

## Written evidence submitted by One Housing Group [NPP 40]

One Housing helps people to 'live better' by providing high quality homes and care. We manage over 15,000 homes across 27 London boroughs and surrounding counties, and care for over 11,500 people to help them live independently.

In the last few years we have delivered more than 1,500 new affordable homes and we plan to build a further 3,600 by 2019 to help meet the housing shortage. We offer a wide range of housing options including homes for affordable rent, shared ownership, private rent and private sale. We also make a positive difference to our residents' lives by promoting aspiration, independence and well-being through a range of training and support services.

We've given evidence for the following topics:

1. The proposals in the consultation affecting green belt land
2. Consequences of changes to the definition of affordable housing
3. The housing delivery test and its implications
4. Proposals on the use for housing of commercial land and developments
5. The timing and length of the consultation

### 1. The proposals in the consultation affecting green belt land

We agree and are pleased that the Government is looking at proposals to consider building on brownfield sites that sit within the green belt. We understand and agree that there is a need to protect the green belt and that there are appropriate measures in place to ensure that we preserve our green spaces, but we agree with Government that in some instances – as with brownfield sites that sit within the green belt- this land is not fit for purpose, and could be used for homes.

The National Land Use Database estimates that there is 500 to 600 hectares of brownfield land in the Green Belt viable for development. We would welcome the National Planning Policy Framework to be amended to allow development on this land.

The Government is keen to open this land up for starter home development, but we would argue that this land should be open to all types of homeownership tenures – including Shared Ownership, Rent to Buy, Help to Buy and a wide range of affordable tenures.

### 2. Consequences of changes to the definition of affordable housing

We would tend to agree with the Government expanding the definition of affordable. In the consultation the Government proposes to amend the national planning policy to include a range of products that can support people to enter into homeownership. We agree with this approach. However, we would stress that currently some local authorities do not follow existing section 106 agreements set out within the National Planning Policy Framework, which require local authorities to positively seek to meet the *development need* in their area. Sadly, from our experience, local need is often compromised for local politics and we've seen this happen in many of our schemes over the years.

We would urge the Government to implement a robust set of laws that require local authorities to uphold the findings for local housing need in their local plans, while considering the financial viability for developers. If these two simple, but effective policies were implemented, we have no doubt that it would decrease the cost and time associated with planning, while increasing supply.

Without a way to implement, monitor and enforce changes to the definition of affordable housing, the type and tenure is irrelevant because councils will still ultimately decide what they determine to be affordable within their section 106 agreements.

### **3. The housing delivery test and its implications**

We agree with the Government's proposal to amend the national planning policy to ensure action is taken where there is a significant shortfall between the housing need within the local plans and houses being built. We agree that highlighting the shortfall through a "housing delivery test" would help ensure that local plans are being followed and that local housing need is being met.

We also agree with the Government that there needs to be incentives for delivery and we would agree that there may be significant barriers to local authorities such as infrastructure and sustainable locations. We agree that these issues need to be taken into consideration when benchmarking against delivery rates.

The *Housing and Planning Bill* states that the Government will place a statutory duty on local councils to support the supply of starter homes, but does not indicate that they will enforce local authorities to produce the homes required set out in their local plans. We would argue that without strict enforcement in place, the Government will find it difficult to ensure that councils deliver based on housing need, rather than deliver based on local politics.

### **4. Proposals on the use for housing of commercial land and developments**

We agree that unviable and underused commercial land employment land should be allocated to build more homes and agree that "a balance needs to be struck" between making land available to meet commercial and economic needs and not reserving land which has little likelihood of being taken up for these uses.

We also agree that unviable or underused commercial and employment land should be released unless significant and compelling evidence is shown why it shouldn't be. In the consultation, government states that this unused commercial land should be reserved to build starter homes. While we agree that certainly in some areas this unused land would be well suited to starter homes, this isn't always the case and that the Government should extend the use to all affordable housing tenures.

### **5. The timing and length of the consultation**

The consultation was launched on 7 December and closes on 22 February 2016. Although we think that whenever a consultation is launched during the holiday season, there will be less participation, we understand that the Government is keen to finish the consultation prior to the Housing and Planning Bill passing in Parliament. We think the length of time given to feedback is sufficient and that the amount of questions asked is also appropriate.

## **Summary**

We support the Government's commitment to build more homes and as an organisation, we are dedicated to helping more people to realise their dream of buying their own home.

As stated above, we are generally supportive of starter homes, but would stress the need for there to be a range of affordable homeownership options and that the Government should support all affordable home tenures rather than just one.

*February 2016*