social renters (43%) and around a third of private renters (35%) were in poverty after housing costs. Around a third of these social renters and half of these private renters were only in poverty after their housing costs were factored in, so appear to be pushed into poverty by the amount they have to spend on housing.”**

Source: UK Poverty 2024: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation (jrf.org.uk)

**“At the end of 2023, [average rent as a percentage of average gross earnings, adjusted to reflect the estimated total income of renting households] reached a high of 29.5%. It came after rents for new lets rose faster than average earnings for more than 2 years (since October 2021).”**

Source: Zoopla UK Rental Market Reports, March 2024

**“Over 70% of households now have at least one spare room (relative to the ‘bedroom standard’) whereas 4% of households are overcrowded on that basis. Yet this conceals some particular issues. 18% of single parents with children live in overcrowded homes.”**

Source: Q2 2024 Housing Outlook, Resolution Foundation

**“One in every six children is being forced to live in cramped conditions with no personal space because their family cannot access a suitable and affordable home.”**

Source: National Housing Federation, 19 April 2023, <https://www.housing.org.uk/news-and-blogs/news/310000-children-in-overcrowded-homes-forced-to-share-a-bed-with-parents-or-siblings/>

## Rental unaffordability expected to peak in 2024

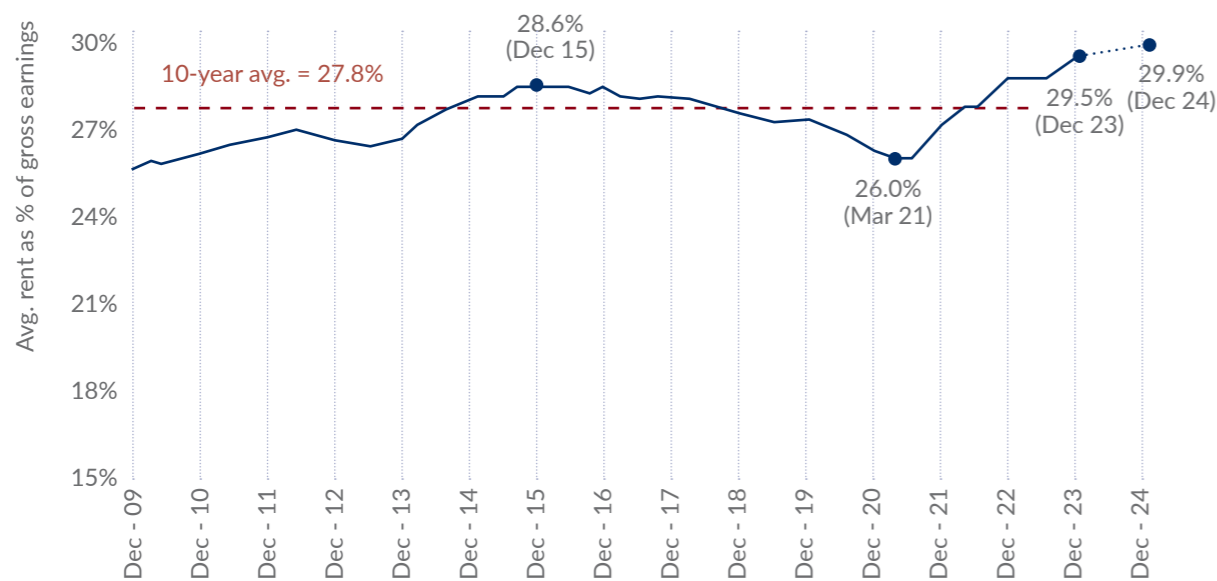


Figure 2. Rental Unaffordability, Source: Rental Market Report: March 2024 - Zoopla  
Source: Zoopla Research & ONS earnings data (ERAN05)

1.25 earner multiplier applied, Dec 24 = estimate

## THE IMPACT OF POOR HOUSING

**Poor housing has a massive impact on the broader economy and health of the nation, affecting outcomes across the policy spectrum, from health and social care to education, skills and economic productivity.**

**The total cost to society of poor housing is estimated at £18.5bn per year. The NHS spends £1.4 billion a year to treat those people who are affected by poor housing.**

Source: BRE, 4 July 2023, <https://bregroup.com/news/poor-housing-will-cost-over-135.5bn-over-the-next-30-years-without-urgent-action>

Additionally, a study by the University of Manchester emphasizes the need for a long-term housing strategy to address these issues, noting that poor housing conditions can hinder local economic growth and regional equality.

Source: Manchester Urban Institute Spatial Policy and Analysis Laboratory, September 2023, [https://uk2070.org.uk/wp-content/uploads/2023/11/Housing-report\\_final.pdf](https://uk2070.org.uk/wp-content/uploads/2023/11/Housing-report_final.pdf)

In 2020 the Health Foundation highlighted that “going into the COVID-19 pandemic, one in three households (32% or 7.6million) in England had at least one major housing problem relating to overcrowding, affordability or poor-quality housing.” Emphasising the crucial need for better housing to improve health outcomes and alleviate extreme pressures on the NHS.

Source: Health Foundation, 29 December 2020, <https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery>

Even before the COVID-19 pandemic, there was significant evidence of the harm the housing crisis was doing to the wider economy. In 2019 the Centre for Social Justice surveyed UK companies with over 1000 employees and found that 43% said that housing issues were having a negative effect on their business’ productivity, with 48% believing that housing issues were adversely affecting the wellbeing of their staff.

Source: CityAM, 28 July 2019, <https://www.cityam.com/housing-crisis-is-harming-productivity-nearly-half-of-uk-businesses-warn/>

The Town and Country Planning Association (TCPA) is running a campaign to bring in a Healthy Homes Bill that addresses the well-evidenced links between housing, health and productivity and seeks to embed their 12 Healthy Homes Principles into any new developments for the future.<sup>3</sup>

## PAYING FOR AFFORDABLE HOUSING

A large body of research clearly demonstrates that improving housing conditions would play a crucial role in boosting economic productivity and overall societal wellbeing. Yet somehow our siloed and often incoherent housing delivery system has evolved into a complex web that does not enable delivery of the right housing mix in a timely fashion.

England spends more than five times as much on housing benefit as on the Affordable Homes Programme. The Government expects to spend £58.2 billion on housing benefit by 2028, as compared with the £11.5 billion allocated to the Affordable Homes Programme.

Source: New Economics Foundation, 14 February 2024, <https://neweconomics.org/2023/02/beyond-new-build>

The cost of delivering new homes has also rocketed. A September 2024 report<sup>4</sup> by the Housing Forum found that “Construction costs for an average-sized three-bedroom semi-detached house in the easiest possible setting are estimated at £133,000. After adding on the costs of external works, planning, professional fees, services and finance costs, the total cost of building this house comes to £202,000. There are a large number of additional ‘abnormal’ costs to building a house, meaning that a more typical cost would be around £242,000. New environmental and building safety requirements will mean that this cost will rise to £251,700 in the near future...”

**In some areas, even with land for free, the costs of building are higher than the housing can be sold for given local market prices.”**

Housing provision will thus eventually be tested and set through strategic plans, with mandated allocated targets for each local plan. The Government has already proposed a new methodology for setting local plan targets and, although this includes a crude ‘affordability uplift’, it does not specify issues around needs for different types of new homes, including affordable ones.

Taking into account these numerous different metrics and reports, it seems straightforward to diagnose the reason for longer social housing waiting lists and for rising numbers of households in temporary accommodation: the failure to add to the housing stock generally, but particularly to homes for social rent, must carry much of the blame.

Nevertheless, it is easy to say the housing market is flawed or in crisis, but what would these metrics need to show in order to conclude that the problems had been resolved?

It seems likely that, as financial, demographic and other circumstances change, the metrics will shift to a greater or lesser extent. But the RBT Commission proposes that, at the end of five years, and even more so at the end of ten years, most of these indicators need to have moved in a favourable direction for policy changes made now and in coming years to be judged as successful. That is the aim of the recommendations in this paper.

At the end of ten years, most of these indicators need to have moved in a favourable direction for policy changes to be judged a success.

<sup>3</sup> Campaign for Healthy Homes - Town and Country Planning Association (tcpa.org.uk) <https://www.tcpa.org.uk/collection/campaign-for-healthy-homes/>

<sup>4</sup> The-Cost-of-Building-a-House-Housing-Forum-Sept-2024.pdf (housingforum.org.uk) <https://housingforum.org.uk/wp-content/uploads/2024/09/The-Cost-of-Building-a-House-Housing-Forum-Sept-2024.pdf>

## Section 1

# IMPLEMENTATION AND DELIVERY

**“..the first step for policy makers should be to determine the objectives for the housing market. This will give regions a clear rationale when determining housing allocations. The process should be led by government setting out its goal for improved affordability of market housing.... This would be an important step in changing attitudes to development by focussing communities and decision makers on housing market outcomes.”**

BARKER REVIEW OF HOUSING SUPPLY / 2004

England has consistently fallen short in meeting its housing delivery targets for decades and previous attempts at ‘fixes’ have often had unintended negative consequences.

The 2024 HBF Beyond Barker report<sup>5</sup> shows that England would have two million more homes today if the most ambitious scenario in the original Barker review for increasing housing had been achieved. Instead, this scenario has not played out and most indicators of housing affordability have worsened. Our greatest concerns relate to the failure to link housing with infrastructure delivery and to build adequate numbers of social homes.

Our recommendations are deliberately a mix of short and long-term but given the systemic nature of the housing crisis and the particularly pressures on the affordable housing sector, we wholeheartedly endorse the National Housing Federation’s call for a long-term plan for housing and all the collaborative efforts of the professional bodies working to generate practical solutions.<sup>6</sup>

Our interim recommendations urged the new Government to recognise the complex housing ecosystem and urgently to create a structure to:

- **Oversee effective cross-government collaboration;**
- **Provide the coherence, clarity and consistency that will encourage the development industry and attract investment where it is required;**
- **Ensure the full implementation of agreed policies.**

Our first six recommendations centre around enabling implementation of policies and delivery of new homes. We offer an innovative new governance framework for housing to prevent policies falling through the gaps and to ensure collaboration can lead to practical delivery of high quality and sustainable new homes in concert with more aligned working with devolved regional bodies, local authorities and councils. Crucially, this framework will emphasise the importance of addressing the housing crisis with the same urgency and focus as the climate crisis.

## RECOMMENDATION /01 Establish a new Housing Delivery Unit and Independent Statutory Housing Committee.

The 2004 Barker Review recognised that getting to the right targets was complex but should be led by a national market affordability approach which “would aim to improve affordability over the housing market cycle and narrow intra-regional differentials in affordability where appropriate”.

It also called for deeper integration between housing, economic and spatial policies as well as the establishment of an independent body, which led to the setting up of the NHPAU (National Housing and Planning Advice Unit) in 2006. Its objective was to make housing more affordable and increase access to home-ownership.

Whilst there is no objection to consistent housing target methodology, the current (and proposed) methodologies are too simplistic to capture complex market factors and, importantly, to ensure increased affordability. As already stated, addressing the housing crisis is complex and planning system challenges need to be dealt with as part of the wider ‘housing ecosystem’.

A newly established independent body is therefore needed to deliver a more sophisticated approach to a complex set of issues. It should also be backed up by national research to support all those planning and delivering new homes.

We are recommending that the Government sets up a specialist Housing Delivery Unit to work across Whitehall, to co-ordinate the delivery of housing working with and through all relevant government departments, agencies and all other appropriate bodies (MHCLG, HMT, DfT, DBT, Defra, Homes England and other agencies) - to set strategy, track progress, monitor delivery and directly tackle on the ground barriers to building.

Another key lesson twenty years on from the original Barker Review of Housing Supply is that whilst most of its recommendations enjoyed broad support, there was fractured

and inconsistent ownership around implementation. Too often, policies fell into a battleground between government departments rather than benefitting from strategic leadership focussed on delivery.

It is imperative that an independent governance structure exists to ensure coherent and proactive collaboration across all key public bodies but also to support and enable delivery in partnership with regional government. There will be explicit recognition that this is expected to be a ten-year programme of long-term structural change to avoid the political changes that have impeded housing delivery in the past.

As well as intervening with local authorities, regulators and other bodies the Delivery Unit will seek to:



- **Work proactively with statutory consultees**, particularly on strategic sites and New Towns, removing barriers but also where support on this is requested by applicants and/or local authorities on the ground;



- **Work with private utility providers** to ensure that supply will be in place for new housing, particularly water and electricity, enabling an integrated approach to housing alongside infrastructure that can catalyse more institutional investment and speed up delivery at scale;



- **Ensure clear and accurate monitoring and reporting** on delivery of numbers of homes built each year at varying levels from national performance, to devolved administrations, linked to mayoral combined authorities’ growth plans as well as New Towns, Urban Extensions and Development Corporations.



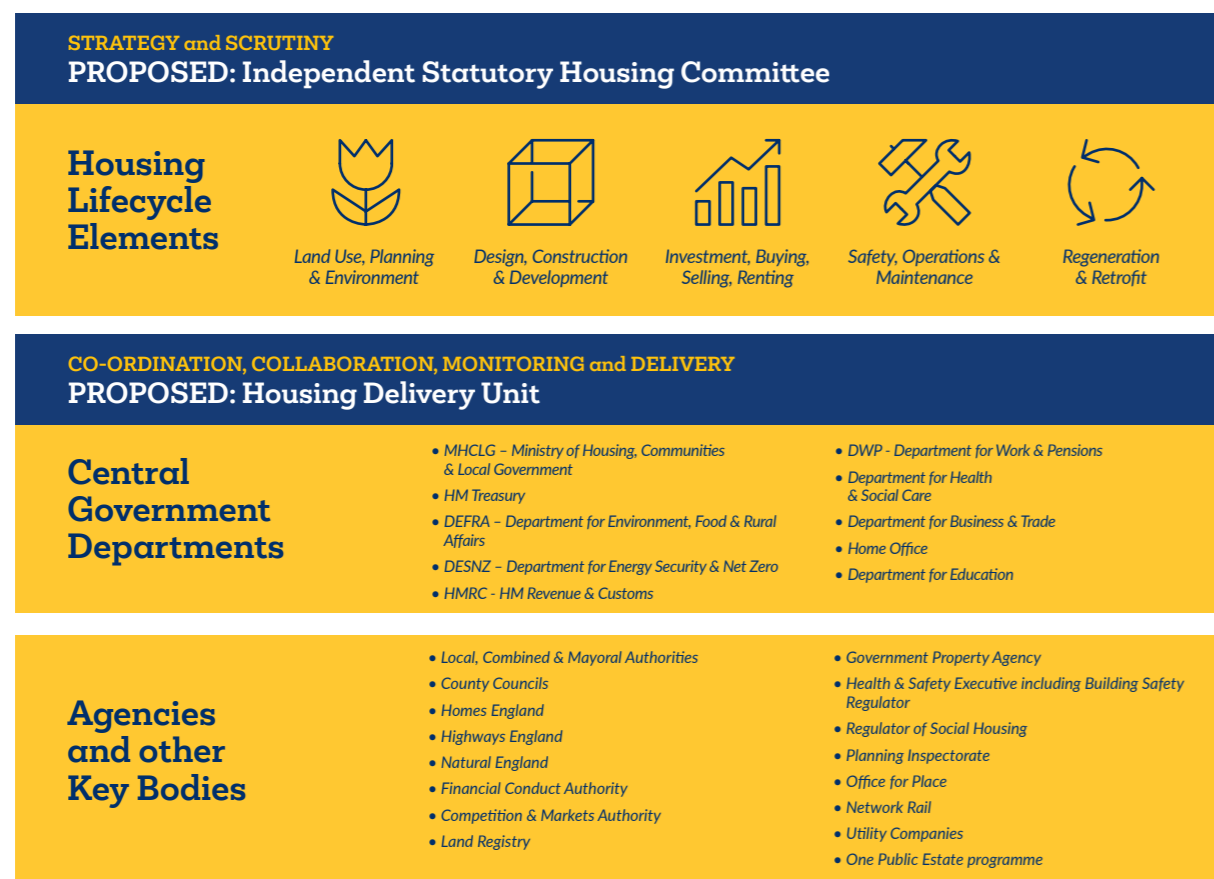
- **Work with those bodies responsible for implementing the emerging National Industrial Strategy**, particularly the mayoral combined authorities to ensure that the ambitions in the emerging Local Growth Plans will ensure delivery of housing and economic growth and that they feed into the wider strategic planning framework.

<sup>5</sup> HBF Beyond Barker report <https://www.hbf.co.uk/news/hbf-beyond-barker-report/>

<sup>6</sup> National Housing Federation - Why we need a long-term plan for housing report <https://www.housing.org.uk/resources/why-we-need-a-long-term-plan-for-housing/>



## PROPOSED NEW HOUSING GOVERNANCE FRAMEWORK



We recommend that this Unit reports to an independent statutory Housing Committee as an independent non-departmental public body (NDPB). This proposal endorses the recommendation of the Church of England and Nationwide Foundation's report, Homes for All<sup>7</sup>, for the establishment of a parliamentary housing strategy committee.

This body would guide and assess government action across all departments modelled on the independent Climate Change Committee, which has been so effective in marshalling support and action across the Government, Parliament and the devolved administrations regardless of political cycles. It would seek to help government to understand how all public policy might impact on its housing strategy and how housing policies might interact on its other goals. It would also be to make sure we maintain a stable but ambitious environment to tackle the housing crisis.

### RECOMMENDATION /02 Create and implement a UK Housing Strategy.

It is extraordinary that the UK currently has no national housing strategy. The first task of the Delivery Unit will be to devise a short and action-oriented national Housing Strategy for England and Wales, explicitly NOT a Green Paper but drafted in close liaison with the Department for Business and Trade (DBT), Ministry of Housing, Communities and Local Government (MHCLG) and HM Treasury in order to dovetail with the emerging national Industrial Strategy, as well as other departments that impact on how the Government plans for sustainable growth, especially in relation to national infrastructure priorities.

This would encourage those involved with complex issues that have a direct bearing on the housing crisis - such as skills training and the supply of materials - to respond accordingly. The proposed reforms to the deeply flawed Apprenticeship Levy are extremely encouraging but this focus on skills should be closely integrated with recognising the complexities of the housing ecosystem. In particular, we need to recognise that housing is part of our national infrastructure which enables economic productivity and growth, rather than something to be treated in isolation.

### RECOMMENDATION /03 Forge a Cross-Party Accord.

Planning permissions for housing are granted at local level. These are often obstructed by so-called 'NIMBY' (Not In My Back Yard) local politics. There is frequently a disconnect between a political party's national stated position on housing growth and their local one. This has become exacerbated in the last decade with the instability of local political governance structures, due to the increasing number of councils governed with no overall party control and where there are council elections every year leading to a more risk averse political culture. Working through the Local Government Association (LGA), the Delivery Unit would establish a UK-wide cross-party accord for housing growth that has demonstrable 'buy-in' from the Labour, Conservative, Liberal Democrats, Scottish National Party, Reform, Green, Plaid Cymru, Democratic Unionist Party and Sinn Féin leaderships to ensure long-term and UK-wide impact is effectively co-ordinated.

This accord will establish certain ground rules for delivery, which - if satisfied on any specific site - will lead to a presumption to approve. Again, this will need to pick up the related issues the housing sector is grappling with, from supply chain issues and skills shortages to building safety and the urgent need for decarbonisation both through comprehensive retrofit and new-build.

The accord should focus on long-term capacity building across the entire property lifecycle; from planning and construction through to ongoing operations across all tenures. This accord will align with and support the practical delivery set out in the strategy by the Committee and Delivery Unit.

### RECOMMENDATION /04 Facilitate the release of public sector land for housing.

Savills research<sup>8</sup> estimates for London alone, a potential of 693,000 homes could be delivered at local average densities on c.18,000 acres (an estimated 20,000 sites) of publicly owned land.

A call for releasing public land is nothing new - developers repeatedly underline that de-risking sites in this way would incentivise and speed up delivery of homes and infrastructure and government already has a significant programme on this issue. Proactive modernisation of legislation and general consent orders for local and combined authorities, Homes England and other public bodies to ensure 'best consideration' achieves the optimal use of public land in line with the proposed national Housing Strategy would be a transformational shift.

The One Public Estate (OPE) programme began as a pilot in 2013 delivered in partnership by the Government Property Unit (GPU) within the Cabinet Office and the Local Government Association (LGA). The aim was to encourage local councils to work with central government and other public sector organisations to share buildings and re-use or release surplus property and land. OPE's 10year anniversary review announced that: "By 2023 OPE partnerships have delivered over 40,000 jobs, releasing land for almost 38,000 new homes, raising £576 million in capital receipts and cutting running costs by £99 million."<sup>9</sup> Despite these significant achievements the OPE has been widely criticised for incentivising the wholesale disposal of public land for one-time capital receipts that have been critical for financially constrained councils and public bodies to meet short-term budgetary pressures but have failed to deliver the public housing so desperately needed.

Within Whitehall the OPE team are recognised as being very supportive of inter-departmental projects and offering critical seed funding but often lacking the capacity to collaborate on more complex projects that would deliver broader benefits.

We recommend that the OPE team work in partnership with our proposed Housing Delivery Unit to look beyond public land disposals, leverage specialist expertise and explore more innovative models for funding and delivering housing on public land, particularly that could accommodate key workers in communities with heavily constrained housing provision.

We urge the Government to support the work already underway across the Department of Health, NHS and HM Treasury catalysed by the NHS Homes Alliance 2023 Key Worker Homes White Paper<sup>10</sup>, which set out a range of innovative funding models that could enable this obvious source of potential new homes to be built on with a range of accommodation appropriate to needs of the local communities.

By facilitating true collaborative working the OPE and Housing Delivery Unit could identify, segment and enable delivery of appropriate land parcels for social housing (council-owned as well as by Registered Providers) and a mix of other tenures appropriate to the needs of the local communities including key or essential worker housing i.e. for NHS staff, as well as for Community Land Trust and self-build programmes alongside integrated energy and transport infrastructure and other critical social infrastructure.

<sup>8</sup> Savills Blog | Unlocking development in the capital: how many homes could be built on London's publicly-owned land? <https://www.savills.co.uk/blog/article/349778/residential-property/unlocking-development-in-the-capital-how-many-homes-could-be-built-on-london-s-publicly-owned-land-.aspx>

<sup>9</sup> One Public Estate | Local Government Association <https://www.local.gov.uk/our-support/one-public-estate>

<sup>10</sup> NHS Homes Alliance Key Worker Homes White Paper, July 2023, NHS Homes Alliance <https://www.nshomesalliance.co.uk/> [https://static1.squarespace.com/static/647f327e87c501655822eef0/t/649ae1a1a703c320fee4a752/1687871908460/NHS\\_report\\_260623.pdf](https://static1.squarespace.com/static/647f327e87c501655822eef0/t/649ae1a1a703c320fee4a752/1687871908460/NHS_report_260623.pdf)

#### RECOMMENDATION /05

### Provide specific support for local and combined authorities.

We urge the Government to focus on building regional and local capacity to support housing delivery as well as reforming national policies. Building on the work of the 'super squad planners' in the rejuvenated Advisory Team for Large Applications Service (ATLAS), the Delivery Unit will compile a call-off list of professional advisers, using as its model the CABE Built Environment Experts (BEEs).

This would comprise surveyors, planners, architects, estates management professionals, landscape and environment consultancies but also regeneration practitioners and experts in negotiating with the private sector. It would be made available to support local authorities as needed. Each call-off contract professional would receive a standard day rate plus CPD (Continued Professional Development) accreditation. One attraction of the CABE BEEs was as a vehicle for business development among small consultancies.

The One Public Estate programme has a similar pool of experts with a narrower list of professions represented so one option may be to expand this existing programme further. Access to this external expertise on centrally procured rates should enable cash-strapped local authorities to bring forward sites more readily and catalyse regional SME businesses in the built environment professions to actively engage in their local areas.

#### RECOMMENDATION /06

### Rethink the role of Homes England so it can act as a master developer potentially working with Development Corporations or other alternative bodies or structures.

The RBT Commission notes and supports the Housing Minister's letter<sup>12</sup> to the Chair of Homes England outlining the revised priorities for the agency, which aligns with the suggestions in our interim recommendations from July:

- **Accelerate delivery in 2024/25, leveraging funding to do so;**
- **Support the new homes accelerator using the ATLAS service;**
- **Support new towns, with a focus on Cambridge;**
- **Maximise social rental homes delivery;**
- **Diversify supply including more SMEs, community-led development and self/custom build;**
- **Implement a new Target Operating Model to support more place-based working;**
- **Input into the Budget and Spending Review processes.**

Whilst we recognise the complexity of the multi-agency and multi-authority space in which Homes England operates, the Commission supports the prioritisation of getting new homes built vs the more recent focus on land disposals. In particular, Homes England needs to become much more place and project-focused, in line with the wider devolution agenda across Government, potentially reorganising around regional offices that can apply a mix of interventions that respond to the specific needs of individual places and projects, rather than running national funding programmes from London. It will also be important that Homes England's delivery role is focused on supporting the priorities set out in the new strategic spatial plans being prepared. The challenge will be to ensure that Homes England has the skills and capacity to deliver on the priorities set out in the Minister's letter and to this end, we would restate our recommendation that the Housing Delivery Unit and independent statutory Housing Committee provide the comprehensive governance framework that can ensure decisions are taken swiftly, communicated clearly and acted on with confidence across the layers of national, regional and local stakeholders.



• **Boost skills and capacity in the public sector**



• **Peer support** – expand One Public Estate's pool of experts to include broader professions as per historic CABE Built Environment Experts (BEEs)



• **Joint teams** - support the establishment of joint teams across local authority areas and consider the opportunities provided through the RTPI's (Royal Town Planning Institute's) proposed planning agencies<sup>11</sup>



• **Devo deals and seed funding** to support collaboration and greater efficiency



• **Define new strategic planning areas** to deliver an effective and robust approach to strategic planning

# County-wide development corporations

#### WHO:

Devon Housing Commission comprising experts, councillors and parliamentarians chaired by independent peer and Housing Commission member Lord Richard Best and funded by Exeter University and local authorities.

#### WHAT:

Solving a complex "housing emergency" through a countywide development corporation performing a master developer role, not just for new towns and urban extensions but for any major developments.

#### WHEN:

Launched July 23. Ongoing.

#### WHAT HAPPENED:

Devon County Council declared a "housing emergency" three years ago after expensive housing and low wages left many local people unable to buy. After receiving over 500 submissions, the Commission also concluded that renting was almost impossible for many, too. It made a key recommendation that the new Devon and Torbay Combined County Authority "should investigate the benefits/opportunities of creating a countywide development corporation with a master developer role, acting at arm's length and with Compulsory Purchase Order powers, to support delivery of strategic development sites and regeneration programmes". The Devon commissioners believe that the development corporation concept should be applied to major developments generally, which, says Lord Best, can prove "too much" for district councils. Other recommendations include: long-term planning overseen by a statutory housing and infrastructure committee modelled on the Climate Change Committee; backing social housing providers and bringing back SME builders and; allowing local authorities to recover the full cost of a speedy planning service through developers' fees.



The Report of the Devon Housing Commission



<sup>11</sup> RTPI | Planning Agencies <https://www.rtpi.org.uk/policy-and-research/research-and-practice/planning-agencies/>

<sup>12</sup> Homes England Chair's letter - GOV.UK ([www.gov.uk](https://www.gov.uk)) <https://www.gov.uk/government/publications/homes-england-chairs-letter>

Section 2

# FUNDING AND AFFORDABILITY

## The Commission recognises the extreme pressures on government finances

Since the early 2000s there has been a gradual decline in home ownership rates and a growth in private renting – by 2022 the ONS recorded the median house price in England as approximately 9.1 times the median annual earnings.

This pressure on affordability has driven innovation and diversification of different housing tenures across the Private Rented Sector (PRS) such as Build to Rent (in investor jargon known as ‘singlefamily’ houses and ‘multifamily’ apartments), co-living spaces, key worker housing and shared ownership schemes, catering to a broader range of income levels and housing needs.

The independent Montague Review<sup>13</sup>, published in 2012, aimed to identify and address barriers to institutional investment in the UK private rented sector and to identify ways to encourage more investment to address the housing shortage. It recommended a more supportive regulatory framework and best practices to enhance the

appeal of specialist Build-to-Rent developments that were particularly appealing to institutions looking to deploy capital at scale.

The introduction of the Affordable Homes Programme in 2011 shifted the focus of many Registered Providers from social rent to affordable rent (up to 80 per cent of market rent), which became the primary funding model for many, particularly as austerity

measures reduced capital funding for new social housing projects and welfare reforms to housing benefit led to further pressures.

Many Registered Providers struggled to maintain or expand their social rent offerings where the subsidy gap was simply too great. The cumulative pressures post-pandemic, cost of living and energy crisis and the 2022 mini-Budget alongside Renter’s Rights (Reform) Bill, building safety and ESG requirements have created an intense vortex of cost challenges across the housing spectrum.

In addition, whilst an extremely popular policy, Right to Buy has numerous ‘unintended consequences’ that have contributed to the depth of the housing crisis. The Commission did not have time to discuss in detail but received evidence with suggestions around increasing time qualification, potentially decreasing discount / market value definitions and ensuring money is reinvested.

The critical role of council housing in reducing the burdens on local authorities in relation to addressing homelessness and meeting housing needs is key to the success of solving the housing crisis. When councils<sup>14</sup> and social housing providers are unable to balance budgets, commit to development programmes or deliver planned repairs and maintenance the 1.5million homes target is simply not feasible without significant financial support for new social and affordable homes.

The Commission recognises the extreme pressures on government finances and therefore has sought to prioritise recommendations that make better use of existing funds and programmes as well as engage third-party capital. This does not replace the fundamental requirement for Government to financially support social and affordable homes through meaningful grant programmes.

According to recent research by UCL<sup>15</sup> most councils are now directly engaged in housing delivery in some form but a number of significant challenges have emerged, which are preventing this activity being further scaled-up to meet much needed housing, particularly affordable homes. A recent report<sup>16</sup> ‘Securing the Future of Council Housing’ commissioned by over 100 councils sets out what these challenges are and includes a number of recommendations to the Government, including a fundamental review of the current Housing Revenue Accounts system. We would urge proactive consideration of these proposals.

### RECOMMENDATION /07 Streamline existing funding pots and processes.

With stringent budgetary constraints, every opportunity to improve the efficiency of how existing funding is administered should be taken. In particular, the Government could replace the wasteful and divisive short-term competitive funding model for small pots with longer-term, needs-based funding formulae.

The transition to greater devolution offers a significant opportunity to better align and consolidate existing funding pots at national, regional and local levels and to explore innovations such as value capture finance tailored to local requirements. This fiscal devolution is already well underway and the RBT Commission would urge the Government to grasp the opportunities presented to re-align funding alongside the refreshed strategic planning approach to enable planning to catalyse and enable inward investment in our towns, cities and regions rather than being a barrier and critical risk. One obvious opportunity is for HM Treasury to give Homes England increased delegations and flexibility to streamline and innovate with its funding mechanisms.

There are specific opportunities to improve and simplify public procurement to enable local authorities to partner more effectively with SME developers and contractors who may not be able to access opportunities via larger panels or OJEU (Official Journal of the European Union) processes. In particular, we would urge the Government to support those authorities who are proactively targeting inward investment and who recognise that an effective spatial investment framework can reduce technical and political risk for new developments and enable crucial investor confidence for the longer term.

### RECOMMENDATION /08 Recognise the importance of rental tenures to the wider housing mix and support the broadest range of tenures and delivery models.

*“The unaffordability of home ownership will continue to support strong demand for renting into 2025, and any policy changes that reduce supply will simply push rents higher – hitting low-income renters hardest. It’s vital that policymakers in Government focus on growing the stock of homes for rent.”*

Zoopla UK rental market report, September 2024<sup>17</sup>

Historically, renting has often been perceived as a ‘second-class’ tenure and policies have prioritised ownership at all costs. It is crucial that not only those who are renters of necessity but also those that are renters of choice have the opportunity to live in sustainable, high-quality and safe homes. Both institutional and private landlords have a critical role in the housing market and should be engaged with on an equal basis to volume housebuilders. The spectrum of housing providers has diversified significantly and all providers can make an important contribution to tackling the housing crisis.

The pressures on private landlords facing greater regulation, high interest rates and escalating mortgage and management costs mean that many are exiting the market more quickly than the still nascent institutional market could ever replace them. As Rightmove notes<sup>18</sup> there are 17 enquiries on average about every available home to rent. It is critical to recognise the valuable housing provided by good private landlords as represented by professional bodies with voluntary codes of conduct such as the National Residential Landlord Association (NRLA) and The Property Institute; in the same way that the British Property Federation (BPF) and Association for Rental Living (ARL) represent larger institutional Build to Rent providers offering both traditional (singlefamily) houses for rent, as well as (multifamily) apartment blocks in urban areas.

We support the BPF’s call for the Government to place increased focus on sites that can deliver a mix of tenures<sup>19</sup> such as Build to Rent, senior living, affordable housing and student accommodation, alongside private homes for sale.



13 Montague Review of the Barriers to Institutional Investment in Private Rented Sector Housing Private rented homes: review of the barriers to institutional investment - GOV.UK ([www.gov.uk](https://www.gov.uk)) <https://www.gov.uk/government/publications/private-rented-homes-review-of-the-barriers-to-institutional-investment>

14 London’s housing crisis ‘threatens to break borough budgets’ amid £700m funding shortfall | London Councils - Localgov Drupal <https://www.londoncouncils.gov.uk/news-and-press-releases/2024/londons-housing-crisis-threatens-break-borough-budgets-amid-ps700m>

15 Fourth report on Local Authority Housebuilding launched | The Bartlett School of Planning - UCL - University College London <https://www.ucl.ac.uk/bartlett/planning/news/2024/jan/fourth-report-local-authority-housebuilding-launched#:~:text=BSP’s%20Professors%20Janice%20Morphet%20and%20Ben>

16 Securing the Future of Council Housing (localgov.co.uk) <https://files.localgov.co.uk/council.pdf>

17 Zoopla UK Rental Market Report - September 2024 | Zoopla Advantage <https://advantage.zoopla.co.uk/research-and-insights/zoopla-uk-rental-market-report-september-2024/>

18 Rents hit new record, as average property receives 17 enquiries - Rightmove Press Centre <https://www.rightmove.co.uk/press-centre/rents-hit-new-record-as-average-property-receives-17-enquiries/>

19 National policy needs to be more inclusive of multi-tenure housing - BTR News <https://btrnews.co.uk/national-policy-needs-to-be-more-inclusive-of-multi-tenure-housing>

## RECOMMENDATION /08 Continued

These larger mixed-tenure schemes represent huge opportunities for placemaking and regeneration on brownfield sites and as part of new towns. Analysis of the few large-scale mixed-tenure or Build-to-Rent led schemes delivered in the UK demonstrates that they do deliver faster absorption rates (the rate at which new homes are leased) than for-sale only schemes, as well as long-term community wellbeing benefits thanks to the significant focus on customer experience and quality of service.

The additionality of housing that mixed-tenure schemes can deliver is significant and even though the completed institutional Build to Rent in the UK currently sits below two per cent of the total housing market, it is growing rapidly. Since 2012, £40bn has been invested into the BTR sector, which has resulted in 116,000 additional homes completed, 45,000 more under construction, and a further 101,000 in planning. The variety of housing options and rental levels can lead to higher and more stable occupancy rates<sup>20</sup>, as the development appeals to a broader range of potential tenants. This in turn incentivises the operator / owner to focus on stability of income and therefore retention rather than churn, which inherently generates community benefits. Conversely, the process of negotiating and agreeing on the precise tenure mix can lead to delays in planning approvals and project completion<sup>21</sup> so we would urge caution around the unintended consequences that might arise from mandating proportions of any particular tenure through planning or other regulation.

A level playing field for tax, and clear plan for the delivery of future developments, will best deliver high-quality, sustainable and affordable housing both for sale and for rent. The priority in the private rented sector (should be to guarantee high-quality professional management by institutional and private landlords as well as Registered Providers - both in traditional housing associations and the new breed of For Profit Registered Providers (FPRPs) who

are increasingly offering a range of affordable rent products from social rent to key or essential worker housing as well as Shared Ownership and traditional PRS. Councils are also a key source of existing housing provision and, in many areas such as the London Boroughs of Barking and Dagenham, Enfield and Waltham Forest, which are all proactively delivering council-led housing projects as part of the GLA's (Greater London Authority's) programme.

It must be acknowledged that true social rent requires subsidy, which has been significantly eroded, but that innovative models of blended finance can enable mixed-tenure, mixed-income communities to be delivered, which satisfy investor needs for returns, meet government criteria for housing affordability with appropriate subsidy and, crucially, provide high-quality homes in communities that people want to live and work in for the long term.

One option explored by Commissioners that would benefit from further analysis was to amend the Value Added Tax Act 1994 to specify that the sale of land to a Registered Provider of social housing, where there is outline planning permission for the construction of affordable housing (for rent or shared ownership) is zero-rated. Housebuilders supply affordable housing to RPs once they have built the dwelling to a stage of 'golden-brick' or beyond. 'Golden-brick' is currently an important milestone, as it is where, under current law, land ceases to

be land and can be classified as a dwelling for VAT purposes and then qualifies for the zero-rate of VAT. The purpose of the UK's zero-rating provisions is to make sure that the final consumer does not bear a VAT cost on essential items. By building to golden-brick the VAT cost of new housing is removed, ensuring that VAT is not a cost to the ultimate acquirer - the RP. The 'golden-brick' provisions are not fit for purpose and slow down the delivery of much needed social housing so we would urge the Government to explore the proposed 'Item 5' solution<sup>22</sup> already discussed with HM Treasury.

Similarly, that level playing field needs to be set up for institutional and private landlords - where policies such as the removal of Multiple Dwelling Relief, the insistence on Selective Licensing and the regulatory uncertainty about what replaces Section 21 'no explanation' repossession have significant negative impacts on investor and landlord appetite and ongoing viability. The Commission supports the NRLA in calling for the Government to publish a plan alongside the Renters' Rights (Reform) Bill which outlines a clear set of standards that tenants and landlords should rightly expect from the justice system and a route map explaining how to achieve them.

There is no shortage of investor appetite for all asset classes across the Living spectrum, but confidence is key to secure that investment so a consistent, clear and fair policy framework is vital.

It must be acknowledged that true social rent requires subsidy, which has been significantly eroded

## RECOMMENDATION /09 Recognise the critical role of institutional investment in housing.

The scale of capital required to deliver the Government's ambitious 1.5million new homes target has been estimated to be as high as £200 billion so will require alternative sources of capital to traditional Government and UK funding sources. As the Government has already recognised, pension funds, both international and local are a key source of capital for inward investment into the UK. The 2023 Mansion House Accord<sup>23</sup> encourages UK pension funds to invest at least five per cent of their defined contribution (DC) funds to unlisted equities by 2030 to support high-growth sectors in the UK around innovation and infrastructure. Whilst the housing sector was not specifically cited we would urge the Government to consider housing as critical infrastructure for the country and that institutional investment should be sought for housing across all tenures.

Those investors already in the UK housing market are often initially attracted by the opportunity to diversify portfolios and reduce exposure to wider market viability whilst generating long-term, inflation-linked stable returns. Institutional investors offer significantly larger pots of capital that can be deployed at scale over the longer-term. This so-called 'patient capital' contributes a level of market stability in the infamously volatile housing market as it is less susceptible to short-term market fluctuations.

However, the Government must be more proactive in recognising that the UK has to compete for that international capital, both with other jurisdictions and with other asset classes. The UK's relative political stability, transparency and track record as a high-performing location for investors must battle with the challenges of increased regulation that is complex and often confused, as well as the inherent risks of development.

# Investors must battle with the challenges of increased regulation that is complex and often confused

Whilst profit margins are often criticised in real estate, the reality is that property development is an extremely high-risk venture and those margins are critical risk mitigation when viability of projects is so often on a knife edge.

In fact, institutional investors into UK Build to Rent schemes are currently buying and developing on an investment return of somewhere between four and five per cent depending on location. When Government 10year gilts are at four per cent, that is very little premium return for a significantly higher risk investment. Indeed, when other asset classes such as industrial warehouses or logistics are delivering double digit returns and significant growth without any of the operational or regulatory burden of managing homes it underlines how brave these living investors are actually being in committing long-term capital to the slow, risky and highly illiquid residential sector.

In terms of specific asset classes, the scale and quality of the nascent Build to Rent sector have proven attractive to a range of UK and overseas investors who see the value of purpose-built, highly sustainable homes that are professionally managed robustly holding values even through volatile economic conditions. Nest, the UK pension scheme managing £43 billion of assets on behalf of a third of the UK workforce recently announced a new partnership with Legal & General (L&G) and PGM, collectively investing up to a billion pounds into building Build to Rent

schemes across the UK.<sup>24</sup> The scale of these schemes also offers the flexibility to offer a range of price points and tenures as well as the incentive to invest in placemaking and community infrastructure, which will have a demonstrable positive impact on the long-term valuation of these schemes and provide enormous benefits to residents and wider communities.

Increasingly institutions are also moving into the affordable sector, particularly around shared ownership, which investors perceive as offering greater security due to its government backing as well as a more demonstrable level of social impact, which is a rising priority for many investors with growing ESG policies and compliance. In 2021 M&G Investments and Hyde Housing partnered in a £50million joint venture to fund large-scale shared ownership projects.<sup>25</sup> Other investors including Schroders, USS and CBRE GI also have established affordable housing platforms. There are untapped pools of institutional finance which would be deployed in the English housing market if it had a more stable policy environment, including longer term rent settlements for Registered Providers.

20 Investors plough record sums into UK build-to-rent properties (ft.com) <https://www.ft.com/content/ae46e755-1a6e-4032-a4fb-7ec73c59676a>

21 Housing policy and the changing tenure mix | National Institute Economic Review | Cambridge Core <https://www.cambridge.org/core/journals/national-institute-economic-review/article/abs/housing-policy-and-the-changing-tenure-mix/C59532E698C1AB7EA01B9E4F827AAE8A>

22 £320 million plan to usher innovation and deliver Mansion House Reforms - GOV.UK (www.gov.uk) <https://www.gov.uk/government/news/320-million-plan-to-usher-innovation-and-deliver-mansion-house-reforms>

23 Thousands of rental homes to be built through new partnership between Nest, L&G and PGM | Legal & General (legalandgeneral.com) <https://group.legalandgeneral.com/en/newsroom/press-releases/thousands-of-rental-homes-to-be-built-through-new-partnership-between-nest-l-g-and-pgm>

24 M&G announces £500 million investment into Shared Ownership sector - M&G plc (mandg.com) <https://www.mandg.com/news-and-media/press-releases/mandg-plc/2021/11-03-2021>

25 RTP1 | Joint letter on the Infrastructure Levy <https://www.rtpi.org.uk/news/2023/june/joint-letter-on-the-infrastructure-levy/>

#### RECOMMENDATION /10

### Reform the current system of developer contributions through Section 106 and CIL, with a particular goal to deliver more affordable housing, instead of implementing the proposed Infrastructure Levy.

Whilst considerable reservations were expressed in response to the previous government's proposal to introduce an Infrastructure Levy (IL - currently on the statute book but not implemented), there is widespread agreement that improvements to the existing system of Community Infrastructure Levy and Section 106 developer contributions are needed. Such improvements are likely to be process improvements, such as seeking greater standardisation of legal agreements, and ensuring that local planning authorities have sufficient planning and legal resources to undertake them speedily.

More than 30 organisations in the sector including the RTPI (Royal Town Planning Institute) and the British Property Federation (BPF) have given thought to what would be most helpful.<sup>26</sup> The experience of introducing the IL suggested that wholesale changes requiring primary legislation would not be productive. As the Government continues to review potential improvements to s106 and CIL it should consider widening the opportunity for strategic planning authorities to raise Strategic Infrastructure Tariff (SIT). The legislative framework for this to be used by combined authorities and statutory joint local plan committees is in place, but this has never been used, apart from the mayoral tariff used by the London Mayor to part fund Crossrail (Elizabeth Line). This would provide additional funding to any developer contributions via S106/CIL used to support the delivery of strategic infrastructure identified through strategic plans.

In addition to standardising and simplifying agreements, other opportunities for bringing forward affordable housing beyond just Registered Providers should be proactively explored including

alms-houses, charities and Community Land Trusts. We would encourage the Housing Delivery Unit to facilitate and support more partnerships between larger housing associations and local community-led housing organisations, particularly to improve reach in underserved markets like rural communities and small towns.

#### RECOMMENDATION /11

### Agree a prompt rent settlement that provides income security for Registered Providers (RPs) and provide an enlarged affordable housing programme from 2026.

The negotiations between RPs in England and Wales and the new Government are focused on extending the current rent policy, implemented in April 2020, which included a rent cap introduced to ensure affordability for tenants whilst providing RPs with predictable revenue to maintain and improve housing stock. As wider economic conditions have deteriorated this has put serious additional pressure on the financial sustainability of RPs grappling with the requirements of the new Building Safety Act, more stringent ESG regulations and requirements from investors as well as rising costs, labour shortages and growing backlogs of repairs and maintenance issues.

We heard repeatedly in our evidence sessions that the operating environment is throttling any new supply. The current policy, which allows for rent increases of up to CPI+1% annually, is set to expire in 2025/26. RPs in England and Wales are asking for the ability to increase rents by a maximum of CPI+1% annually for the next 10 years. This request aims to provide them with a stable and predictable revenue stream to maintain and improve housing stock. They argue that this increase is necessary to cover rising costs and ensure the sustainability of their operations. The Government is considering this proposal but is also weighing the impact on tenant affordability. However, government should be aware that issues currently caused by providers being

unable to fund their development programmes from the increased leverage that the settlement would allow is deepening the loss of housebuilding already caused through s106 and lack of updated Local Plans. This delays delivery of private sale new homes across the country. A recent Savills survey<sup>27</sup> found that 53 per cent of the country's RPs (nationally) had scaled back intentions for delivering S106, with 75 per cent citing financial capacity as the primary challenge. One other option proposed to the Commission was to support rent convergence, i.e. the ability to 'catch up' the lowest rents offered by RPs to meet social rent levels over time. This is potentially both more valuable than CPI+1% and perhaps less reputationally risky so merits further exploration.

For RPs to meet sustainability requirements, health and safety regulations, and futureproof stock for climate change impacts, it is widely accepted that most of the existing stock needs to be redeveloped and regenerated. This requires effective partnership with local authorities and key stakeholders and 'Best Value' consideration of land will provide some funds. However, there is still need for capital investment in excess of Affordable Housing Programme (AHP) in order to maximise the levels of affordable housing whilst offering other rented products for the wider market. We ask Government to make swift decisions on longer-term AHP and rent settlement to enable the sector to attract institutional investment alongside the AHP grant in order to achieve its ambition for growth in the housing market.

# Loss of plans through political uncertainty

#### WHAT:

A joint strategic plan to build 100,000 homes and infrastructure in Oxfordshire by 2050 with £215 million of government investment agreed through Housing and Growth Deal in 2018 between the local authorities and Government.

#### WHEN:

Regulation 18 (part 1 and 2) consultations held between 2019 and 2022 but the joint plan was abandoned in 2022 when constituent member authorities failed to agree on a housing distribution for the next stage in the plan-making process.

#### WHERE:

Oxfordshire.

#### WHO WAS INVOLVED:

The Oxfordshire Growth Board (re-named the Future Oxford Partnership in 2021) comprising Oxfordshire councils: Cherwell District Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council with Oxfordshire Local Enterprise Partnership.

#### WHAT HAPPENED:

Six councils signed up to the Oxfordshire Housing and Growth Deal with the Government in March 2018, which included funding to support 100,000 new affordable homes, supporting strategic infrastructure to enable growth across the county and the establishment of a joint planning team to prepare the joint strategic plan.

The Conservatives controlled the council until local elections in May 2023, when huge losses saw Liberal Democrats and Green Party councillors, who opposed the housing targets, take over. The elections left only two councils - Oxford City Council (Labour) and Cherwell District Council (Conservative) - controlled by the same political parties which led them in 2018 when the deal was struck.

Disagreement then broke out between South Oxfordshire and the other councils, some still wanting to press ahead with housing plans up to 2050.

But in August, 2022 the leaders of the five local planning authorities announced "with regret" that they were "unable to reach agreement on the approach to planning for future housing needs" within the framework of the Oxfordshire Plan.

"The Oxfordshire Plan 2050 work programme will end and the issues of housing needs will now be addressed through individual local plans for each of the city and districts," they said. The councils would use their own plans to decide housing numbers.

The Government did not intervene and was said to have retrieved only a "small proportion" of the money paid to the Oxfordshire Growth Board as a whole. In a letter to heads of the board the then-minister for Housing and Planning Lucy Frazer wrote that the "affordable housing funding (worth £60million) was not fully utilised".

The letter from Ms Frazer added: "My predecessors wholeheartedly supported you in that (the growth deal) agenda. However, progress since that point has not been as positive as we had hoped for".

Oxford City Council said the criticism was "misplaced" and that it had a "fully worked up plan" to make full use of the funds. In September 2024 the Oxford City local plan was found to have failed the legal Duty to Cooperate as a result of concerns raised by some of the other councils during the Examination process. As a result, the Council will have to withdraw the plan and start again.

#### FIND OUT MORE:

Future Oxfordshire Partnership

### Section 3

# PLANNING AND BOOSTING SUPPLY OF HOMES

**“Economic, social and environmental goals will be attained more readily by a planning system that is focused more on outcomes and less on process”**

KATE BARKER / 2004

The statutory planning system is often cited as a key barrier to housing delivery. The 2004 Barker Review’s recommendations to improve the system were designed to provide more flexibility and to ensure the system was more responsive to change, particularly in a global context providing more efficiency of both process and use of land.

Their implementation relied on the strategic planning tier and institutions such as regional government offices and the National Housing and Planning Advice Unit (NHPAU), recommended by the Barker review, to create integrated sustainable growth. The abolition of the strategic tier along with these institutions from 2010, coming at the same time as the country was recovering from the global financial crisis, had a significantly negative impact on the housebuilding industry.

Blockages soon became apparent and a series of government-sponsored and independent reviews began to determine the reforms needed to boost housing delivery. They included:

- **The 2016 Local Plan Expert Group review**<sup>28</sup> which led to small changes but not the fundamental ones needed. Key recommendations included standardising methods of calculating housing targets in local plans (the ‘standard methodology’) and a more robust approach to strategic planning.
- **The All-Party Parliamentary Group (APPG) on Housing Markets and Housing Delivery report from September 2023** ‘Hacking Housing’<sup>29</sup> and **the Building the Future Commission report**<sup>30</sup> on planning to solve the housing crisis (January 2024). These set out key recommendations around the need for a more effective approach to strategic planning and to strengthening capacity, especially within local planning authorities.

- **The Competition and Markets Authority (CMA) housebuilding market study**<sup>31</sup> (February 2024), which recognised that, despite some increase since the global financial crisis, housing delivery was still well below the (former) government’s target of 300,000 new homes a year. It came after planning permissions dropped significantly and noted particularly poor delivery in and around London and the South-East concluding that the planning system was “exerting a significant downward pressure on the overall number of planning permissions being granted across Great Britain and within England”. It found that the planning system had limited ability to support the housebuilding that policymakers believed was needed and noted “a lack of predictability for housebuilders when navigating the system, (that) the process is significantly costly, lengthy and complex, and there are mixed and inconsistent incentives for LPAs to meet housing need.”

**“A virtually cost-free policy lever, that can have immediate impact, is to undertake effective strategic planning. Critically, this must occur at the regional and sub regional level to help effectively resolve the tensions between supplying homes in the South-East where the demand is primarily located and supporting the Government’s Levelling Up agenda elsewhere.”**

APPG HOUSING MARKETS AND DELIVERY / 2023

**“Without a strategic planning tier, abolished in 2011, unmet housing need is not being picked up by neighbouring authorities, as there is no effective mechanism to force this to happen. The way to address these issues is by reinstating a strategic planning tier to take decisions on key strategic (or larger than local) planning issues such as housing numbers and green belt. In order to hit the ground running, this tier should be based on existing sub-regional institutions such as metro mayor-led combined authorities, unitary or county authorities, or combinations of them”.**

BUILDING THE FUTURE COMMISSION / 2023

All of these studies will provide the Government with robust evidence for the changes needed to deliver on its manifesto commitment of providing 1.5 million new homes by 2029, or at the very least, make major progress towards this target. The evidence submitted to this Commission builds on these key messages with four main areas highlighted as having the greatest potential to address the housing crisis.



1. **Deliver** a plan-led approach to sustainable growth



2. **Provide** a more efficient decision-making process



3. **Diversify** the market and expand the role of SMEs and self-commissioned housing



4. **Rebuild** capacity and capability within the public sector

28 <https://www.appghousing.org.uk/wp-content/uploads/2023/09/APPG-Housing-report-September-2023-Final-RGB.pdf>

29 <https://www.building.co.uk/building-the-future-commission/building-the-future-commission-planning-to-solve-the-housing-crisis/5127494.article>

30 <https://www.gov.uk/cma-cases/housebuilding-market-study#final-report>

31 <https://publications.parliament.uk/pa/cm201011/cmselect/cmcomloc/writew/abolition/ars71.htm>

## 1. Delivering a plan-led approach to sustainable growth

Dame Kate Barker's 2006 review of land-use planning recognised that a plan-led system provided a balance between certainty and flexibility. The up-to-date framework of local plans delivered certainty. It guaranteed flexibility by not being legally binding; there was room to consider other factors and provide responsive decision-making.

The 2004 report also concluded that there were wider benefits to a plan-led system: local communities could play a part in designing their neighbourhoods; development and infrastructure were more co-ordinated and by offering upfront site selection ahead of consideration of individual planning applications, it proved more efficient.

Between 1968 and 2010, England managed growth through a two-tier development plan with both strategic and local plans. The strategic level plans provided a long term, spatial framework within which local plans were prepared, addressing key issues such as scale and distribution of development to meet economic and housing needs, identifying strategic infrastructure priorities and setting the extent of green belts, where relevant. The role of local plans was to translate these at local level, allocating specific sites to meet development needs.

The 2011 Localism Act abolished this formal two-tier approach, replacing strategic level plans with a new legal 'duty to co-operate'. The proposal was met with warnings. The Communities and Local Government Committee undertook an inquiry<sup>32</sup> into the impact of the abolition of the Regional Spatial Strategy (RSS) and concluded that "... the 'duty to cooperate' will not be a panacea for the absence of effective strategic planning and will not achieve the co-ordination necessary to address the controversial strategic issues". It noted that "nobody who has any appreciation of planning, or cares for the issues planning deals with, has ever doubted the need for planning to have local and strategic components ....".

The Government has recognised that a much more effective approach to strategic planning underpins the success of a plan-led system and the vacuum left by the abolition of regional planning in 2010 therefore needs to be filled urgently. Its five-year pathway to universal strategic plan coverage across England is set out in its July 2024 consultation documents and letters from the Deputy Prime Minister to local authority leaders and mayors. In the short term, it will:

- retain the duty to co-operate but introduce a more robust approach to testing local plans in relation to cross boundary co-operation through the examination process;
- work with mayoral combined authorities to explore extending their powers to develop a Strategic Development Strategy (SDS) (only a small number currently have strategic planning powers); and
- identify priority groupings of other authorities where strategic planning – and, in particular, the sharing of housing need, would provide particular benefits. It will engage directly with these authorities and "structure and support this co-operation, using powers of intervention as and where necessary".

In the long term, more legislation will be needed to make sure that strategic planning and robust decision-making is adopted across the country. There are two potential routes for this; the Planning and Infrastructure Bill and the Devolution Bill, both, announced in the King's Speech in July.

But the foundations for this need to be put in place quickly in order to achieve full coverage by 2029. An integrated programme of support for strategic planning will need to run through every

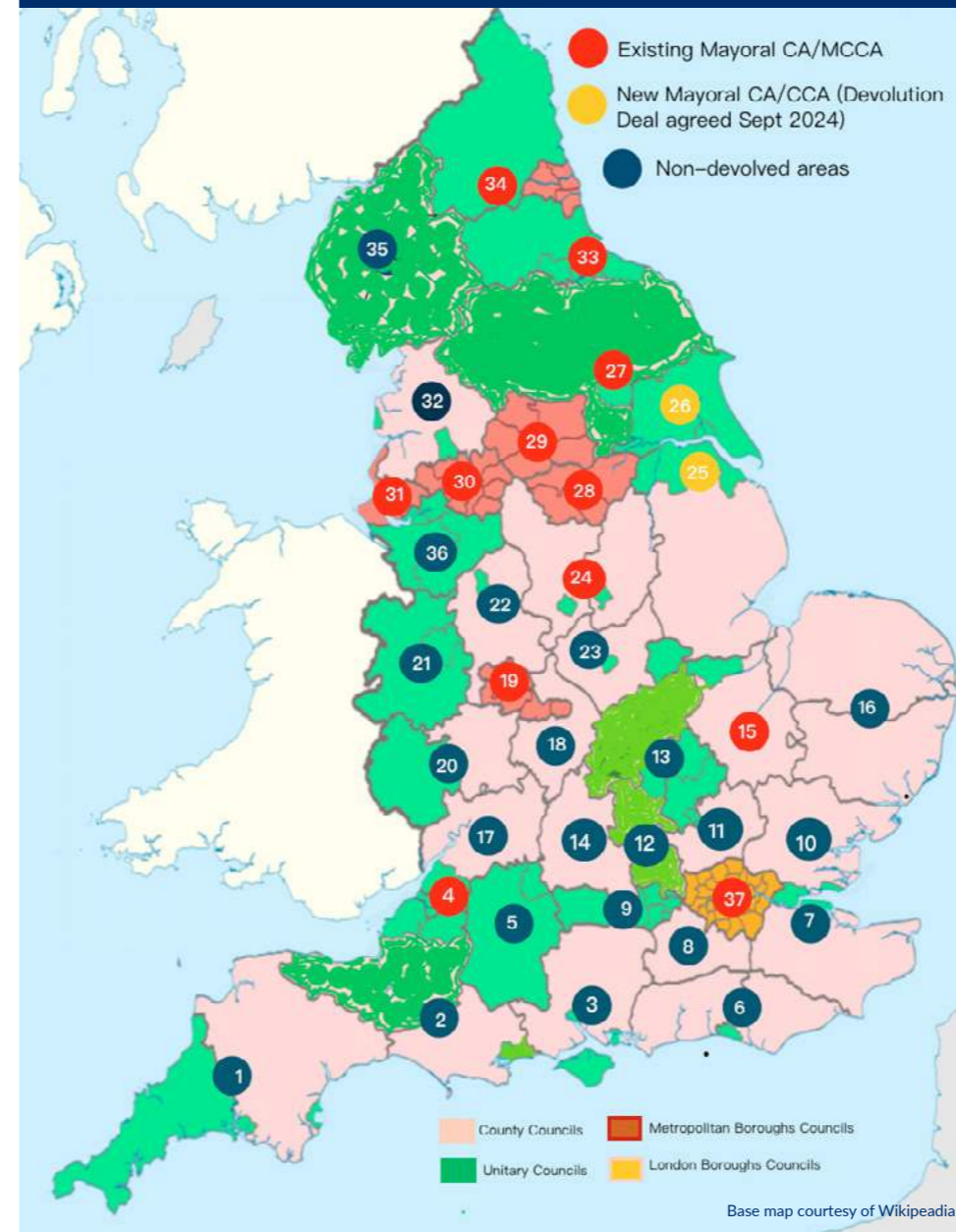
relevant government department, agency and local authority so that they can move quickly to provide the integrated strategic spatial frameworks required to support growth and facilitate comprehensive coverage of local plans. Therefore, the Commission wholeheartedly endorses the work already underway to restore strategic planning to the heart of the system.

### RECOMMENDATION /12

**Restore a mandatory approach to Strategic Planning at the sub-regional/city region level to support the plan-led system and free up planners for spatial planning rather than regulatory development management functions.**

The spatial geography for the new strategic plans will have to be established as soon as possible to ensure that early progress can be made. Given the importance of the new Government's devolution agenda, it is vital that it reflects the new devolved geography and ensures that spatial priorities are aligned with other economic, social and environmental priorities of local and combined authorities, especially local growth plans.

The map opposite sets out one potential strategic planning geography. This reflects existing strategic governance arrangements and established partnerships, which are considered to be the most effective approach to managing the varied functional relationships that exist as recommended by the recent research commissioned by the RTPI on strategic planning.<sup>33</sup> We consider the proposed devolved geography to be a practical approach to a complex set of functional arrangements, and we know from experience that overlaps and cross-boundary relationships can be managed provided there is universal coverage of strategic plans.



Source: Catriona Riddell

## Potential Strategic Planning Areas

1. CORNWALL & DEVON (INCL TORBAY & PLYMOUTH)
2. SOMERSET & DORSET (INCL BCP)
3. HAMPSHIRE, (INCL SOUTHAMPTON & PORTSMOUTH) & IOW
4. WEST OF ENGLAND (INCL NORTH SOMERSET)
5. WILTSHIRE & SWINDON
6. WEST SUSSEX, EAST SUSSEX, BRIGHTON & HOVE
7. KENT & MEDWAY
8. SURREY
9. BERKSHIRE UAS (X6)
10. GREATER ESSEX
11. HERTFORDSHIRE
12. BUCKINGHAMSHIRE & MILTON KEYNES
13. NORTH NORTHANTS & WEST NORTHANTS, BEDFORDSHIRE UAS
14. OXFORDSHIRE
15. CAMBRIDGESHIRE & PETERBOROUGH
16. SUFFOLK & NORFOLK
17. GLOUCESTERSHIRE
18. WARWICKSHIRE
19. WEST MIDLANDS
20. HEREFORDSHIRE & WORCESTERSHIRE
21. SHROPSHIRE, TELFORD & WREKIN
22. STAFFORDSHIRE & STOKE-ON-TRENT
23. LEICESTER, LEICESTERSHIRE & RUTLAND
24. EAST MIDLANDS
25. GREATER LINCOLNSHIRE
26. TEES VALLEY
27. NORTH YORKSHIRE & YORK
28. SOUTH YORKSHIRE
29. WEST YORKSHIRE
30. GREATER MANCHESTER
31. LIVERPOOL CITY REGION
32. LANCASHIRE
33. HULL & EAST YORKSHIRE
34. NORTH EAST
35. WESTMORLAND & FURNESS, CUMBERLAND
36. CHESHIRE EAST, CHESHIRE WEST & CHESTER, WARRINGTON
37. GREATER LONDON

32 <https://www.rtpi.org.uk/research-rtpi/2024/august/strategic-planning-in-england/>

33 <https://www.building.co.uk/delivery-of-new-homes-over-reliant-on-a-handful-of-volume-builders-says-housing-minister/5131746.article>

# Model Joint Planning Team



**Establish a new team within MHCLG to provide a more coordinated approach to strategic planning within the department (i.e. across teams working on planning policy and delivery; devolution and city growth; housing policy). It should work across departments in concert with the new Housing Delivery Unit to ensure strategic plans can fully support growth.**

A key role of strategic planning is to provide an integrated framework for managing growth on a spatial basis. It will be crucial for all the new strategic planning bodies to ensure that spatial priorities set through the strategic plans are fully aligned with other key plans and strategies that will play a part in delivering sustainable growth, especially local growth plans, local nature recovery strategies and local transport plans. The support provided by government across all the different departments involved will therefore play an important part in getting this integrated approach right.

Alongside the proposed new Housing Delivery Unit, the Government should establish a new team with MHCLG that can act as the ringmaster for strategic planning, working across teams both within and outside the Department to deliver a consistent approach.

The Government has made it clear that the focus for growth will continue to be the main urban areas although they will be expected to work together (through strategic planning) with neighbouring authorities to ensure needs are met in full. Many of the larger urban areas are surrounded by green belt and again, the Government has made it clear that these will need to be reviewed through the strategic plans.

Whilst for most areas this will be relatively straightforward given the number of local planning authorities involved, it is a much more complicated process for the Metropolitan Green Belt (MGB) which surrounds London.

# Create a standard methodology for green belt reviews

**Commission an independent review of the Metropolitan Green Belt to identify strategic opportunities for growth, including new or expanded towns.**

The MGB falls in a wide number of county, unitary and district/borough areas as well as the Greater London Authority and London Boroughs. Government should commission an independent review of the full extent of the green belt and areas for strategic opportunities for growth, including new towns, as well as more localised sites for local plan allocations.

The review should seek to reimagine the MGB in its current context and make bold recommendations to reduce its scope as well as providing recommendations for new housing and employment development to support growth.

Government should mandate a template and process for all green belt reviews to be conducted by local planning authorities. Having to follow a standard methodology will ensure that every council approaches green belt review in the same way and reduce arguments about methodology at Local Plan examination level.

Government can also use the template to target certain types of areas for release and feed this into the work of the New Towns Taskforce.

## 2. Providing a more efficient decision-making process

A well-functioning plan-led system requires up-to-date plans in place and our proposals for a revitalised approach to strategic planning will help the Government achieve this.

The Government has proposed a stronger presumption in favour of development and comprehensive coverage of plans. Even so, the decision-making process within development management remains inefficient, costly and slow. In fact, there has been little improvement since the 2006 Barker land use planning review, which reflected that:

*"The clear priority is to reduce the amount of information required to support applications. Local planning authorities should operate on a more risk-based and proportionate system, to cut applicant costs and free up planning departments resources."*

Other proposals such as standardisation of development management policies as proposed in the Levelling Up and Regeneration Act, and modernising planning committees through the Planning and Infrastructure Bill's national scheme of delegation, will help to address concerns.

But there are also three key areas (beyond resourcing which is dealt with separately in this report) that need reform, as shown by the evidence submitted to this review.



These would support a more efficient and productive approach to decision-making and vitally, speed up the process between securing permission and delivery on site. They are:

- **Streamlining the supporting information for planning applications;**
- **Speeding up the process between approvals and ‘spades in the ground’, especially in relation to the discharging of planning conditions;**
- **Providing much more proactive support for small and medium housebuilders (SMEs), community-led developers and self/custom builders to deliver small and medium sites.**

The 2006 Barker Review of land use planning identified issues around the engagement of statutory consultees, especially government delivery agencies and county councils in two-tier areas (who undertake a number of statutory roles related to local planning). The increasingly long time it takes to gather formal responses from statutory consultees impacts the pre-application process.

The post approval process is also delayed with overuse of complex conditions, particularly those required to be discharged pre-commencement. These include legal proceedings and the impact of case law (Hillside, Dennis) on the ability of consents to ‘flex’, and dependency on third party actions. This, then, results in significant time delays in delivering development. (The previous government undertook a review of statutory consultees earlier in 2024 but this was never published).

Evidence submitted to this Commission has offered suggestions for addressing these challenges and bridging the gap between planning approval and delivery on site. Some of these could be achieved quickly without any need for consultation or legislation so we would urge the Government to proactively review this list. These are set out here.

### Route to delivering a more efficient planning application process

- Rationalise statutory consultees (a) number of them and (b) process for consultation.
- Reduce the information requirements for submission with a planning application to (a) a design justification (ie why it represents good design) and (b) an impact assessment (i.e. the impacts of the scheme and how they are mitigated or otherwise acceptable – this would be the ES for EIA development).
- Introduce a national scheme of delegation so that officers deal with all planning decisions except large developments that are departures or are controversial. This is expected by commentators to come as part of the Planning and Infrastructure Bill which the Government has stated will seek to ‘modernise planning committees.
- To speed up the issuing of decisions where a planning obligation is required allow/mandate the use of negatively worded conditions to require a planning obligation prior to commencement of development, or a resolution to refuse if a planning obligation is not completed within a set time. Provide guidance, ideally within the NPPF to encourage the use of an ‘Arsenal condition’ where a developer/applicant does not have the land interest necessary to enter into a binding obligation.
- Enable LPAs to issue split decisions to allow part/refuse part of a proposed development.
- Extend the Permission in Principle (PiP) route. Where a development is allocated in a local plan (that is not more than 5 years old) PiP is granted, which leaves only the detailed matters approved to be managed through the planning application process.
- NPPF and Planning Practice Guidance (PPG) to provide much stronger and robust guidance on planning conditions not duplicating other consenting regimes.
- Categorise PPG advice around conditions into strict groupings as follows:
  - the standard time limit condition for commencement of development;
  - the details and drawings subject to which the planning permission is granted (this will become unnecessary once the new s73B is enacted);
  - any pre-commencement conditions;
  - any pre-occupancy or other stage conditions;
  - any conditions relating to post occupancy monitoring and management.
- Require LPAs to publish their standard conditions and require applicants to submit a schedule of proposed conditions.
- Publish and require the use of standardised s106 agreements or use regulations to effectively perform the role of the main body of such agreements.
- Require LPAs to produce, consult upon, adopt and publish the most common obligations that they use.
- Resolve the impact of Hillside and Dennis through primary legislation to provide a clear process for consenting changes to proposed development once consented.
- Leverage the new technologies available to streamline and enhance user experience and community engagement. This will make it easier to both support and object to planning proposals!
- Develop a new national strategy to streamline the planning decision-making process. Some of this will require primary legislation (which could be introduced through the Planning and Infrastructure Bill) but most of these require support through changes to national policy and guidance, as well as changes in priority to resourcing within local authorities. Above all, there should be a new proactive and positive relationship between local planning authorities and developers. As part of this process, the Government should establish an external local authority reference group to test proposals.

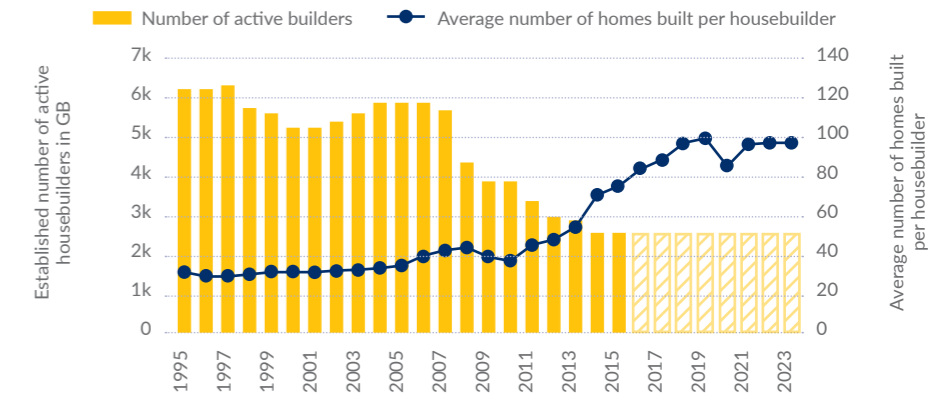
### 3. Diversifying the market and expanding the role of SMEs and self-commissioned housing

The burden placed on SMEs (Small and Medium Sized Enterprises) and self-commissioned housing is having a particularly adverse impact on housing delivery. Self-commissioned housing includes homes built, commissioned or customised by individual households and by community led organisations such as Community Land Trusts, co-housing communities and housing co-operatives.

The UK has an unusually concentrated housebuilding market, by international standards – the Competition and Market Authority’s recent study found that 40 per cent of all new homes in the UK are delivered by 11 of the largest housebuilders each year.<sup>34</sup>

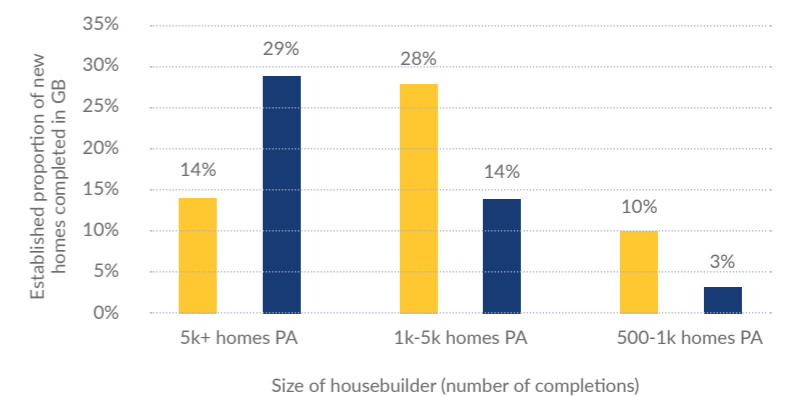
Conversely, a report from the House of Lords Built Environment Committee in January 2022,<sup>35</sup> notes that small and medium sized enterprises (SMEs) developed 10% of new homes in 2020, down from 39 per cent in 1988. Analysis by CWE for the 2021 Bacon Review<sup>36</sup> showed that only around 6 per cent of new homes in the UK are self-commissioned, compared to an international average of around 40 per cent, and noted that in some markets like Austria, Germany, Poland and Japan, self-commissioned housing is the dominant form of housebuilding.

The decline in active housebuilders and growth in their average output



Source: Savills for LPDF (2024) using NHBC, Housing Market Intelligence Report, Housebuilders Directory, ONS, MHCLG NB: Due to lack of comprehensive housebuilder data this is an estimate of the number of housebuilders.

The proportion of new homes built by housebuilder size



Source: Savills for LPDF (2024) using Wellings, “British Housebuilding” (Blackwell, 2006), NHBC, British Housebuilders, Housing Market Intelligence Report, Housebuilders Directory, MHCLG, ONS, Scottish Government, Welsh Government

34 House of Lords Built Environment Committee Meeting housing demand <https://lordslibrary.parliament.uk/meeting-housing-demand-built-environment-committee-report/#:~:text=In%20January%202022%2C%20the%20House,that%20prevent%20increased%20housing%20supply>

35 <https://www.gov.uk/government/publications/government-response-to-the-independent-review-into-scaling-up-self-build-and-custom-housebuilding/independent-review-into-scaling-up-self-build-and-custom-housebuilding-government-response>

36 <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

The then government's 2018 review of build-out rates,<sup>37</sup> undertaken by former Cabinet Office Minister Oliver Letwin, concluded that diversification was essential to speeding up delivery. The analysis, which focused on the build-out rate of fully permitted new homes on the largest sites in areas of high housing demand, concluded that "the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out."

Although some of the Letwin Review's recommendations were implemented, the delays, uncertainty and unpredictability of the planning system continue to have a disproportionate impact on SMEs (as evidenced in the CMA's 2024 Review<sup>38</sup> already referred to), and there has been no action on the recommendations to diversify delivery in large sites. Yet it is clear they offer a way forward for boosting supply significantly in the short to medium term. SMEs and self-commissioned housing can unlock smaller sites as they usually require less infrastructure: they only focus on only a small number of projects at a time and are therefore at much more financial risk than the larger housebuilder, so need to deliver quickly. They offer a more diverse range of tenures and housing types, and cater to local needs and consumer demands unmet by the volume builders.

There are a number of ways that the Government can increase and diversify the supply of new homes through SMEs and self-commissioned housing. One is to target financial options for SMEs and self-commissioned housing providers. Their funding structure and limited cashflow from fewer sites leaves them with greater exposure to delays. Their loans do not finance planning application costs. They therefore need to build quickly.

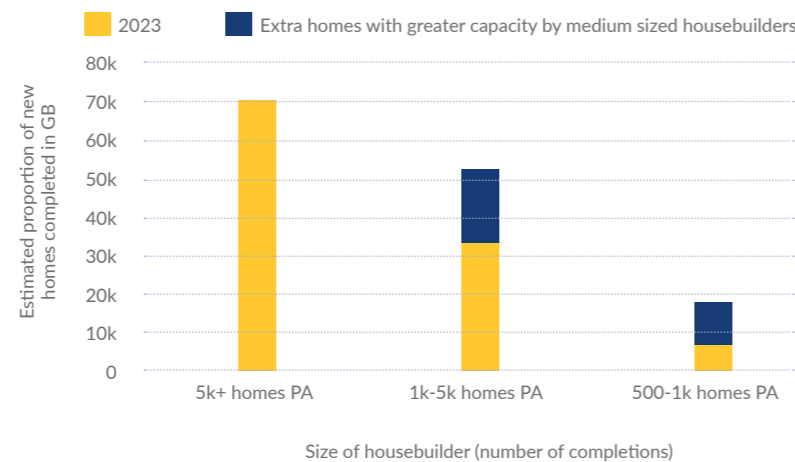
There are different ways that the Government can ensure a quicker and easier planning process for SMEs and self-commissioned providers which would have the advantage of sustaining (and possibly increasing) the number of SME enterprises in the housebuilding sector, as well as increasing the number of small and medium sites delivered. Evidence submitted to the Commission on suggested ways of doing this are set out in Box X on the opposite page (35). The proposed recommendation synthesises the detailed and varied proposals suggested to the Commission to catalyse more housing on small and medium sites through specific changes within the planning framework and also to enable greater diversification of supply by providing more comprehensive support to SME and self-commissioned housing delivery. This would contribute much-needed additional supply on sites of all sizes.

**RECOMMENDATION /15**

**Develop a new, bespoke policy for supporting SME, community-led and self/custom-build housebuilders and the increased delivery of small and medium sized sites to boost the supply of housing in the short to medium term. This could incorporate specific amendments to the NPPF, for example, by supporting Permission in Principle.**

This policy should ensure that SMEs and all forms of community-led builders play a role in the delivery of strategic urban extensions and new towns and are not constrained to small sites alone. It should also form part of the wider government strategy for supporting SMEs, increasing the number of companies and supporting them through the planning process and linking closely with the agenda for skills and modernising construction, as well as specific revisions to the Apprenticeship Levy.

**Scenario showing how many extra homes could be built if medium sized builders delivered similar number of homes as they did in 1995**



Source: Savills for LPDF (2024) using Wellings, "British Housebuilding" (Blackwell, 2006), NHBC, British Housebuilders, Housing Market Intelligence Report, PropertyData UK Housebuilder Directory, ONS, Scottish Government, Welsh Government

**Proposals that could support the delivery of small and medium sites and SMEs collated from evidence provided to the Housing Commission:**

- The important objective of broadening the range of market competition must be written into the NPPF and PPG. In this way SMEs and community organisations can play their part in delivering the housing the country so desperately needs).
- Redefine "small" in planning policy to 20 or fewer and introduce a separate definition of "medium" sites, say 20-100 and specify that they make up a significant percentage of every local plan.
- Implement the Letwin Review's proposals for the subdivision of large sites, with limited primary and secondary legislation via the forthcoming Planning and Infrastructure Bill to complement changes to the NPPF which require each phase of development on large sites to meet a range of needs with diversification as an explicit objective. This should include allocations of homes for community-led development as well as self and custom build homes where it can be shown there is demand.
- Introduce a process whereby communities can propose site allocations in the local plan for community priority projects, meeting needs with a spatial dimension such as community centres, community shops, workspaces, housing, heritage buildings and so on.
- Ask the government's Office for Place to pilot the wider use of design codes and local/neighbourhood development orders to reduce the information requirements, cost and uncertainty around small sites, with the specific objective of reducing barriers for SMEs, self and custom builders, and community-led developers.
- Use 'Permissions in Principle' to loosen restrictions around aspects such as design guidance, whilst reducing the number of documents needed when submitting planning applications. Simply being able to establish the principle of development will help de-risk applications and reduce the cost and time of delivery. This would be with the understanding that technical matters would be resolved later through a delegated team of professional officers.
- Introduce measures to reduce the impact of time delays on SMEs whether through limiting the time to be taken by statutory consultees or deemed approvals / consents where responses are not received within a given time frame. Consider changing the time period for approvals for sites below 200 from 13 weeks to eight.
- Remove current duplications between the planning and building regulation systems ending the need to repeatedly seek approval for the same thing.
- Simplify and minimise processes for assessing nature-based impacts (such as biodiversity net gain), mitigation 7 and payments.
- Provide SMEs with a dedicated LPA support service to fast-track them through pre-application and s106 agreements.
- Set up a dedicated fast track service within the planning inspectorate to manage appeals.
- Switch to using digital information, GIS and interactive mapping to reduce supporting information required for sites below 200 dwellings, for example, in relation to ground conditions.
- Provide a planning applications helpline, either through MHCLG or Homes England. Homes England should co-ordinate opportunities for SMEs to be involved within strategic sites and new towns with any public sector funding to include a requirement for SME involvement in delivery.
- Co-ordinate initiatives to broaden SME financing structures through MHCLG with the support of HMT.

#### 4. Rebuilding capacity in the public sector

##### Wider skill sets:

Although development management functions are an essential part of the planning service, in recent years this has monopolised resources with LPAs often reacting to pressures from planning applications due to the lack of up-to-date planning policy frameworks. This work could be reduced by cutting householder applications and using digital rules-based systems to simplify the process of applying for simple changes such as an extension.

A genuinely plan-led system should be proactive in how it manages growth, providing an integrated framework. This not only requires resources and core spatial planning skills to navigate the different and often competing demands on development and the environment, but also wider skill sets; both professional, like ecologists, urban designers, transport specialists, housing policy specialists, land economists and data analysts, and softer skills: communications, negotiations and political awareness.

It is well documented that local authority resources are under severe pressure.<sup>39</sup> Lack of access to a wide range of specialist and planning skills is making this pressure even harder to manage. The Government has promised to fund an additional 300 new planners to address the urgent need for this. However, traditional approaches where these resources are retained within individual (often very small) LPAs are not likely to prove realistic. Not only is there increasing financial pressures on councils but also a severe shortage of trained planners.

The focus must be shifted back to a plan-led system to be sure that more decisions are made through both strategic and local plans, reducing pressure on development management. This will be required for the Government's proposed new strategic planning policy, modernisation of planning committees and national infrastructure (all to be implemented through the Planning and Infrastructure Bill) and for wider national planning priorities such as new towns.

##### The management of scarce public sector funds and resources:

The capacity challenge in the public sector is not just about planners. There is an urgent need to manage scarce public sector resources more effectively, especially in two-tier areas and government agencies. Recommendation 7 on streamlining funding pots and processes targets this issue. However, boosted resourcing of the planning system would have a significant positive impact.

About 20m people live within two-tier local government structures where responsibilities that impact on planning and housing are split between county and district councils. Whilst districts are the local planning authorities, counties are responsible for minerals and waste planning, for transport, education, public health and are the lead authorities for flood risk and local nature recovery. This fragmentation of local government responsibilities has inevitably weakened the effectiveness of planning and infrastructure provision at both the plan-making and development management stages. All recommendations in this report require the Government to prioritise more efficient use of existing resources. Their purpose is to target additional resources wisely and to focus on developing the wider skillsets that will help the entire public sector to evolve within this proposed more integrated governance framework thus effectively tackling the housing crisis.

Lack of access to a wide range of specialist and planning skills is making this pressure even harder to manage

## Water shortages and their effects on new housing

##### WHO WAS INVOLVED:

Cambridge City Council, Anglian Water, Horsham Borough Council, Southern Water, Cambridge Delivery Group, Homes England, Environment Agency, DLUCH.

##### WHAT HAPPENED:

The average water use per person per day is 142 litres in England and Wales. Under the 2021 Environment Act, this has to be reduced by 20 per cent by 2038 on the way to cutting household water use to 110 litres per person per day, a 50 per cent reduction in leakage and a 15 per cent reduction in non-household water use by 2050.

The first two areas affected by Natural England's effective ban on new development, where it increases water use, are Cambridge and north Sussex.

The Environment Agency advised that some water bodies in the Cambridge area are at risk of deterioration, and that any new development must not increase abstraction (the process of extracting water from any natural source) and risk deterioration to water bodies in Greater Cambridge

The government is helping by devising a water credit system, issuing just enough water credits each year to keep to the target. Otherwise they have to wait to get a new reservoir and pipework, not due until the mid-2030s.

Exactly three years ago (Sept 2021), Horsham Council received a position statement from Natural England, which showed that water abstraction for drinking water supplies is now having a negative impact on wildlife sites in the Arun Valley. They have advised that any new development that takes place must not add to this negative impact.

They have introduced the idea of water neutrality - defined as meaning that: "For every new development, total water use in the region after the development must be equal to, or less than, the total water-use in the region before the new development," which any new development needs to demonstrate before it can get planning permission (known as a Regulation 77 permission). They can do this partly by offsetting against new sources of water, showing how the presence of these new houses will lead to people using less clean water, and by working out how any new buildings can minimise the use of water.

# INTO THE FUTURE

## Studies have shown that community-led development achieves high standards of energy efficiency

### Decarbonisation and healthy homes

The construction, maintenance and demolition of buildings has a significant environmental footprint. Various studies over the years have attempted to calculate the limits to this activity implied by planetary boundaries. For example, a study focused on London in 2009 concluded that even when every known means to reduce the environmental impact of housing was employed, levels of housebuilding still needed to fall by 20 percent to stay within carbon and ecological footprint budgets.<sup>40</sup>

A more recent study estimated that a business-as-usual strategy would see the housing sector consume the whole of England's cumulative carbon budget by 2050, with nine per cent of that coming from the construction of new homes.<sup>41</sup>

These studies calculate the emissions from goods and services consumed in the UK, including – for example – construction materials produced abroad but imported to the UK. Carbon budgets approved by parliament, and in international agreements, are founded on production-based accounting, which only considers emissions produced within the UK (so excluding imports). But both from a UK and a global perspective, it is inevitable that carbon budgets – and other considerations such as ecological budgets and biodiversity – place hard, physical-science limits on the level of construction, maintenance and demolition activity.

Our interim recommendations called for the Government to recognise the evolution beyond costly 'fabric first' retrofit and support strategic programmes that can already deliver sustainability improvements and energy savings at a lower cost.

Unfortunately, we were not able to explore this critical specialist area further but are encouraged that the Climate Change Committee is proactively liaising with a range of industry bodies including the UK Green Building Council on ways to tackle the carbon intensity issues around the built environment, both new build and retrofit for housing as well as around even higher-emitting asset classes such as logistics and data centres.<sup>42</sup> Similarly, a huge body of work around achieving healthy homes is evolving across a number of organisations including the RTPi and Health Foundation and should be supported.

### Environmental Protection and Enhancement

Beyond carbon, developers and investors are increasingly focussed on other elements of environmental protection and enhancement, whether biodiversity net gain and net neutrality requirements or investment in Natural Capital as wider infrastructure. The Commission repeatedly heard in evidence sessions about concerns across the industry that the lack of significant infrastructure investment was having substantially negative impacts on current and future housing delivery, whether

through lack of water availability due to lack of reservoirs or lack of electrical grid capacity preventing planning permissions for critically needed new homes. Better alignment of housing with all types of infrastructure in a genuine strategic planning approach will achieve far-reaching results – but in the mean time we must grapple with the consequences of historic under-investment.

### Community-led Development

Community-led development, such as building undertaken by Community Land Trusts, housing co-operatives and co-housing communities, is a tiny niche in the UK housing market. But it is commonplace in many other advanced economies. In some countries and cities, such as Sweden and Vienna, it is the default form of non-state social housing provision. National, regional and local government policies have supported its growth across Europe and North America. Government in the UK has begun to support it in recent years, but we are far behind most of our peers.

Although it is not widely known about in the UK, there is evidence of considerable appetite. For example, when U3A polled 7,000 of its members about older age co-housing, 14 percent indicated they would be interested, were it available.

When the Government provided grant funding for the sector from 2017 to 2022, community groups launched projects with a pipeline of almost 12,000 homes, with a potential – including more speculative projects – for as many as 23,000.<sup>43</sup> The Community Land Trust Network estimated in 2023 that replicable forms of community-led development could be scaled to provide up to 278,000 homes.<sup>44</sup>

Studies have shown that community-led development achieves high standards of energy efficiency,<sup>45</sup> has helped to pioneer locally-rooted programmes of area-wide retrofit,<sup>46</sup> promotes circular building design (minimising the use of and maximising the reuse of materials)<sup>47</sup> and promotes sustainable lifestyles with lower carbon emissions.<sup>48</sup> Affordable homes tend to be genuinely affordable,<sup>49</sup> projects improve social cohesion, physical and mental health,<sup>50</sup> and tackle loneliness.<sup>51</sup>

It provides additional housing supply, by developing small sites others won't touch; secures local support for development in sensitive locations such as national parks or suburban back gardens; secures support for more dense development in urban areas; and diversifies the housebuilding industry. In view of these and other benefits, public subsidy provided medium to high value for money.<sup>52</sup>

Recent government policy at the national and local level has supported a modest growth in community-led development. The now defunct Community Housing Fund reduced financial barriers, and developed the body of expertise in the industry; reforms to the NPPF have improved access to land and planning consents. But it is still treated as niche, for example with small bespoke grant programmes and the disposal of small and often-unviable sites.

If community-led development is to realise its potential, the Government needs to view reforms across implementation, funding and planning with a community-led development lens. In 2023 the sector developed a long-term strategy, which has been discussed with ministers and officials. The strategy had three elements, which relate to the headings of this report: creating the implementation capacity in the industry; improving access to finance at all stages; and reforming policy and regulations, including to the planning system, to create greater opportunities.



Image: Tom Chance



Image: Tom Chance

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# CONCLUSION

**The Government's pledge to build 1.5 million new homes over the course of this Parliament is the lynchpin of its policy platform.**

Succeed and it will be well set to deliver on its other missions: improving Britain's health, reducing poverty, progress towards net zero. Fail and it cannot succeed anywhere.

The Government clearly recognises this challenge. That is surely why we have seen more action in this policy area than any other since Labour came to power: exploring options around the so-called green/grey belt, reviewing the priorities of Homes England, the establishment of the New Towns Taskforce.

Housing is a complex ecosystem. That's why getting the systems and processes right is a crucial first step. So, we start our recommendations with a **focus on implementation**: a clear strategy, a new housing delivery unit at the heart of government, cross-party collaboration and clarified roles for different tiers of government.

But talk is cheap, literally. Real change to deliver high quality, affordable housing will need to be matched not only with new structures and processes, but with hard, cold cash. More social rent housing will require subsidy. Nevertheless, in this paper we make a number of specific recommendations which could bring **more funding** into the system without significant additional public expenditure: streamlining the existing funding pots and processes, making the climate for institutional investment in housing more attractive, making better use of rental tenures in the housing mix and rapidly agreeing a new rent settlement to deliver more affordable housing.

Underpinning all is the need to **reform a planning system** which – despite substantial goodwill – has proved itself inadequate to identify and release the sites necessary to meet demand. So, we now recommend a mandatory approach to strategic planning, a streamlined planning process, and more opportunities for SME actors in the system, hand in hand with action to release more small sites for development.

A housing crisis, decades in the making, will not be solved overnight. That is why - in preparing this paper - we have focussed on often small but practical steps that can be implemented now to deliver change. Looking further ahead, however, we recognise that **radical long-term action** will be necessary, to meet net zero targets and change the way in which new homes are delivered altogether.

This is the start of a process, not the end. Each journey begins with a few steps but without a map we risk going round in circles. We hope here to have provided **a direction for England's housing journey** and we look forward to working with the Government to finally fulfil the mission of the original Barker Review some two decades ago: to deliver the high quality, affordable homes our country so desperately needs.

# The 'Stretham Model' for affordable social housing using a CLT

## WHAT:

A community-led scheme to build affordable housing in a high-priced area with strong demand.

## WHEN::

First conceived in 2011, planning permission given in 2014, development since then.

## WHERE:

Rural Cambridgeshire just outside the village of Stretham. WHO WAS INVOLVED: National Community Land Trust Network, CLT East, and Stretham and Wilburton CLT, plus the Nationwide Foundation, parish and district councillors and the Design Council/CABE.

## WHAT HAPPENED:

In 2011, the first community land trust (CLT) in Cambridgeshire was formed, encouraged by the Localism Act, from the two rural fenland villages of Stretham and Wilburton. They wanted to provide much needed affordable homes and other amenities for local people through community leadership. This proved especially difficult in a place where house prices were 10.58 times local incomes (2022 figures), with another 215 affordable rented homes needed in this area every year.

Sponsored by their parish councils, the CLT began the search for a suitable development site and they found 14 acres of agricultural land just outside Stretham, where the landowner was willing to sell. Unable to sell the land with planning permission to a mainstream developer - and aware that the council was prepared to make exceptions for mixed developments put forward by local communities, the landowner struck a deal with the CLT which provided increased land value from the change of use to housing and cross-subsidy for the affordable homes through the sale of market housing on the site.

Two years of intensive community engagement followed, supported by a grant from the Design Council. They received planning permission in 2014, when the CLT launched their three-phase development project involving 75 new homes. The first phase of 26 homes started on site in June 2015 with another 24 to follow. The mixed development includes 23 affordable rented homes and 52 for market sale, with land reserved for a new doctor's surgery, workspaces and a new village green. Funding for the affordable housing was up to half from cross-subsidy from the market homes and half from a commercial loan from a bank specialising in support for social enterprises. It helped that the CLT chair is a local councillor who has been a champion for community-led development in the local planning authority.

**FIND OUT MORE:** Nationwide Foundation (2024) 'Affordability of community-led homes.' Sheffield: CRESC at Sheffield Hallam University.

## Radix Big Tent is the think tank of the radical centre.

We are concerned with system renewal, challenging established notions and reimagining society. We aim to provide a platform primarily for those from outside the Westminster bubble to inform and help shape public policy. It was formed in 2022 from the merger of Radix UK with the Big Tent Foundation.

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