

Opening the Door

Good Quality, Available
and Affordable Housing
in the East of England

March 2023





A thank you goes out to all council members, officers and wider partners who were involved in the engagement on and production of this report.

Your support is greatly appreciated.

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1 Introduction

1.1 Foreword

Housing is one of the biggest challenges we face in the East of England. Uncertainty, in both policy and in the wider geopolitical context, has created a difficult environment for developers to plan within. In addition, the downturn in the housing sector precipitated by the cost-of-living crisis and the war in Ukraine is only likely to make this issue even more difficult to grasp in the short to medium term.

Nevertheless, the issue must be handled. The East of England is the fastest growing region in terms of population in England, and new homes must be built to accommodate this population growth. Be it for new professionals moving into the area to fuel our growth industries; for those struggling to get onto the housing ladder and the stability it provides; or, for the children of residents who want to live locally and take advantage of the East as a great place to start their careers and maybe even families of their own.

If we do nothing, then the risks are great. A generation of professionals could be priced out of homes, homelessness may continue to rise, and the huge costs of temporary accommodation will continue to be felt across local authorities. These risks need to be headed off to ensure a sustainable public sphere.



Cllr Graham Butland
Chair of the Infrastructure and Growth
Panel and Leader of Braintree
District Council

We are pleased to see that central Government recognises the importance of this issue and trusts local authorities to be part of the solution by making it clearer that the targets that exist are advisory and can be adjusted in the face of exceptional circumstances. But we can go further than this, and this report highlights a series of recommendations being made to facilitate housing development here in the East of England.

1.2 Executive summary

Our recent report “Levelling Up the East of England” demonstrated how all 12 Levelling Up missions and our regional 13th mission of climate change must be taken together if we are to:

- Address existing and worsening inequalities.
- Put the region on a firmer footing so there is much more equal opportunity for economic growth and quality of life.

The chapter on the housing mission in our Levelling Up report provided an initial assessment of the current position in our region, which merited more detailed analysis.

This report, Opening the Door: Good Quality, Available and Affordable Housing in the East of England, has been produced to examine the current and historical context with respect to housing in more depth, both nationally and across the East of England.

It analyses the complex range of factors affecting the availability, quality and affordability of housing solutions for our people and communities and proposes what is needed to address the significant challenges and barriers we face as a society, and as the local government sector.

The provision of sufficient and suitable housing is:

- One of the primary determinants of health and wellbeing.
- The key to unlocking economic potential for people, businesses and places.
- A central feature of how we plan and design our communities.

The report sets out the stark realities of the scale of the housing crisis we are facing.

With a cumulative deficit in house building over several decades, an 8.3% increase in the population of the East of England in the last 10 years, and a declared climate crisis, this now requires urgent action.



A concerted effort is needed by all key players, as demonstrated in the summary table of recommendations below, and a combination of solutions is the only way forward. This will require interventions in areas such as workforce, regulation, policy, funding, and leadership.

Central to all of this is the vital role of local authorities – as the place makers and planners, the conveners and custodians of communities, and the bridge between central Government policy and locally successful implementation.

This report is a call to action for a new era of housing delivery in the East of England, and beyond.

The East of England local government sector is ready to lead the way, accelerate housing delivery in our region, and provide a much better deal for our residents.

1.3 East of England Housing Statistics



There has been a deficit of perhaps as many as 4.2 million homes constructed nationally over the past 40 years.



As many as 236,000 sites in the East of England with planning permission in 2022 had not been built yet.



The number of social homes built in the East of England fell by 85% between 2010/11 and 2021/22, from 4,652 to 661.



The average price of a house in the East of England was £363,779 in 2022; up from £104,203 (Adjusted for inflation) in 1997.



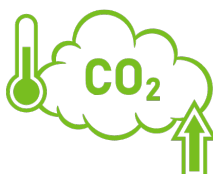
House prices are currently 10.5 times the average salary in the East of England, twice what they were 20 years ago.



Local Authority spending on temporary accommodation in the East of England quadrupled between 2011/12 and 2021/22.



As of September 2023, 6,720 households in the East of England were in temporary accommodation.



In 2021, the residential sector accounted for 19.9% of all carbon dioxide emissions in the UK, mainly through their gas heating and cooking.



According to the RTPI, planning department budgets in the East of England shrunk by around 20% between 2009/10 and 2020/21.

Barrier	Recommendations	Outcome
Resources	<ul style="list-style-type: none"> • Greater and ambitious long-term funding for local authorities to engage in housebuilding; particularly focussing on diverse tenures catering to those who need genuinely affordable and social housing. • Change regulations to enable greater involvement of local authorities in housebuilding projects, such as allow local authorities to keep more of their Right to Buy Receipts. • Increased flexibility on setting planning fees and reduce regulation limiting how the proceeds of housing-related funding can be spent. 	A sustainable programme of housebuilding, aimed at constructing affordable tenures.
Homelessness and Temporary accommodation	<ul style="list-style-type: none"> • Stimulate the housing market to enable more housing and reduce reliance on temporary accommodation. • Boost wellbeing support and practical support for homeless individuals, families, or migrant groups, such as mental health, housing, and transitional support to move them back into more stable accommodation. This includes accommodation-based support and prevention-orientated support to reduce the need for temporary accommodation. 	Better preventative services to reduce homelessness and cater to the needs of marginalised groups, and a more affordable approach for local authorities.
Workforce	<ul style="list-style-type: none"> • Establish a regional dialogue on workforce standards and raise the attractiveness of planning as a profession. • Encourage the training of the next generation of planners through a Skills Strategy and commensurate funding, along with career development opportunities across the region. • Recruitment and training should be considered at scale, taking an approach such as the recent Local Authority Building Control Scheme. 	A sufficient number of housing / planning officers to sustain the demand for these professions in the East of England.
Community engagement	<ul style="list-style-type: none"> • Create a more effective narrative for public engagement about the critical importance of housing on health, wellbeing, homelessness and children's education. • Advocate on behalf of community led housing, and promote how the use of rural exception sites can be used to engage with rural groups who may be resistant to high-level developments. • Gather information about interest and demand for different types of affordable housing (I.E. intermediate affordable housing as well as affordable rented) to inform strategic plans 	A planning system that respects the wishes of local communities – and local communities that understand the importance of housebuilding.
Infrastructure	<ul style="list-style-type: none"> • Infrastructure and public service investment – such as health, blue light, and education services - need to precede, or be developed in parallel with, new conurbations or communities. • Greater strategic oversight would be useful to enable infrastructure projects to be joined up with housing need. • Enable local authorities to make proactive applications to the newly developing Infrastructure levy to fund the construction of infrastructure that will open up sites for housing development. 	This will see infrastructure being integrated more fully into housebuilding at the planning and delivery stage, rather than after the fact.

Barrier	Recommendations	Outcome
Developer Build-out rates	<ul style="list-style-type: none"> Local authorities will need capacity to monitor and enforce any system of penalties as proposed in the NPPF consultation. 	Faster build-out of private developments, boosting the number of new homes entering the market year-on-year.
Empty / inadequate Dwellings	<ul style="list-style-type: none"> Give local authorities greater tools to dissuade empty dwellings, such as stronger council tax penalty, to boost the availability of housing for local communities. Give local authorities the power and resources to investigate poor quality rental accommodation in their area. Local authorities should be given the resources and authority to bring empty properties back into use as temporary accommodation or affordable housing. 	Stronger optimisation of dwelling stocks in favour of local communities.
Climate Change	<ul style="list-style-type: none"> There needs to be a priority towards making new homes EPC A-Rated, and to retrofitting of existing housing stock. Sustainability should be at the forefront of the East of England's housing agenda, particularly around water usage. To facilitate this, the construction sector needs to make more ready use of existing sustainable construction methods. Greater information and capacity to access any grant funding available for energy efficiency improvements, including for temporary accommodation stock, reducing bills for customers and the council, and future proofing stock. 	A new wave of sustainable, low pollution and low emissions homes fit for a net-zero future.
Accountability and Oversight	<ul style="list-style-type: none"> The Planning Inspectorate needs more funding – but this must be matched with far stronger accountability. 	A well monitored system that enables better internal feedback.

2 Scale of the crisis: Context and analysis

As England enters 2023, there is a housing crisis. The reasons for this are complex and multi-factorial, and the scale of the crisis is huge.

The scale of the challenge is heightened due to how housing interacts with a variety of other areas of policy and practice, such as homelessness, sustainability, health, transport links, migration and the local economy. The existing cost-of-living crisis undermines the ability of aspiring homeowners to save for a much-needed deposit.

Furthermore, those in receipt of benefits are limited from achieving a settled home due to elements such as the benefit cap, the bedroom tax, and Local Housing Allowance rates being out of step with market rents.

In this chapter, we will examine:

- The scale of this crisis in the East of England.
- Its impact on other areas of policy.
- How housing, its construction, and the associated infrastructure to support new communities has become one of the most important areas of practice for councils.



2.1 Housing undersupply

The housing crisis has many potential contributory – it is not a straightforward problem to solve and does not lend itself to an easy answer. However, by noting what has happened during the second half of the 20th century and the start of the 21st century, an attempt can be made to identify how certain decisions, conditions or processes could have led to the situation being faced today.

The first issue is an undersupply of housing. It is important to note that for all the technology and productivity gains of the past few decades, housebuilding peaked in the 1960s, when 300,000 homes were built every year between 1964 and 1969; more than twice as many per year as the average number of homes built per year for the last 10 years.

However, after 1980, local authorities stepped away from housebuilding, due to reductions in the level of subsidy¹, restrictions on their ability to spend on housing, and the encouragement of social housing tenants to purchase their local-authority-owned homes².

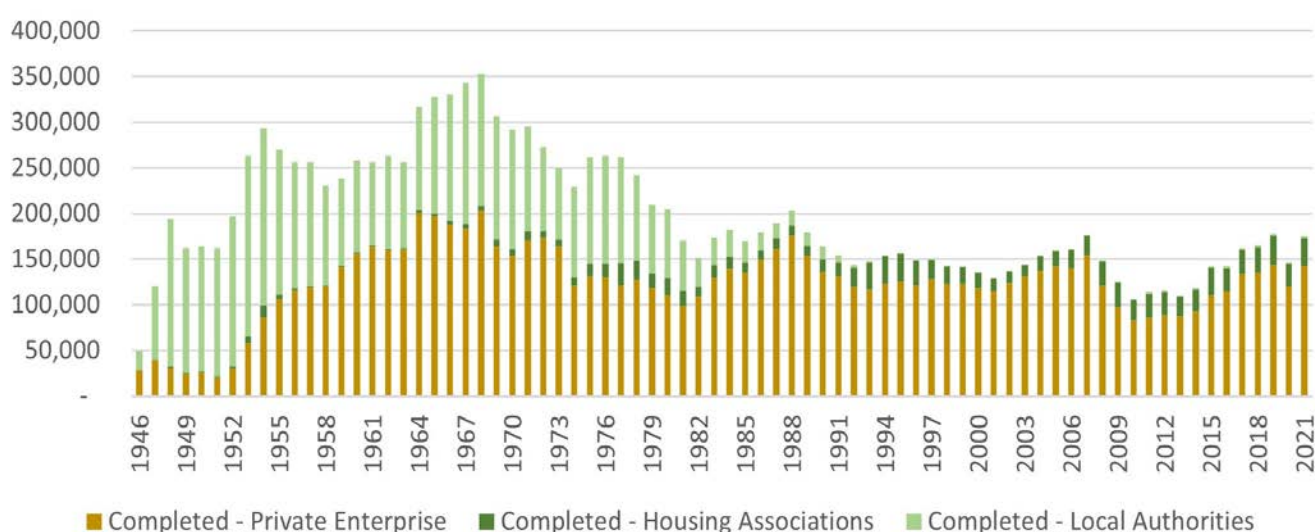
Because of this, the number of homes being built by local authorities dropped considerably, and total housing figures have not recovered, despite the small-but-significant efforts of housing associations and other registered providers.

This deficit has added up over the course of several decades. While the metric used for the graph below consistently underestimates the number of dwellings completed in a given year, it suggests that England is missing out on roughly 100,000 homes a year, assuming that previous housing numbers had held the rough average figure for the whole of the 70s. Multiplied by the 42 years between now and then, and the resulting number of lost homes is a staggering 4.2 million; more than the number of homes that have been built in total between 1992 and 2022 combined. For the East of England alone, between the years of 2000 and 2020, this represents a loss of 273,000 homes, assuming our proportion of the homes built in the UK remained the same.

¹[Capital Economics - 2019](#)

²[House of Commons Library - 2022](#)

Total New Housing divided by Sectoral Share



2.1 Lack of Alternative Tenures

Another reason for the housing crisis is the lack of alternative tenures. It is not just that there is not enough housing, but rather that affordable housing prices and rent are no longer seen as a priority in policy.

A total of 59,175 affordable homes were built nationally in 2021/22³, approximately 25% of the total net additional dwellings for that year⁴. Of these, a total of 7,216 affordable homes were built in the East of England in 2021/22, representing 26.3% of all of the homes built in the East of England, and more than the England per-capita average⁵. However, when discussing housing, the term “affordable housing” can feel like a misnomer. For example, one definition of “affordable” means that the property is either sold or rented for 20% below the local market rate⁶. Given the current ratios between wages and average house prices (something that will be expanded upon later in this chapter), 20% is not enough to bring house prices back to what would be considered historically affordable post-war.

Furthermore, social housing numbers, the cheapest kind of household for tenants, have dropped markedly; completions have dropped markedly in the last 10 years both regionally and nationally.

Homes for social rent are typically funded one of two ways – through Government funding, or through S106 agreements with developers. However, the Affordable Homes Programme, through which most funding for social housing is received, was cut by 60% from 2012 onwards. This has had a clear impact on the number of social houses under construction nationally. In the East of England, the number of homes built for social rent fell from 4,652 built in 2010/11 – down to just 661 homes built in 2021/22, the most recent year data is available for. This is a pattern reflected at the national level.

Perhaps even more starkly, this level of social home building is not even meeting the replacement rate for social homes. According to Shelter, there has

been a net loss of 135,000 social homes for the decade between 2010/11 – 2019/20⁷. This means that for every new home that was built in the last 10 years, nearly two have been lost.

Rather than just being a question of equity, this lack of divergence in tenure also impacts on how the housing market functions, and it precludes the introduction of greater supply into the system. In 2018, the Government investigated the reasons why developer build-out was so low. The subsequent “Letwin review” found that part of the reason why housing was so slow to fully integrate into the market was because of the “homogeneity of the types and tenures of homes on offer”. Therefore, if the Government is serious about ensuring that more houses enter the system and go to market at the same time, it is important that the Government enables the development of more than just private-sector for-sale properties⁸.

Finally, a problem with availability of tenure is that the rental market is suffering just as greatly, if not more so, than the housing market. The quality of rented accommodation is by no means universally high, and there have been several, recent high-profile examples of rented homes being deemed extremely low quality. Combined with their often-high price to rent, it can have the impact of locking people into substandard accommodation, with no ability to save and escape it.

More recently, interest rate increases and tax changes mean private landlords are looking to sell their properties, reducing the number of homes available for rent. They are also requiring higher rents, or guarantors for tenants, reducing the availability of privately rented stock available for use for those on lower incomes, making it more difficult to escape homelessness or home precariousness.

³ Gov.uk - 2022

⁴ Gov.uk - 2022

⁵ Gov.uk - 2022

⁶ Commonslibrary.parliament.uk - 2022

⁷ Shelter - 2021

⁸ Gov.uk - 2018

2.3 Availability of Loans and Finance

An undersupply of housing is not the only issue. Another reason for the housing crisis is the increase in capital made available to house buyers.

In short, mortgages became more readily available, at lower interest rates, and at increasingly high ratios compared to wages over the past 30 years. This boosted house prices through the 1990s and noughties, until 2008, where the ready availability of mortgages was curbed in the wake of the 2008 financial crisis⁹.

This has led to a problem whereby it takes increasingly bold guarantees from central Government to enable banks to make the kind of loans required to help first-time buyers onto the housing ladder. In addition, prohibitively high

deposits are required even to access the kinds of loans needed to buy a starter property. These high deposits are being asked from those generational groups who have not seen their wages rise higher than inflation and have been disproportionately impacted by Covid-19; all of which have made it much harder to save at the same rate as previous generations. This makes it disproportionately difficult for first-time buyers to enter the market.

⁹[UK Collaborative Centre for Housing - 2019](#)



2.4 The Impact of the Housing Crisis

The outcome of these various processes has had a clear impact on house prices. Average house prices in the UK have risen year on year, far faster than inflation, and now stand at £294,329 nationally in December 2022¹⁰.

Once adjusted for Consumer Price Index (CPI) inflation, this means prices have risen from £221,602 in December 2012, and from £166,083 in December 2002. The picture for the East of England is particularly striking, as the average house price here was £363,779 in December 2022; nearly 25% higher than the national average and up from £104,203 (adjusted for inflation) in 1997¹¹.

Furthermore, and perhaps more importantly, houses are becoming less affordable in relation to average salaries. Due to stagnant wages, and above-inflation increases to house prices, the latest data suggests that average house prices are now 9.1 times the average workplace-based annual earnings; up from 3.5 in 1997¹². This is especially pronounced in the East of England where over 80% of local authorities have a price-to-earnings ratio over the national average, and the average affordability ratio is 10.5; twice the figure it was in 2001. This issue has also fed into the rental market as well, with the East of England having the 3rd highest rent rates on average, behind only London and the South East¹³.

The impact of the housing crisis can be felt on nearly every area of policy. On a direct level, the failure of the housing market to generate enough affordable homes can be linked to homelessness levels in the UK – discussions with partners in our region have returned to this theme time and time again, citing homelessness as a fundamental failure of housing policy.

There are 27,480 households in the East of England assessed as owed a duty under homelessness legislation, defining them as either homeless or at high risk thereof. Nationally, the number of people owed a prevention or relief duty under Homelessness legislation increased by just under 8,000 in 2021/22, up from 270,000 to around 278,000. Meanwhile, the number of rough

sleepers in the East of England was estimated to be 285 in Autumn 2022, slightly up from 276 in 2012¹⁴.

This places pressure on local authority budgets, as temporary accommodation must be found for these individuals when more permanent lodgings cannot be achieved.

As of September 2023, 99,270 households were in temporary accommodation in England; 6,720 of which were in the East of England, the third highest after London and the South East. This is part of an upward trend, with households in temporary accommodation increasing year-on-year since June 2011, where 48,330 were in temporary accommodation¹⁵.

This figure is extraordinarily expensive for local authorities to manage. In 2021/22, it cost local authorities just over £1.4bn nationally to provide temporary accommodation, up from only £545m in 2011/12; an increase of around 200%. In the East of England, the amount spent on temporary accommodation has risen from £15.4m to £61.2m; nearly quadrupling in 10 years¹⁶. This figure does not include the administration costs associated with providing this temporary accommodation, which would push the 2021/22 national figure to nearly £1.6bn.

This demonstrates that while there has been an increase in the number of individuals in temporary accommodation, the increase has not risen in line with the increase in cost of temporary accommodation. It is therefore not just an increase in demand, but an increase of the cost of supply.

¹⁰ [ONS.gov.uk - 2022](https://ons.gov.uk)

¹¹ [ONS - 2022](https://ons.gov.uk)

¹² [ONS.gov.uk - 2022](https://ons.gov.uk)

¹³ [ONS.gov.uk - 2022](https://ons.gov.uk)

¹⁴ [Gov.uk - 2022](https://gov.uk)

¹⁵ [House of Commons Library - 2023](https://houseofcommonslibrary.org)

¹⁶ [Gov.uk - 2011 - 2022](https://gov.uk) (Data only available for local authorities who filled out their outturn)

Temporary Accommodation - What's the trend?

It is worth noting that the latest data available on temporary accommodation numbers ends 30 September 2022, and the latest costing data we have comes from financial year 2021/22.

However, we have heard from member authorities that the number of households in temporary accommodation has increased markedly even since then.



One local authority indicated that in November 2022 they had 360 households in temporary accommodation, up from 321 in September 2022.



Another raised that they had 565 households in temporary accommodation in early 2023, up from 469 in September 2022.

It is therefore no surprise that one local authority officer in the East of England reported that, when it came to budget-setting meetings, “adult social care and the cost of temporary housing are always the two main headings.”

This also impacts on the wider socioeconomics of a given area. Higher house prices provide an active disincentive for the best and brightest to move to the area to start new businesses or contribute to the East of England’s world-leading economic clusters. It also can price-out the key workers needed to keep the region’s public services running smoothly. Likewise, it can make it harder for individuals brought up in the East to buy a house where they were born and raised, providing an incentive for more skilled individuals to leave the area.

Finally, there can be environmental impacts of housing policy. It is important that housebuilding is prioritised, but this housebuilding needs to be to a sustainable standard. In 2021, the residential sector accounted for 19.9% of all carbon dioxide emissions in the UK, mainly through their gas heating and cooking. It is therefore important that the retrofitting of older homes, and the high-tech provision of alternative heating solutions in new homes, be used to maximum effect to avoid the negative outcomes that may arise should the effects of climate change continue to exacerbate.

How do we solve It?

Given the scale of the ongoing housing crisis, it is unsurprising this has received a great deal of ongoing attention, from local authorities, the media, and from central Government itself. The Government’s ambition remains for the UK to build 300,000 homes per year; an ambition that is to be welcomed.

In this report, the barriers to housebuilding will be examined, along with potential approaches to overcoming these barriers; particularly those approaches and interventions that local authorities could utilise to assist central Government in achieving its objective.



3 Barriers to Addressing the Housing Crisis

Below is a list of some of the key barriers to addressing the housing crisis. These have been highlighted in consultation with EELGA's member authorities and other key stakeholders:

3.1 Resource and Tenure

The last time that 300,000 homes were being built a year – per the Government's current ambition – there was significant state action within the housing sector. Local authorities built approximately a third of all homes, and central Government provided generous subsidies for the construction of this housing¹⁷.

The situation now is very different. Local authorities are still reeling after a considerable period of austerity, external shocks, and price pressures, all of which have impacted on their ability to spend on anything outside of core, statutory services.

Many local authorities are not involved with building their own properties at all, and within the East of England, 20 authorities owned less than 200 houses each in 2021, the threshold for owning a Housing Revenue Account and being called a "stock owning authority". Housing associations have stepped up to provide expertise and housing and have been building an increasingly large number of homes, with organisations such

as the Association of South Essex Local Authorities working closely with housing associations in their area to address barriers and develop solutions. However, there is scope for greater investment.

As explored in chapter one, the number of social houses in circulation, and being built, is much lower than the high rates seen earlier in the century, despite the modest increase in the number of homes being built by housing associations over the past decade.

However, it is not simply about social housing and genuinely affordable housing. It's about making sure that homes are being built to cater to the future. With increased home-working, ensuring that new homes have studies, or dedicated places to work, will be crucial for maintaining wellbeing, and adapting to the future.

Addressing the housing crisis is not going to be cheap. However, while private developers have an integral role to play in this, the last 40 years have highlighted that they alone cannot build the number of houses needed.

¹⁷[Capital Economics - 2019](#)



3.2 Workforce

Planning department budgets have shrunk by 43% on average between 2009/10 and 2020/21, and while the East of England has protected more of its spending compared to other regions, it is still a drop in funding in both absolute and real terms, of around 20%¹⁸. Combined with high inflation, and a shrinking workforce, this has led to planning departments across the country facing increasing amounts of work with fewer resources, with teams being unable to deliver a prompt and effective service.

However, long-term, long-standing features of the profession must also change. Planners in the region highlighted some of the difficulties of their role, where they “can do no right” in their decisions, often caught between either aggravating the developers needed to build homes or souring their essential relationship with councillors. It is a stressful, conflicted, job, and it is only getting more difficult, with less funding, fewer flexibilities compared to a now-more-generous post-covid private sector, and an ever-more-complex planning system to work within.

In total, this has contributed to a 25% reduction in planning officers across England since 2009¹⁹.

This is a widely recognised problem across the public, private and voluntary community sector, with everyone agreeing that local authority planning departments are struggling. The overall weight of workload is driving planners into the private sector or leading them out of the profession entirely. This is forcing planning authorities to make use of agency staff within their planning departments, an increasingly expensive option.

Many local authorities are taking action to become more attractive as an employer to those remaining planners that are available within the system. While establishing how best to attract planners to the profession is important, this particular approach risks increasing the cost of planning without necessarily fixing the underlying problem, as there have been many reports of poaching planning staff from neighbouring authorities, as local authorities resort to fighting over an increasingly small pool of planners to maintain their departments.

¹⁸[Royal Town Planning Institute - 2022](#)

¹⁹[Royal Town Planning Institute - 2022](#)



3.3 A Crisis in Planning

However, the problem does not stop with the workforce. It is impossible to talk about the crisis in housing developing in the UK without mentioning the planning system in the UK.

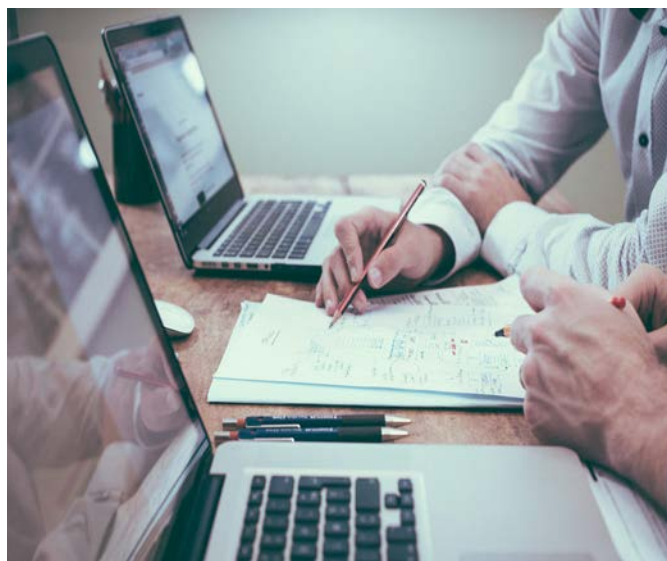
While its role in the crisis can be overstated – multiple contributors have raised that the UK Government’s current target could theoretically be met by the current system – it was a constant refrain that there are issues surrounding how the system of planning operates.

The current system is also complex, which can make the system difficult to work within. Local plans can run to hundreds of pages, involving a great deal of hard work to put together. Furthermore, national policy can be difficult to decipher, and the data available to monitor progress is simultaneously overwhelming yet incomplete.

Furthermore, the current system is highly adversarial, which can lead to a conflicted working environment for planners, and an

inefficient planning system for both local populations and developers alike.

This adversarial nature is further impacted by increasingly subjective terminology within planning guidance, which then also involves an unaccountable and slow-moving Planning Inspectorate.



3.4 Community Engagement

It is the duty of local authorities to protect the interests of local individuals and ensure that their voice is heard and understood in matters of planning.

However, when it comes to the subject of housing, it can be very difficult for local authorities to find acceptable places for new developments because of these interests.

Despite housing being desperately needed, the exact placement of developments can be extremely politically controversial, and the cause of much political consternation. This can delay or halt much-needed developments in their tracks and can damage faith in the planning system.

In particular, it is damaging when a local plan is agreed in consultation with the community, but then either permitted developments lead to unplanned development, or speculative bids from developers undermine this consensus.

While community consent is crucial, the seriousness of the housing crisis requires a compromise to be drawn between enabling local voices to be heard, and the ability of local authorities to build out promising and essential sites for development.

3.5 Infrastructure

Linking in with community engagement, it has been raised that there is a problem with accessing the funding for key infrastructure in preparation for a project, due to the unreliability of the s106 system.

This can further undermine community consent in a scheme, as those in the existing community fear that it may lead to stretched services.

Furthermore, the creation of this infrastructure can be exceptionally expensive for local authorities, particularly where greenfield land is used; a relatively common occurrence given the rural nature of the East of England.

There are also problems in more urban local authorities around the use of Permitted Development. Offices are being turned into residential accommodation, and while the additional supply is useful, it has the impact of changing the character of a given area quite considerably with no local authority input.

It can be extremely difficult for local authorities to plan around, as areas that previously had little need for residential services – health, education, and so on – due to being broadly commercial in base, then become in need of these services, putting pressure on existing supply.

There is also a lack of medium-term funding solutions to allow councils and their partners to plan for the necessary infrastructure ahead of, or in parallel with housing developments. Integrated place-based planning has suffered as a result of this, and local authorities are increasingly frustrated by their critical role as leaders of place being constrained by these issues.

It is also feared that the Government's proposed solution – the Infrastructure Levy – may lead to fewer affordable houses built across the East of England due to the additional costs it will put on developers.



3.6 Developer Build-Out Rates

Reports have been published suggesting that “land-banking” – that is, the use of land as a financial asset – is not as common as suggested, though many of the local authorities EELGA has engaged with disagree.

However, the practice of developers adjusting the tempo of land-development to suit their own cashflow, project plan and market needs appears to be alive and well, with the LGA estimating in 2021 that a full 1.1m homes in England have been given planning permission but have not yet been built ²⁰.

Regional figures indicate that as of last year, as many as 236,000 sites in the East of England have planning permission but have not been built out. Therefore, it is imperative that local authorities are given a way to boost the rollout of developments once planning permission is obtained to speed up the delivery of housing; regardless as to whether this is caused by slow market absorption, self-interest, or other barriers to development present in the system.

²⁰ [LGA-2021](#)

3.7 Empty Dwellings

Particularly in rural areas, or towns with a significant tourist industry, second homes can lead to a lack of domestic supply in an area, pushing up prices.

This makes it difficult for residents to find homes within their local community, and also makes it harder for an area to attract key workers to support public services and important sectors.



3.8 Environmental Concerns: Energy, Climate Change and Habitats

The current housing system holds the potential for a great deal of environmental damage.

It is important that the next generation of homes being built are energy efficient and contribute as little to climate change as possible. However, it is difficult to find builders with the skills required to build energy efficient homes, and the modernisation and retrofit of the existing housing stock is a gargantuan task with costs beyond what local authorities can realistically account for unilaterally. While not a barrier to housebuilding in and of itself, this problem needs to be accounted for before any major increase in housebuilding, or else we will be cementing in energy dependency and greenhouse gasses into our future developments.

In addition, the Government has been paying more attention to pollution, and has introduced measures to handle how housebuilding interacts with the wider environment. For example, Nutrient Neutrality refers to the practice of balancing the amount of nitrogen and phosphorus in the water to avoid harmful levels of eutrophication, which can cause excessive growth of algae and other plant life that can choke the waterways and harm

aquatic wildlife. Within the East of England, this impacts particularly on local authorities in Norfolk – particularly those near the River Wensum and the Broads.

However, while reduction in pollution is a laudable objective, this presents a significant barrier to housebuilding. 12,000 homes have been placed on hold in Norfolk by measures introduced by Natural England, and it has been estimated that this policy adds £6,000 - £8,000 per house developed to a given area. This is a cost that will be passed on through higher property costs, fewer affordable homes, or fewer overall homes.

Local authorities in the East of England have raised that similar problems may await the rest of the region with the introduction of “Biodiversity Net Gain” measures due to be introduced. This could present a major challenge to local authorities, and many have raised that the lack of ecologists available for recruitment is already a chief concern.

3.9 Housing Services

Regrettably, when the housing system experiences a crisis of this magnitude and stops working for residents, it is local authority housing departments that are placed under pressure to make the best of the situation they have been given, placing a huge amount of responsibility on their stretched budgets.

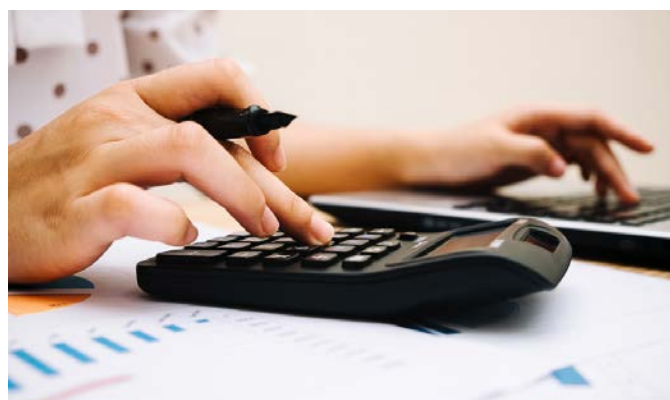
Local authority housing services departments in the UK are facing a range of challenges when it comes to supporting households affected by the cost-of-living crisis, preventing homelessness, and providing accommodation.

One of the most pressing issues is the struggle many households face in paying their housing costs, particularly as wages stagnate and the cost-of-living rises. This can result in rent arrears and housing insecurity, with some households at risk of eviction and homelessness. Local authorities are then obligated to step in to provide accommodation in this case, something that is extremely costly for local authorities to provide,

and an experience that residents would rather avoid.

Unfortunately, local authorities often lack the resources necessary to prevent homelessness and provide supported housing to those in need. This can be due to a lack of funding from central Government, as well as increasing demand for services from those who have been hit hardest by the cost-of-living crisis.

As this paper has established already, both the number of people requiring temporary accommodation, and the cost of the provision overall, are rising precipitously. As a result, local authorities struggle to provide the level of support needed to prevent homelessness and provide housing to those who are most in need.



4 What the East of England is doing already

The East of England is eager to take on the challenge of building more homes, and there are plenty of examples of good practice from across the region of local authorities, developers and registered providers going the extra mile to build the high-quality housing residents deserve.

However, the East of England also faces its share of challenges when it comes to the delivery of housing. A fast-rising population, the East of England's proximity to London, our transport and other infrastructure challenges, our rurality and nutrient neutrality all contribute to a housing market that is overheating in relation to other regions in the UK.

According to numbers provided by Lichfield Consultancy, (combined with those provided by planning officers across the East of England and

based on a formula proscribed by Government), the total housing need in the East of England is 35,542 dwellings per year ²¹.

In contrast, the East of England only added 27,446 dwellings to its overall stock in 2021/22; 77% of the need figure. The East of England is not alone when it comes to struggling to meet its housing need – and there is considerable debate as to whether the housing need figure used by central Government currently is even fit for use, given that it is based on housing projections initially made in 2014, and often produces unrealistic expectations of housing in certain areas.

²¹[Lichfields - 2022](#)

Case study

Strategic Place Partnership: Association of South Essex Local Authorities (ASELA) and Homes England

One approach being piloted by the government is to set up Strategic Place Partnerships to address housing barriers. One such Partnership, of only two nationally, is with the Association of South Essex Local Authorities (ASELA). This partnership hopes to pilot a new model for partnership working between the government's housing and regeneration agency, Homes England, and local authorities. ASELA also works internally, with both Registered Providers operating in the area, and the other member local authorities, to make use of all the opportunities and experience available between its members, and help move sites along where progress has stalled.

The partnership between ASELA and Homes England aims to transform housing and regeneration in South Essex where there is a recognised need for, and commitment to, a programme of strategic and tactical interventions that would significantly increase delivery rates. The partnership will look to overcome the following barriers to delivery rates:

- Low levels of land supply.
- Slow progression of sites due to lack of capacity, land banking and other issues.
- Specific site level barriers including viability, policy compliance, affordable housing, infrastructure costs, site remediation, and land remediation.

Case study

Tackling Neutrality: Norfolk Environmental Credits Limited

In response to the nutrient neutrality constraints being imposed in Norfolk, the relevant Local Authorities – Norwich City, South Norfolk & Broadland, Breckland and North Norfolk councils ²² – in partnership with Anglian Water, are setting up a joint venture company.

This venture will source largescale mitigation solutions and sell nutrient neutrality credits, a combination of nature based, runoff management, wastewater management and demand management solutions. These credits will then act as evidence that sufficient offset measures have been built within the waterway system to enable the resumption of construction of housing whilst avoiding damaging net increases in nutrients ²³. This will be exceptionally useful for smaller developers, who may not have the space, capital or expertise to build their own systems of mitigation.

By supporting the development of the necessary environmental infrastructure, NECL hopes to encourage more housing development in Norfolk while minimizing the impact these homes have on the environment, and satisfying the criteria of Natural England, the main regulator in this field. Furthermore, in the future, this joint venture may move into providing other kinds of environmental credits, further enabling greater environmentally conscious housebuilding in Norfolk.



Other examples of great progress across the East of England include:

- The work being undertaken by the Hertfordshire Growth Board to boost growth and housing in the area ²⁴.
- The 5-year Housing Strategy in Cambridge and Peterborough Combined Authority concluded in 2022, having achieved the delivery of nearly 1500 homes across the region ²⁵.
- Central Bedfordshire approved the creation of a housing development company called New Vista homes in 2020, which will look to deliver 250 homes over the next 3-5 years ²⁶.

²² [Norfolk nutrient neutrality new homes deadlock could end | Eastern Daily Press \(edp24.co.uk\)](https://www.edp24.co.uk/news/norfolk-nutrient-neutrality-new-homes-deadlock-could-end/1024441)

²³ [Communities, Housing and Planning Policy Development Panel Agenda - 8 February 2023 \(southnorfolkandbroadland.gov.uk\)](https://www.southnorfolkandbroadland.gov.uk/communities/housing-and-planning-policy-development-panel-agenda-8-february-2023)

²⁴ [Hertfordshire Growth Board - 2021](https://www.hertfordshiregrowthboard.co.uk/)

²⁵ [Cambridge and Peterborough Combined Authority - 2022](https://www.cambridgeandpeterboroughcombinedauthority.gov.uk/housing/cambridge-and-peterborough-combined-authority-housing-strategy-2022)

²⁶ [New Vista Homes - 2023](https://www.newvistahomes.co.uk/)

5 What more should be done?

The Housing Crisis is having a material impact on so many elements of people's lives in this region – and the associated policy problems are numerous and complex. Therefore, based on consultation with the sector, EELGA recommends the following changes be made.

Please note that while writing this report, a consultation on the National Planning Policy Framework concluded, and some of the changes raised were relevant to housebuilding. Some of these will be listed below – but a full EELGA response to the consultation can be found at Appendix 1.

5.1 Resource

Time and time again, contributors to this report raised that a chief concern was a lack of resource. This was typically made under two arguments.

Funding for planning departments

Firstly, funding for planning departments has dropped significantly during the austerity years. Therefore, a top-up to planning funding is required to ensure the effective and efficient functioning of the system.

EELGA has heard from interviewees that even private-sector providers would pay higher planning fees so long as the service they received improved. While the request that these additional funds be ring-fenced for planning is tricky to enforce, (as, in practice, funding can be moved around quite straightforwardly), there is a real appetite for further planning fees supported by more funding. This holds particularly true if the system is graduated to ensure that those who most use the planning system pay their fair share, and that most of this developer-raised funding goes towards improving the service they rely on.

This would not only ensure a good service but would also potentially give local authorities more resources to maintain a business-as-usual service while refreshing their local plan. This will be important if the Government wants its recommendations from the NPPF consultation to come to fruition.

State involvement in housebuilding – expanding tenure

Secondly, the repeated request is made for Government to commit a much more substantial number of resources to housing development

through an expansive programme of social and affordable housing.

Advocates note that local authorities were a key lynchpin to housing construction in the 50s, 60s, and 70s, and could be again with support from registered partners if enabled to. The national LGA, for example, is advocating a return to the construction of 100,000 social homes a year; a bold objective, but history shows us that it is not unrealistic ²⁷.

This would cost a considerable amount of money. For example, the National Housing Federation has claimed that £12.8bn a year would need to be spent to end the housing crisis ²⁸. However, not only would this be money well spent, to end an ongoing crisis and create a meaningful and lasting social good, but it would also generate savings that could offset this cost, such as reducing Housing Benefit, as well as income through social rents for local authorities and Registered Providers; bodies who sorely need an independent and reliable income.

However, it is not just raw funding that local authorities need. Currently, the restrictions on what local authorities can allocate with regards to housing funds are too onerous, and right-to-buy has created an incentive for local authorities to build fewer houses, as any stock that is built up is often sold at a discounted price, making it harder to recoup costs and make meaningful investments.

Therefore, these barriers need to be fixed, to create a system where local authorities feel it is worth the time, energy, skills and risk appetite to engage with the housing market again – or feel confident that they can work with Registered Providers in their area to enable substantial build-out.

²⁷LGA - 2020

²⁸National Housing Federation - 2019

5.2 Homelessness, Temporary Accommodation and Migration

Homelessness and rough sleeping cause great instability and distress at great human cost for those who experience it. Furthermore, for the public sector, it can be extraordinarily expensive to meet the needs of those who are homeless, as it creates barriers to good health and economic independence that can be costly to surmount. It is therefore of crucial importance that more socially rented and affordable housing is built to enable individuals to move into properties, and to keep rents low to avoid further risks to homelessness. Furthermore, for rough sleepers in particular, for any progress to be made it must be considered as a holistic issue, with practitioners recommending that effective mental health services will be crucial for addressing this issue long-term.

Resourcing prevention services, and providing support for households with planning long term changes in household composition, could help avoid the need for emergency housing. This is because it would enable households to prepare for future housing needs in a more planned way. This links with community engagement activities as well, such as helping residents think ahead to what happens when their adult children move out or help in creating adaptations for vulnerable household members.

Homelessness legislation is framed around dealing with emergency solutions, but an advice service for those thinking about future housing need, at every stage of life, as well as emergency situations would be far more advantageous for our communities and our public services. A good example is Hertfordshire Young Homeless, who give advice in schools, although this is limited in scope to certain year groups, given limited resources.

Resource is also needed to enable social housing providers to keep rents low. “Affordable” rent is not affordable for many on low incomes, especially when rent and deposits are needed in advance to obtain a tenancy.

In addition, the cost of temporary accommodation is a major concern for many local authorities, and resources should be liberated to ensure that local authorities have access to local temporary accommodation that is cheaper to run than the heavily-in-demand private sector. This could deliver savings to the local government sector, which would increase the financial stability of local government in the long-term. This could be delivered by directing funding to local authorities to enable the procurement, or development, of council owned temporary accommodation. This would be the most cost-effective solution and would ensure the provision of temporary accommodation of good quality in the right area to meet legislative demand.

A combination of arrivals over the past few years in terms of asylum seekers, refugees, and others on visa schemes such as for Afghanistan, Ukraine and Hong Kong nationals all need to be factored into the integrated housing plans for local authorities in our region and nationally. A lack of permanent accommodation for these groups also impacts on the availability and utilisation of temporary accommodation, adding indirectly to local authority costs by increasing competition for limited places. For the time being, until more accommodation is found at a cheaper price, local authorities from all levels must work together, alongside other bodies, to provide support and practical solutions to avoid this group of individuals from being required to make homelessness applications.



5.3 Workforce

With regards to the workforce, this is not an easy problem to fix. Planners and Housing Officers do not appear immediately after investment – but there are things that can be done in the short, medium, and long term.

In the short term, there are things that EELGA can support local authorities to do, such as providing information and encouragement to harmonise sectorial wages and standards across the region to prevent excessive competition for much-needed planners. Likewise, planning networks could be set up to enable the sharing of expertise between planners, increasing the efficiency of the system, and hopefully encouraging planners to stay in the public sector within the East of England.

In the medium term, the Government must generate a skills strategy to encourage the recruitment of planners and housing officers as a matter of urgency – this can be done through funding our well-established education resources available in the East of England, and by encouraging these institutions to start planning courses. Likewise, local authorities can help by

committing to a certain number of starts a year, to ensure that these courses have customers from day one. One approach that had great success was a 2022 EELGA Talent Bank assignment in 2022 for a training scheme for Local Authority Building Control ²⁹. This was a great success, and there is perhaps scope for approaches like this to be replicated for recruitment and retention in planning.

In the longer-term, it is important that planners and housing officers are made to feel like it is worth staying in the local government sector and be held in the high esteem they deserve. Planners and housing officers must be made to feel more integral to the councils they are part of; consulted at the highest level and taken seriously when they make comments. Only then will councils be able to attract and retain the skilled staff that planning departments need.

²⁹[The Construction Index - 2022](#)



5.4 Community Engagement

It is only right that local communities are consulted on developments taking place in their area, and that their views are heard and implemented.

In this respect, the NPPF consultation is already making useful headway. While existing workforce constraints make the formation of local plans difficult, the idea of having regular, stronger, and simpler local plans is one that has support. In addition, measures mentioned in passing in the NPPF Consultation, such as the use of non-traditional means of engagement such as digital approaches, are welcome and could enable wider and more effective community engagement.

However, there is a role for local authorities and partner organisations to make the case that more housing is good for communities. While there are limitations and compromises that need to be

made, ultimately, a local place will stagnate if there are no means for new people to come to the area, or if there are no affordable housing spaces for those brought up in that area.

While the capacity they can offer in terms of raw housebuilding is limited, rural exception sites have been highlighted by partners as a good way to sell the idea of housing to communities that otherwise have an entrenched scepticism to new housing, and contributors to this report requested that more national and legislative support was offered to make these more prominent. Community-led housing also has a place in the East of England, and further measures to boost these kinds of development are welcomed.



5.5 Infrastructure

When it comes to infrastructure, community engagement is once more important to be considered, as current residents often raise that existing infrastructure may buckle under new demand from much needed housing development.

It was raised that details around the Government's new Infrastructure Levy would be useful to know before a firmer commitment to a position can be raised. One suggestion was that it would be useful for the Levy to work in a proactive way, where local authorities could apply to the levy to obtain funding to build key enabling infrastructure, that would then retroactively generate the money required to fund the work in question through the creation of new viable land for homebuilding. This would enable housebuilding in otherwise impossible areas and would ensure that key infrastructure would be in place from day one for local communities.

5.6 Developer Build-Out

The Government has already made some progress in understanding the importance of this area. In the NPPF consultation that closed on 2 March 2023, they consulted on powers that would enable much greater oversight of developer build out – and powers for local authorities to deny planning permissions to developers that regularly deliver at a slower rate than promised.

Additional powers are welcome, though it has been raised that without proper, well-funded, enforcement, this will not have the anticipated impact that the Government may want it to have. There are also concerns that this will not increase developer build-out in the short-to-medium term, as blocking one developer based on slow roll-out does not necessarily speed up the whole process. It may in reality take just as much time for competitors to come in with alternative bids, and once the whole process is accounted for, the actual difference in total housing delivery may not be significant.

In addition, it would enable the kinds of infrastructure a community needs to develop successfully. Connectivity – not just in terms of roads, but in digital infrastructure as well – is exceptionally important given the rural character of the East of England, and methods need to be brought into place to facilitate this, in both existing and new communities.

However, it is not just a matter of roads and hard infrastructure. Citizens also expect key public service provision to be in place before new houses are developed. While this can be a risk – building a school, or a GP or dental surgery before the houses are built can lead to difficulties if the development runs into trouble before it gets built out – communities may find it easier to consent to new communities if they felt that it would not materially impact on their own current standards of public service.

In addition, more needs to be done to ensure that new houses are quickly absorbed into the market. The Letwin review made clear that the “homogeneity of the types and tenures of homes on offer” is one of the leading causes of low market absorption, which in turn, limits the number of homes that can meaningfully enter the system at a given time ³⁰.

To disrupt this phenomenon, this paper calls for much stronger support for local authorities and Registered Providers in building affordable, genuinely affordable and social rent properties, and measures to compel developers to build a certain percentage of affordable homes that cannot be challenged on viability. This should increase the number of homes that can be absorbed into the market, which in turn should support build-out.

³⁰ [Gov.uk-2018](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/724422/letwin-review-2018.pdf)

5.7 Council Powers Around Empty Dwellings and Rental Accommodation

Empty houses were raised as a particular issue in more rural and tourist-orientated areas, and measures to address this would be most welcome in ensuring that those brought up locally can remain local.

Suggestions for how to handle this situation have included powers to impose a substantial council tax surcharge, paid on second and empty homes, in areas of low housing supply. In addition, greater regulation of short-term rentals would help ensure that more properties were used for housing residents, rather than profit. This could take the form of licensing schemes, setting limits on the number of days per year that properties can be rented out, or through regulation aimed at large providers of such services.

In addition, as mentioned earlier in this report, fixing the rental market is an important part of fixing the housing crisis more generally. Therefore, funding and powers to enable local authorities to regulate and gain more assurance on the quality of the rental markets and landlords in their area could be exceptionally useful, for example in challenging bad landlords over sub-standard accommodation.



5.8 Climate Change and Sustainability

The challenges of climate change, along with increasingly volatile energy prices, and evolving changes in sustainable building standards, means that homes can no longer be built like they used to be.

The next generation of homes must not only be plentiful, but sustainable too. Therefore, incentives should be deployed to ensure more EPC-A homes are produced. Furthermore, the retrofitting of older housing stock must become a priority if the UK as a country wants to reduce its climate change emissions meaningfully. The UK is not going to rebuild every single house in its stock for quite some time. However, the cost to retrofit older properties on this kind of scale is completely beyond what private investors and citizen owner-occupiers can manage; and even local authorities lack the financial resources to assist in a meaningful way. If this is to be achieved, central Government will need to intervene.

In addition, housing must also be developed with energy grid capacity and water scarcity in mind, to ensure that new properties do not place unviable strain on the environment or energy infrastructure. To avoid a situation like the nutrient neutrality issue, clear infrastructure to mitigate these costs should be investigated into before blanket policies are rolled out. The East of England is a drought-prone region of the country, and any planning for developments going forward must consider this and establish how to mitigate any additional risks to the water supply water.

Finally, training for construction workers in more sustainable and climate-friendly methods of construction would potentially yield strong results, and therefore this kind of training should be made more readily available.



5.9 Oversight and Accountability

Problems with oversight and accountability were raised throughout the process. From operational concerns regarding the clarity of the plethora of housing statistics available, to significant around how the Planning Inspectorate was unaccountable and needed stronger oversight.

This final point around the Planning Inspectorate is only going to become more urgent if the terms mentioned in the NPPF consultation are left without guidance or are not clearly defined. For example, while no-one would challenge the fact that new houses should meet a certain aesthetic standard, introducing the subjective quality of “beauty” into an already strongly adversarial planning system may cause issues for planners.

EELGA will continue to advocate on behalf of the region and make the case to Government that the local authorities of the East of England can be valuable partners in a shared objective to end the housing crisis.

Within EELGA our work to address the housing needs of our region will be governed by our member-led Infrastructure and Growth Panel.

Our advocacy programme related to this report and its recommendations will also be carried out in conjunction with MPs and other partners via the East of England’s All Party Parliamentary Group.

In addition, there may be an avenue to give much needed powers to local authorities the process of devolution. With more powers being given to local authorities to shape their places, housing and planning should be at the forefront of this, and the Government should attach additional money and powers around these areas to the devolution framework, in addition to those targeted to skills and economic development.



Barrier	Recommendations	Outcome
Resources	<ul style="list-style-type: none"> • Greater and ambitious long-term funding for local authorities to engage in housebuilding; particularly focussing on diverse tenures catering to those who need genuinely affordable and social housing. • Change regulations to enable greater involvement of local authorities in housebuilding projects, such as allow local authorities to keep more of their Right to Buy Receipts. • Increased flexibility on setting planning fees and reduce regulation limiting how the proceeds of housing-related funding can be spent. 	A sustainable programme of housebuilding, aimed at constructing affordable tenures.
Homelessness and Temporary accommodation	<ul style="list-style-type: none"> • Stimulate the housing market to enable more housing and reduce reliance on temporary accommodation. • Boost wellbeing support and practical support for homeless individuals, families, or migrant groups, such as mental health, housing, and transitional support to move them back into more stable accommodation. This includes accommodation-based support and prevention-orientated support to reduce the need for temporary accommodation. 	Better preventative services to reduce homelessness and cater to the needs of marginalised groups, and a more affordable approach for local authorities.
Workforce	<ul style="list-style-type: none"> • Establish a regional dialogue on workforce standards and raise the attractiveness of planning as a profession. • Encourage the training of the next generation of planners through a Skills Strategy and commensurate funding, along with career development opportunities across the region. • Recruitment and training should be considered at scale, taking an approach such as the recent Local Authority Building Control Scheme. 	A sufficient number of housing / planning officers to sustain the demand for these professions in the East of England.
Community engagement	<ul style="list-style-type: none"> • Create a more effective narrative for public engagement about the critical importance of housing on health, wellbeing, homelessness and children's education. • Advocate on behalf of community led housing, and promote how the use of rural exception sites can be used to engage with rural groups who may be resistant to high-level developments. • Gather information about interest and demand for different types of affordable housing (I.E. intermediate affordable housing as well as affordable rented) to inform strategic plans 	A planning system that respects the wishes of local communities – and local communities that understand the importance of housebuilding.
Infrastructure	<ul style="list-style-type: none"> • Infrastructure and public service investment – such as health, blue light, and education services - need to precede, or be developed in parallel with, new conurbations or communities. • Greater strategic oversight would be useful to enable infrastructure projects to be joined up with housing need. • Enable local authorities to make proactive applications to the newly developing Infrastructure levy to fund the construction of infrastructure that will open up sites for housing development. 	This will see infrastructure being integrated more fully into housebuilding at the planning and delivery stage, rather than after the fact.

Barrier	Recommendations	Outcome
Developer Build-out rates	<ul style="list-style-type: none"> Local authorities will need capacity to monitor and enforce any system of penalties as proposed in the NPPF consultation. 	Faster build-out of private developments, boosting the number of new homes entering the market year-on-year.
Empty / inadequate Dwellings	<ul style="list-style-type: none"> Give local authorities greater tools to dissuade empty dwellings, such as stronger council tax penalty, to boost the availability of housing for local communities. Give local authorities the power and resources to investigate poor quality rental accommodation in their area. Local authorities should be given the resources and authority to bring empty properties back into use as temporary accommodation or affordable housing. 	Stronger optimisation of dwelling stocks in favour of local communities.
Climate Change	<ul style="list-style-type: none"> There needs to be a priority towards making new homes EPC A-Rated, and to retrofitting of existing housing stock. Sustainability should be at the forefront of the East of England's housing agenda, particularly around water usage. To facilitate this, the construction sector needs to make more ready use of existing sustainable construction methods. Greater information and capacity to access any grant funding available for energy efficiency improvements, including for temporary accommodation stock, reducing bills for customers and the council, and future proofing stock. 	A new wave of sustainable, low pollution and low emissions homes fit for a net-zero future.
Accountability and Oversight	<ul style="list-style-type: none"> The Planning Inspectorate needs more funding – but this must be matched with far stronger accountability. 	A well monitored system that enables better internal feedback.

6 Appendix 1 – EELGA’s response to the “Levelling-up and Regeneration Bill: Reforms to national planning policy”

1. Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

EELGA welcomes the greater flexibility that this would offer local authorities and would strengthen the importance of developing a local plan. Given the huge amount of work that goes into the rigorous process of plan making, these new measures will help ensure that plans are not undermined due to events outside of the local planning authority’s control.

2. Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

EELGA welcomes this development. Many planning authorities struggle to make meaningful headway with this buffer, and it serves as another point of failure in the plan system. Furthermore, there is no guarantee that houses that may be in train five years from now will be ready to be built immediately in the case of a bad housing year or the pulling out of a developer on another site. Therefore, the buffer does little to address year-on-year fluctuations. However, some small buffer should still be encouraged in local plans to take into account unforeseen circumstances.

3. Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

This makes sense given the cyclical nature of the housing market, as it will insulate local authorities against speculative planning applications made in bad years caused by extraneous shocks that they may have no control over.

4. What should any planning guidance dealing with oversupply and undersupply say?

EELGA has no view on this at this time.

5. Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

EELGA supports constructive engagement with communities early, to both boost community consent to the kinds of development on offer, but also to ensure that once these plans are in place, there is stability and certainty that can be used by both planners and developers to get on with the important business of constructing homes. In addition, it has been pointed out that the intention of a given neighbourhood is important, and that it may be the case that neighbourhood plans could receive protections in other cases besides those where they have allocated enough housing – such as, for example, in circumstances where their policies allow for that housing to be built in line with a local plan. /However, it may also be important to ensure that Local Plans and Neighbourhood Plans are tested to the same level of thoroughness to avoid discrepancies.

6. Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

The development of more housing is of great importance and has a knock-on impact on many other areas of policy and practice. Therefore, anything that can be done to stress the importance of planning for homes is valuable, even if in this case the impact is likely to be minor. However, the stressed importance on the “Developments that communities need” should make explicit a commitment to varied tenures, and there is an argument to be made that infrastructure that facilitates these developments should also be provided.

In addition, it is raised that the use of the word “sufficient” regarding housing and other development in the NPPF paragraph one may need better clarity to establish what is meant by sufficient.

7. What are your views on the implications these changes may have on plan-making and housing supply?

It has been raised by our members that the government may struggle to simultaneously enable greater consultation and quicker local plans. While these two goals are not necessarily mutually exclusive, it has been raised multiple times by partners that greater housing development can be stymied by a lack of community consent, and that veto-points within the existing system can lead to frustrating situations for those trying to build affordable housing.

In addition, planners we have spoken to have stressed the need for a stable policy environment with known and established expectations, as changes lead to investigation and thus delay. Therefore, while changes to make a positive difference are important, it is important that they are made and confirmed quickly to avoid any period of uncertainty.

8. Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

EELGA agrees that clarity would be useful, as it would enable a better and clearer understanding of what is acceptable and unacceptable to propose in a local plan with regards to exceptional circumstances. For example, many housing authorities in the East of England have to struggle with large amounts of land being covered by the Green Belt – and the issue of whether to facilitate construction on green-belt land is currently fiercely contested. Therefore, clarity is welcome.

It has been pointed out that this may lead to a situation where local authorities who do want to diverge meaningfully from the Standard Method will have to evidence why this is reasonable. The commission of this evidence can be a time-consuming and expensive task. Therefore, it has been suggested that Planning Practice Guidance should set out very specific tests as to whether such a departure from the Standard Method is justified.

Finally, when it comes to some of the terminology, such as “densities significantly out of character”, some kind of objective metric – or extensive guidance – will be needed to give both planners and developers the stability and certainty they need to make decisions.

9. Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

See answer to Question 8.

10. Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

Whatever the evidence provided, there should be a clearer definition of “Significantly out of character with the existing area” to give local authorities more certainty.

11. Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?

It has been raised that the role of the Planning Inspectorate will need to be clearer if the soundness tests are going to be amended. Furthermore, the Planning Inspectorate needs to be held to account, and have meaningful oversight.

12. Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

See answer to Question 11.

13. Do you agree that we should make a change to the Framework on the application of the urban uplift?

There are no areas in the East of England that are subject to the Urban Uplift.

14. What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

There are no areas in the East of England that are subject to the Urban Uplift.

15. How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

A great deal of our member authorities have a close geographic proximity to London, and as a result often have very high Housing Delivery Tests/Housing targets to meet. Especially combined with the combination of other issues – including that much of their land may be green belt – this can put them in a situation where housing need for that area is very high, to the point of not being achievable practically.

16. Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

EELGA feels that this is a sensible approach.

17. Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

EELGA does not have a view on this issue at this time.

18. Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

This would be a useful development, as it would enable local authorities to prove that the planning system in their area is working as anticipated, and that sufficient homes are in train. Housing is a strongly cyclical business, and there may be down-turn years where completions do not match requirement, at no fault of the local authority's own procedures. Therefore, judging local authorities on the metrics they can control – permissions – rather than a metric that they can often only control indirectly – build out – makes more sense.

However, there is an argument that making the HDT about housing permissions removes its focus away from being strictly about housing delivery and turns it more into a de facto measure of housing supply as permissions will be counted as delivery. This would only make sense if the housing land supply test was amended to do something else or removed.

19. Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

EELGA does not have a view on the exact number of houses to trigger this impact at this time.

20. Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

EELGA does not have a view on the exact procedure to count deliverable homes at this time.

21. What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

EELGA does not have a view on this issue at this time.

22. Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

The construction of more houses for social rent, particularly by registered providers and local authorities, would assist in the creation of a more balanced tenure mix that will, in turn, boost housebuilding and the absorption rate of new homes into the market. However, under the current system, EELGA has received many suggestions that affordable homes are the first homes to be cut in commercial developments under viability. Therefore, if there is a need for more homes at different tenures, including Affordable and Social Rent homes, then Local Authorities and Registered Providers will be crucial in providing these homes, and will need to be resourced accordingly.

23. Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

The population of the East of England is aging considerably, and therefore anything to support the provision of good quality and sustainable homes aimed for older people would be useful and would also serve to increase the different tenures of homes available.

24. Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

It has been suggested that, in order to boost the provision of affordable accommodation from small sites, perhaps the government could enable local authorities to set local policy thresholds. In addition, local plan inspectors will need to accept a degree of uncertainty in the Local Plan process if councils are seeking to grow the SME sector – for example, it may not be possible to point to a ready market to delivery smaller sites, as this is something that needs to be incentivised and grown.

25. How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

See answer to Question 24.

26. Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

The quality of rented accommodation must be maintained to a high standard, and if it is to be made easier to develop affordable homes, this must not come at the cost of quality in terms of both initial development and maintenance.

27. Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

It was raised by our members that it would be useful if these exception sites could be supported by national legislation. However, it has been suggested that there is a larger problem around support, knowledge and training in this area.

28. Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

EELGA does not have a view on this issue at this time.

29. Is there anything else national planning policy could do to support community-led developments?

EELGA does not have a view on this issue at this time.

30. Do you agree in principle that an applicant’s past behaviour should be taken into account into decision making?

Member authorities in the East of England agreed that these proposals were interesting. However, the key issue with the proposal is that it will require research and enforcement, and the planning workforce in the East of England is already stretched to its limit. Therefore, it will be difficult to meaningfully make use of the power without further resources to enable its use.

In addition, any decision made on this basis could be subject to appeal or other sorts of legal challenges. Costly court cases do not lend themselves to either fast-roll out of housing, an agile planning department, or a well-funded planning system. Therefore, for it to be used as a material consideration, the conditions under which this is to be applied should be precisely defined, to avoid misuse either way or subjective decision-making. It has also been pointed out that at the site allocation (i.e. plan making) stage, the developer is not known. Therefore, this proposal could also affect the ability of allocated sites to be granted permission further down the line.

31. Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

EELGA does not have a view on this issue at this time.

32. Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

These three policy measures would be welcomed by local authorities. The LGA identified that in 2021, 1.1m homes that had planning permission had not yet been built out. While EELGA respects the need of developers to maintain a healthy pipeline of land and property to best manage cashflow and risk, it is imperative that developers manage that pipeline faster if the government wishes to meet its ambitious and laudable target of 300,000 homes to be constructed a year.

Increased provision of different tenures in particular would be of great use, as this would boost the absorption rate of properties. However, developers must be held to their explanations, and there must be adequate enforcement of these explanations, or else there will be little difference to the status quo, where affordable home commitments are often the first thing to be cut when a site's viability comes into question. Additional funding will also be needed to ensure that this enforcement, and the collection of data from developers, is meaningful and also doesn't eat into existing stretched capacity.

33. Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

EELGA supports beautiful housing on principle, and it is only right that the quality of housing be considered when building out additional properties. However, beauty is deeply subjective, and could lead to increased veto-points where confirmation is sought on matters of subjective beauty, and it would be different to respond with a concrete factual response due to the aesthetic nature of the argument. Therefore, any definition of beauty will need to be agreed with the community in advance in local design codes.

It should also be considered within a wider agenda of place-making. Beauty is just one element of a good neighbourhood, with other metrics – such as walkability and good service provision – also being an important part of what makes a good place. Therefore, it may be more practical to use a term like “Good design” which can then be more objectively marked, appreciating that there is always going to be some kind of subjective element.

34. Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word ‘beautiful’ when referring to ‘well-designed places’, to further encourage well-designed and beautiful development?

See the answer to Question 33.

35. Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Any system of design requirements should be set out very clearly, to establish what needs to be presented, when, and to what specification. Otherwise, there is a risk that this expectation will become another obstacle to housebuilding.

36. Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

While density, where in keeping with need, character, and desired tenure, can be a good thing, many we spoke to found it unusual to focus very specifically on one particular kind of densification, instead of letting local planning authorities decide what is best in a given situation.

37. How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

EELGA has no view on this at this time.

38. Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

In the East of England, land availability is a key issue when it comes to housebuilding. Therefore, measures that may constrain that further would make it difficult to develop affordable housing in the East of England. If this were to work, local authorities would need clear figures from the government regarding the amount of land needed for agriculture within a given Local Planning Authority.

39. What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

It has been suggested that mobile phone data could be used to project travel, which is a key contributor to carbon emissions in a given area.

40. Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

EELGA has no view on this at this time but is working with local authorities across the region through the Regional Climate Change Forum to establish how local authorities can best adapt to climate change.

41. Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

It is important that the UK pivot from carbon-intensive forms of energy production towards carbon neutral methods of energy production as soon as possible. Therefore, maintaining existing infrastructure in this field, or upgrading it to become more efficient, is welcome.

42. Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

See our answer to Question 41.

43. Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

Community consent is important for new developments, and EELGA welcomes the change to enable the construction of onshore wind developments where this consent is established. However, given the immediacy of climate change, the volatility of energy prices, and the relatively affordability of onshore wind in comparison to competitors, there is a strong case for relaxing planning restrictions around onshore wind even further where possible, while still ensuring community support.

However, it has been raised that “Community support” is another vague term that needs clarification. For example, how large a group constitutes a community, and whether that limited by some geographical area. Community Support is undoubtedly important, but from a planning perspective it would be useful to establish exactly what that is.

44. Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

It has been raised by our member authorities that retrofitting existing properties will be hugely important in both reducing the long-term impact of reliance on fuel, and also in reducing climate change emissions. Therefore, it is welcome to hear that significant weight should be considered with regards to this point. In addition, member authorities have mentioned that ambiguity around whether properties in a conservation area can have environmental/sustainable upgrades can be made. Therefore, it is important to establish just how much weight that this will have, to enable the straightforward adaption of properties in conservation areas.

45. Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

While EELGA has no alternative timeline to propose, it must be recognised that the planning system is currently stretched beyond its capacity. As a result, the process of creating a local plan is incredibly difficult for planning departments as a task that must be managed on top of existing demand. While the new system of local plan development has the potential to enable certainty and stability within housing construction, it will need to be resourced accordingly.

However, it is important to ensure that there is no sudden cliff edge for local authorities that do not miss the 30-month timetable. If, for example, local authorities have to start again on failing to hit their deadline, that could be extremely costly.

46. Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

See our answer to Question 45.

47. Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

See our answer to Question 45.

48. Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

See our answer to Question 45.

49. Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Local plans are exceptionally long and complex documents. Therefore, measures enacted to provide formal, legislative, support to areas of national policy, while simultaneously reducing the complexity of local plans, are a welcome development.

50. What other principles, if any, do you believe should inform the scope of National Development Management Policies?

In keeping with the spirit of subsidiarity, national development management policies should only be used in occasions where a more local approach would be impossible, or in situations where they are focussed on issues with identical or near identical considerations nationally, or perhaps apply to national objectives to the local planning process.

51. Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

EELGA have no thoughts on this area at this stage.

52. Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

It has been suggested that Amenity policies and policies on tree protection/woodland are often very similar across the country, and therefore could be candidates.

53. What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

It's important to note that each individual planning authority is its own place, with its own approach and way of doing things. Therefore, there needs to be respect for these planning authorities, and the funding needed to ensure they can deliver the high-quality decisions that both local communities and planners want to see.

Here in the East of England we have been thinking considerably on the ramifications of the 12 levelling up missions, and have written a report in collaboration with the East of England All Party Parliamentary Group that can be found [here](#). Specifically around housing, the report calls for the ability to tackle non-decent homes, and to facilitate first-time buyers.

54. How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Infrastructure needs to be front-loaded to facilitate development in some cases, otherwise opportunities for development could be missed. This would also help communities accept developments in their area.

55. Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Brownfield site development is exceptionally complex and difficult to pursue. It has been raised that this perhaps isn't a matter for planning policy, and more of a matter of reform to Compulsory purchase systems to better sort out the difficult land ownership.

56. Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

EELGA welcomes any measures that boost the inclusivity of our public spaces, and therefore would welcome engagement and discussion about how to make public spaces more accessible for a wider section of the population.

57. Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

EELGA has no view on this matter at this time.

58. We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

EELGA has no view on this matter at this time.

