

# CIH response to MHCLG consultation on 'Changes to the current planning system'



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## About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

Further information is available at: [www.cih.org](http://www.cih.org)

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## General comments

Thank you for the opportunity to comment on the proposed changes to the current planning system.

CIH welcomes the government's ambition to deliver more new homes and the recognition that this must be "the housing people need". Across all tenures households are facing huge challenges in accessing affordable decent homes and we need a planning system that ensures we have the right kinds of homes, in the right places and at the right prices. Everyone deserves a safe, secure, comfortable place to call home and delivering a step change in the numbers of houses being built is critical in this. However, it is not just about numbers. Delivering the right types and tenures of homes is also crucial. Whilst CIH supports the government's ambition for more affordable home ownership, we also know that social rent is a very pressing area of need. In England, each year [90,000 homes for social rent](#) would need to be built over the next 15 years to address this need, a need which is only likely to increase as a result of the coronavirus. An opportunity exists here to shape a recovery that benefits every community and leaves no one behind. Building genuinely affordable

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homes can help to make this happen and therefore we urge government to consider their proposals in light of this.

CIH has a number of specific comments about the proposed changes to the current planning system which we consider below under the four main proposal areas, before answering the specific consultation questions in turn.

CIH would welcome the opportunity for further engagement and involvement as the changes to the current planning policy and regulations progress.

## **The standard method of assessing housing numbers in strategic plans**

CIH welcomes the government's review of the standard method and the recognition of the limitations of the current method, including that it is based on backward looking demographic trends. We support the government's ambition to achieve a 'fair share' approach and we welcome government's commitment to growth and substantially increased levels of house building.

However, we have concerns about the potential risks of a 'one-size fits' all centralised approach to calculating housing targets moving away from local authority discretion. Whilst we welcome the government's ambition to achieve a more appropriate distribution of homes, we question if the proposals will create a stable, fair and deliverable housing need figure for every local authority which ensures that the supply of new homes is highest in the areas where they are needed most and not only where prices are highest.

Whilst CIH welcome the objective of 'levelling up' in the north and midlands, [research by consultants Lichfields](#) appears to show the new method may actually fall short of the government's objective. The unintended consequences of the revised method will be a direction of development away from a number of urban areas, particularly certain cities in the north. Lichfields' calculations based on the proposed standard method, show the creation of a continued concentration of housing growth numbers in London and the south of England, with some areas of the north and midlands flatlining or falling below recent delivery. This will leave some local planning authorities (LPAs) with extremely high numbers which are unlikely to be deliverable given land constraints. On the flip side, it also shows a lack of scope for ambition and vision for other areas, which have been delivering significantly higher numbers over the last few years. For example, in Liverpool the average delivery over the last three years has been 2,817, the current standard method generates a figure of 1,558 and the proposed standard method only 1,154. Similarly, in Manchester the average delivery over the last three years has been 2,370, the current standard method figure is 2,613 and the proposed method generates only 1,645 ([analysis by Lichfields](#)).

Our members surveyed in our member opinion panel (MOP) were split evenly as to whether they thought the new focus and method will achieve any more of an

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appropriate distribution of homes than has been the case with the current standard method. This split reflects the variety of different housing markets that our members are operating in. It seems logical that any new method should be weighted towards urban areas and towards the midlands and northern areas to reflect constraints in London and the south east, and also that a new methodology should be responsive to labour force pressures to create more homes where new jobs are being created. The proposals and methodologies require more detail. For example, what happens if a local planning authority fails to meet their new housing numbers, and how will housing need be redistributed or agreed cross-boundary with the removal of the duty to cooperate?

*"This proposal fails to address the basic problem of developing affordable housing, which is the lack of availability of potential housing development sites and the prohibitive cost of land"*

(CIH MOP response)

## Response to detailed questions

**Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?**

We consider it is a positive step to include stock in the method to address some of the shortfalls of solely relying on household projections. However, the proposals are still considerably reliant on household projections which means the feedback loop of housing projections is not addressed and it does not solve the problem of the low projected population growth certain areas. Housing need is a complex issue. It does not seem from the proposals that the new method goes far enough to capture that complexity and really evaluate the need for new housing and the opportunities it can bring to support wider objectives.

**Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.**

The application of a flat per cent of existing stock seems too simplistic for such a complicated issue with such variances across the country. A higher stock figure could be considered for the north to increase the northern target.

**Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.**

This measure of affordability effectively indicates the extent to which employees can afford to live where they work, it is a longstanding and well recognised data set.

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However, it may be that there are other factors which should also be incorporated into these adjustments to reflect the complex nature of this topic. The main driving force for the size and mix of local development should be local needs and correspondingly there must be a mechanism for reflecting this in the affordability assessment and ensuring it is then embedded in the planned numbers and mix.

**Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.**

Whilst it seems logical to incorporate an adjustment for affordability over a period as long as 10 years, considering both current affordability and affordability over a ten-year period gives affordability a double weighting. This is partly what is driving the unrealistically high requirements in some areas of London and the south and the minimal uplift effect in other areas, particularly the north. Solely focusing on affordability for an uplift overly-simplifies the drivers of housing markets and results in a level of housing which is insufficient to meet jobs growth aspirations in some areas.

**Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.**

Whilst we support the consideration of affordability, the affordability uplift proposed will inevitably focus attention on parts of the country that are unaffordable. There is a risk that, by simply channelling back these figures into the least affordable places (a southern centric focus), many LPAs will be left in a situation where they have a huge target they cannot deliver because of the land constraints of their authority. There may be other ways to consider it which warrant further investigation such as migration trends and other market signals. We urge the government to consider again its method to address greater complexities.

**Do you agree that authorities should be planning having regard to their revised standard method need figure, the publication date of the revised guidance, with the exception of:**

**Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?**

We appreciate that this package of reform is intended to create greater certainty and enable more houses to be delivered. However, the reality could be greater uncertainty in the interim and a very mixed complicated picture with authorities covered by a number of different methods until the details of the new National Planning Policy Framework (NPPF) are released which confirm binding housing requirements. For example, if an LPA with a large number of constraints is part way through the plan making process and a high housing number is generated through the

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proposed changes, it may feel it is beneficial to hold back and see what the later algorithm generates particularly as it is understood this will take into account land constraints. This would then be counterproductive to the government's aim. Questions also remain unanswered about what happens from a development management point of view in the interim period.

**Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?**

No comment

## Delivery of First Homes

CIH welcomes the government's ambition to support households to access affordable home ownership. Across all tenures households are facing huge challenges in accessing affordable decent homes. There is currently a pressing need to build homes of all affordable tenures and First Homes must form part of a wider, long term plan aimed at fully addressing the housing crisis. There must be a level playing field enabling local authorities and their partners to deliver mixed communities with the widest range of affordable tenures to ensure genuinely affordable homes are provided in thriving communities for all in our society.

It is imperative that First Homes are not delivered at the expense of other much needed forms of affordable housing. The planning system is currently a major mechanism for delivering new affordable homes for rent. Nearly half (49 per cent) of all affordable homes delivered in 2018-19 were funded through section 106 (nil grant) agreements. Sixty six per cent of new affordable homes in 2018 - 2019 were for rent (including social, affordable and intermediate rent ([National Statistics, Statistical Release, November 2019](#))). It is vital that First Homes are provided alongside rather than instead of other affordable housing options to ensure the housing system works for everyone in our society. The ['People in housing need' report](#) published in September 2020 shows that nearly 8 million people in England have some form of housing need. For more than 3.8 million of these people, social rented housing would be the most appropriate tenure to address that need. On top of this the number of people in need of social housing could rise rapidly as a result of the coronavirus crisis with low-income earners roughly twice as likely to lose their jobs. Whilst the government's focus on home ownership is understood, long-term investment in social housing is also needed to tackle this problem and provide people with suitable homes they can afford.

## Response to detailed questions

**Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and/or evidence for your views (if possible):**

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
- ii) Negotiation between a local authority and developer.**
- iii) Other (please specify)**

We consider that option i) is the most appropriate of the options presented as LPAs are best placed to set these ratios. However, we are extremely concerned that First Homes could be delivered at the expense of other much needed forms of affordable housing. The proposed placing of First Homes as a priority over other affordable home-ownership products will mean that the opportunity for the delivery of versions of shared ownership will be largely lost. Shared ownership has been very successful in some places offering an affordable route into home ownership for many people. It offers an established model widely accepted by mortgage lenders and the funders of social housing providers. It provides flexible access to different shares of equity purchased to enable a flexible response to local housing market factors. It is also an effective mechanism for receipts to be recycled back into the delivery of new homes.

Also of great concern are situations where First Homes replace all home ownership products and then chip away at the affordable and social rent delivery too. For instance, the consultation cites as an example a situation where a local plan requires the affordable housing mix to be 20 per cent shared ownership, 40 per cent affordable rent units and 40 per cent social rent units. A compliant application would therefore deliver a tenure mix of 25 per cent First Homes, 37.5 per cent affordable rent and 37.5 per cent social rent. Displacing affordable and social rent in favour of First Homes gives us serious concern. This initiative should not come at the expense of the provision of the required affordable housing products identified in local plans. Other mechanisms should be found so that First Homes can sit alongside the other affordable housing tenures and potentially increase the number of new homes delivered overall.

Local authorities are best placed to understand the housing needs in their areas and therefore are best placed to decide their requirements for tenure mix. The top down imposition of 25 per cent First Homes is therefore not appropriate regardless of how the remaining 75 percent is then divided up or negotiated.

*"I don't have a problem with the notion of First Homes and they are a huge improvement on Starter Homes, BUT I don't agree with blanket imposition -*



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*they should be tool in the bag for local planning authorities to seek as part of the affordable mix where the local evidence base supports them”*  
(CIH MOP response)

*“Local need must trump this initiative. An assessment of how First Homes can fit with the affordable housing needs of local people is the focus”*  
(CIH MOP response)

**With regards to current exemptions from delivery of affordable home ownership products:**

**Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?**

Yes, we consider that the exemption from the requirement to deliver First Homes should apply in line with the current exemptions set out paragraph 64 of the NPPF as First Homes is not appropriate to impose in all development scenarios.

**Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.**

No comment

**Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.**

There may be other exemptions needed such as for community-led development (generally via Community Land trusts) which might not be 100 per cent affordable housing.

**Q12: Do you agree with the proposed approach to transitional arrangements set out above?**

No comment.

**Q13: Do you agree with the proposed approach to different levels of discount?**

Affordability varies significantly by location. Thirty per cent seems like a practical starting point and any level above this should be determined at the local authority level or housing market area level to relate to local incomes and local house prices. However, it is also important to note here that whilst affordability is linked to the depth of the discount without being linked to local incomes, in some locations even a discount of 40 or 50 per cent would not be affordable for many. For example, in the Royal Borough of Kensington and Chelsea, the average house prices are estimated to be 39.6 times average annual earnings ([ONS, affordability data, 2019](#)). Here a

discount of even 50 per cent would still mean that home ownership through the scheme is well out of reach for many potential first-time buyers and key workers. In addition, if the depth of the discount is too great there is risk that a 'First Homes trap' will be created. This would mean purchasers using the scheme will be unable to 'move up' to a larger home which meets their needs when their family grows or circumstances change because the depth of the discount on their first property means the financial jump to the next property, where no discount would be provided, is too great. Where such deep discounts are needed to make First Homes accessible, there are almost certain to be even greater needs for more accessible and affordable housing options.

**Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?**

We do not support proposals for amending the scope and definition of entry level exception sites. Whilst it is accepted that the take up of entry level exception sites has been relatively low, the refocusing of entry level exception sites on First Homes may make it more difficult to meet local needs for affordable rented homes on those sites. It is important that local areas have the tools needed to meet their objectively assessed needs.

If the First Homes exception sites policy is introduced, then flexibility should be permitted in the policy to allow a proportion of other affordable homes to be delivered on these sites as well where there is an identified local need. If market housing is to be allowed to ensure viability then what is meant by a 'small proportion' should be defined to provide certainty.

**Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?**

No. We have concerns that a site size definition based only on being "proportionate in size to an existing settlement" is too open and cannot be reasonably applied across a range of scenarios. For example, a 'proportionate' site adjacent to a market town could generate a relatively large development on an unallocated site without generating Community Infrastructure Levy to deliver the necessary infrastructure. A less ambiguous and quantified threshold is required.

**Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?**

Yes, the First Home exception sites policy should not be applied in designated rural areas. Rural exception sites are being implemented in some areas and can and do play an important role in delivering new homes to meet local needs. Greater promotion of such schemes and support for housing enablers working specifically with applicants and Community Land Trusts through planning could enable greater uptake.



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Reinstatement of Homes England funding for Community Land Trusts, which had been building up a significant programme, would also assist.

In addition, we also consider that a more inclusive definition of “designated rural areas” should be considered as this is based on a S157 1985 Housing Act definition, which will not apply to 70 per cent of smaller rural communities. We would welcome the replacement of the definition to ‘all parishes with a population of 3,000 or fewer’.

## Supporting small and medium-sized developers

CIH welcomes the ambition to stimulate economic recovery with particular focus on small and medium sized (SME) developers. Like the government, we recognise the important role SMEs play in both contributing to overall housing supply and also providing more variety in the type and design of homes. The final report of [Sir Oliver Letwin's independent review of build out](#) concluded that the homogeneity of the types and tenures of homes on offer on large sites limits the rate at which the market will absorb them. In light of this, the role of SMEs in developing small sites offering more bespoke housing products seems even more significant.

However, we have serious concerns about extending the small site policy and the impact that this would have on the provision of affordable housing and also its genuine ability to reduce the economic pressure SMEs are under and allow more small sites to come forward. The needs of SMEs are complex and nuanced, and this policy does little to understand these needs nor will it advantage SMEs over volume housebuilders. In addition, this temporary scheme could potentially increase complexity and uncertainty when considered in conjunction with how it fits into the plan making process. If an SME is needing to challenge an adopted plan policy to access this scheme, this seems counter-intuitive. There is a lack of detail in the proposals about how this will be implemented.

## Response to detailed questions

### **Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?**

No, we do not agree with the proposed approach to raise the small site threshold. Raising the small sites threshold in this way has the potential to remove the only available sites in some settlements to provide some level of affordable housing, thus depriving the community of much needed affordable housing.

These proposals could be particularly damaging in rural areas which are disproportionately reliant on small sites and s106 homes and often suffer from issues of affordability.

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*This will have an adverse effect on affordable housing delivery, particularly in rural areas, where sites tend to be smaller. The proposal may also result in developers "banking" small sites with planning permission that avoid any affordable housing contribution, which will probably result in such sites commanding a financial premium on resale, to the benefit of the landowners without any new homes being built. The proposal does not prevent landowners submitting revised planning applications to eliminate previously agreed affordable housing contributions.*

(CIH MOP respondent)

Those likely to benefit from this scenario are landowners rather than SMEs or people who are disadvantaged by the housing market.

An example of the impacting loss has been modelled out by Grand Union Housing Group who build over 300 new homes every year across Bedfordshire, Milton Keynes and Northamptonshire. This is an area of the high affordability pressures with average house prices 8 to 10 times average incomes. They estimate that lifting the threshold to 40 will result in least 77 fewer affordable homes per year in Milton Keynes, 35 fewer affordable homes per year in Central Bedfordshire and 34 fewer affordable homes per year in South Northamptonshire (source Grand Union 2020).

## **Q18: What is the appropriate level of small sites threshold?**

i) Up to 40 homes

ii) Up to 50 homes

iii) Other (please specify)

iii) We consider that the small sites threshold should be set locally rather than nationally. Some areas, including some cities, have many small sites and very few larger sites. In such areas, a number lower than 10 might be appropriate if viability can be demonstrated. However, if a national figure must be set, we consider it should remain at 10 homes.

## **Q19: Do you agree with the proposed approach to the site size threshold?**

More detail is required to answer this question. The proposal to "scale up the size threshold at the same proportion as the increase in homes threshold" is insufficient. It seems logical that there would need to be an increase in the site size threshold if the numbers are increased.

## **Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?**

No, we do not agree. It seems likely that the raised threshold will inflate land prices for longer than the 18-month period since applications approved in that time could be built out over a longer period. Also, we are concerned that there will be

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problems when it comes to removing the threshold and therefore it could be extended which will lead to more loss of affordable housing.

## **Q21: Do you agree with the proposed approach to minimising threshold effects?**

We agree that there is a risk that developers will artificially split sites and bring forward large sites in phases to avoid contributions. However, there is a lack of detail in the consultation document on how this will be minimised. The proposals only say that it will be set out in planning guidance how LPAs can secure contributions for affordable housing where it is apparent that a larger site is being brought forward. We would be happy to comment on this when more detail is provided but cannot comment currently as the consultation includes no meaningful proposal of how this would be done.

## **Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?**

Yes, we agree with the maintenance of the current threshold that in designated rural areas LPAs can set a lower threshold of five units or fewer in their plans. However, a more inclusive definition of "designated rural areas" should be considered. We suggest that the definition of designated rural areas be replaced from those listed under S157 regulations to 'all parishes with a population of 3,000 or fewer'. This would provide a definition that is transparent and provides consistent coverage across rural England.

## **Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?**

Yes, there are many ways the government can support SME builders to deliver new homes and this deserves thorough investigation and consultation. Direct support to SMEs should be available to assist them without localities losing out on affordable housing. Local authorities could be encouraged to form more strategic partnerships with local SMEs. In addition, a simplified s106 process could be introduced for smaller developments allowing more flexible options (including deferred cash contributions) without abandoning important affordable housing contributions altogether.

*"this is not the way to encourage SME builders. Affordable Homes grant should be available for a limited period to support them"*  
(CIH MOP response)

## **Extension of Permission in Principle (PiP) consent regime**

CIH does not object to the extension of this consent regime which has been rarely used to date, however there is a lack of detail in the proposals being put forward.

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PiP arguably could be an attractive, less expensive, more secure route for some developers. However, it is important to note that the PiP process is not well understood or utilised. LPAs will require adequate resources to deal with its increased use. LPAs only have five weeks to determine a PiP application as opposed to eight weeks for an outline application. This is a huge undertaking for already significantly over-stretched and under-resourced planning teams. It is unreasonable to expect planning teams to take on another burden to determine these applications faster and with lower planning application fees being generated from them. LPAs will require more funding and expertise to get to grips with the PiP regime so that this change does not actually cause less certainty rather than more. There is also the issue of less opportunity for local democracy in the determining of PiP applications which must be addressed.

## Response to detailed questions

**Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?**

No comment

**Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.**

No comment

**Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?**

No comment

**Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.**

No comment

**Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities**

**34i) required to publish a notice in a local newspaper?**

**ii) subject to a general requirement to publicise the application or**

**iii) both?**

**iv) disagree**

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Yes, otherwise it is a route to bypassing local democracy and engagement.

**Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?**

No comment

**Q30: What level of flat fee do you consider appropriate, and why?**

No comment

**Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.**

No comment

**Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.**

No comment

**Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?**

No comment

**Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.**

No comment

## Public Sector Equity Duty

**Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? If so, please specify the proposal and explain the impact. If there is an impact - are there any actions which the department could take to mitigate that impact?**

The dominance of First Homes and the reduction in availability of other affordable tenures through decreased s106 contributions (both through raising the small sites threshold and displacement through by First Homes) will negatively impact on many people including some of the protected groups who have lower than average incomes

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and are more reliant on more affordable tenures as a means to securing decent housing. For example, the First Homes proposals could have a negative impact on disabled people and people aged 55 and over. This is because disabled people are more likely to use other affordable housing tenures and because first-time buyers are more likely to be under 55. The reduced delivery of social and affordable rent, this will inevitably impact on those groups. In addition [Black households are most likely out of all ethnic groups to have a weekly income of less than £400](#). Therefore, Black households are less likely to be able to afford a First Home and First Homes will displace housing which they can afford delivered through s106.

## **b) What steps can the Government take through other programmes to minimise the impact on protected groups?**

Proposals need to be considered within the wider housing policy landscape, and as one of a range of housing products supporting people into secure, safe housing. There is a pressing need for more truly affordable homes particularly at social rent levels however, the proposals presented in the consultation are likely to reduce supply of genuinely affordable homes further. This pressing need existed before the coronavirus pandemic but is even more apparent now. An opportunity exists here to shape a recovery that benefits every community and leaves no one behind.

We would also urge the Government to carefully consider the accessibility and adaptability standards to which First Homes are built. Housing Made for Everyone ([HoME](#)) is a coalition of ten organisations pushing for urgent action to tackle the UK's acute and growing shortage of accessible homes. HoME calls for the 'accessible and adaptable' design standard (set out in volume 1 of the Building Regulations M4 Category 2) to be made the mandatory baseline for all new homes. This must be the case for First Homes. If First Homes are not built to a high enough accessibility standard those disabled people with a high enough income to access the First Homes initiative will not be able to use this scheme as the homes will not be suitable.

It is important also to note that the government could provide increased support for other forms of housing which would in turn provide more homes for families and first-time buyers which would therefore ease the current situation. For example, if independent living and extra care housing were better resourced and supported, then more older people would be moving out of their family homes and this would therefore free up their houses for younger people. This would help the flow through the housing market and would aid affordability as these would be homes without the new homes premium and would be likely to be within existing communities where there is already infrastructure.

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