



Campaign to Protect
Rural England

February 2005

Response from CPRE to the draft 'London Housing Strategy 2005-2016'

1. CPRE welcomes the opportunity to comment on the draft 'London Housing Strategy 2005-2016'. CPRE agrees that there is a need for a significant increase in the provision of genuinely affordable housing in London to meet both existing need and future growth.

Introduction

2. CPRE has an interest in the growth of London and housing because of London's impact on the wider South East and UK, particularly in terms of out-migration causing pressure on the countryside for new homes and the effects that demands for new infrastructure to serve London (roads, airports, reservoirs, etc) would continue to have on the countryside. However, CPRE believes it is possible to continue improving housing for everyone without significant increases in environmental damage or a major increase in the rate at which countryside is lost to development. We need to plan for a steady supply of new homes. The London Housing Strategy is a key part of the process but this planning should be based on the need for new housing, rather than demand, and it must take account of the need to protect the environment.

Affordable Housing

3. The supply of housing subsidised by the state for people who cannot afford market homes must be increased. The Government should invest more, but the planning system should also do a better job of ensuring genuinely affordable homes are built along with market housing. The London Housing Strategy should also ensure that housebuilders provide a better mix of housing for sale, which reflects local people's needs; at present they tend to supply for the upper end of the market, and insist on wider application of sustainable construction techniques.

Supply of housing

4. In paragraph 3.5, the draft strategy identifies a range of factors that have contributed to the current situation in London. We would strongly disagree with the suggestion that the planning system and local authorities holdback the supply of land for housing. As shown by the annual reports of the leading housebuilders themselves, the supply of land with planning permission increased across England by over 17% between 1998 and 2002¹, a trend that has been shown to continue in company statements since. We are, however, pleased that the draft strategy recognises the lack of capacity or willingness in the construction sector to supply affordable homes as a contributory factor.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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5. CPRE welcomes the aim *'to ensure that more people can be housed by increasing the supply of new homes of appropriate sizes in each sector'* but would caution against making decisions based on a simplistic consideration of household projections and market demand. This is likely to continue to lead to the provision of too many new 'executive' homes that are beyond the financial means or physical reach of those in need of affordable housing. Recent nationwide figures show that the supply of new housing at market prices is at a level consistent with the average over the past 50 years, but overall output is relatively low. The sole reason for this has been a collapse in the output of subsidised housing built over the last 20 yearsⁱⁱ. Housing policies should be based on careful judgements about environmental capacity and social need to ensure that more affordable housing is delivered in the right places at the right time, as stated in central Government policy on planning in Londonⁱⁱⁱ.

6. The list of work underway to increase new supply (paragraph 4.3) is welcome but would be more useful if details of the timings for each initiative were given. A list of contacts for each initiative could be included in an appendix to the strategy for those who might want to follow up on these initiatives.

Empty homes

7. CPRE welcomes the progress made so far on bringing empty homes back into use in London and in increasing the supply of affordable homes (paragraph 3.12) but much more remains to be done. We welcome the draft strategy's aims to build on these successes but it is lacking in detail of how this will be achieved. The strategy should set challenging targets for the reduction of empty properties (particularly long-term empty properties) and the provision of affordable homes which will help achieve the strategies aims. The target for a net reduction in the number of empty homes mentioned in paragraph 4.32 should be included in the final strategy. If, as identified in the draft strategy, a lack of availability of data makes this impossible, a date when the target will be published should be included. More detail is needed on the means to achieve the target for the reduction of empty homes (paragraphs 4.33 to 4.39). For example, details are needed of the funds that are available for these actions, and how and by whom information will be provided to owners of empty properties.

Sustainable construction

8. CPRE welcomes the aim of the strategy *'to promote the supply of new homes that are of the highest quality design possible'*. Paragraphs 4.23 to 4.31 of the draft strategy address the issue of design quality and we welcome this but the strategy needs to be clearer in defining what it considers 'high quality' to be and to set specific and measurable standards. The strategy should also explain how these standards would be monitored and enforced.

9. The draft strategy rightly identifies that the quality of new developments in London has been poor and refers to CABE's recent *'Housing Audit'*. However, neither CABE's work or the draft strategy takes full account of environmental factors such as, water efficiency or energy efficiency. Environmental standards should be included in any definition of quality. Use of the London Plan policies on sustainable design and construction are a good starting point but much more should be done to improve the sustainability of new homes in London (and its existing stock). At the very least the aim should be that all new homes in London are built to the Eco-Homes Excellent standard.

10. The recognition of the importance of energy efficiency in tackling both fuel poverty and climate change (paragraph 3.25) is welcome but there is a range of other environmental factors that should be considered which have both environmental and social impacts. The Mayor aims to provide 30,000 new homes in London each year^{iv}. As a Defra-commissioned study^v found, house building on this scale has potentially huge negative impacts on resource use. These include land take, water use, energy consumption, waste production and aggregate consumption. The study also found that these impacts could be reduced significantly, during construction and throughout the lifetime of the building, by use of sustainable design and construction practices, such as the BREEAM Eco-Homes standards. In London between 2000 and 2003 only 208 new homes in four developments attained an Eco-Homes Very Good or Excellent rating^{vi}. This is less than 1% of all new homes built in those three years. To prove that London is serious about becoming a leading city in sustainable development practice, all new homes should be built to the highest standards of sustainable design and construction. Adopting these environmental quality standards also has social benefits as the overall running costs of new homes are reduced as they use less energy and water and are healthier to live in.

Existing housing

11. Poor neighbourhoods and poor housing conditions can be improved by a range of measures including projects to improve or provide green open space for recreation, energy efficiency or alternative energy schemes, local recycling projects, community garden projects and a range of other environment based community regeneration initiatives. This link between environmental and sustainable development initiatives also needs to be made in paragraph 3.27.

12. We welcome the aims and means for improving the quality of existing homes and the physical environment of local neighbourhoods, preventing homelessness, meeting diverse housing needs and creating mixed and sustainable communities. However, the means for achieving these aims need to be set out in greater detail and specific targets set. For example, paragraph 4.49 could be made less vague by setting targets for the number of people benefiting from such initiatives to improve neighbourhoods. To meet diverse housing needs, targets will be needed for each size/type of house and sector.

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i ***Housing Myths: Housing Solutions***, CPRE, 2003.

ii ***Building on Barker***, CPRE, 2005, pp. 28-30.

iii Government Office for London Circular 1/00: *Strategic Planning in London*, paragraph 3.15.

iv Policy 3A.1, *The London Plan*, February 2004

v *Study into the environmental impacts of increasing the supply of housing in the UK*, ENTEC, April 2004

vi Private communication from Buildings Research Establishment, July 2004