



G15 Resident Group
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20th September 2024

Rt Hon. Angela Rayner MP
Secretary of State for Housing, Communities and Local Government

Dear Angela Rayner,

I am writing to you in my position as Chair of the G15 Residents Group, regarding proposed reforms to the National Planning Policy Framework (NPPF) and broader changes to the planning system.

Our newly established group, comprising of two involved residents from each G15 landlord, is unique in that all members have housing sector knowledge as well as experience of living in social housing and understanding the impact of housing policies and decisions. As a group, we independently set our agenda to influence housing policy from a resident's perspective. This letter covers some of the points that came out of our recent discussion on the NPPF consultation which we believe should be brought to you for consideration.

We fully support reforming the NPPF and the broader efforts to get Britain building again. We are pleased to see Labour taking initial steps to tackle the housing crisis and committing to building 1.5 million homes by 2029.

In all, group members support efforts to improve the planning system and reforms that should lead to more homes being built. However, we are concerned that at present there is a lack of emphasis placed on the development of social rent.

While we agree that mandatory targets are necessary to hold underperforming local authorities to account, we feel there is a risk that in striving to meet these targets authorities may focus on building studio and one-bed homes when the demand for family-sized homes (three and four beds) is acute, particularly in London. There are currently over 150,000 children living in temporary accommodation – the highest number since records began – and over 380,000 households living in overcrowded conditions.¹ While we understand that targets for unit numbers are introduced at a local level, we feel there should be stronger guidance within the NPPF to address the urgent need for family homes, particularly in urban areas with the highest demand.

Similarly, we do not believe the reforms go far enough in places. While we welcome the shift towards 'promoting' social rent and requiring local authorities to account for social housing demand, we hold concerns.

¹ [Tables on homelessness - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/homelessness-statistics) and [Overcrowded housing \(England\) – House of Commons](https://www.parliament.uk/business/committees/committees-a-z/commons-select/housing-and-communities-committee/publications/overcrowded-housing-england/)

- Firstly, that assessments of social housing need may underestimate the true demand, as many people in overcrowded, 'hidden' homelessness or financially overstretched situations are not accounted for in official figures.
- Secondly, that having social housing development as a recommendation rather than a requirement will not drive the development of social homes we desperately need. Social homes require the most subsidy to build, and without a review of the Affordable Homes Programme (AHP) and enhanced grant funding, local authorities and housing associations will struggle to build homes for social rent.

As social housing residents, we have personal experiences of why social rent is so important. It offers stability, security and low-cost rent which, particularly in London, allows low to middle-income earners to live in extremely high-cost areas. Social rents are around 70% lower than private rents and at present, 1 in 4 Londoners live in poverty after housing costs are considered.² The government needs to take action to address the unaffordability of homes and by extension, the NPPF ought to place greater emphasis on, and set a specific target for, **building homes for social rent**. The government also needs to **provide the necessary grant funding** to make this financially viable for housing associations and developers.

Ultimately, we hope that through providing sufficient grant funding, housing associations can return to solely building homes for social rent and end the need for 'Affordable Rent'. The 80% of market rates 'Affordable Rent' product was only introduced to make up for the reduction of grant funding. It is unaffordable for many, confuses the conversation and dilutes the benefits for both residents and wider society, that are associated with social rent.³

The group has strong feelings about mixed tenure developments, agreeing that they are useful as a means to increase social and affordable housing. However, as residents of social housing, including those living in mixed tenure schemes, we have experienced first-hand the challenges and segregation these developments can present. To avoid stigma and ensure a positive living experience for all residents, it is crucial that these developments are well-planned, thoughtfully executed and carefully maintained.

We also welcome the commitment within the NPPF to support majority affordable developments as well as mixed tenure. Members believe no upper limit should be placed on the maximum size of a 100% affordable scheme. Planners and developers should work closely with residents, and groups like ourselves, to establish the most effective approach and design codes.

The group is supportive of a renewed approach to land use, even if this does involve reviewing the current Green Belt. The Green Belt, as it stands, is outdated and restricting London's growth. While it is crucial to protect and ensure public access to high-quality green spaces, much of the current Green Belt does not serve its intended purpose. Re-evaluating it

² [Poverty before and after housing costs | Trust for London](#)

³ [G15 | London's Social Homes Contribute Almost £6.9 Billion to UK Every Year](#)



could allow for the expansion of London's footprint, opening up more green space within the city and reducing the need for such high-density developments consisting of high-rise tower blocks, which are extremely unpopular with residents. Given recent events in Dagenham, we urge those reforming the NPPF to consider whether high-rise homes are appropriate for modern living.

Similarly, while the proposed sequential approach of prioritising Brownfield sites makes logical sense, members feel it may not always be the best option due to the specific challenges these sites can pose, such as requiring demolition, de-contamination or new infrastructure, all of which cause delays and increased costs. As such, we feel a more flexible approach to land use should be considered.

These reforms are a step in the right direction, which should be backed up with adequate funding – otherwise, we risk not seeing any meaningful change. We are hopeful that the upcoming Autumn Statement will allocate the necessary resources to turn the goal of building 1.5 million homes into a reality.

If you or your department wishes to engage with our group or discuss our views further, please do not hesitate to contact me.

Yours sincerely,

Daisy Armstrong, Chair of the G15 Resident Group, on behalf of the G15 Resident Group