

Housing and Planning Bill Lords Committee Stage Briefing

The following is an outline of JRF's views on the Housing and Planning Bill ahead of Lords Committee Stage beginning on Tuesday 9 February 2016. It does not aim to be a comprehensive overview, but instead provides analysis of the parts of the Bill where JRF has particular expertise.

If you would like to arrange a meeting with one of our experts to discuss the points raised please contact:

Tom Peters: **Senior Public Affairs Officer**

tom.peters@jrf.org.uk / 07972 773963 / 020 7520 2080 / @jrftom

Key points

- The government is right to help people onto the housing ladder but, on its own, this does not provide a route out of poverty. People need a variety of stable housing options, but too many are being forced into the bottom end of the private rented sector with higher rents and less security. We need a much more ambitious plan to supply genuinely affordable homes.
- Proposals to allow 'Starter Homes' to replace low-cost rented accommodation will reduce the supply of housing affordable to those on low incomes.
- Action to tackle rogue landlords and estate agents is very welcome and should be the first step in a comprehensive Private Rented Sector strategy.
- Selling vacant 'high value' local authority-owned housing will have an immediate impact on the availability of homes for those in housing need.
- Setting the threshold at which tenants are judged to be 'high income' will require sensitivity to avoid including households below minimum income standards. A tapered approach will be required to avoid creating work disincentives.
- Efforts to improve delivery of homes through the planning system are very welcome, but must ensure a mix of tenures are delivered as a result.

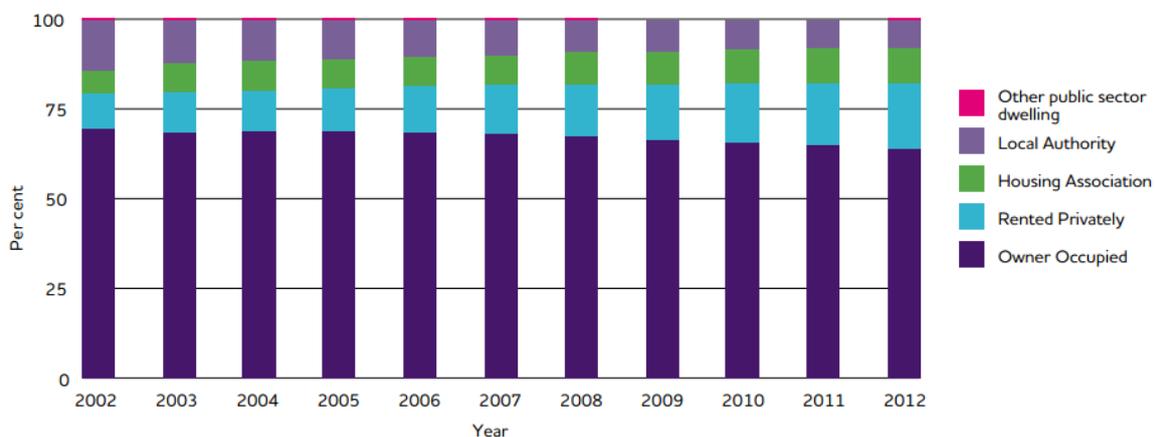
Introduction: the housing market today and tomorrow

We have a housing crisis. At its heart is the fact that the supply of new homes – of all tenures – does not meet the additional demand arising each year. This has been the case for some time, and has consequences for housing affordability, and ultimately for the ability of people to achieve their housing aspirations. The Government’s determination to increase housing supply is very welcome, but this must deliver a boost in supply of homes of all tenures. Low cost rented housing, in particular, is vital to contain and mitigate against poverty.

The last decade has seen major changes within the housing system (Lupton and Collins, 2015). These changes are forecast to continue:

Changing tenure: Home-ownership in the UK declined from 69 to 64 per cent between 2002 and 2012. The private rented sector expanded rapidly from 10 to 18 per cent. In the last decade it has overtaken the social rented sector, which declined from 21 to 16 per cent. These trends are forecast to continue over the next five years and beyond, with social housing forecast to decline from housing one in seven people today to just one in ten by 2040. Poverty will rise if the proportion of social housing in the overall housing market is not maintained (Stephens et al, 2014).

Fig 1: Dwelling stock by tenure over time



Source: DCLG, Live tables on dwelling stock, Table 101, 2015

New homes: Current rates of housebuilding in England are running at around half the level needed to meet existing and anticipated demand for new homes. This shortfall in supply is one factor in rising house prices. The private rented sector has grown mainly through the conversion of existing properties from other tenures rather than by new building. We need to deliver an average of 240,000-245,000 new homes per annum in England, of which 78,000 must be in the social sector (Holmans, 2013). At a minimum, 200,000 homes per year are required to avoid rising poverty (Stephens et al, 2014).

Rising rents: While mortgage costs fell following Bank of England cuts in interest rates after 2007, rents have risen faster than earnings. This is set to continue towards 2040, with JRF projections suggesting private rents in England will rise twice as fast as incomes (Stephens et al, 2014)

Fig 2: Forecast for incomes and private rents in England to 2040:

Private rents in England are forecast to **rise by around 90%** in real terms between 2008 and 2040 – **more than twice as fast as incomes.**



(Source: Stephens et al, 2014)

Social housing: Reforms since 2010 have included the introduction of higher Affordable Rents for new homes and some re-lets, set at up to 80 per cent of market levels. These higher social rents will result in a real-terms social rent rise of 160% to 2040, putting 1.3million more people into poverty by 2040 (Stephens et al, 2014). The recent decision to cut rents for social housing over the next four years will have a marginal impact on this rise, but this and other measures will remove capacity from the social sector, resulting in 34,000 fewer homes being built (OBR, 2015b).

Homelessness and housing need: Local authorities have more flexibility to house homeless families in the private rented sector and to set allocations policies according to local priorities. The number of people facing – or at serious risk of – homelessness has risen steeply in recent years (Fitzpatrick et al, 2015).

Living standards: Measures of the earnings required for a decent standard of living include assumptions about housing costs. Both the living wage and (until 2014) the minimum income standard have assumed that people live on social housing. The 2014 version of the minimum income standard (see box below) assumes that pensioners and households with children live in social housing while adults without children live at the lower end of the private rented sector (Davis et al, 2014).

Wider costs: Housing also has an influence on other costs such as energy bills. This is an increasingly important issue in debates about sustainability and welfare reform. However, these factors are only part of a market failure in the wider housing system. Failures in the credit market and housing market volatility have increased housing costs and pressure on affordable housing and pushed housing need up the income scale.

The Minimum Income Standard

- The Minimum Income Standard (MIS) shows how much money people need so that they can buy things that members of the public think everyone in the UK should be able to afford.
- MIS asks members of the public what goods and services they believe different types of households require to live to an adequate level
- The standard is updated annually in response to changes in living costs and to the tax and benefits system
- In 2015, a single person household requires an income of £17,100 a year before tax to achieve MIS.
- Couples with two children need to earn £20,000 each. (Hirsch, 2015)

Clauses 1-7: Starter Homes

The Conservative Manifesto committed the Government to delivering 200,000 'Starter Homes' by 2020. These homes would be available for first time buyers under 40 to buy at a 20% discount. Clauses 1-7 provide a statutory framework for the development of Starter Homes.

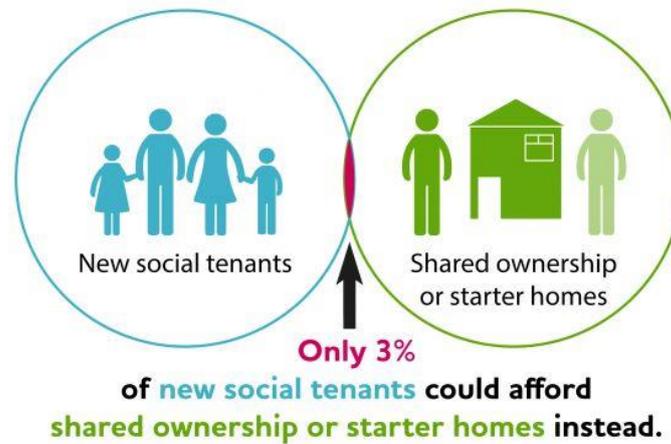
Key points

- Starter Homes may have a role to play in response to the housing crisis. However, they are not a tenure suitable for those on low incomes: just 3% of new social renters could afford starter homes or shared ownership instead.
- Allowing Starter Homes to replace low-cost rented homes within planning obligations will reduce the supply of housing affordable to those on low incomes.
- We need a much more ambitious plan to deliver homes of all tenures, including for low-cost rent.
- It is important that planning obligations deliver homes that respond to local housing needs. Local authorities should be allowed to use their understanding of local housing markets to enable this.

JRF welcomes the development of homes of a range of tenures, to meet housing need across the market. Starter Homes may have a role to play in this, but it should be recognised that they are not a proposition suitable for those in poverty, who would lack the ability to raise the deposit and mortgage finance available to purchase these homes. **Our research shows that just 3% of new social renters could have afforded to access starter homes or shared ownership instead.**

(Clarke et al, 2015) – demonstrating the tiny overlap between the markets served by low-rent affordable housing and assisted ownership options.

We need more homes of **all** tenures



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People need a variety of stable housing options, but too many are being forced into the bottom end of the private rented sector with higher rents and less security. We need a much more ambitious plan to supply genuinely affordable homes.

Planning obligations

Clause 4 allows for provision of Starter Homes through planning obligations. Local authorities will only be able to grant planning permission for certain residential developments if specified requirements relating to Starter Homes are met – e.g. the provision of Starter Homes on site, or the payment of a sum towards the provision of Starter Homes elsewhere.

This will allow Starter Homes to replace affordable rented homes which would have been delivered through a mechanism known as Section 106. Depending on the wording of regulations, this could be mandatory.

JRF has serious concerns about this proposal, as our research shows Section 106 is an important mechanism for the delivery of affordable rented housing:

- Section 106 delivered 16,193 homes or 37% of all affordable housing in 2013/14.
- This figure has been higher in the past - 65% of affordable housing was delivered through S106 in 2006/07.
- In some areas, as much as 87% of affordable housing is delivered through Section 106

(Brownill et al, 2015)

Responding to local housing needs

Affordable rented housing plays an important role in mitigating against poverty. We can only contain poverty at current levels if it continues to represent the same share of the overall housing market (Stephens et al, 2014). JRF would therefore urge Government to reconsider measures which would oblige local authorities to insist on

provision of Starter Homes. Instead, local authorities must be able to utilise their understanding of local housing markets to reach agreements with developers, ensuring that planning obligations deliver homes that help meet local housing need.

Recommendations

- Local authorities should be given the freedom to negotiate planning obligations in a way that will meet their local housing need, rather than obliged to insist on a particular tenure or housing 'product'.
- The wording of Regulations in relation to Clause 4 will be important in this respect, and Peers should push for their early publication.

Clauses 13-54: Rogue landlords and letting agents

Part Two of the Bill provides greater powers for local authorities to identify and tackle rogue landlords and letting agents in England. This includes enabling local authorities to apply for orders banning people from acting as landlords and letting agents, and establishing a database of those who have been banned.

Key points

- Action to tackle rogue landlords and letting agents is welcome, but should form the first step towards a wider strategy addressing the Private Rented Sector.
- Affordability is a key challenge in the PRS, with poor private renters spending 55% of their income on housing costs.
- Stability is also important. The end of a private tenancy is the fastest growing cause of homelessness, and is the most common cause in London.

The proposed action is very welcome and may drive up standards in the bottom end of the PRS. Private renters and households in poverty are more likely than other households to live in poor quality housing, and there has been no change in the number of non-decent private rented homes over the last five years, while the number of owner-occupied and social rented homes deemed non-decent have fallen substantially over the same period (MacInnes et al, 2014).

Affordability and stability

There are 4.2million privately rented homes in England (Wilcox et al, 2015). This makes the sector larger than housing associations and local authorities combined. However, demand for private rented housing is tiered and segmented, according to the income of tenants. The measures proposed in this Bill may go some way to driving up standards in the very bottom of the sector, but they could make a bigger difference if they were part of a wider strategy addressing the private rented sector.

Affordability is a key challenge because the PRS is now home to an increasing number of people in poverty. 4.1m people are now living in poverty in the PRS, compared to 2.1m in 2002/3. Private renters in the bottom fifth of the income distribution spend the highest proportion of their income on housing costs of any group, at 55% of income (MacInnes et al, 2014)

Stability is also important, and the Assured Shorthold Tenancies used in the private rented sector offer little security of tenure. The end of a private tenancy is now the fastest-growing cause of homelessness, up by 200% in the last four years, and the largest single cause in London.

JRF's research in this area (Clapham et al, 2010) suggests that a combination of incentives for landlords combined with checks and balances for tenants could deliver increased stability for tenants. Affordability challenges can be met through increased supply of affordable rented housing, and by maintaining the housing benefit safety net. Without both of these, poverty is likely to increase.

We note that Lord Flight has tabled a new Clause to be inserted after Clause 54 to provide for the collection of tenure information when collecting council tax information. Some councils already ask residents to provide some of this information voluntarily, but the practice is not universal. As well as providing greater information to local authorities on their local private rented sector, this measure would also enable better management of those estates and neighbourhoods where former Right to Buy properties have moved into the private rented sector.

Recommendations

- Action on rogue landlords and letting agents is welcome, and Peers should push the government to ensure these are the first steps towards a more comprehensive private rented sector strategy which also addresses issues of stability and affordability.
- Collecting tenure information when Council Tax information is collected would fill an important gap in data on housing tenure.

Clauses 62-66: Implementing the Right to Buy on a voluntary basis

Government has reached a voluntary agreement with the housing association sector to extend right to buy discounts to housing association tenants. These clauses enable government to pay for the cost of discounts to tenants, and to set home ownership criteria for housing associations.

Key points

- Fewer than one in ten housing association tenants are likely to take up the Right to Buy over the next five years
- Right to Buy can be made to work for those in poverty – but only if homes sold are replaced on a **like-for-like** basis
- Replacing low-cost rented homes sold via Right to Buy with homes for sale on a shared ownership or starter homes basis does not help those in poverty – only 3% of new social tenants could afford these tenures instead.

Analysis commissioned by JRF (Clarke et al, 2015) suggest that around 1.3 million housing association tenants will gain the Right to Buy, but only around 180,000 of those will be eligible and able to afford to exercise it. Total uptake over the first five years of operation is estimated at 128,000.

If stock sold is replaced on a like-for-like basis (e.g. same tenure and location), Right to Buy and local authority 'high value' sales can eventually have a positive impact on the availability of low cost housing and on poverty.

However, if social rented homes are replaced with shared ownership or starter homes, these will not be affordable to households who would otherwise have accessed the social rented homes. Just 3% of new social tenants could afford these tenures as an alternative. Poorer households who would have accessed social housing but cannot afford these assisted ownership tenures are therefore likely to end up renting in the private rented sector. This will increase poverty and housing benefit costs.

Recommendations

- Homes sold under Right to Buy must be replaced on a like-for-like basis in order to maintain the supply of genuinely affordable housing and to contain poverty.

Clauses 67-77: Vacant High Value Local Authority Housing

These clauses enable the Secretary of State to require a payment from local housing authorities based on the market value of the 'high value' housing stock they own which would have become vacant during the year. The Conservative manifesto proposed that income from this source would fund Right to Buy discounts for housing association tenants.

Key points

- Selling off high value housing stock when it becomes vacant will have an immediate impact on the availability of homes for those in housing need.
- JRF's analysis shows that around 10% of local authority housing nationally is 'high value' for its size and region. However, the worst affected areas will see a reduction in over 50% in social housing available for letting.
- The impact also varies by the type of home. For example, our analysis suggests around 28% of all higher value sales will be bungalows.
- Public assets must be deployed wisely to achieve best value, but these decisions are best made locally by those with a sensitive understanding of local markets.
- Government must be clear about what constitutes 'high value' housing stock, and how this will be calculated

JRF's research stresses the critical importance of the availability of low-cost rented housing to containing and mitigating poverty. Research by Cambridge University for JRF found that selling off high value housing stock when it becomes vacant will have "an immediate and severe impact" on the availability of homes for those in housing need (Clarke et al, 2015). In this regard, the sale of local authority vacant stock has a more immediate and damaging affect than the Right to Buy, the impact of which is only felt much later when the property would have become available for re-letting.

Defining 'high value' stock

It is accepted that public assets must be deployed wisely to achieve best value. In this respect, Clause 74, placing a new Duty on local authorities to *consider* selling high-value stock when it becomes vacant is a reasonable measure, ensuring that assets are managed strategically, but allowing those with a sensitive understanding of local housing markets to make appropriate decisions.

However, other clauses in this Chapter will mean local authorities will effectively be obliged to sell 'high value' stock in order to fund the payment government will require them to make. The impact of this measure cannot be fully understood without government defining what constitutes 'high value' stock, and how this will be calculated.

There are three important areas on which clarity is required:

1. The threshold at which Government believes stock is of 'high value'. Is this a cash figure, a proportion of the overall stock, or some other measure?
2. If it is a proportion of the stock, at what geography will this be calculated (e.g. within a local authority, a region, or nationally)?
3. What exemptions will be made for stock which is difficult to replace, either due to its location (e.g. in rural areas) or other characteristics (e.g. homes which have been adapted for use by those with disabilities)?

The Government has defined a maximum value (a 'price cap') for Starter Homes on the face of the Bill (Clause 2(8)). It therefore seems reasonable for a 'high value' threshold to also be set out, or at the very least for draft regulations to be published.

Localised impacts

It should be recognised that there will be particular spatial impacts from this policy. Over 200 local authorities have transferred some or all of their housing stock to housing associations since 1988, involving over 1 million properties. Those areas where local authorities have retained their housing stock face the sale of a proportion of their council stock to pay for discounts on housing association stock, and loss of local housing association stock through Right to Buy.

Using indicative thresholds published by the Conservative Party during the election, analysis commissioned by JRF (Clarke et al, 2015) found that some local authorities will be particularly affected. While this analysis shows that around 10% of local authority housing nationally is 'high value' for its size and region, the worst affected areas will see a reduction in over 50% in social housing available for letting.

The impact also varies substantially between regions. Much higher proportions of local authority stock are likely to be sold off in the East Midlands, East of England and London than elsewhere. This is because the distribution of stock values across each region is different, with more variation in some regions than others.

The impact also varies by the type of home. The analysis conducted for JRF suggests that Bungalows are likely to represent 28% of all sales, despite representing only 9% of all council stock. If bungalows are particularly likely to be sold under the policy, this may create difficulties for older people and households including disabled people who need single-storey accommodation.

Recommendations

- Government should restrict action in this area to Clause 74, which represents a reasonable duty on local authorities to ensure they actively manage their housing assets.
- If these measures are to proceed, Government must be clear about what constitutes 'high value' stock, how this will be calculated, and what exemptions will be allowed. The equivalent price caps for Starter Homes are stated on the face of the Bill – the value of 'high value' stock should be defined similarly.
- Exemptions should be made for adapted stock, and that which cannot be replaced even if funding were available – such as in rural areas.

Clauses 78 – 89: ‘Pay to stay’ for social tenants

These clauses will enable the introduction of market (or near-market) rents for council tenants whose households are classed as ‘high income’. This measure has become known as ‘pay to stay’.

Key points

- Setting the threshold at which tenants are judged to be ‘high income’ will require sensitivity to avoid including households below minimum income standards.
- A ‘tapered’ approach will be required to avoid creating work disincentives.

The Bill provides the Secretary of State with a power to issue regulations and guidance to ensure that local authority landlords charge mandatory rents for high income social tenants. The scope of these rents is very wide in scope – it could be equal to market rate, a percentage of market rate or determined by reference to other factors.

Threshold and taper

The threshold at which ‘high income’ is reached will be very important. The Summer Budget suggested that this will be a household income of £30,000 outside London, or £40,000 inside.

JRF’s research shows that this proposed threshold may be too blunt to accurately reflect the differing needs of households. Each year, we ask members of the public to help us define a Minimum Income Standard, showing how much money people need, so that they can buy things that members of the public think that everyone in the UK should be able to afford. The results of this exercise for 2015 (Hirsch, 2015) show that a couple with two children would need to earn at least £20,000 each to achieve a basic standard of living. This assumes they live in social housing. By contrast, a single person household would need to earn £17,100, living in basic private rented accommodation. As can be seen, there is a large difference in the income needed to achieve a minimum income standard, depending on household composition.

A blunt threshold at which households begin to pay a market rent would create a ‘cliff edge’ disincentive for households to increase the hours, or value, of their work. The increase in rent therefore needs to be carefully tapered, as is the case in the reduction of Universal Credit as earnings rise.

The explanatory notes acknowledge that ‘vital elements’ of the policy will be set out via regulations. As is the case for the definition of ‘high value’ stock, more clarity is required. Consultation on Pay-to-Stay closed on 20th November 2015, and we would urge Peers to push for publication of draft regulations.

Recommendations

- The threshold for 'pay-to-stay' requires sensitive definition, and a taper for rent increases should be included to avoid work disincentives.
- Draft regulations relating to this proposal should be published to aid legislative scrutiny.

Clauses 113 & 114: Ending security of tenancy for local authority tenants

These clauses introduce Schedules 7 & 8 which end security of tenure for local authority tenants. In future, councils will only generally be able to grant secure tenancies for a fixed term of between 2 and 5 years.

Key points

- Secure tenancies provide important stability for vulnerable groups in the context of volatile housing markets and dynamic labour markets.
- Existing arrangements offer local authorities a range of options, and lifetime tenancies should remain available as part of this menu.

The 1980 Housing Act introduced a comprehensive package of legal protections for local authority tenants. Until that point, much had depended upon an assumption of the 'benign' nature of local authority landlords, and secure tenancies redressed this balance in favour of the tenant, reducing the power of the municipal landlord. (Carr et al, 2010).

The granting of secure tenure provides important stability to those who would otherwise be very vulnerable in the housing market. These are often the same people exposed to a highly dynamic labour market. Lifetime tenancies provide a vital element of security and can enable the creation of strong and resilient communities in which residents have a genuine stake.

It should be recognised that the use of starter/introductory tenancies is now widespread in the social housing sector, and that local authorities do have the option to issue fixed-term tenancies where they believe this is appropriate. Lifetime tenancies should remain part of the menu available to local authorities, and national intervention to phase out such tenancies is not desirable or necessary.

Clause 84: Assessment of Gypsy and Traveller accommodation needs

This clause removes the requirement for local authorities to make an assessment of the accommodation needs of Gypsies and Travellers who reside in or resort to their area. It also removes the Secretary of State's ability to issue guidance on the carrying out of these assessments and the subsequent preparation of strategies to meet their accommodation needs.

Key points

- Gypsies and Travellers are heavily excluded groups. Removing the requirement to directly assess their housing needs is likely to exacerbate the shortage of sites to accommodate this community.

The Bill removes the requirement established by the 2004 Housing Act for local authorities to make an assessment of the accommodation needs of Gypsies and Travellers who reside in or resort to their area. It also removes the Secretary of State's ability to issue guidance on the carrying out of these assessments and the subsequent preparation of strategies to meet their accommodation needs.

The former Commission for Racial Equality concluded in 2006 that Gypsies and Irish Travellers are the most excluded groups in Britain today (CRE, 2006). In the past, the accommodation needs of Gypsies and Travellers were not well evidenced, and as a result, provision was lacking. The Equality and Humans Rights Commission, in reviewing activity since the 2004 Act, concluded that the overall rate of progress was slow, but that there were a number of positive aspects emerging, in terms of the types of sites being developed, and their permanence (Brown et al, 2011).

The Bill proposes that Gypsy and Traveller needs are instead considered as part of a wider review of district housing needs. This approach, including a generic assessment of need for 'caravan sites' may be superficially attractive, but given the small size of the Gypsy and Traveller community, such a strategic assessment is unlikely to pick up this community's specific needs and provide statistically robust results for a small, heavily excluded group. Hence the need for a continued focussed assessment of this community's particular needs.

Recommendations

- The existing requirement for an assessment of local Gypsy and Traveller needs should be retained, given the small and highly excluded nature of this group.

Clause 132: Secretary of State powers on local plans

In addition to their existing power to prepare or revise overdue local plans, this clause gives the Secretary of State powers to direct a planning authority to prepare, revise or submit a local plan. Government has briefed that their intention is that local authorities will have local plans in place by 2017.

Key points

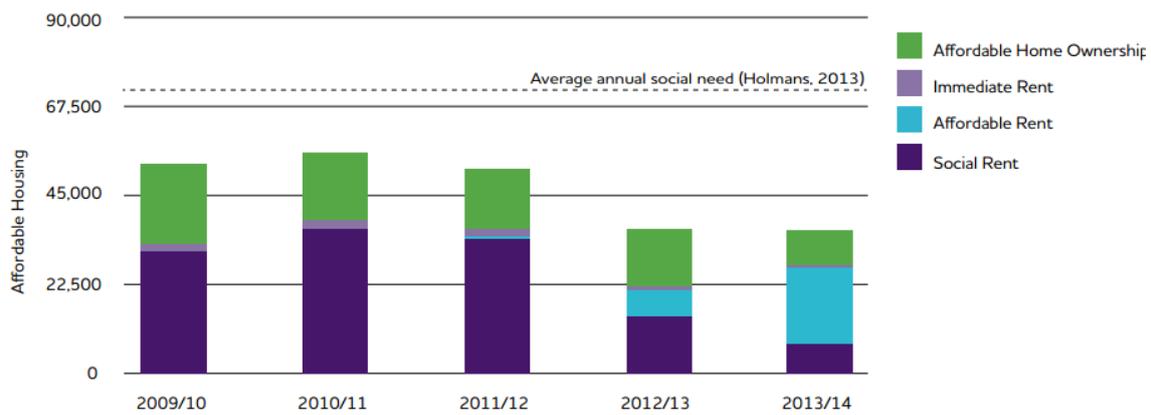
- The Government's focus on the delivery of new homes is very welcome
- Increased housing supply is required just to contain poverty at its current level, but the homes delivered must be from a range of tenures.

This clause gives the Secretary of State additional powers to direct a planning authority to prepare, revise or submit a local plan. Government have suggested these powers would be deployed where local authorities do not have a local plan in place by 2017, placing this in context of their commitment to delivering 1million new homes by 2020.

This focus on the delivery of homes is very welcome. JRF's evidence shows that we cannot contain poverty at the existing high levels unless housing supply increases to at least 200,000 homes per annum (Stephens, 2014). This is the level of supply the Government is aiming for. However, to meet demand, we should be delivering a higher figure - an average of 240,000 – 245,000 homes per annum (Holmans, 2013).

Crucially, though, these homes must comprise a mix of tenures. The most credible recent estimates of demand place the need for social housing at 78,000 homes per annum (Holmans, 2013). Social housing must continue to represent the same share of the overall housing market as it has in the past, if we are to avoid rising poverty. We are falling far short of this at present, as the chart below shows. JRF has developed a new development framework for affordable housing – Living Rents – which can meet this need, but this requires additional capital investment (Lupton & Collins, 2015)

Fig 3: Affordable Housing Completions Funded by the HCA and GLA



Source: Department for Communities and Local Government, Affordable housing starts and completions, England 2014

Creating capacity to manage growth and change

Whilst the Government's determination to see plans in places is welcome, consideration must also be given to the reasons behind the significant delays in some places. Whilst there will be complicating factors in each authority, one common issue is capacity of planning departments to manage growth and change.

Planning has been subject to considerable pressures arising from the government's growth and housing supply agendas as well as the recovery of the development industry. There may be a particular case for considering how capacity can be created to manage growth and change within planning departments.

JRF research suggests planning has seen cumulative cuts of the order of 45% (Hastings et al, 2015). Slowing the pace of the cuts would give local government and its partners sufficient time or 'headroom' to devise appropriate, strategic responses with the best chance of being effective in delivering the housing growth agenda over the long term.

Recommendations

- The Government's determination to increase housing supply by ensuring local plans are in place should be welcomed.
- The tenure of the homes provided requires focus, with 78,000 affordable homes per annum required to meet need.
- Consideration should be given to the resourcing of local planning functions, which have faced increased demand and great change in recent years.

Clause 136: Permission in principle for development

This clause enables the granting of permission in principle for land in England. Land within these zones would then only require technical

details consent to receive full planning permission. It introduces the principles of 'zoning' to England.

Key points

- Zoning is common practice around the world, though approaches vary. It is not a 'silver bullet' to land and housing shortages.
- This is a big change to the planning system, and more detail is needed on how this system will operate in practice.

Research for JRF has shown that zoning is very common practice around the world, though approaches vary in the degree of discretion available to developers once the zone has been fixed (Monk et al, 2013). It is not a 'silver bullet' for land and housing shortages, and our research identified land shortages in countries even where zoning was commonplace.

Government has stated that - at least initially – powers to grant permission in principle will be limited to sites suitable for housing use. If this increases housing delivery, it will be welcome.

It should be recognised that this marks a big change to the operation of planning in England. Whilst the Government seems to intend only selective implementation of this model at present, it will inevitably set precedents should the approach be rolled out more widely in future. More detail is needed on how this system will operate in practice, including how issues of design and sustainability will be considered, and the approach to planning obligations on such sites.

Recommendations

- More detail is required on how this system will operate in practice. It is particularly important that a clear approach is in place with regard to Planning Obligations, which deliver a significant proportion of affordable housing.

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We work for social change in the UK by researching the root causes of social problems and developing solutions. Together with the Joseph Rowntree Housing Trust, we use our evidence and practical experience of developing housing and care services to influence policy, practice and public debate.

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