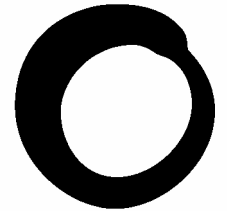


September 2005



**Friends of  
the Earth**

# Planning for Housing Provision

**ODPM July 2005**

Response to the consultation paper by  
Friends of the Earth

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## Introduction

Friends of the Earth has long-standing reservations about the analysis, prescription and effectiveness of the Barker Report's recommendations. We have expressed these concerns at a number of meetings and in a number of previous submissions. This response builds on those concerns but focuses on the detailed recommendations of the consultation paper. We are in the process of commissioning further research from Professor Ian Cole based in the Centre for Regional Economic and Social Research at Sheffield Hallam University. His scoping paper, which reflects our long-standing concerns over the Barker approach, is attached as appendix 1.

Our response is structured into two parts. Part one deals with a number of significant policy issues surrounding the role of price in planning decision-making and the consequences this will have for the effective delivery of social housing, sustainable patterns of development and public participation. Part two deals with specific redraft of the key policy sections of the consultation paper. We hope these are a helpful way of illustrating how our concerns can be incorporated into the final version of housing policy.

## Part 1

### **The role of market information in decision making**

1.1 Our major concern with the consultation paper is how "*plans should use market information, in particular prices in determining the level and distribution of housing provision*" (Box 2.2), and how this will be factored into "Sustainability Appraisal".

1.2 Sustainable Development should underpin PPS3, as is made clear in PPS1. In line with the new Sustainable Development Strategy (SDS2005), this means that economic, social and environmental objectives should be integrated. SDS 2005 is very clear that "integration" is essential, and that integration is different to "trading-off" or "balancing" of the different objectives. This recognition should be made more explicit in PPS3 by, at the least, replacing "reconcile" with "integrate" whenever Sustainability Appraisal is mentioned.

1.3 We appreciate that the detail of how market information will be used to determine housing numbers will be left to a later consultation. However, the principles by which this is done materially affect the issues raised in this consultation. It is clear (paragraph 2.2) that ODPM consider market information; "*in particular price*" should be a critical element in determining housing numbers, alongside other factors. This elevates price to the status of a sustainability objective. There are two problems with this.

1.4 First, the social objective for sustainable development is around securing housing need for everyone. House prices are a very poor proxy indicator for this. Even slightly more sophisticated price indicators - ratios of, for example, lowest quartile income to lowest quartile house prices - are poor indicators, because, for example:

- Affecting this ratio does not in any way guarantee that people in housing need will be able to buy these houses – low price houses are open to all to buy – speculators as well as people in housing need.

- This ratio only deals with the owner-occupation tenure.

1.5 Second, the means of tackling whatever price indicator is chosen has already been deemed to be increasing housing numbers. However if the policy objective is some target around price, then the mechanism of increasing housing numbers is almost certainly not the most efficient nor only means of meeting it. First, the mechanism is not likely to be effective in its own right:

- There is no guarantee that the houses built be affordable, or in the “lowest quartile”
- Supply-demand is not simple for housing – building more houses in an area can make the overall house price go up.

1.6 Perhaps more importantly though, there are many more policy mechanisms which could and should be used to meet housing objectives, not just building more houses. These include:

- Setting a higher percentage of affordable homes in any development
- Lowering the size-threshold below which developers must build affordable homes
- Tackling the incentives which are fuelling the growth of second homes (e.g. council tax rebates and the proposed SIPPS revisions)
- Relocating jobs from higher to lower demand for housing areas

1.7 The above mechanisms and others all need to be considered to achieve the optimal policy outcome. The relative use of each of these mechanisms would all affect the total numbers of housing provision needed to meet any affordability target. In addition the use of policies to improve the social rented and private rented sectors also need to be considered to ensure that measures to tackle housing need do not just focus on the owner-occupation sector.

1.8 As a result, market information – because it is a poor proxy for the social objectives of housing – should not be elevated to the position of a sustainability objective, and also housing provision should not be seen as the prime means of meeting a market-information based indicator or target.

1.9 This is not to deny the importance of market based information, as one part of the information on housing need – but in order for the Government to meet its sustainable development objectives PPS3 needs to be clearer about the extent of the role this information can usefully play at the regional level. The consultation paper is not clear as to whether price is a determinative or advisory factor in decision-making. This tension is revealed in a different expression of the language in Box 2.2 of the consultation as opposed to paragraph 6 immediately following. The redrafting of part 2 attempts to clarify this position. As we made clear in our recent meeting the current formulation in Box 2.2 bullet one is wholly unacceptable.

## Local implementation

1.10 There are a number of important concerns about how local authorities will respond to market information. The consultation paper recommends that regions will establish three kinds of housing market, although it's not clear how this will be determined. Those local authorities that sit within a high demand housing market will have a major role in responding to affordability issues. They will be required to gather information about local housing markets. They will be required to have a supply of at least five years of land available for immediate development at any one time and identify a further 10 years worth of supply. They will be required (Page 19) to bring forward land from future provision if market information indicates higher than expected demand.

1.11 This represents a second tier of market sensitivity which may require the bringing forward of land in areas of high demand and much faster rates than either the RSS or adopted Local Development Framework expected and prescribed. This raises a whole series of difficulties not just in terms of the role of price as discussed above but also of the practicality of identifying sustainable locations in areas where marketing information indicates that large-scale growth should take place.

1.12 Many local authorities in areas of high demand are already struggling to find new housing land in sustainable locations which don't impact on existing protective designations. Careful consideration is needed for how these areas will meet the requirements of five years of developable land being available at any one time. Some of these areas will not be able to continually meet the requirements of allocating ever more housing land in what is essentially an open-ended market sensitive system. We are concerned that these new pressures will lead to the government relaxing its key environmental target to develop 60% of new housing on brown field sites.

1.13 We do not support the proposal that developers should be allowed to bring forward any site in the five year supply in high demand areas. Phasing is a vital part of plan, monitor and manage. Where significant growth is intended it is even more important that phasing delivers such development in a rational sustainable way. Public understanding and confidence of the planning system is undermined if the five year supply is effectively a free-for-all. While an indicative view of a further 10 year supply of housing land is desirable this must also be carefully phased so that its release delivers the most sustainable outcomes in terms of location and infrastructure provision.

1.14 We remain uncertain as to how the local tier of market sensitivity will interact with regional forecasts. For example, we know that at the time of adoption the LDF must deliver five years of housing land to meet the requirements of the RSS forecast. In areas of high demand the early release mechanism will mean an increase in the amount of housing land and housing numbers in the five-year local supply number. Will local authorities be required to maintain five year supply at the RSS forecast level or at the new level prescribed by local market information? This is fundamental since a whole series of high demand local authorities all increasing their 5 year supply will not only create all the principal problems discussed in our response but will also begin to override the regional forecasting mechanism and most importantly the strategic role of the RSS. This view of the 'tail wagging the dog' distracts from the role of strategic planning and compromises the effectiveness of RSS in dealing with the social and environmental implications of new housing supply through the

provisions of the SEA directive. Indeed growth will happen, at least until the RSS ‘catches up’ through a partial review, beyond that analysed in the RSS SEA. This in itself raises interesting legal questions.

## **Public Participation**

1.15 The consultation paper suggests (page 19) that the early release of land will be achieved not by reviewing the LDF but by means of supplementary planning guidance. This proposal is wholly unacceptable and unworkable and contrary to existing policy on public participation in both PPS 1 (ODPM 2005) and ‘Public involvement in planning: the Governments Objectives’ (ODPM 2004). It is already the case that planning for housing provision is the most centralised aspect of the planning process. Housing figures established at the regional level are enshrined in the RSS. There is no right to be heard for the public in the adoption of these documents despite the fact that they are legally binding plans and that they impose housing figures on local authorities. The LDF process offers a number of participative standards which act as important safeguards to communities. SPD’s do not contain such safeguards. There is no public inquiry and consequently no right for public to be heard by a planning inspector.

1.16 To be effective LDF must allocate housing sites and indicate the phasing of those sites in a clear and transparent way (this is vital if SEA and SA are to be meaningful). Changing the phasing can only be fairly and sustainably achieved by a proper review of the plan which can consider the spatial consequences of faster development rates and ensure public participation and therefore the legitimacy of decisions.

## **So what’s the alternative?**

1.17 There is no doubt that the new Local Development Framework offers a vastly more flexible mechanism to respond to change than the old development plan system. This was the principal rationale for changes in the new Planning Act. There is no case for another tier of flexibility to be built into the system specifically for housing provision. The LDF is subject to annual review and three-year replacement. Given this stringent timescale the new local planning framework is perfectly capable of responding to real world changes in a framework which allows for sustainable development and public participation to be properly addressed. Any new guidance should focus on incorporating responses to changing housing needs in the existing local and regional planning review processes and not seek to create new and complex systems which will undermine public confidence.

## **The spatial consequences of the new housing supply methodology**

1.18 The rationale of the Government’s Communities Plan was to focus growth in those areas best able to be serviced with sustainable infrastructure. It was focused spatial policy in response to growth in the South East. The consequence of the current recommendations will produce precisely the opposite effect. As well as the growth provided for in the

Communities Plan, regional and local planning authorities will be required to meet their affordability targets implying significant growth beyond the identified growth areas. The requirement for those local authorities in high demand areas to early release land identified in LDF's will for reasons discussed above in paragraph 1.14 exacerbate this trend. This may result in a whole series of individual local authorities' early releasing land in areas of high demand. There must be a clear view of how this new form of diffuse urban growth will deliver a wider pattern of sustainable development both inside and between high demand regions. Ultimately the proposals need to be carefully considered in relation to its impact on overall regional inequalities, a point we have made in detail in previous submissions.

## Part two – suggested redraft

In our view the consultation paper raises a whole series of profound problems which require much further detailed exploration before changes to housing forecasting are progressed. While we disagree in principle with the price mechanism on the grounds of its failure to deal with social housing need and the impact on the environment, we also believe that the recommendations are unworkable in their own terms. However, we are aware of the determination to press ahead with these proposals and the following detailed drafting changes reflect the need to clarify the role of price, and to recognise the importance of SEA and the imperative for public legitimacy. We have focused our redraft on the summary tables and associated text which capture the new approach from part 2, page 18 of the consultation paper. New text is highlighted yellow, deleted text by strike through.

## **Summary of proposed approach: Planning for housing markets**

### *Determining regional housing provision*

The Regional Spatial Strategy will establish the overall level of new housing provision needed in the region **based on comprehensive and evidenced view of housing needs and the requirements of SA and SEA.** ~~Government will set out later in the year further details of the way in which Regional Spatial Strategies should better take account of housing need and housing market pressures in the region to improve affordability in responding to Kate Barker's proposed affordability goals.~~

### *Establishing the distribution of new homes across the region*

The Regional Spatial Strategy will also set out the **broad** distribution of the new housing provision needed in each sub-regional housing market area. That distribution will be based on robust analysis of the housing market in the sub-region, housing land availability assessments, conducted in partnership with stakeholders, and a sustainability appraisal to take account of wider issues such as environmental or transport considerations. The Regional Spatial Strategy will therefore need to:

- Identify sub-regional housing markets, rather than simply looking at administrative boundaries
- Decide, **depending on the outcomes of SA,** whether sub-regional housing markets should be designated for high levels of new homes (for example, the Thames Gateway), for managed growth, for low levels of new homes, or for managed reductions in housing. This will need to take account of the local housing market and the level of demand, as well as wider environmental, social and economic considerations.
- Allocate housing numbers to sub-regional housing market areas and to local authorities within them.

**The purpose of these proposed changes is to ensure that decisions about the level of new housing required in each area should be based on considerations of the housing market, rather than simply administrative boundaries, and that they should take proper account of ~~affordability and market information about housing need,~~ as well as wider social, economic and environmental considerations.**

### **Summary of proposed approach: identifying land for housing**

#### Land supply at the local level

Local authorities, in their Development Plan documents, will allocate land to deliver housing for the first five years of their plan. They also identify a further 10 years of land supply for future use **and indicate the phased release of this land.**

Sites allocated in the first five years should offer the most sustainable option for development and be developable. Allocations need to take account of the Government's brownfield target, as well as the readiness of land to be developed. Land will be identified through housing land availability assessments, in partnership with stakeholders **and the wider community.**

~~In areas designated for high levels of new homes, developers will be able to bring sites out of the five-year land supply forward at any time. In managed and low-growth manage reduction areas~~ **In order to ensure the most sustainable locations are developed first** local authorities will have the first option to phase land release. Developable brownfield land in sustainable community should be released first.

**The purpose of this approach is to help ensure that new housing is delivered according to the plans. This is to address the current shortfall between plans and delivery which exist in some areas due to constraints on supply of appropriate that appropriate developable land.**

## **Summary of proposed approach: Monitoring and managing land supply**

### *Responding to changes in the housing market*

Local authorities will monitor the development of land in their plans in the context of **a range of housing need indicators**. ~~the housing market~~. If land from the five year supply is developed as expected local authorities will top up their 5 year supply steadily from their future allocation. Land identified in the later years of the plan will be brought forward as intended, with developable brownfield land in sustainable communities the priority.

If land is used up more quickly than expected, suggesting higher than expected levels of demand in the market, then:

- In areas designated for high levels of new homes local **authorities will begin a partial review of the 'LDF to consider whether increased allocation are necessary** ~~will roll forward land from the future provision through a Supplementary Planning Document.~~
- At the same time a partial review of the RSS will be triggered, so that proper consideration can be given to the changing market circumstances. Housing numbers may need to be revised or the market area designation changed.
- In managed growth areas local authorities should continue to phase land release to manage the pace of development.
- If in a low growth/managed reduction area the rate of development is significantly higher than anticipated, a partial RSS review will be triggered, to determine whether housing numbers need to be revised or the market designation changed.
- If land is used up more slowly than expected, local authorities will investigate why land is not being developed.
- If it is because the land is in practice too difficult to develop, local authorities will need to take further measures to make it easier to develop, or allocate alternative land to ensure that plans are met.
- If it is because of a change in the housing markets, local authorities will need to consider whether this is as a result of long term market changes (as opposed to short term cyclical changes). If so a partial review of the RSS should be triggered as a result, so that the level of housing provision or the designation of the sub-regional market can be reconsidered.

**The purpose of the proposed approach is to allow the planning system to be more responsive to the market while continuing to balance other social and environmental objectives and to recognise that plans need to be reviewed in response to significant changes in the housing market. It also allows significant and unexpected changes in circumstances to be understood and addressed, and their consequences managed.**

## a) Planning for housing markets

### Background

1. The current approach to planning for housing has been to require regions to allocate housing numbers to local authority areas, largely on the basis of demographic projections. This has resulted in two main problems:

- Housing markets in many cases have been artificially carved up. Lack of effective coordination between local authorities within the same housing market has meant that the housing market in the round has either under or over delivered housing. In some places the planning system has failed to deliver the right amount of housing land at the right time, in the right places. For example local authorities could be acting competitively within the same housing market over households or would ignore problems of supply in another part of the housing market where they could have offered part of the solution (see examples in Box 2.1 below);
- Secondly, local authorities have been focused exclusively on delivering housing numbers without seeing this provision in the context of the wider housing market or the unintended consequences of their approach. In some areas, where local authorities have met their housing numbers before the end of a plan period they have refused planning permission for further development notwithstanding rising house prices and worsening affordability.

#### **Box 2.1 – Where housing markets matter**

##### *Example 1*

Local authorities x and y are neighbouring authorities in a dense urban area. Local authority x might unexpectedly have applications for development, which if approved would exceed their agreed housing numbers. Local authority y in the same market has experienced unforeseen problems in bringing forward its allocated sites. Whilst local authority x delivered its numbers, local authority y fell short, and so there was a shortage of housing in the housing market area in the round.

##### *Example 2*

Local authority x contains a low demand area; neighbouring local authority y is a desirable market town where prices are rising. Y is granting permissions to meet rising need, whilst x is also granting permissions consistent with a now out of date housing number. Partly as a consequence to this, x is experiencing difficulties in delivering regeneration of its low demand area.

2. If the local authorities in these examples had been working collaboratively, both on the evidence base within the housing market area and on planning to deliver sufficient housing in the housing market as a whole, together they could be more responsive to changes in the market over time. This will not be new to some authorities who have recognised these issues and have started making real attempts to work together to deliver common objectives but this now needs to be the norm rather than the exception.

## The proposed approach

### **Box 2.2 – Using market information in planning**

There are three elements that the proposed approach sets out to achieve:

- At the regional level, plans should **consider** market information **as part of the evidence base in establishing wider housing need in the region**. Sustainability Appraisal should be used to reconcile economic, social and environmental objectives and evidence in considering options for housing provision.
- Regions and local authorities should work together and with stakeholders to identify sub-regional housing markets to use as a basis for planning.
- Regions and local authorities should tailor their approach to delivery to suit the needs of different housing markets, in particular, whether housing numbers should act as a ‘floor’ or ‘ceiling’ on housing development.

3. The Regional Spatial Strategy (RSS) will set out the strategic approach to housing delivery for 20 years, including the distribution of housing provision between sub-regional housing markets, and local authorities within them so that it contributes to the creation of sustainable urban and rural communities.

4. Until now, regions have relied primarily on demographic information, particularly household projections, to determine the level and distribution of housing numbers within the region, alongside assessments of environmental constraints, infrastructure capacity, regional strategies and policy objectives such as reviving weak housing markets.

5. Local housing assessments and wider housing market assessments undertaken by the region will in future provide the region with an assessment of the need for housing provision **based on a range of housing need indicators including** ~~informed by~~ market information. This will form part of the evidence base for determining **the options for the** level and distribution of housing provision.

6. Using market information and an understanding of housing markets to inform plans does not mean that market demand alone determines the level and distribution of housing. Rather it will be an input alongside other factors. ~~It is, however, important to establish the principle and value of using housing market information, which has generally been absent from strategic planning.~~

7. Regions will reconcile different objectives by analysing the costs and benefits of different options for the distribution of housing across the region through a Sustainability Appraisal. Sustainability Appraisal provides a tool to meet multiple objectives in the distribution of housing numbers (including market demand, economic growth, regeneration, environmental protection and social inclusion). This will ensure that there is a consistent approach and that the distribution of housing numbers is evidence based and transparently derived.

End

## Appendix 1

### **Responding to Barker.. the inverted logic for stimulating the housing market**

**Ian Cole**

**Professor of Housing Studies**

**Director, Centre for Regional Economic and Social Research, Sheffield Hallam University**

The report by Kate Barker on future housing supply has become one of the most prominent and influential housing documents to be produced by the government in the past eight years. In essence, Barker argues that the current crisis of shortage and affordability in many housing markets in Britain stems from a lack of ‘responsiveness’ in which supply has lagged ever further behind changing aspirations and demands. This ‘lag’ is compounded by the constraints on land supply, which have forced prices up still further, especially in high demand areas. Barker therefore argues for a 40% increase in land release in order to ease such constraints, enabling housing supply to increase, demand bottlenecks to ease and prices to become more affordable. The reduction in house price volatility would stimulate further construction activity, as investment is drawn to a more stable market context. This would set in train a virtuous circle, so that the historical drag on market performance is replaced by a more responsive framework meeting rather than thwarting consumer needs and preferences.

One fundamental problem with this analysis is that it tends to brush aside the intrinsic complexity of housing as an economic good. As any first year economics undergraduate knows, housing is ‘different’ from other goods for several reasons; it is geographically fixed; it is a long-term asset; it is very expensive - requiring a complicated financial and legal machinery to assist consumption, though an array of mortgages, rents and public subsidies - and housing is a positional good, connoting social status as the more tangible physical attributes. What is seen as ‘desirable’ in housing market cannot be reduced to a series of measurable components – the ‘externalities’ weigh heavy.

The essential problem with Barker is that this complexity is reduced to a simple, and simply misleading, equation; stimulate supply, and demand pressures will ease. This may be a golden rule for many goods and services; but housing is not one of them. The recommendations of the report are based on a lopsided leap of faith rather than hard empirical evidence. The British housing market, for example, is already marked by deep spatial inequalities, often illustrated by regional differences in house prices. While these have slowed somewhat in the past year as the housing market cycle moves into a different phase, it would be entirely misleading to view this in terms of ‘the North’ catching up ‘the South’: the disparities are still intense. The Barker recommendations, focused on easing supply constraints in high demand areas, would simply intensify these differences, with acute difficulties for labour mobility, the revival of vulnerable local markets and the capacity of the construction industry.

What should be done instead? The government has partly answered that itself through its programme of housing market renewal, seeking to restructure those markets with problems of over-supply, low demand, and neighbourhood stigmatisation. The flaw in this approach is that it has neglected the complex interplay between housing and labour markets. It is perhaps naïve to imagine that the government will embrace a *dirigiste* policy of economic development, but a much more assertive stance could be taken, for example to the relocation of public sector jobs, firming up the rather tepid Lyons review of last year. In a report about to be published<sup>1</sup>, Professor Stephen Fothergill and colleagues have pointed out that much could be achieved through these means – not by sending civil servants from London and the south east to other high demand enclaves of the North (York, Harrogate, Leeds, Manchester) but to parts of Lancashire, West Cumbria and Teeside instead. A ban on relocating activities to towns and cities that do not demonstrate deprivation and labour market need is one way in which, it is suggested, this could be achieved. Placing an obligation on government departments to demonstrate that the business benefits of relocating to main regional cities significantly outweigh the merits and needs of other locations is another. Such measures would also stimulate local economies and even ensure that refurbishment of existing dwellings relied less on public subsidy and support and more on private investment from households with a significant level of resources. The essence of this approach is to focus efforts on reducing demand in London, the South East and other pressured housing markets, by addressing some of the root causes of uneven economic growth and regional disparities. Implicit in the Barker review, in contrast, is an acceptance and accommodation of these disparities and an agenda which will continue to drive people and resources down south. After all, what's to say that the anticipation of increased supply and lower house prices will not simply attract more people to London and the South East, thereby sustaining the current balance of supply and demand?

Barker also operates of a limited and rather antiquated view of tenure. Entry to owner-occupation is the goal, apart from a rather disconnected reference to the need to increase social renting for households in need. But in the context of a residualised social rented sector and a relatively unregulated private rented sector offering no security of tenure and variable in quality and cost it is no wonder that alternatives to home ownership are viewed, at best, as inferior and short-term and, at worst, as a last resort. Even a most cursory look at the housing market in the past twenty years would show the intrinsic interconnectedness of different tenures, as a balance is sought between flexibility, affordability and desirability. Look at the right to buy, or mortgage rescue packages, or the growth of the buy-to-let sector – tenures adapt and change. There are arguments for social housing to be developed going beyond a narrow function of 'meeting need' by adopting niche developments, imaginative design and playing a lead role in the creation of mixed communities. Instead there seems to be a trickle down model of the most basic kind at work – in which affordable home ownership eventually reaches those in temporary accommodation. In a country of pronounced inequalities in income and wealth there is little to deny that an increase in supply would not simply increase the number of second homes rather than ease problems for key workers in high demand areas.

The planning system is simply set aside in the Barker prognosis beyond reference to English partnerships role in land assembly and reform of section 106. Yet if developers are to be

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<sup>1</sup> Fothergill, S., Gore, T. and Powell, R. (2005) *Relocating Public Sector Jobs: The Case for Deprived Non-Traditional Locations*, Centre for Regional Economic and Social Research, Sheffield

encouraged to provide a greater proportion of affordable units in their new developments, this will come at a cost. In a sector not renowned for its risk taking and innovation, a warm (and hence expensive) security blanket of discounted land, hidden and overt subsidy may be needed to induce private developers to take part – that has been the experience in several ‘mixed’ housing schemes across the country. Nye Bevan’s maxim more than fifty years ago – that ‘the developer is not a plannable instrument’ – has stood the test of time rather well. Instead, a revitalised and diverse social housing sector, and a well regulated and incentivised private rented sector might begin to dispel some of the deep-rooted received wisdom about different housing sectors – that renting is inherently inferior. There are signs that this is starting to change in some sub-markets (‘loft living’ scenarios). Barker simply attempts to turn the clock back to the not so golden 1980s when tenure polarisation stifled labour mobility, fed social division and in different ways ‘trapped’ both poorer home owners and households on housing benefit.

The environmental and social impacts of extending high density development in the most expensive and crowded part of the country needs to be examined – this is not necessarily ‘nimbyism’; there are often strong positive social and economic arguments for achieving a better balance between supply and demand across the country. An environmental impact assessment prior to all new development, for example, would help to ensure the ecological value of the land is not diminished and fiscal incentives could be introduced to encourage the uptake of sustainable homes (for example Stamp Duty relief, capital allowances to convert premises into sustainable homes, reduced VAT on supplies required to create sustainable homes)

And what, at the end of it, about affordability? Barker concentrates solely on supply and the price mechanism. Yet ,as she acknowledges herself (oddly enough), there is little evidence that increasing supply will per se reduce prices – much more depends on the macro-economic position, interest rate movements, the housing market cycle. In particular, demand side solutions – reform of the housing benefit system to make it more market responsive, the creation of new mortgage products, targeted subsidy for private landlords, the extension of subsidised home ownership schemes like Homebuy - are simply ignored. This may not have been considered part of Barker’s brief; but to look at supply without considering demand is as ill-conceived as doing it the other way round. And to examine supplying more to over-heated housing markets at the expense of thinking through creative ways of reviving those with problems of over-supply may be similarly wrong-headed.