



**Friends of  
the Earth  
Cymru**  
**Cyfeillion  
y Ddaear  
Cymru**

## **FRIENDS OF THE EARTH CYMRU**

### **Consultation relating to the Proposed Technical Advice Note 2**

#### **Planning and Affordable Housing – Consultation Draft**

**July 2005**

**Response by**

**Friends of the Earth Cymru**

**October 2005**

#### **Friends of the Earth Cymru**

Friends of the Earth Cymru inspires solutions to environmental problems which make life better for people.

Friends of the Earth Cymru:

- is dedicated to protecting the environment and promoting a sustainable future for Wales
- is part of the UK's most influential environmental campaigning organisation
- is part of the most extensive environmental network in the world, with over 60 national organisations across five continents
- supports a unique network of campaigning local groups working in communities across Wales
- is dependent upon individuals for over 90% of its income

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### 1. Introduction

Friends of the Earth is an environmental justice organisation and it is in this context that we evaluate the contents of the draft TAN 2 – Planning for Affordable Housing.

We have noted the provisions of **“Draft Ministerial Interim Planning Policy Statement (DMIPPS/02/05) issued on the 5<sup>th</sup> July 2005”** and strongly support its contents; particularly:

- Paragraph 9.1.3 – Stakeholders involvement and integration of community strategies into the planning process.
- Paragraph 9.1.4 – Adopting an holistic approach to the whole housing system with effective monitoring of outcomes.
- Paragraph 9.2.1 bullet points with regard to the:
  - **“capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing”** and
  - **“the environmental implications, including energy consumption and greenhouse gas emissions; and**
  - **the capacity of existing or planned infrastructure”**
- Paragraph 9.2.4 with regard to community partnerships and the need for Sustainability Appraisal and the Strategic Environmental Assessment provisions to form part of the land selection process for housing provision.

- Paragraph 9.2.7 with regard to the statement that **“New settlements on Greenfield sites are unlikely to be appropriate in Wales, and should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements.”**
- Paragraphs 9.2.8 to 9.2.10 relating to site selection criteria.
- Paragraph 9.2.11 Open space provision and protection.
- Paragraph 9.2.14 provision of **“affordable housing” by the creation of a range housing development to meet the needs of all social groups.**
- Paragraph 9.2.17 Local authorities may identify sites for up to 100% affordable housing.
- Paragraph 9.3.1 configuration of new housing developments to avoid ribbon development and the coalescence of existing settlements or a fragmented development pattern.
- Paragraph 9.3.4, which provides in determining planning applications for new housing, local planning authorities should ensure that the proposed development does not damage an area’s character and amenity.

We are of the opinion that this ministerial guidance must inform the contents of the TAN 2 criteria for the provision of **“affordable housing”** through the planning process.

Friends of the Earth Cymru believes that the planning system in Wales should be founded on the highest standards of community participation to ensure that the system empowers all sections of society to help shape a sustainable future. These standards should be based on the Aarhus model of participation – access to information, access to participation and access to justice.

We therefore, welcome the cabinet statement made by Carwyn Jones, Minister for the Environment Planning and the Countryside on the 16 March 2004 with regard to community involvement in the provision of **“affordable housing”** sites in the countryside. Paragraph 7 of his statement supports the recommendation of the **“EPC Committee Report on Planning Aspects Associated with the Provision of Affordable Housing and Sustainable Communities in the Countryside”** by confirming support for the report’s recommendation that local communities should have a key role in helping to identify potential landowners and sites for the development of **“affordable housing”**. He affirmed: “that local knowledge is best, and we have recognised that in the Planning and Compulsory Bill [now Act], which requires local planning authorities to take community views into account when preparing local development plans. Our only qualification to this cabinet statement is that it equally applies in urban areas.

We are particularly concerned about the provision of **“affordable housing”** for socially excluded groups. The submission of the Royal Town Planning Institute to the ODPM Housing Bill consultation in June 2003 is relevant to this matter and their comments on the **“Right to Buy”** provisions Part 6 is given below:

**“The RTPI does not believe that this proposal will significantly ease access to affordable housing for those in need. The fundamental problem remains in both Wales and England – the stock of social housing has been reduced and is not being replaced. If the ODPM and the Welsh Assembly Government are serious about the growing issue of affordability and access to decent housing for all, then this issue must be tackled in a more comprehensive fashion including the allocation of resources both for new build and for schemes such as ‘Homebuy’. Despite additional resources being put into both schemes recently, this is still not sufficient to adequately tackle the scale of the problem.”**

The **“Beveridge Report”** issued at the close of the Second World War concluded that there will always be a need for socially rented housing provided by local authorities or public agencies as **10%** of each generation will fall behind the progress of society to higher standards of living. This factor has caused enormous problems as the stock of publicly provided housing for rent has been reduced by the **“Right to Buy”** schemes and the capital receipts from sales have been blocked by UK government policy to fund the provision of replacement units for rent.

We have taken note that it is Welsh Assembly Government policy to seek the transfer of local authority housing stock to Housing Associations and leave the local authorities with just the preparation of **“Housing Strategy Plans”** to meet housing need in their areas.

It is in the context of the above considerations that we have compiled our response to this consultation.

## **2. Executive Summary**

- We support the concept of full community involvement in the preparation of Local Housing Strategies for the supply of **“affordable housing”**.
- We support the formation of Strategic Housing Forum Partnerships including all stakeholder groups.
- We support the concept that with the relaxation of the **“Crichel Down Rules”** concerning the sale of public owned property, that local authority and National Health Service land surplus to requirements should be offered to relevant **“Housing Associations”** in the first instance at below market cost for the provision of **“affordable housing”**.
- We support the concept that the local community should be involved in the identification of possible sites for the **“provision of affordable housing”**.

- We do not accept that Section 106 planning gain agreements or planning conditions will provide via the private sector sufficient housing stock for the provision of “**affordable housing**”.
- It is our view that the supplementary planning guidance contained in TAN 2 “Planning and Affordable Housing” has a significant input into the formulation of Local Development Plans”.

### 3. Friends of the Earth Housing Policy

- **Extract from “Housing: Building a Sustainable Future” June 2004**

#### **Social Housing paragraphs 1.25 to 1.27:**

The Barker Report restates the longstanding analysis of the shortage of social housing (Paragraph 5.2). However, the report does not offer any detailed analysis or new solutions. Simply increasing the total supply of housing will not substantially impact on **affordability**. At best the report acknowledges it will stabilise house price inflation.

Friends of the Earth’s view is that there is an overwhelming social justice case for meeting the demand for social housing in every region in the most efficient manner possible. In practice this means moving away from a model based on the private sector provision of “**affordable homes**” through mechanisms such as planning obligations (essentially a form of cross subsidy, so that higher value housing can subsidise low cost units). This is inefficient in terms of land use and has not always ensured the right tenure choice. Instead radical reform of the funding and delivery of social housing is necessary which recognises that it is a lack of public investment not the planning system which is the prime cause of the social housing crisis. This reform should be based on three principles:

- Significant increases in central government funding on social housing
- A return to direct delivery of housing by local authorities
- Decentralised participative governance of housing management.

Direct public sector provision allows for the efficient use of land and the greatest integration of housing provision with the planning process. Public sector control allows the rate of housing unit production and quality of design to be effectively delivered.

### **The Government Housing Policy**

Friends of the Earth has four fundamental concerns about the UK Government’s existing housing policy as specified in the Communities Plan (ODPM 2002).

Existing policy has led to development of large scale greenfield sites with an undoubted impact on the environment. (See **Friends of the Earth Cymru publication *Sustaining Spin* and the South Sebastopol development in**

**Torfaen where 1200 houses were built in open countryside in order to provide 180 units of affordable housing.)** The development of these sites has often been unimaginative, low density and largely dependent on the car. The provision of new housing in suburban locations has contributed to the decline of the inner areas of our towns and cities.

Exiting housing policy has dramatically failed to deliver equity in the provision of housing. Many of the most vulnerable groups in society particularly the young and elderly live in unacceptably poor housing conditions. The provision of large-scale new housing development would do nothing to meet these needs nor would it address the issue of affordability.

Current housing policy tends to reinforce the tension between national need to provide new homes and the rights of individuals and communities to have a say over the way that their areas develop. New policy must make clear where the boundaries between these sometimes contradictory policy objectives lie in order to avoid divisive political polarisation.

Traditional forecasting techniques based on crude trend projection have proven inaccurate and insensitive to local needs. Forecasting for housing must be sensitive to local housing needs surveys and the environmental and social capacity of a locality to take increased housing numbers.

### **Making good policy**

The consideration of housing policy should be conducted holistically, considering the full range of factors, which define quality, quantity and accessibility. These factors include:

- Population and household formation rates
- Housing conditions
- Empty and second homes
- Affordability
- Tenure choice

The current debate over housing is dominated by housing land supply and underplays the need to address **affordability and quality**.

Friends of the Earth Cymru accepts that housing poverty reflected through homelessness and poor conditions is a major contributor to social exclusion.

### **Friends of the Earth's Principles for housing provision**

- **Social Equity.** Access to good housing is a basic human right (by delivering social housing needs through greater public sector investment).
- **Sustainable Development.** Communities, which maximise quality of life and minimise resource use by operating within environmental limits of the locality.

- **Demand Management.** The redistribution of housing demand from areas of high to low demand.
- **Urban capacity.** By greater sensitivity of social and environmental capacity of existing communities to accommodate new housing and of the housing needs of those communities.
- **Design Innovation.** By the promotion of innovation in housing design, construction and layout.
- **Participative Processes.** A planning system which places the views of local people at the heart of the planning system.

### **Housing Land Provision**

Friends of the Earth strongly supports the use of a sequential approach to the provision of housing land. In this context we support the need to reflect a ‘plan, monitor and manage approach’ to housing provision. This suggests that a flexible and iterative approach is required, with an emphasis on meeting local needs and formulating creative solutions to protracted problems through continual monitoring and adjustment.

### **Setting targets for the recycling of land and buildings**

Friends of the Earth strongly supports the aim of increasing the percentage of housing development which takes place on previously developed land and conversion of redundant buildings.

### **A phasing mechanism**

Friends of the Earth strongly supports that use of phasing mechanisms to ensure that housing developments take place on previously developed land before the use of Greenfield sites.

### **Design and density**

Friends of the Earth is particularly concerned to emphasise the need for increased densities to be encouraged and for more resource efficient homes to be built.

In addition, Friends of the Earth believes that Development Plans should be required to promote the development of resource efficient homes through the inclusion of policies which specify acceptable levels of resource efficiency for all new developments.

**Friends of the Earth strongly recommends that TAN 2 should support the achievement of Eco Homes ‘excellent’ standard for all new homes built over the plan period.**

**Key point: This standard equally applies to the provisions of Local Development Plans in Wales.**

### **Low Impact Housing**

TAN 2 and related planning policies should encourage new development in housing design which combine elements of traditional building techniques with innovation in sustainable building materials, energy conservation and water and refuse recycling. Such development has a minimal impact on the local and global environment and provides a visionary model for how sustainable communities might develop in the future.

**Key point: The Centre for Alternative Technology at Machynlleth, Powys has produced very helpful resources in this project area and will be a reference point for low impact housing development in Wales.**

### **Affordable Housing**

Housing equity is a vital part of the sustainable development of a region. There is a need not just to increase the supply of **affordable housing** but to ensure a range of size, types and tenures of housing to be provided so as to ensure a greater level of equity in housing provision than that which currently exists.

TAN 2 should make a clear commitment to ensure that approximately 30% of all new homes are **affordable**. Such targets may need to be exceeded in some areas depending on local circumstances.

### **Monitoring housing supply objectives**

Core indicators for monitoring housing supply are a vital part of effective implementation of housing policy. Friends of the Earth would recommend that the core indicators to be used are:

- **Affordable housing provision as a proportion of all housing completions (as stated)**
- **The number and proportion of new dwellings including conversions built on previously developed land, which should be above the aspirational targets set out in the TAN 2**
- **The average density of new development, which always should be above 25 dwellings per hectare**
- **The number of households in substandard or overcrowded accommodation**

**Note:**



**These key Friends of the Earth policies can be translated from a TAN, PPW and other policies and strategies (including the WSP) into a Local Development Plan context.**

#### **4. Conceptual Approach**

- We have noted the contents of **Draft Ministerial Interim Planning Policy Statement No. DMIPPS/02/05** and have used it as a benchmark to judge the contents of TAN 2.
- The degree of compliance with adopted Friends of the Earth Housing policy guidance is a further benchmark in framing our response to TAN 2.
- As an environmental justice organisation, the degree of community involvement in the formulation of housing strategy for the provision of **affordable housing** through the planning process is a key factor for us,
- We wish to make the new TAN 2 an improved working document to inform the Local Development Plan process.
- We are also keen to ensure that the provision of **affordable housing** is sustainable and does not breach environmental limits.

#### **5. Detailed Comments on TAN 2**

<b>Page No.</b>	<b>Paragraph</b>	<b>Comments</b>
2	2.1	Support
2.	2.2	Support
2	2.3/2.4	Support and guidance flow chart.
2	3.2	Noted
4	4.1	Support
4	4.3	Strongly support
4	5.1	Very good description
4	5.2	Very helpful
4	5.3	We support the concept of discounted land for the provision of <b>affordable housing via housing associations.</b>

5	6.1	We support local authority strategic housing forums composed of all stakeholders.  Note: Torfaen Friends of the Earth are members of Torfaen County Borough Council Strategic Housing Forum.
5.	6.2	Support
5	6.3	Noted.
5	6.4	<b>The EC Strategic Environmental Assessment Directive (SEA) should inform site selection for housing development.</b>
6.	7.1	Support
6.	7.2	Support
6	7.3	Support
6	8.1	Support
7	9.1/9.2	Support
7	10.00	Support both paragraphs.
<b>Page No.</b>	<b>Paragraph</b>	<b>Comments</b>
7	10.3/10.4	Support
8	10.5	<b>Key point</b>
8	10.6	Noted
8	10.7	<b>Regard should be had to cumulative effect.</b>
8	10.9	This paragraph lacks clarity and needs redrafting Need to specify borough wide targets at local levels. <b>(i.e. In Torfaen CBC for Blaenavon, Pontypool and Cwmbran)</b>
8	10.10	Noted
9	10.11	<b>This paragraph has a key policy statement in the last sentence.</b>
9	10.13	Support this is a key point.

9	10.14	<b>This is an important qualifier. We support this policy position.</b>
10	10.15	<b>This is key point. We think environmental groups should be involved in this exercise.</b>
10	10.16/10.17	Noted.
10	11.1	Support
10	12.1	Noted
11	12.2	Noted
11	12.3	Noted. Annex is very helpful and important.
11	12.4	Noted with reservations.
11	12.4	Very important paragraph.
11	12.5	Very important paragraph.
11/12	12.7	‘Cascade’ mechanism welcomed.
12	13.1	Noted
12	13.2	Noted
<b>Page No.</b>	<b>Paragraph</b>	<b>Comments</b>
12	13.3	Noted and supported.
13	14.1	Noted
13	14.2	Noted
13	14.2	<b>Planning register records must be up to date.</b>
13	14.3	Important monitoring and recovery clause.
14/15	Annexe	Very good working document.
16/17	Glossary	Very helpful

## 5. Conclusion

- **We feel that it is important that Housing Strategic Fora should include environmental and community groups in their membership. It is most important that tenants in affordable rented housing are also included.**

- **It is important that site selection for the provision of housing should take account of environmental limits as provided for in the EC Strategic Environmental Assessment Directive (SEA) and Environmental Impact Assessment legislation.**
- **The design and energy efficiency of housing provided should comply with “ECO Homes” standard.**
- **Low impact housing should be encouraged where appropriate.**
- **The relaxation of the Cricheol Down rules for the disposal of publicly owned land should be utilised for the transfer to Housing Associations of such land at a below market value to address the shortage of affordable homes.**
- **Planning and Affordable Housing strategies under TAN 2 are a key component of the Local Development Plan process.**
- **The Welsh Assembly Government should give guidance on expected housing densities as a benchmark for average density calculations.**
- **The Welsh Assembly Government should give guidance on the preferred percentage of affordable housing to be provided in new housing development.**
- **We wish to provide through our local groups network a positive and constructive input to the affordable housing strategy process.**
- **We hope this response will be helpful to you.**

Mike Jacob

On behalf of Friends of the Earth Cymru

27<sup>th</sup> October 2005