



CPRE Sussex Policy Position Statement

HOUSING DEVELOPMENT

Section 1

The scope of the problem

Every year 21 sq miles of countryside, an area larger than Southampton, disappears under new development, of which about 50% is to market housing. Opposition is mounting. We are now witnessing an increase in the number of villagers across the country who are clubbing together to protect their local countryside from developers through purchasing their green spaces. A significant increase in house building would accelerate this loss, spoiling the fundamental character of the countryside. An independent body advising the Government reported at the end of October 2007 that 27,000 extra homes per year, above the Governments' 3 million target by 2020, will be needed to avert a housing crisis that could see an entire generation unable to get on the property ladder. This plan could have horrendous consequences in terms of environment, landscape and quality of life.

New housing development is the largest single consumer of Greenfield land in the UK. In 2003, undeveloped land lost to housing amounted to 250ha (21,000 homes) Population rise combined with the growing trend for smaller households as more people opt to live alone, is fuelling the need for more housing. There is now a mismatch of supply and demand. Considerable concern has been raised by the Government's independent inspectors' official report on the viability of the South East Development Strategy. It has concluded that a massive increase in new houses – from 28,900 to 32,000 every year for the next 20 years - cannot be sustained. Their recommendation is 28,900 and no more.

Nowhere is the UK Government's housing strategy more crucial and contentious than in

the South East. The South East region has witnessed one of the sharpest rises in house building on the Green Belt - the Labour Government has already presided over a 60% increase in house building on the Green Belt. In fact, the pressure for new housing in the SE is more intense than in any other region of the UK. This volume of new housing development represents a severe threat to both the countryside and the environment in a region where the capacity of the environment is being stretched to the limit. It poses a serious challenge to the character, beauty and tranquillity of the region's countryside. Severe environmental damage from increases in greenhouse gas emissions, higher levels of noise and pollution associated with traffic growth, threats to wildlife, increase flood risks and damage resulting from quarrying and the construction of new water resource will create major problems for rural areas. In its housing plans, the Government is failing to consider the associated key issues of water management, the likelihood of EU landfill targets being exceeded and the need to increase sewerage capacity.

More specifically, land that was supposed to be protected from large scale development has faced a sustained assault from the Government. A Government Think – Tank states that 2 million new homes will have to be built on the Green Belt in order to meet Gordon Brown's pledge to build 4.2 million new homes by 2026. Policies for the provision of new housing based on the simplistic consideration of household projections and market demand will continue to produce too many executive homes on Greenfield sites, way beyond the financial and physical reach of those in need of affordable housing.

The Green Belt – the planning’s gold standard for holding back urban sprawl and protecting the countryside - is under increasing threat from developers. The economist Kate Barker has recommended that Britain build an extra 140,000 houses a year and she argues for the Government to rethink the whole GB approach, encouraging cities to build out into the countryside including parts of the Green Belt. At the end of October 2007, Natural England the official body charged with protecting the English countryside, announced that the sanctity of green belt land should be questioned. Once some building is allowed, it would be difficult to control. Over the last 20 years, universities, business parks and housing estates have eaten away at the Green Belt. Looking to the future, the Government’s acceptance for an urgent increase in the number of affordable homes in the UK will place serious and unacceptable pressures on rural areas.

In recent years there has been a proliferation in the practice of the emotionally charged issue of “Garden grabbing or backland development” and Sussex has not escaped! This development tends to particularly affect suburban areas with high house prices and the end result is often upmarket rather than affordable homes. Complaints from the public include dismay at the government’s definition of brownfield sites, alarm at the way planning authorities apply the rules and revulsion at the type and style of properties being built by developers. A taste of applications includes turning a space of 100 metres into blocks of 52 flats.

Planning Policy Statement 3 makes it clear that not all brownfield land is suitable for development, and sets out a comprehensive range of criteria which development proposals should follow.

With Global Warming issues to the fore it is vital the housing developments meet sustainable criteria but this does not always happen as developers strive to maximise their profits. Incorporating energy efficient measures into homes to make them more ecofriendly is, regrettably, often overlooked.

Section 2 Central and Local Government Planning Policy

PPS3 Housing was developed in response to the recommendations in the “Barker Review of

Housing Supply” (2004). The Government says that it wants a step change – a big increase – in the building of new homes. It outlines the Government’s commitment to improve the affordability and supply of housing in the community, including rural areas. It seeks to provide high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages. The total number of homes planned in the Regional Spatial Strategies in England is 203,000 per year. Gordon Brown is keen to see swathes of new estates, not only in regeneration areas but right across the South East.

The Government’s objective is to ensure that the planning system delivers a flexible, responsive supply of land. Reflecting the principles of “Plan, Monitor, Manage”, Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that suitable land is available to achieve their housing and previously developed land delivery objectives (60% on Brownfield sites). In an effort to tackle the problem of empty homes in the UK, the Government announced at the end of October 2007, a £510m fund to help bring empty homes back into use. At the same time, in an attempt to increase the number of new homes, it announced that it would give to those local councils intending to build the most new homes, additional funding - £1,100 per home.

Natural England, the official body charged with protecting the English countryside, accepts the Government’s endorsement of household projections for 2020 and the government’s 3 million homes target.

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CPRE Sussex believes that the Government’s housing policy needs to have more joined up thinking - rather than focusing on sheer house numbers in an ad hoc manner. Instead it should consider the question of whether any new development will impose an unacceptable strain on services.

CPRE Sussex believes that any planning for new houses should be based on careful judgements about environmental capacity and social need to ensure that more affordable

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housing is delivered in the right places at the right time.

CPRE Sussex is opposed to Government changes to the planning system which requires councils to release more land for housing development in high price areas – it heralds a free for all in the countryside. We urge the Government not to accept the proposal to increase the number of houses in the South East.

CPRE Sussex strongly supports the increasing development of housing on previously developed brownfield land in both rural and urban areas. This will in turn help protect the countryside and promote urban renewal. Currently in England there are 27,000ha of Brownfield sites available which could in turn provide 1 million homes at a density of 40 per ha. We consider it essential to increase the national target for new housing on brownfield land from 60% to 75% or more. (On a positive note, the target of 60% of new homes on Brownfield sites was reached in 2000). We need to make much better use of land and buildings, supporting policies which attract developers and householders back to neglected urban areas and further develop policies which make previously developed, brownfield sites more attractive to house builders. (addressing the VAT anomaly)

CPRE Sussex welcomes the plans for improved capturing, for the benefit of the community, the windfall gains of land which accrue to landowners when planning permission is granted.

Whilst Sussex does not have any Green Belt land, CPRE Sussex believes that any Green Belt reform must be delivered in the right way it may be more acceptable to reassess land for potential development at the boundary of the Green Belt rather than within the Greenbelt. We are opposed to the release of greenbelt land – the virtue of the permanence of the green belt is what makes it so effective.

CPRE Sussex believes that in certain circumstances building on the edge of towns/cities may be acceptable when it stops the process of leapfrogging into the countryside proper leading to more commuting, congestion and pollution.

CPRE Sussex believes that good planning is needed to ensure that the right homes are delivered in the right places. It recognises that

there needs to be a substantial increase in subsidised, affordable housing in villages and market towns. (CPRE is a supporter of the “Affordable Rural Housing Charter.”) We accept that more affordable housing is critical to allow for the projected growth and economic output of underperforming localities.

CPRE Sussex believes that the house building industry should adopt a design-led approach in order to produce both better designed and better built homes. The houses should contribute to the local distinctiveness of the area – fostering a sense of place and minimising the demands on the environment – enabling special features such as wildlife habitat and open spaces to be retained. At the same time, developments must provide better houses at higher densities in sustainable locations close to employment, shops, schools and public transport. The house building industry should be urged to increase the proportion of brownfield land in their landbanks and prioritise development of these sites in line with Government policy.

CPRE Sussex supports policies aimed at increasing the supply of subsidised housing for people on low incomes. The downward trend in the number of such homes must be reversed – only 17,500 affordable homes were built in 2005 compared to 150,000 per year in the 1950’s. The aim should be to secure the greater provision of smaller, more affordable housing and help increase the average density of all new housing to 50 dwellings per hectare or more. We must actively support the use of the “one –for-one” policy, set out in the Rural White Paper, by local authorities to enable a higher proportion of affordable housing to be provided on sites identified for residential development.

CPRE Sussex sees its role as working with local planning authorities to specify the provision of a wider range of different sizes and types of housing – on all sites to meet the needs identified in local housing need surveys. At present house builders tend to supply for the upper end of the market. We urge the development of mixed housing developments and integrating it more effectively in terms of appearance and location. We would discourage the development of large scale, single tenure housing estates while supporting the policy of not providing an excess of open market housing.

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CPRE Sussex supports policies that would improve the planning and provision of infrastructure which should accompany needed housing growth. The rapid development of housing without sufficient supporting infrastructure could lead to even worse congestion and more environmental and social problems which would in turn choke off growth in the South East. More public money must be found to provide this necessary infrastructure – especially for transport.

In CPRE Sussex's view, designating gardens as Greenfield sites would add a layer of complexity to what is already a complex planning system: the logistics of separating residential sites into part greenfield and part brownfield are formidable. A better alternative, we suggest, would be for planning authorities to strengthen local planning policies designed to protect the character of residential areas. This will increase their chances of decisions being supported at appeal and let developers know the kind of schemes that are likely to be granted permission – or not. This means having the right policies in place, investing in staff with the necessary skills and expertise, and monitoring: everyone should know exactly how much development takes place, or is prepared to take place, on gardens.

CPRE Sussex strongly sympathise with the aims of the Land Use (Gardens Protection) Bill, and support the principle of giving "special regard to the desirability of preserving gardens and urban green spaces." We oppose random, speculative development affecting gardens. Our preference is for development to be planned and co-ordinated, rather than piecemeal. Local planning authorities must assess how robust their planning framework is for guiding planning decisions affecting gardens – at least in areas where this is, or is likely to become, an issue. Where decisions have not been supported at appeal, councils should consider strengthening the local planning framework. This will require putting policies in place, including guidelines on backland development, and preparing supplementary planning documents to support them. Planning departments should ensure they employ sufficient numbers of planning staff who possess strong drafting, design, negotiation and advocacy skills.

We are concerned that there are far too many empty homes in the UK – On the 1st April 2006 this number reached 663,000. This large

surplus could be used to reduce the threat to the Greenbelt and other rural areas.

We believe that decisions about future development should be made on the basis of locally agreed development plans and policies drawn up in the light of local knowledge and aspirations. If there is to be some development on private gardens in residential areas then it should be planned for and serve the overall public interest - rather than merely serving the interests of backland developers and the home-owners who sell their properties to them. However, we believe that the development of existing brownfield sites should be able to meet the district-wide housing density targets without the need to damage the character of residential areas by allowing developments on gardens.

CPRE Sussex supports the use of building aggregates from local sources as far as practical in order to minimise the problems linked to the transport of large volumes of materials.

CPRE Sussex supports the development of sustainable and eco-friendly houses to help meet the UK's carbon reduction targets. It is important that all new houses are well designed with high levels of energy efficiency measures incorporated into them before addressing renewable energy options. Architects/ Developers should follow the Code for sustainable housing which includes strategies for energy, water efficiency, material specifications, surface water and waste reduction, pollution and ecology. As far as possible Level 4 (Excellent) of the code should be adopted which implies an improvement on current energy standards of 44%. In terms of the existing housing stock, it is vital that their CO₂ emissions are cut to help offset the higher CO₂ costs associated with building new houses. Policies that favour refurbishment rather than demolition will also be more sustainable. For this to happen there needs to be fiscal reform which addresses the anomaly of VAT being charged on refurbishing old buildings and not on new builds.

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Section 5 What can you do?

When a housing planning application has been submitted in your district, use the following checklist to see whether you should object and what planning guidance backs up your decision:

Refer to one or more of the following planning guidances - your local plan/ local development framework/ SE Plan/ East Sussex/Brighton and Hove/ PPG9 –Government Regional Planning Guidance.

Consider the following questions:

Site

Is the site Greenfield; has it been subject to an urban capacity study or a housing availability assessment; is there sufficient brownfield capacity for the district allocation of new housing; is the district on target with its housing trajectory; did the CPRE object to any previous proposals for the land, is the local job situation on balance with the additional housing proposals?

Situation

Should an Environmental Impact Assessment be conducted; is any of the development area covered by landscape designations; is it in a Conservation Area and are any listed buildings affected; will the development adversely affect noise levels, light spillage or tranquillity; will there be a significant loss of trees and hedgerows and will local important views be affected; are there any wildlife considerations; are there issues linked to flood risk and air quality; will there be access to public services, good pedestrian/cycle routes and public transport; are you satisfied with the increase in traffic that would arise and the affect on rights of ways; is the density of dwellings in accordance with PPS3; does the site layout promote sustainable communities, high quality design, adequate services, help alleviate social

deprivation, and is affordable housing included in the proposal?

Sustainable housing

You can reduce your carbon footprint by introducing energy saving measures into your home. These can include energy efficient boilers, double/triple glazing, roof /wall insulation low energy lights both inside and outside and energy efficient white goods.

Reading

Planning Policy Statement 3 (PPS3) Housing Nov 2006 – Communities and Local Government.

Building on Barker – a CPRE Report Jan 2005
Housing the nation – a CPRE Report Nov 2004

Web Sites

CPRE National Office planning help website

<http://www.planninghelp.org.uk/>

See also the CPRE Sussex planning guidance download

<http://www.cpresussex.org.uk/planning/planning-for-future-index.htm> (click right hand yellow box)

Green guide to housing specifications

www.bre.co.uk (Building research establishment)

Best options on building materials – see Lambeth Council web site

Sustainable Development Commission