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BSHF Response to Liberal Democrat consultation on planning policy

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Contents

BSHF publications referred to in this document

- Space in the Home: Public views on minimum housing needs (Forthcoming)
- Creating the Conditions for New Settlements in England (2013)
- More Homes and Better Places (2011)
- Abolition of Regional Spatial Strategies (2010)
- Redefining the Commons (2005)

About BSHF

The Building and Social Housing Foundation (BSHF) is an independent housing research charity committed to ensuring that everyone has access to decent and affordable housing. BSHF has a strong commitment to housing rights and seeks to identify and promote housing policies and practices that ensure people's access to adequate housing, both in the UK and internationally.

BSHF holds Special Consultative Status with the United Nations Economic and Social Council and has run the World Habitat Awards since 1986, acknowledging and promoting housing projects in the Global North and South that show a commitment to innovation, sustainability and transfer.

Since 1994 BSHF has organised an annual series of Consultations at St George's House, Windsor Castle, on a range of housing issues, bringing together diverse groups of experts for in-depth discussion and consideration of an important housing issue. Recent topics have included the need to increase the supply of housing and reforms to support with housing costs for lower income households. This submission is based on these consultations and on original research undertaken by BSHF.

Section 1: Ensuring decision-making for planning is at the right level

Liberal Democrats believe that if you give people responsibility, they will make responsible decisions on planning. How can we best ensure decision making for planning is at the right level?

a) What role should Central Government play?

For reasons of clarity, and due to the increasing divergence of housing and planning policy in the devolved administrations of the United Kingdom, these responses relate to the English policy context, unless otherwise specified.

In 2010 just 37 per cent of people felt they could influence decisions affecting their local area, down from 44 per cent in 2001.[1] This may well change within the context of Localism. The Localism Act (2011) has given the public greater powers for involvement and participation in the planning process. The concept of devolving certain powers to local residents, or institutions, has widespread, cross-party support. However, the coalition government has been criticised for a lack of clarity regarding the definition and implementation of the policy.[2] Increasing the capacity of communities to make a substantive contribution to local areas is a positive step and should work to allow communities to grow in a sustainable manner. An emphasis on local decisions, rather than top-down interventions, is encouraging.

However, the role of central government remains vital within the context of localism. Central government should endorse and create a framework to empower local authorities and communities to take an active interest in planning for development, and develop mechanisms to ensure that their concerns and wishes are taken into account.

b) More specifically, how can we ensure a wider strategic vision from Central Government with regard to major national infrastructure projects and how do we ensure democratic accountability for this?

While the Localism Act has provided a number of opportunities to engage communities and facilitate a bottom-up approach to planning, there remains a need for a **clear overarching spatial framework** to allow local authorities and other stakeholders to more efficiently coordinate their responses to a variety of

housing and infrastructure challenges. The provision of adequate and sufficient housing is a national issue.

Restricting planning decisions to smaller units, without a broader framework, risks "generating policy decisions which are only of benefit to a minority of residents and which will, in fact, increase rather than reduce spatial inequality".[3] Local approaches alone may also "fail to contribute to broader social and economic goals, as vested local interest work contrary to regional and even national objectives".[4] What is needed are spatial plans at a national and sub-national level.

It is therefore recommended that a national strategic spatial plan for England is developed. Ideally, an independent panel of experts would investigate a broad range of matters relating to planning, infrastructure, design, public space and sustainable place-making, in the short-, medium- and long-term. The recommendations of such a committee would both provide impartial direction for future policies and a focal point for support and collaboration. Given the long-term nature of these issues, **cross-party support for any such plan would be crucial**.

A national strategic spatial plan for England would provide a geographical context for national aspirations by planning the "spatial distribution" of a range of development objectives.[5] The government has already recognised the importance of national strategic planning through the creation of the National Infrastructure Plan.[6] However, this lacks a cohesive vision for the future and a plan for implementation.[7] Furthermore, a number of other areas would benefit from a cohesive national framework, particularly housing. Economic growth, employment, connectivity, climate change, energy supply and land use are all areas which could be covered by such a document, as well as a national housing strategy.[8] While the government is opposed to prescriptive top-down targets, there is a need for some form of national strategy to ensure that sufficient homes are built.

A national document would also provide a **framework for sub-national planning**. This would give local government agencies the knowledge and assurance to be able to develop their own plans. Local authorities are obliged to plan for the impact of climate change, tackle changing demographics and consider the uneven levels of development throughout the country.[9] However, these are national issues requiring national leadership if they are to be effectively implemented.[10] Equally, planning authorities should be more able to respond quickly and positively for planning approval that fits within such a national plan.

A **national strategic spatial plan** would also enable the taking of a broader perspective, not limited by a focus on immediate concerns and practicalities. This should include a vision for how England will look in the future and a direction towards achieving desirable new places and communities. This would include the creation of vibrant mixed communities, with healthy economies and strong environmental credentials.

As previously noted, the involvement of local residents in the planning and development of their communities is a positive step in creating places where people want to live. **Democratic accountability is a vital aspect of building strong communities.** Participatory democratic involvement is now incorporated into the planning system through the process of Neighbourhood Planning, while Local Plans are developed by local authorities. The issues between strategic planning for the future and democratic accountability are explored below.

Prior to 2010 housing targets and other significant planning issues were addressed at a regional level. This regional level was supposed to fill "the gap between local planning issues determined by local planning policies and nationally-determined policy aspirations, such as housing".[11] In practice, **Regional Spatial Strategies** (RSSs) drew criticism for being overly complex and expensive to develop. There was concern around the imposition of housing targets and little consultation with communities, as the regional authorities had no democratic accountability. RSSs were ultimately abolished under the Localism Act in 2011 with local authorities becoming responsible for assessing housing need and setting targets locally.

However, the abolition of the RSSs resulted in some confusion at a local level as to how to meet the new responsibilities[12] such as the need for local planning to consider the wider context for large building and infrastructure projects. Sharing environmental resources, planning for retail developments, housing and educational facilities will all need to be addressed at a **larger-than-local level**. Housing markets may extend over several local authority boundaries.[13] Individual lives are not confined to such boundaries, with people commonly living, working and accessing services in different areas. The **Duty to Cooperate** is the principal means for local authorities to consider these issues but there was a significant hiatus between their abolition and the introduction of the Duty to Cooperate. This has resulted in deadlocks, which have delayed some housing construction.[14] This can be a particular problem where neighbouring local authorities have competing or contradictory views on planning development.[15] Some urban local authorities are very restricted in terms of access to land and are "entirely dependent" on working with neighbouring authorities to find sites for development[16] but there is evidence that cross-boundary developments are being held back.[17]

Neighbourhood Planning now creates a mechanism for communities to actively contribute to the developing and siting of housing and other amenities, within the context of a Local Plan and evidence of housing need. Although Neighbourhood Planning is not mandatory it does provides a new level of planning reflecting the desire for increased local, democratic engagement. The process has, however, been described by some as a "NIMBY's charter" effectively allowing local people to block development locally. [18] Planning reform, although a positive step, does not address perhaps the more significant problem of opposition to local development, which is a major block to addressing housing need. While participative democracy is a welcome addition to the planning system, it must be ensured that local areas have sufficient housing to meet needs, even if there is local opposition.

Opposition to development from local populations can be a significant barrier to many developments. Despite an acceptance of the scale of the housing crisis at a national level, these concerns are not necessarily reflected in support for development at the local level[19] and there is often little local support for many developments.[20] The reasons behind this are complex and may be well-founded. It is important to listen to communities and respond constructively to concerns. And these issues need to be balanced against the range of problems with the housing system. **Communities need to be aware of the imminent pressure on housing and resources in their local area**.

In addition, communities are likely to consider developments only at a relatively limited neighbourhood level. There is currently no support for communities to be involved in larger-scale planning for the wider area. To address this issue BSHF suggests the Department for Communities and Local Government works with local authorities to develop mechanisms and statutory guidelines for involving communities in planning beyond the local level.

As local communities become increasingly involved in planning, it is important that they are supported to think beyond their immediate area and consider the needs of future generations. The concept of neighbourhood planning should have **"regard to potential future needs rather than just the preferences of existing residents"**.[21] Just as local authorities must be encouraged to tackle housing issues together and consider larger, joint developments, so too must the debate involve communities.

The current mechanisms in place to facilitate larger-than-local planning are intended for local authorities, other statutory bodies and, to a certain extent, LEPs. For a truly participatory planning system there needs to be a process for a range of cross-boundary communities and neighbourhoods to engage on an equal footing with statutory bodies and other organisations. There are already

concerns that the test for financial viability in the NPPF will be used to "veto [a] local community's aspirations".[22]

c) How can the planning system play a role in delivering business and growth (including addressing transportation) and in revitalising areas which fall into neglect? What role should:

i) Central Government play

BSHF has no specific comment on the role of central government in delivering business growth in revitalising areas. However, issues of transport and business infrastructure should be covered in a national strategic spatial strategy. Please refer to answer 1(b) on this point.

ii) Local Government play

BSHF has no specific comment on the role of local government in delivering business growth in revitalising areas.

d) Do we want to abolish the Planning Inspectorate? What role, if any, should the Secretary of State play in any decisions which are not national and clearly should be resolved locally?

Central government is able in intervene in local planning issues when there is evidence to suggest that local planning authorities are "not performing adequately". In this case, local authorities become subject to "special measures" and major planning applications will be taken by the Secretary of State for Communities of Local Government.[23]

However, the overruling of many local decisions is, for some, a sign that the rhetoric of localism is powerless in the face of planning and development, even on previously protected greenfield land.[24] While local decisions are ideally made at the local level there will, inevitably, be circumstances which, for one reason or another, require national-level input. A National Strategic Spatial Plan would not only provide additional guidance for local authorities it would also provide the context for decisions made at the national level and a framework for central government intervention in local decisions (see response 1(b)).

Under current legislation local authorities, and other statutory bodies, are required to work together constructively on a range of planning issues under the Duty to Cooperate. There is a lack of clarity, however, around defining a failure to cooperate and how best to deal with conflicts "when local authorities cannot resolve them by themselves".[25] This situation has the potential to be time-

consuming and costly for all partners, leading to legal challenges and stalling development.[26] In these circumstances BSHF has called for a **regulatory body with appropriate authority and powers to sanction** to be appointed to manage disagreements between local authorities. BSHF proposes that the Planning Inspectorate could take on this role.

The Planning Inspectorate, the authority responsible for reviewing Local Plans, has stated that the Duty to Cooperate is a process that takes place during the preparatory stages of a Local Plan. As things stand, after plans are submitted, the Planning Inspectorate would not, therefore, be able to support local authorities to resolve issues with the Duty. Despite this the Planning Inspectorate would appear to be well-placed to take on this role as they have the knowledge and expertise required. They are currently the reviewing body for Local Plans and could provide sanctions for those statutory organisations which have not consulted widely enough or worked constructively with other authorities. The Planning Inspectorate should receive adequate support and resources to take on this function in a timely manner, in order not to create additional delays.

e) In two tier authority areas, how can we ensure full involvement from district councils where the county is the relevant planning authority (e.g., for minerals and waste)? Gravel pit extraction and fracking are key concerns.

According to the recently published National Planning Practice Guidance (NPPG) "close cooperation between district local planning authorities and county councils in two tier local planning authority areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education".[27]

BSHF has recommended that **the Department for Communities and Local Government strengthens mechanisms supporting the Duty to Cooperate**. The Duty to Cooperate has been criticised for its lack of clarity, meaningful sanctions or mechanisms for cooperation and there is concern that the problems created by the abolition of RSSs will not be effectively addressed.[28] The Communities and Local Government Select Committee has therefore called for "a framework for local authorities to work within, outlining what actions local authorities should take in their duty to cooperate, how they measure success or failure, how parties may insist on the delivery of what has been agreed and default options if there is inadequate cooperation".[29] This recommendation was been reiterated in the Taylor Review of Planning Guidance.[30] While the NPPG provides clarification around some of these issues incentivising authorities to work together would further encourage constructive joint work.

f) Publicly-owned land. How can we improve accountability for government departments and other public land holding bodies (e.g. Network Rail) that "land bank"? How can local authorities and communities challenge to ensure that redundant land is either put into use or released for development where appropriate?

The government has recognised the potential benefits of increasing the supply of public sector land as a means to provide land for housing.[31] In order to deal with this issue a range of initiatives have been developed to accelerate the release of land. This is a positive step if it results in an increase of suitable land for building. However, there are other mechanisms which could be considered regarding the release of both public and private sector land.

For example, HM Treasury should require public sector bodies to reflect a cost in their accounts as if they were paying market rent for their land and buildings. This **'shadow market rent' mechanism** would increase public sector bodies' appreciation of the holding cost of those assets. At present the holding cost may be perceived to be near zero. Appreciating the true holding cost of land and property assets will encourage efficient use, and in some cases may prompt disposals, making them available for other uses, including redevelopment to provide housing.[32]

In promoting the release of public sector land and facilities it is also important to **consider the readiness and suitability of the land**. For example, the decommissioning of MOD villages in Lincolnshire has resulted in piecemeal land ownership with absentee landlords, a lack of infrastructure, and substandard roads and utilities being left 'unadopted' by local authorities.[33] In these instances it is vital to consider the sustainability of new and existing communities.

While it is important to encourage the release of public sector land it is also worthwhile considering mechanisms to **support private owners to bring land to market**. Currently, landowners ready to release large parcels of land face high taxation demands, which, under the present system, must be met within that fiscal year. One option to support landowners to release land would be a system of tax deferral. This would have no impact on the amount of tax paid but rather would allow landowners to manage their payments over a longer period of time, making the release of land more viable.

In addition the UK tax system can also discourage landowners from developing their land for rent. The government is keen to promote institutional investment in the private rented sector and has sought to address some of the barriers to this through the Montague Review.[34] This approach offers the potential for genuinely new developments to contribute to the growing need for private rented

accommodation. It also provides such developments with a stakeholder committed to the land and a long-term view for growth in the local area. It is an approach which could prompt higher quality projects.[35]

Landowners can be unwilling to release land with planning permission due to land value expectations.[36] In response to this problem the International Monetary Fund endorses "fiscal disincentives for holding land without development".[37] There are a number of international examples of such systems of taxing unimproved land, such as in Denmark and New Zealand.[38]

Section 2: Delivering vision at a local level

How can we deliver a vision at local level?

a) How do we get more leadership into the planning process, both from ward councillors and from the cabinet, to help get the maximum from planning opportunities and make plans attractive to local residents?

Residents must be encouraged and empowered to make an active contribution to the planning process. Developing plans that are attractive to local residents must, therefore, incorporate the views of local residents. **Charrettes** are an interesting tool by which to explore community attitudes to development. This intensive process allows relevant stakeholders, including residents, council representatives, architects and planners, to discuss local development within an interactive forum. The Scottish Government is actively promoting charrettes as a means to "allow people to positively shape the decision-making process in their communities in a dynamic and effective way, improving the quality, attractiveness and success of places across Scotland".[39] Strong local leadership is required to prioritise community participation and ensure local views are taken into account.

BSHF recognises the need for debate and engagement on planning issues at a local level. Swindon Borough Council, for example, is reaching out to its residents to create a dialogue on the pressures it is facing due to increasing demand and reduced funding.[40] The Swindon model may be particularly valuable in generating debate.

Such initiatives, however, must accommodate more than just a one-way communication strategy. A debate needs to take place at a number of levels, in a variety of places and in different ways. People need to have the opportunity to contribute to the debate as well as receive accurate information. That contribution must also have the potential to impact on decisions at the local, larger-than-local and national levels. Both mainstream and social media can provide a platform and host discussions. **Those most affected, and disaffected, by the housing crisis need to be included.** Their voices need to be heard and their stories should be a call to action.

Are planning officers currently trained to deliver strategic outcomes?

BSHF has no particular comment on the current training of planning officers in respect to delivering strategic outcomes (Section 3 does cover departmental skills and capacity specifically relating to issues of design, see page 18). Nevertheless it is essential that housing and planning practitioners have the necessary knowledge to build desirable places for people to live in. The **marginalisation of the planning profession** has been highlighted, as budget cuts and the politically sensitive nature of planning decisions impact on the ability of planning departments to freely exercise their professional judgement.[41]

Do we need to rethink current council structures in relation to planning, to make sure the links between other policies are fully compatible at cabinet level (e.g. health policies)?

It is vital that policies are strategically aligned and departments work together to improve the health and wellbeing of their residents. In particular the links between planning, housing and various health issues have been long-established.[42] The decentralisation of the responsibility for public health to local authorities, along with recent NHS reforms, provides an opportunity to highlight the role of planning and housing in relation to health and develop new relationships to tackle these issues. In particular **the inclusion of housing representatives on local health and wellbeing boards** has recently been suggested.[43] This would be a positive step and may provide a means to consider some of the practical health and housing projects that are taking place in the UK today.[44]

b) How can the planning system best be used to solve problems and concerns in a community (e.g. levering in access to and creating more green open space, affordable homes and school places)?

The Localism Act 2011 has given the public greater powers for involvement and participation in the planning process. This is a positive model for development and recognises the importance of community-based responses and community planning methods. Other recent initiatives, such as Community Right to Reclaim Land, Community Right to Bid and Community Right to Build work to strengthen the concept of community ownership and engagement.[45]

In our recent report, *Creating the Conditions for New Settlements in England,* BSHF recognises the importance of community involvement to develop sustainable communities. New Settlement Partnerships are recommended as a model to encourage a range of stakeholders to play an active role in shaping new communities.

In order to **secure long-term stewardship and management of communities** a partnership should be endowed with income-generating assets to sustain civic and practical functions in years to come for the benefit of the community. The endowment of resource-generating assets would mean that liabilities, such as communal parks and gardens, are financially secure. Community involvement in any such work would be a vital component of ensuring community benefit. These management responsibilities may require **the provision of training for community members** to enable them to take on these obligations. Examples of potential assets for community ownership include the freehold of land to provide ground rent income and taking control of reserve sites for community facilities or enterprises to be developed in response to future needs.

There are a range of different models by which this could be achieved, including the approaches adopted by the **Letchworth Garden City Heritage Foundation**[46] and the **Milton Keynes Parks Trust**. The latter is endowed with a property and investment portfolio and looks after 5,000 acres of parks and green spaces so that these communal features can "be managed and protected forever, without having to compete for funds with other council priorities".[47]

There are further models which can be explored as a means of empowering communities to take an active, long-term interest in the future development of their community. For example **Community Land Trusts** offer a mechanism for capturing increases in land values for the benefit of a community. Housing or commercial activities can be planned to provide an income stream for the future.[48]

c) How can communities be encouraged to engage with neighbourhood planning? What is the role for neighbourhood forums after Neighbourhood Plans have been adopted?

It is important that communities are empowered to work together and that their interests, desires and concerns are listened to and responded to appropriately. Planning and development are rarely one-off undertakings. Villages, towns and neighbourhoods continue to evolve in reaction to local, regional and national circumstances. It is important to maintain local interest in planning issues over the long-term; neighbourhood forums provide a useful opportunity for ongoing engagement. It may be necessary to **provide funding for the training and facilities needed for communities to engage on planning issues**.

d) How do we agree how many homes should be built in an area, and how can this be made to work and for whom? At the moment, for example, some officers still work on the old Regional Spatial Strategy numbers. Is there a clear and transparent process for calculating housing need and/or challenging the RSS figures?

Abolishing Regional Spatial Strategies also put an end to regional housing targets. Housing targets are now set at a local level. This has seen the level of identified housing need drop dramatically in some areas, with only the North East of England increasing targets. **Research by BSHF has demonstrated that many local authorities lack the skills and resources required to develop robust measures of housing need.**[49] However, a toolkit has been developed – with support from BSHF – to help local authorities improve their assessments. The resource was developed in response to a call from practitioners for practical support in assessing how many homes were needed in their areas in the context of the new housing and planning landscape. The **What Homes Where toolkit** is freely available online (http://www.howmanyhomes.org/index.html).[50]

e) Should planning seek to ensure different types and tenures of housing are built into local plans (e.g. social rented; 1 bed/2 bed)? How could we do this?

Mono-tenure developments are associated with a number of adverse individual and neighbourhood effects.[51] Mixed communities, both in terms of housing size and tenure, allow households to move between housing tenures and types, without having to leave their communities. Tenure-blind developments allow for quality of design and construction throughout a neighbourhood or community and prevent the stigmatisation of areas.[52] Therefore, inclusion of a range of housing types and tenures should be built into local plans.

f) Should we support the LGA campaign to have more local "use classes" to help meet local needs?

While BSHF has no particular comment to make on this point we do support the concept of local authorities having the power to plan multi-use, sustainable neighbourhoods for the benefit of a range of users and to adequately respond to residents' concerns regarding the composition and usability of high-streets and commercial areas.

g) What further could be done to support our high streets and district shopping centres (thinking about reviews by Portas and Grimsey)?

BSHF has no particular comment to make on how best to support commercial or retail development and sustainability.

Section 3: Housing standards

What needs to be done – if anything – about design quality, building/sustainability standards and enforcement?

There has been widespread recognition of the poor quality of some housing developments in England.[53] The government has called for local planning authorities to tackle unattractive developments with a lack of individuality and character, which are seen as the norm.[54] **Poor planning and design can affect social wellbeing.** For example, "crime and the fear of crime have a considerable impact on the lives of individuals and their wider communities. The role good planning and design have to play in both reducing crime and giving people peace of mind [shouldn't be underestimated]".[55] Secured by Design is a scheme intended to provide advice and tools for architects and planners to design features which minimise the risk of crime.[56]

There is also a relationship between health and spatial design. Pollution, green and open space, transport connections, access to food and community participation have all been identified as having a "significant impact on health".[57]

Building for Life 12 is a government-endorsed, voluntary scheme designed to help local planning authorities assess the quality of new developments and to generate discussion between the various stakeholders involved.[58] A regional audit of new build developments based on Building for Life criteria assessed a large majority of developments as either average or poor.[59]

In addressing these issues of poor design, there are further challenges to be overcome, including the operation of the construction industry and the availability of the necessary skills within local authorities.

The current trader model is the predominant model of market housing provision in the UK. This "consists in essence of a cycle of land acquisition, development and outright sale. Profit is the margin between sale price and acquisition and development costs; the developer retains no long-term interest in the property".[60] This approach does not encourage high quality development, as builders do not maintain an interest in the property and so quality has less impact on profitability. Because of this lack of long-term interest "There is … no particular incentive to design to any higher quality than that needed to achieve the initial sale: aspects such as public realm and long-term maintainability assume less importance than features such as a double garage".[61] In fact, investing additional resources in increasing the quality of property may even be seen as a threat to

viability. The Callcutt Review noted that "**within the housebuilding market as it is today, the incentives for quality are weak**".[62]

There is also concern that some planning departments lack the necessary professional skills and capacity to effectively tackle design issues.[63] Equally, it has been suggested that considerations other than the appropriateness of developments have an increasing impact on planning decisions. As planning department budgets are further constrained, there is a risk that planning becomes increasingly marginalised.

England, along with the rest of the world, is also facing the **challenges of climate change** and the need to reduce both the consumption of natural resources and the emission of carbon dioxide. The government has highlighted a range of policies in this area, including: greater use of low carbon technologies and renewable energy sources, improving household energy efficiency and reducing transport energy consumption.[64] If we are to respond effectively to the threat of climate change, there is a need for places to adapt and become resilient to issues such as flooding. Alongside these pressing concerns, preserving the natural environment for current and future generations is an important goal.[65] Not only does this maintain the aesthetic and social benefits of access to the countryside but also protects biodiversity, which is vital for ongoing environmental sustainability.[66]

Currently there is some uncertainty regarding the government's commitment to meeting the housing zero carbon standards in 2016.[67] At the moment the UK fares poorly on energy efficiency of homes compared with many European countries.[68] For example, in terms of the thermal efficiency of walls, the UK was ranked seventh out of eight countries tested.[69] Not only does this increase carbon emissions but also puts households at greater risk of fuel poverty.

BSHF is supportive of a consultation on these issues and to this end will be contributing to the government's current request for submissions regarding building regulations.

Should there be top down standards from Central Government or should standards be set entirely at local level?

Appropriate minimum space standards and/or space labelling for new-build housing throughout the country, if appropriately implemented, could be a welcome development. **Space is vital to "maintain health, safety and wellbeing, and to enable working, social and family lives".** [70] The UK, though, builds some of the smallest homes in Europe.[71]

BSHF supports the introduction of a mandatory space standard across England for all new build properties regardless of tenure. There are, certainly, a number of complexities to be considered. For example, the government has strongly promoted the rights of local areas and communities to determine their own environments, particularly with regard to planning and development. To prevent local authorities from doing so with regard to space standards is at odds with this principle. Were local authorities to set local standards, or impose additional local space standards, however, the problems for builders generated by a multiplicity of standards across the country will be manifold. Therefore, if local authorities were to be allowed to make decisions locally on this issue, they should be required to have due regard to the potential impact on viability and affordability, including an appropriate assessment of these issues.

Nonetheless, mandatory space standards (as opposed to voluntary approaches) have the advantage of ensuring that all homes built are of a sufficient size. As with other building regulations, this ensures the quality of the dwelling stock, which is important if all households in Britain are to live in decent housing, both now and in the future.

Furthermore, the UK is facing increased health and social care costs in relation to the aging population.[72] Currently the Lifetime Homes scheme provides a set of design criteria to be applied to new housing to make it accessible for residents throughout a lifetime.[73] Individual homes should be constructed to provide accessible and adaptable spaces for a variety of people including wheelchair users and young families. These guidelines are not compulsory, but BSHF supports building new homes which are suitable for a range of household types over the course of a lifetime.

In terms of design, **design codes provide an opportunity to build better quality places and buildings**. These are detailed, technical instructions on "constructing buildings within a certain geographic area [and] based on a specific vision for place-making". The use of design codes has been shown to lead to better quality housing at the same time as speeding up the planning process.[74] In addition, they may be particularly useful for sites in "multiple ownership" or developments involving a range of developers. Four main benefits of design codes have been identified:[75]

- They encourage higher design standards.
- They, almost always, require the input of qualified architects rather than relying on design technicians.
- They foster a collaborative relationship with local authority planners, leading to swifter planning consent.

- They allow smaller house builders, more accustomed to building at a higher specification, to compete on a more equal footing with volume house builders.

While BSHF is supportive of the concept of design codes these should be developed and constructed at a local level in order that they are appropriate for the local context and take into account the viability and affordability of schemes.

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